WELLS + ASSOCIATES

MEMORANDUM

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TO: The District of Columbia Board of Zoning Adjustment

FROM: Jami L. Milanovich, PE
Pejman Bahramipour, AICP

COPY: Adam Vitarello, Rock Creek Club
David Avitabile, Goulston & Storrs

RE: Rock Creek Club (2325 Porter Street NW)
BZA – Case #21510
Response to Symmetra Design's Memoranda dated October 5, 14, and 26, 2026

DATE: October 30, 2026

The Applicant, Rock Creek Club (RCC), submitted the Transportation Statement (TS) for the proposed development at 2325 Porter Street NW to the District Department of Transportation (DDOT) on September 23, 2026 and an updated TS on October 5, 2026. Symmetra Design prepared a draft memorandum titled *BZA Case No. 21510 | 2325 Porter Street NW – Transportation Statement Review* on behalf of neighboring residents Laurie Davis and Joseph Seller of 2331 Porter Street NW and Julia and Lowell Schiller of 2323 Porter Street NW. The final version of the memo is dated October 14, 2026. The memorandum provides comments on the original TS dated September 23, 2026. The following responses address the comments raised in the memorandum and provide clarification regarding the transportation analysis, assumptions, and proposed transportation-related measures documented in the TS. These responses are intended to clarify the basis of the analysis, address the specific concerns identified, and provide additional context to assist DDOT in its review of the proposed development.

1. The Project Meets the CTR Trip Threshold, but the Agreed Study Scope Does Not Include a CTR

- The project exceeds the stated CTR trip threshold, but the basis for limiting the study scope is not documented. The Transportation Statement projects 103 person trips during the Friday facility peak hour, exceeding the 100-person-trip threshold identified in the DDOT Scoping Form. The Scoping Form identifies a Transportation Statement as the selected study type; however, the materials reviewed do not document the basis for limiting the study to a Transportation Statement despite the projected person-trip generation exceeding the stated threshold. The Scoping Form also identifies 100 peak-hour person trips as a trigger for multimodal network evaluation.

  W+A Response: DDOT's *Guidance for Comprehensive Transportation Review* identifies the following components for CTRs that do not meet the threshold for a Traffic Impact Analysis: site design (access, loading, vehicle and bicycle parking, streetscape, and street trees); multimodal trip generation and mode split assumptions; a multimodal network evaluation of pedestrian, bicycle (including Capital Bikeshare), and transit networks; a vehicular analysis including pick-up/drop-off operations, parking, and

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curbside management; and mitigation where required. All of these elements are included in the Transportation Statement. Relabeling the study a CTR, therefore, would not change the analysis, findings, or proposed mitigation measures. Additionally, prior to initiating the study, we prepared a detailed 25-page scoping document (including supporting graphics) with a 45-page Attachment containing supporting documentation. This comprehensive scoping submission allowed DDOT to thoroughly review the proposed application and make an informed decision regarding the scope of the study. The submitted Transportation Statement includes all of the components identified in the DDOT approved scope.

- New 10/14/26 Comment: The limited study scope is particularly significant given the complexity of the site's surrounding access conditions. Access to the shared gravel road occurs within a multi-lane, multi-directional roadway environment near the Porter Street/Williamsburg Lane intersection, which has unconventional geometry and multiple vehicle, pedestrian, and bicycle movements. Nearby residents have also reported concerns regarding stop-control compliance at the intersection. The Transportation Statement does not document existing traffic operations, sight distance and visibility, stop-control compliance, or how additional Club-related vehicle, pedestrian, and PUDO activity could interact with these conditions. These are the types of existing network and operational conditions that warrant consideration in determining the appropriate scope of transportation analysis, particularly for a project exceeding the stated CTR person-trip threshold.

  W+A Response: The scope of the Transportation Statement was developed through DDOT's Comprehensive Transportation Review (CTR) scoping process, which is among the most detailed transportation scoping processes of any jurisdiction. Through this process, DDOT reviewed the project's location, trip generation, surrounding transportation network, and the proposed methodology and assumptions. Based on all of this information, DDOT approved the scope and methodology. The Transportation Statement was prepared in accordance wit the DDOT approved scope.

  As part of the approved scope, the Transportation Statement included a safety evaluation and crash data was reviewed within ¼ mile of the site to identify potential safety concerns, including at the Porter Street/Williamsburg Land intersection. Since January 1, 2020 (nearly seven years), no crashes involving fatalities or major injuries occurred within this area. Two crashes resulted in minor injuries, one of which involved a pedestrian. This crash history does not indicate a pattern of safety problems that would warrant more detailed operational analysis of the intersection.

  Anecdotal concerns about stop-control compliance are noted. However, RCC would add very little traffic to the intersection. During the peak hour, which does not coincide with the peak hour of the adjacent street, RCC-generated traffic averages approximately one vehicle every five minutes. Most members are expected to arrive via non-auto modes. The small increase in vehicle trips would not be expected to materially change how the intersection operates or how drivers comply with existing stop control.

2. Trip-Generation Estimates Rely on a Single Comparison Facility and Assumptions Require Further Support

- The study relies on one comparison club without sufficiently establishing that its activities and travel patterns represent the proposed Club. Cleveland Park Club is used as the sole basis for estimating the proposed Club's person trips, but the comparability of the two facilities has not been sufficiently established. The proposed Club's racket courts, swimming and wellness facilities, café/bar, meeting and work spaces, and anticipated programming may result in different attendance levels, lengths of stay, travel patterns, and peak periods. The 1.69 household-membership scaling factor accounts for the difference in household memberships but does not account for potential differences in programming and operations.

  W+A Response: Because no existing facility is identical to the proposed community center, engineering judgment was used to identify the most comparable facility for estimating trip generation. As no Institute of Transportation Engineers (ITE) land-use category adequately represents a membership-limited private community center in an urban context, the estimate was developed using observed traffic counts at a nearby comparable facility. The Cleveland Park Club (CPC), located within the same Advisory Neighborhood Commission (ANC 3C), was selected as the most appropriate comparison based on its membership-based structure and similar amenities. In addition to the swimming pool, the CPC holds fitness classes and regularly hosts potluck dinners, teen parties and movie nights, house parties and social gatherings for adult members, summer camp for children featuring daily outdoor activities, arts and crafts, swim lessons, and seasonal events.

  Although the CPC does not include racquet courts, the lack of this amenity would not cause the trip generation rate to be underestimated. Racquet courts are a low-intensity use: each court holds only two to four players at a time, so the number of people using the courts during any given hour is small compared with the pool and other activities that generate most of the trips at a community center. Moreover, for the CPC to accommodate racquet courts, the facility would require a larger site, and a larger facility would support a larger membership. In other words, while the total trips to and from CPC could be marginally higher if racquet courts were present, those trips would be spread across a proportionally larger membership base. Because the estimate is based on a per-member trip generation rate, the rate would not be expected to be materially higher, and the CPC, therefore, remains a reasonable basis for estimating trips at the proposed Rock Creek Club.

- Limited case-study count data were used to establish activity projections for the proposed Club without sufficient documentation of the activities observed or adjustments for differences in operations. Counts at Cleveland Park Club were conducted on one Friday and one Saturday in July. The Transportation Statement does not identify the programming or activities occurring at Cleveland Park Club on the count days or sufficiently compare those activities and operating hours with those proposed at Rock Creek Club. If Cleveland Park Club's operating hours were shorter than the

proposed Club's 9:00 or 10:00 PM closing times, the daily projections should account for the additional operating period at the proposed Club.

W+A Response: Every person entering and exiting CPC at both of its entrances was counted for the duration of time CPC was open (from 7:00 AM to 8:00 PM on Friday and from 8:00 AM to 8:00 PM on Saturday). As such, the person-trip estimates reflect observed travel behavior, rather than assumed rates, and the 1.69 factor adjusts for the difference in size between the CPC and proposed Rock Creek Club. The approach was also conservative:

- The counts were taken on a Friday with a day camp operating, including up to 40 campers and 10 counselors, and Saturday in peak summer, in sunny mid-80s weather. Therefore, the trip generation presented in the TS reflects peak summertime conditions (other than summer holidays). The trip generation for the remainder of the year (i.e., fall through spring) will be significantly lower since the RCC's pool and outdoor courts will be closed and activities more limited to indoors.
- The trip generation rate was calculated using only the club's 160 voting households and did not include social members. Using total membership would have produced a lower rate and fewer trips.

Given the conservative approach taken in estimating the trips for the Rock Creek Club, we do not believe it is necessary to increase the daily volume of traffic to account for the additional two or three hours RCC will be open. Furthermore, Rock Creek Club will agree to a monitoring plan that measures vehicular activity on the gravel road against a daily trip cap. As detailed in the response to Comment 11 and documented in the Transportation Management Plan (Attachment I), the trip cap will be 68 daily vehicular trips (inbound plus outbound) on the gravel road.

- The daily trip estimate uses the lower Saturday count without explaining why the higher Friday count was excluded. The scoping table uses 242 daily person trips at Cleveland Park Club, matching the Saturday count, although the Friday count was 342. Applying the stated 1.69 scaling factor to the Friday count produces approximately 578 daily person trips, compared with 409 in the scoping table. The basis for selecting the lower count for the column labeled "Average Daily Traffic" is not explained, and daily person-trip estimates are not carried forward into the final trip-generation tables.

W+A Response: The Average Daily Traffic (ADT) represents the average. The Friday count was 342 person-trips, and the Saturday count was 242 person-trips. Friday is the busiest day of the week, so it was not considered the "average" day. Therefore, Saturday, which also is considered busier than most days, was used for the ADT. Nevertheless, we compiled a summary based on both Friday and Saturday volumes, as shown in the table below.

	Friday-based	Saturday-based
Cleveland Park Club daily person trips	342	242
Rock Creek Club daily person trips(×1.69)	577	409
Vehicle trips on the gravel road	68	48
Average vehicle trips per hour	~5	~3

Based on Friday and Saturday volumes, the average number of vehicle trips per hour is expected to range between three and five trips per hour. The use of Friday versus Saturday data does not change the conclusions of the study.

3. Vehicle Occupancy and Mode Shares Are Not Sufficiently Substantiated

- The assumed average vehicle occupancy of 3.0 is not sufficiently substantiated and materially reduces the estimated vehicle trips. The Transportation Statement attributes the assumed average vehicle occupancy (AVO) of 3.0 to the Club's household membership structure rather than observed occupancy data or another documented source. The assumed AVO also exceeds the nationwide social/recreation reference value of 2.10 presented in DDOT's May 2024 CTR Guidelines. Because higher vehicle occupancy results in fewer calculated vehicle trips, the basis for the 3.0 AVO should be further substantiated through observed data or another appropriate source.

  W+A Response: The 2.10 value in DDOT's CTR Guidelines is a nationwide average for all social and recreation trips. The Rock Creek Club membership is by household, limited to 270 household memberships, so members are expected to arrive as family groups rather than as individual travelers. Household sizes support this. The membership applications received to date by the Rock Creek Club show an average household size of 3.5 people, which is above the 3.0 assumed in the study.

- The cited sources do not quantitatively support the percentages assigned to each travel mode, and available comparison-site data were not used to substantiate the bicycle/scooter assumption. DDOT initially questioned the proposed auto and ride-hailing shares and requested additional supporting information before subsequently concurring with the revised assumptions. However, the Transportation Statement does not document how the adopted mode shares were derived from the cited Census, park-visitation, tourism, and travel-preference data. In particular, the NRPA surveys allow respondents to select multiple travel modes and therefore cannot be directly translated into mutually exclusive mode shares. In addition, the Cleveland Park Club entrance counts separately identify bicycles and scooters, providing observed comparison-site information that could have been considered in developing the proposed 30% bicycle/scooter share, but those observations are not referenced in support of the adopted assumption. The resulting assumption that 50% of Club trips will occur by walking or bicycle/scooter materially reduces the number of calculated vehicle trips.

  Updated 10/14/26 Comment: Moreover, the raw Cleveland Park Club count data provided in the Technical Appendix (page 60) identify only two bicycle/scooter person

trips during the facility peak hour, representing approximately 3% of the observed person trips during that period. This observed comparison-site share is substantially lower than the 30%bicycle/scooter share assumed for the proposed Club, yet it is not presented or discussed in developing the adopted mode-share assumptions. Given that Cleveland Park Club serves as the sole comparison facility for the trip-generation analysis, the basis for not considering its observed bicycle/scooter activity in developing the mode split should be explained. The resulting assumption that 50% of Club trips will occur by walking or bicycle/scooter materially reduces the number of calculated vehicle trips.

W+A Response: Since the Rock Creek Club does not exist today, it is not possible to obtain directly applicable data. As is the case with virtually all developments in the District, estimation of mode shares rests on engineering judgment across several sources, as described in the TS. Although DDOT provided comments on the initial mode shares and asked for more support and recommended additional sources for review, DDOT ultimately concurred with the revised assumptions based on the supporting documentation included in the scoping submission. These mode shares were carried forward into the TS.

With respect to the CPC data, the former Executive Director of the CPC estimated that approximately 80 percent of visitors to the Club come on foot or by bicycle or scooter, making the 50 percent combined walk/bike mode share for RCC conservative. The split between walking and biking does not change vehicle traffic, because a member who walks or bikes is not in a car.

- The treatment of Census data and its relationship to the adopted mode shares is not sufficiently explained. The Census percentages presented in the Transportation Statement total 74%, with “Other” and “Work from Home” excluded. Excluding categories that are not directly applicable to Club travel may be reasonable; however, the Transportation Statement does not explain whether or how the remaining percentages were normalized or otherwise considered in developing the adopted mode shares. More broadly, the analysis does not document how journey-to-work Census data and public park-visitation data were translated into travel assumptions for a private membership Club, or how those sources were weighed relative to available observations from Cleveland Park Club. As a result, the basis for the ultimate mode-share assumptions is not readily reproducible from the information presented.

  W+A Response: Census data for the surrounding area was initially reviewed as a starting point; however, journey-to-work data does not describe recreational trips and, therefore, is not directly applicable. People choose recreational facilities and workplaces for different reasons. When choosing a recreation center, proximity to home is a primary consideration, and members typically pick a facility within a short distance of where they live. In fact, at least 85 percent of all RCC members must live within a mile of the facility. A workplace, by contrast, is chosen mainly for employment opportunity, salary, and career considerations, and proximity to home generally is not one of the main factors. As a result, people typically travel much shorter distances to a recreation center than to work, and shorter trips are more likely to be made on foot or by bicycle. Census-based

journey-to-work data, therefore, would understate the share of walking and biking trips to the proposed facility. In addition, being physically active is one of the main reasons people visit a recreation center. Members who are already traveling to the facility to exercise are more inclined to walk or bike there, since doing so supports the purpose of the trip itself. Notwithstanding the factors above, it should be noted that the auto mode share used for RCC (35 percent) is higher than the auto mode share for the area based on journey-to-work data (25 percent or 33 percent if work-from-home is excluded). Therefore, the auto mode share used in the analysis for the RCC should be considered conservative.

Given the limitations on journey-to-work data, National Recreation and Park Association (NRPA) research on how people travel to parks also was reviewed. The NRPA research was used as a directional indicator since respondents could select multiple modes and because many respondents live in rural and suburban areas that are less walkable and bikeable than the District. Accordingly, the mode splits were adjusted for the urban context and for RCC's limited on-site parking (just 14 spaces).

- The assumed 50% combined walking and bicycle/scooter share is not evaluated in the context of site topography and access conditions. The analysis does not sufficiently connect the assumed walking and bicycling shares to the grades and physical characteristics of the routes approaching the site. Given the significance of the 50% active-mode assumption to the resulting vehicle-trip estimates, the reasonableness of that assumption should be evaluated in the context of actual site access conditions.

  W+A Response: The assumption was evaluated in the context of actual site conditions. At least 85 percent of RCC members will live within one mile of the site, and the estimated 10-minute bicycle catchment covers nearly all of that radius. Similarly, the approximate 15-minute walkshed reaches the surrounding neighborhoods and nearby transit.

  The RCC site connects to bike lanes on Porter Street and Klingle Road and to the Klingle Valley Trail, the Rock Creek Trail, and the Western Ridge Trail. Electric bicycles and scooters are now widely used and substantially reduce the effect of grades. Further, the Rock Creek Club is being designed to facilitate higher bicycling rates by providing significant bicycle parking with 40 bicycle spaces, at least five of them with chargers for electric bicycles and scooters, and a new exclusive pedestrian/bicycle entrance to take advantage of the site's proximity to bike lanes on Porter Street, and connections to the Klingle Valley Trail, Rock Creek Trail, and the Western Ridge Trail. Showers and lockers also will be provided for members arriving by bike or on foot.

  Together, RCC's catchment area, the connected network of sidewalks and trails, and site design features to facilitate biking make a 50 percent combined walking and bicycling share reasonable for this site.

4. Programming is Not Clearly Reflected in Trip Generation

- The analysis does not establish whether the trip estimates account for the full range of proposed Club programming and overlapping activities. The materials do not provide

sufficient information regarding proposed programming, anticipated attendance, or frequency of activities to determine whether the trip estimates account for lessons, camps, food and beverage service, conference-room use, guests, and other Club activities. The Proposed Special Conditions also define regular Club operations to include indoor member events of up to 49 people, but it is unclear whether or how these events are reflected in the trip-generation and parking estimates, particularly when they occur concurrently with other Club activities.

W+A Response: The trip generation estimate is built from observed counts, so it reflects the whole mix of activities at a comparable club. The Cleveland Park Club offers similar programs to those proposed at the RCC: swim lessons, gatherings, holiday events, porch parties, and potluck suppers. The counts were taken on a peak summer Friday and Saturday while its day camp was operating (on Friday), which included up to 40 campers and 10 counselors, so activities are built into the observed trip generation rates. Like CPC, the pool at the RCC will be open May through September, making summer the busiest season.

Events at the Club are limited to three categories, and no events may overlap: Special Events (up to six per year, for members and guests, Friday through Sunday), Family Dinners (one to two per week, Friday through Sunday, for up to 100 members), and Social Events (one at a time, with up to 49 people including no more than 20 guests). Family Diners are expected to be attended largely by families who already are at the RCC for other activities and who stay after dinner, so these events are not expected to generate a significant number of new trips. The Applicant has prepared an Event Management Plan, which is documented as part of the Transportation Management Plan provided in Attachment I.

- New 10/14/26 Comment: Unrestricted food deliveries to Club members would add vehicle trips and compete for space in the pickup/drop-off area. Delivery vehicles would enter and exit the site and occupy the pickup/drop-off area while completing deliveries, potentially increasing queues when they overlap with member pickups and drop-offs. The study does not account for these additional trips, delivery dwell times, or their effect on queues and the adequacy of the three-vehicle holding area.

  W+A Response: RCC has agreed to prohibit members, guests, and employees from ordering individual food deliveries. (The facility will have an on-site café for members.).

5. Special Event Demand and Transportation Arrangements Remain Undefined

- The study does not estimate transportation demand for the proposed special events. The Proposed Special Conditions allow up to six special events annually and identify the traffic plan as "TBD." Event-specific attendance, person and vehicle trips, PUDO demand, parking demand, and vendor/service activity are not established in the Transportation Statement.

W+A Response: See Attachment I for the Transportation Management Plan, which includes the Transportation Demand Management Plan, an Event Management Plan, and a Monitoring Plan.

- The materials do not demonstrate how special event transportation demand would be accommodated. Special events may represent some of the Club's highest transportation demand conditions, yet the materials do not establish how associated parking, PUDO, deliveries/loading, and vehicle activity on the shared gravel road would be managed without interfering with resident access. The event transportation arrangements and responsibility for implementing them remain undefined.

W+A Response: See Attachment I for the Transportation Management Plan, which includes the Transportation Demand Management Plan, an Event Management Plan, and a Monitoring Plan.

6. Pickup and Drop Off Trips and Operations Are Incompletely Evaluated

- Pickup and drop-off vehicle trips appear to be undercounted because each service event requires both an arrival and a departure. Each pickup or drop-off generally creates both an entering and an exiting vehicle movement. Table 4B of the Transportation Statement appears to convert PUDO passenger trips to vehicles without fully accounting for the vehicle movement before pickup or after drop-off. Unless included elsewhere, these movements are omitted from the network and gravel-road estimates.

W+A Response: Table 4B was corrected and is reflected in the updated TS, which was filed into the record with the 30-day pre-hearing statement and provided to DDOT on October 5, 2026. Pick-up/drop-off trips now count both movements for every service event: a drop-off vehicle enters with a passenger and leaves without one, and a pick-up vehicle enters without a passenger and leaves with one. The numbers are conservative because they do not assume a vehicle that drops off a passenger (an Uber, for instance) picks up a different passenger on the same trip.

- The final study does not provide the detailed pickup and drop-off operational assessment identified during scoping. DDOT's scoping comments identified dwell time, queues, loading/unloading operations, pedestrian and ADA conflicts, and procedures to prevent waiting outside the designated area as elements of the PUDO evaluation. Although the PUDO location subsequently changed from curbside to the on-site turnaround, the final Transportation Statement does not provide this level of operational assessment for the revised location.

  Updated 10/14/26 Comment: DDOT requested an evaluation of anticipated PUDO demand, dwell times, vehicle accommodation, queue lengths, loading/unloading operations, impacts on through traffic, pedestrian and ADA conflicts, and procedures to prevent waiting outside the designated area. Following DDOT's concerns regarding curbside PUDO on Porter Street, the Applicant relocated the designated PUDO area to the on-site turnaround accessed via the shared gravel road. Although the revised circulation plan identifies the turnaround and gate, the Transportation Statement does not demonstrate how the PUDO area would operate under

overlapping vehicle arrivals and departures, whether queues could extend onto the shared gravel road, or how conflicts with other vehicles and pedestrians would be managed.

W+A Response: The updated report includes the pick-up/drop-off evaluation for the revised on-site turnaround using the updated trip generation numbers in Table 4B. The turnaround conservatively holds three vehicles in a single lane (if vehicles are closely spaced, four vehicles can be accommodated). At most, five vehicles per hour are expected to pick up or drop off. If those five vehicles arrive at random times and each stays five minutes, the chance that three vehicles are already present when another arrives is about one percent. In the rare case when a fourth vehicle arrives while three are in the circle, there is sufficient space for the vehicle to wait on the RCC property without having to wait on the shared gravel road.

- New 10/14/26 Comment: Potential pickup and drop-off activity at the Porter Street pedestrian entrance raises the same constrained-roadway concerns identified by DDOT during scoping. During the October 5 ANC presentation, the Applicant acknowledged that some ride-hailing pickups and drop-offs may occur on Porter Street near the pedestrian entrance. Assigning all such activity to the gravel road may conservatively estimate gravel-road traffic volumes, but it leaves the effects of curbside activity on Porter Street unaddressed. DDOT previously raised concerns about the roadway's constrained width and the originally proposed loading area's location immediately before the roadway divergence, prompting the Applicant to relocate PUDO activity to the on-site turnaround. If PUDO activity is nevertheless anticipated at the Porter Street pedestrian entrance, the Transportation Statement should evaluate the operational and safety implications of that activity rather than relying solely on the on-site PUDO configuration.

  W+A Response: The Applicant is providing a pick-up/drop-off location on private property to address concerns related to such activity on Porter Street. RCC will not direct or encourage its members pick-up or drop-off passengers on Porter Street near the pedestrian and bicycle entrance. That said, there are no signs prohibiting stopping or standing along Porter Street. As shown in the picture below, there is sufficient space for a vehicle to bypass a vehicle momentarily stopped on the curb.



- New 10/14/26 Comment: The mode-split assumptions do not account for the potential for different arrival and departure modes. A member may, for example, walk downhill to the Club but choose ride-hailing for the uphill return trip, particularly after exercising, swimming, or spending an extended period at the Club. The study does not evaluate the potential for different arrival and departure modes or demonstrate that Cleveland Park Club's access conditions are sufficiently comparable in this regard. To the extent that members use ride-hailing for only one direction of a trip, pickup/drop-off demand could be greater than reflected in the adopted mode-share assumptions.

  W+A Response: The comment's suggestion that members would walk to the Club and use ride-hailing to return home is speculative and is not supported by any data or evidence. Standard practice in trip generation analysis is to apply the same mode split to inbound and outbound trips. Separate directional mode splits are not typically used, unless there is a documented systemic reason to do so (such as express, directional transit service). Here, there is no basis for applying different inbound and outbound mode splits.

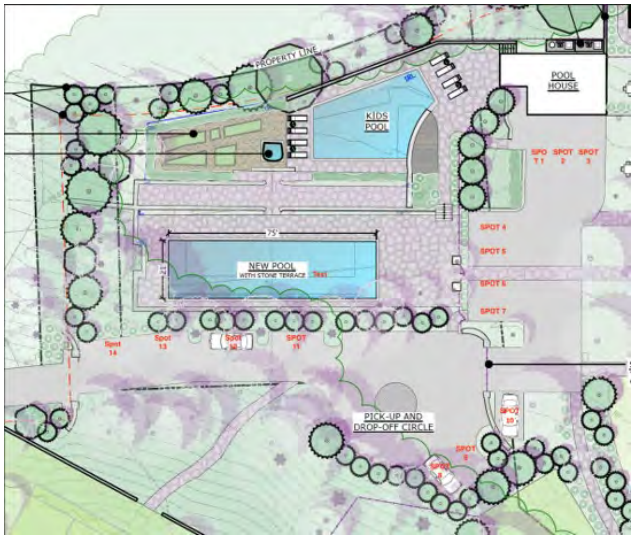
  Even if some members did walk to the Club and use ride-hailing to return home, other members would be just as likely to do the opposite. For example, a member might be dropped off by a spouse on the way to another destination and then walk or bike home, or a parent might drop off a child who later walks or bicycles home. Across the membership, these differences would be expected to offset one another, and they would not systematically increase pick-up/drop-off demand.

  Furthermore, RCC members live close by, and for a short trip, the travel time plus the time spent requesting and waiting for a ride-hailing vehicle is often comparable to or longer than the walk or bike trips themselves.

7. The Parking and Turnaround Configuration Is Not Demonstrated

- **The materials do not demonstrate that 14 parking spaces and turnaround can function together.** The Transportation Statement states that 14 on-site parking spaces will be retained, with some spaces reconfigured to accommodate the turnaround. However, the final parking configuration and its simultaneous operation with occupied parking spaces, PUDO activity, the vehicular gate, and delivery/service vehicles are not demonstrated. Individual vehicle turning diagrams do not establish that these activities can occur concurrently without operational conflicts or vehicles waiting or backing onto the gravel road.

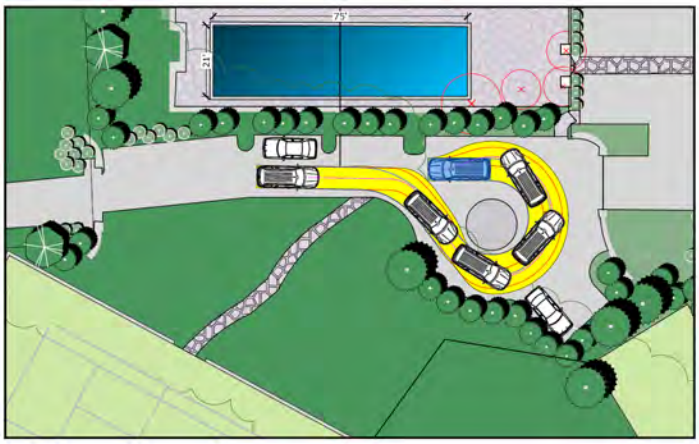
  W+A Response: The reconfigured parking is shown below and AutoTURN diagrams illustrating the ability of vehicles to navigate the turnaround are included in Attachment II. Three design vehicles were used for the AutoTURN analysis: a Ford Expedition, Nissan Pathfinder, and Honda CRV. As demonstrated with the AutoTURN diagrams, each of the vehicles can easily navigate the circular turnaround. Parking spaces 8 and 9 may be temporarily blocked from time-to-time, when cars are queued in the circle, but those blockages will be short in duration.



The TS shows that the parking, pick-up/drop-off, and service/delivery activity are minimal and are unlikely to overlap in practice, as described below:

- **The volumes are low.** In the Friday peak hour, the RCC is expected to generate about two vehicle trips to the on-site parking spaces and at most five pick-up/drop-off vehicles. Parking is limited to members with special access needs, staff, vendors, and emergency vehicles, so few of the 14 spaces will be occupied at any time. Looking at the person-trip generation accumulation throughout the day and applying the five percent of trips that are expected to park on-site yields a maximum of four vehicles on Friday and a maximum of three on Saturday. RCC expects a maximum of three employees could arrive before the facility opens. Conservatively, if all three drive, a maximum of seven spaces would be occupied on Friday and a maximum of six would be occupied on Saturday. This leaves more than enough available spaces to accommodate shift overlap or a delivery or service vehicle that may need to visit when the facility is open.
- **Pick-up/drop-off has been evaluated.** The turnaround conservatively holds three vehicles in a single lane (if closely spaced, four vehicles can be accommodated). Assuming five vehicles arrive at random times within the peak hour and each stays for five minutes, the probability of three vehicles being present at one time is approximately one percent. Even assuming a conservative 10-minute dwell time, a fourth vehicle is present only about six percent of the time.

  In the rare case when a fourth vehicle is present, an inbound vehicle can enter once the lead vehicle exits the circle (shown in blue in the image below).



The lead vehicle must wait for the inbound vehicle to enter the circle before it exits the property.

- **Deliveries are scheduled away from member activity.** Most deliveries and service visits will take place on Tuesdays, when the RCC is closed. The AutoTURN diagrams in Attachment B of the TS illustrate movements for a 28-foot box truck and a typical delivery vehicle. In the event that a parcel delivery or service vehicle needs to be accommodated on a day when the club is open, parking spaces would be available to accommodate them, as demonstrated above through the trip generation accumulation data.
- **The gate is positioned beyond the turnaround.** The circle sits in front of the vehicular gate, so vehicles can turn around without entering the gated area.

- New 10/14/26 Comment: The potential for PUDO vehicle accumulation to affect operations on the shared gravel road has not been evaluated. The proposed turnaround is described as accommodating up to three vehicles, but the Transportation Statement does not evaluate how the area would function when multiple PUDO vehicles arrive or remain in the turnaround while additional vehicles approach along the gravel road. If the turnaround is occupied or operating at capacity, arriving vehicles may be required to wait on the narrow gravel road, potentially interfering with opposing vehicle movements and residential access. The analysis does not establish where vehicles would queue, how entering and exiting vehicles would maneuver under these conditions, or whether waiting or backing movements could extend along the shared road.

  W+A Response: The Transportation Statement did evaluate pick-up/drop-off (PUDO) operations, including whether the turnaround has enough capacity for the expected demand. The evaluation estimated PUDO demand from the projected trip generation, compared that demand with the turnaround's three- to four-vehicle capacity. AutoTURN diagrams included herein as Attachment II illustrate that vehicles can enter, circulate, and exit the turnaround without backing.

8. Combined Operations on the Shared Gravel Road Are Not Established

- The study does not demonstrate how opposing vehicles would navigate the approximately 800-foot-long, narrow gravel road while maintaining resident access. The gravel road is currently approximately 17 feet wide, narrowing to approximately 12 to 16 feet at certain chokepoints. The road serves five properties and would accommodate recurring Club PUDO, employee, authorized-member, owner, vendor, and delivery/service traffic in addition to existing residential vehicle traffic and residents walking and bicycling along the road. The study does not identify clear passing locations or evaluate sight distance at critical locations along the roadway. Low hourly trip estimates and on-site vehicle turning diagrams therefore do not demonstrate how opposing vehicles would pass or otherwise navigate constrained sections of the shared road, or how these movements would interact with residential driveways and residents walking and bicycling. Routine passing, waiting, and backing operations have not been established, including whether they can occur without relying on neighboring driveways or other private property.

  W+A Response: W+A measured the entire gravel road in the field. The roadway varies in width from 14'-9" to 21'-5". The majority of the roadway is wide enough for two vehicles to pass. At the narrower roadway sections, the road operates like a "yield street" where one driver pulls to the side or waits briefly at the wider sections while the other goes through. This is not unlike low-volume residential streets throughout the District where on-street parking narrows the width to 16 feet or less. Attachment III includes a plan showing the widths along the gravel road.

  During the peak hour, RCC-generated traffic would average about one vehicle every five minutes on top of the estimated four peak hour trips generated by the four single family home that use the gravel road (based on Institute of Transportation Engineers' Trip Generation Manual rates). At the slow speeds the road's width and gravel surface already require, a vehicle can traverse the length of the road in about a minute (at 10 mph). As such, two vehicles meeting at a chokepoint would be an occasional event, not a routine one.

  In its current state, the gravel road functions as a de facto shared street and has many of the same characteristics as intentionally designed shared streets. Like a designed shared street, it has no curbs or separate sidewalks, carries low traffic volumes, and has a narrow width that keeps speeds low. Its gravel surface also works much like the textured paving used on designed shared streets. Drivers feel and hear the rougher surface, which encourages them to slow down and signals that the road is not a conventional street. Drivers, pedestrians, and bicyclists share the same space, and drivers are expected to travel slowly and yield to others. These conditions are what make shared streets work, and those same conditions are already present on the gravel road.

- New 10/24/26 Comment: The study does not evaluate pedestrian safety along the shared gravel road, which also serves as the pedestrian access route for existing residences. The gravel road accommodates both vehicular and pedestrian activity and provides the only pedestrian access to the residences along it. With an existing traveled way generally

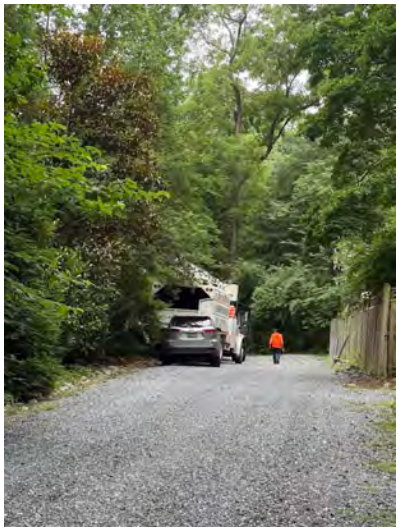
approximately 14 to 16 feet wide and no separate pedestrian facility, residents walking along the road would share the available roadway space with Club-related vehicles, including pickup/drop-off, employee, vendor, and delivery/service traffic. The Transportation Statement does not evaluate how pedestrians and vehicles would safely navigate constrained sections of the road, particularly when opposing vehicles meet or when vehicles are required to wait, pass, or back up. The adequacy of the shared roadway to accommodate both pedestrian and vehicular movements under the proposed operating conditions has not been demonstrated.

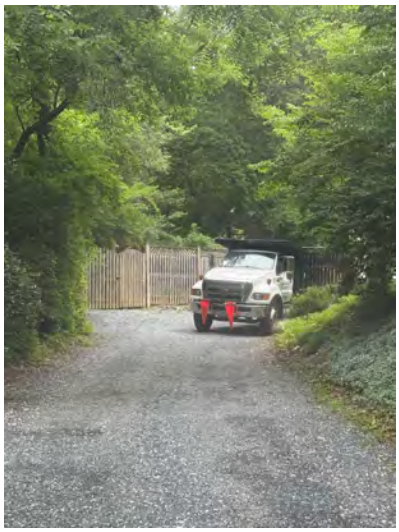
W+A Response: The gravel road already operates as a shared space. Residents currently walk along it alongside residential, visitor, delivery, and service vehicles, with no separate pedestrian facility. The RCC would not introduce a new type of interaction; it would add a small number of vehicles to an existing shared environment. As described in the response above, the road has many of the characteristics of an intentionally designed shared street: it is narrow, has a textured gravel surface, carries low traffic volumes, and has no curbs or separate sidewalks. Each of these features keeps vehicle speeds low. At low speeds, drivers can see and react to pedestrians in time, can stop within a short distance, and can readily slow down or pull over to let pedestrians pass.

The facility's added traffic would be small. During the peak hour, RCC-generated traffic averages about one vehicle every five minutes, so a pedestrian walking along the road would encounter a vehicle only occasionally. A separate pedestrian/bicycle entrance for RCC will provide an alternate means of access for RCC-generated pedestrian and bicycle trips, which would minimize additional pedestrian and bike trips on the gravel road.

- New 10/24/26 Comment: The turning analysis does not demonstrate that delivery/service vehicles and opposing traffic can navigate the constrained Porter Street entrance. The diagrams depict a 28-foot delivery vehicle but do not evaluate simultaneous entering and exiting movements or clearly account for fixed constraints, including the stone entrance pillars and raised median on Porter Street. If vehicles cannot pass at the entrance, the analysis does not identify where they would wait without obstructing Porter Street or the shared road. Although the analysis uses a 28-foot delivery vehicle, the materials do not establish a corresponding restriction limiting delivery and service vehicles to that size or smaller.

W+A Response: As shown below, trucks of this size already use the gravel road, including regular deliveries by UPS/FedEx in 28-foot trucks.









These vehicles already navigate the entrance, including the stone pillars and the Porter Street median, as part of existing conditions. RCC deliveries would be made by vehicles of a similar or smaller size. Most deliveries are expected to be made in parcel delivery vehicles. Parcel deliveries are not all expected to be new trips since they are already being made to the other homes along the gravel road. Other delivery and service vehicles are capped at 28 feet in length to ensure that the can navigate the gravel road and turn around on-site. Further, the vast majority of the RCC deliveries would be made on Tuesdays when the facility is closed.

- New 10/24/26 Comment: The truck maneuvering diagrams do not accurately represent the existing physical roadway and its constraints. The diagrams identify a 25-foot ingress and egress easement over land owned by neighboring property owners and illustrate truck movements within that area without adequately depicting the substantially narrower existing

gravel roadway. The traveled way is constrained by steep slopes, drainage ditches, a culvert and associated stone bridge, and existing stone entrance pillars, which limit the area physically available for vehicle maneuvering. The illustrated truck paths extend beyond the existing gravel roadway, including at a location where the easement narrows to approximately 15 feet. Accordingly, the diagrams do not demonstrate that the 28-foot delivery vehicle can navigate the shared road within its existing physical limits. Although potential widening was referenced by the Applicant during the ANC presentation, the location, extent, viability and feasibility of such improvements have not been established. A revised maneuvering analysis reflecting the actual roadway geometry and physical constraints is needed to demonstrate adequate truck access.

W+A Response: The comment misreads the truck maneuvering diagrams. The AutoTURN diagrams in Attachment V show two separate paths: the path of the truck's front and rear wheels, and the outline swept by the truck's body. The wheel paths are what determine whether a vehicle can physically travel a road, and they stay within the limits of the existing gravel roadway for the full length of the route, including at the stone entrance pillars, the culvert, and the location where the easement narrows to approximately 15 feet. The truck does not need to drive outside the existing gravel surface, so it would not enter the drainage ditches or travel on the adjacent slopes.

In some locations, the truck body extends beyond the edge of the gravel. This overhang is normal for any truck on a narrow road. Because it occurs above ground level, the body passes over the road edge, shoulder, and ditches without making contact with them. Within the 25-foot easement, the only object the overhang could come near is overgrown vegetation, which can be trimmed as part of routine road maintenance. The truck body clears the three sets of stone pillars.

The diagrams therefore demonstrate that the 28-foot delivery vehicle can navigate the shared road within its existing physical limits. The analysis does not depend on any road widening.

- New 10/24/26 Comment: The turning analysis does not demonstrate that a 28-foot delivery vehicle can complete the key approach movements needed to reach the site. The diagrams show only right-turn entry and exit at the gravel road. They do not evaluate southeastbound vehicles on Porter Street turning left at Williamsburg Lane and immediately right onto the Porter Street service road, or northwestbound vehicles turning right at Williamsburg Lane and then right onto the service road. For vehicles approaching from the Klingle Road ramp, the turning analysis should extend to the left turn before the crosswalk and the subsequent approach to the gravel road. The analysis also does not establish a feasible delivery vehicle approach route that accounts for applicable truck restrictions based on the DC Truck and Bus Map, including those affecting Beach Drive and Piney Branch Parkway. A delivery vehicle access plan should be provided identifying the proposed approach and departure routes, applicable truck restrictions, and maneuvering analyses demonstrating that the proposed delivery vehicles can complete the required turning movements within the available roadway geometry.

W+A Response: Our standard practice is to show right turns into and right turns out of roadways and driveways because right turns are more difficult to make than left turns. Because of this, the original AutoTURNS showed a right turn into the gravel road from Porter Street even though commercial vehicles are prohibited from using National Park Service Roads. The AutoTURN diagrams included in Attachment V correctly show the trucks turning left from Porter Street onto the gravel road, as trucks do today.

9. Parking Demand and Availability Are Not Adequately Established

- **The study does not calculate how many Club vehicles would be parked at the same time.** The Transportation Statement provides vehicle-trip estimates but no corresponding parking-demand or accumulation analysis accounting for arrivals, departures, and length of stay. Existing availability of approximately 10–19 on-street spaces during the weekday observations does not establish that Club parking demand can be accommodated. Demand associated with overlapping programming, small events, and special events is not separately established.

W+A Response: Attachment IV includes estimated parking accumulations for both on-street and on-site parking based on the hour-to-hour trip generation estimates. The results are summarized below.

	On-Street	
	Friday	Saturday
Minimum	0	1
Maximum	4	3
Maximum after 7:00 PM†	2	1

† The last parking sweep for the on-street parking occupancy study was conducted between 6:00 and 7:00 PM.

Weekday on-street parking counts conducted on September 1st revealed that parking availability within ⅓ mile of the site ranged from 10 spaces to 19 spaces through the 6:00 PM sweep. Looking at the extent of parking along Porter Street between the site and Connecticut Avenue shows that 23 to 37 spaces were available through the 6:00 PM sweep. Therefore, on-street parking is expected to accommodate the anticipated typical weekday parking demand for the RCC.

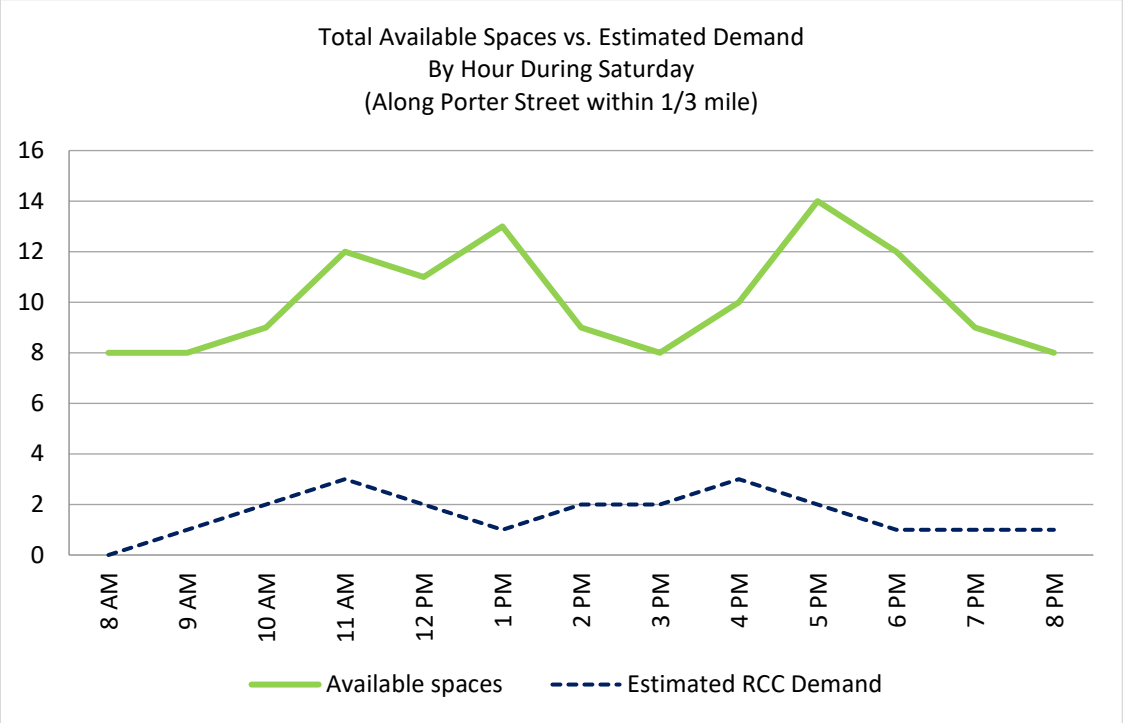
- **Saturday observations identify periods when little or no on-street parking is available.** Approximately 42 of the 43 identified spaces were occupied at 1:00 PM on Saturday. The Transportation Statement attributes the elevated demand to nearby religious services and identifies greater availability later in the day. However, the observation demonstrates that concurrent neighborhood activity can substantially reduce available parking and does not establish how Club parking demand would be accommodated under those conditions.

W+A Response: The Saturday observation on September 12th was an unusually high-demand day. Overlapping Rosh Hashanah services at Adas Israel, between 8:15 AM and 2:00 PM, filled 42 of the 43 spaces at 1:00 PM. Availability rose to 10 spaces by 5:00 PM and 13 by 6:00 PM, after the services. The RCC will be closed on Rosh Hashanah, so its

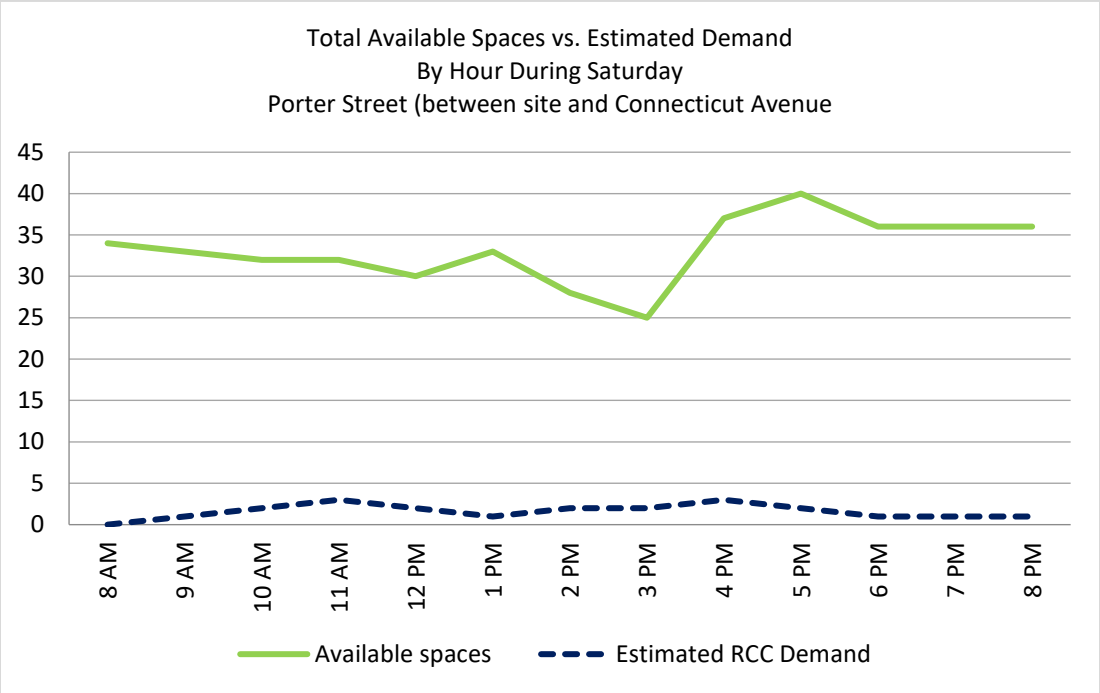
demand would not coincide with the conditions observed on September 12th. A second Saturday parking study was conducted on Saturday, October 24th from 8:00 AM to 9:00 PM (the last sweep was conducted between 8:00 PM and 9:00PM) to document parking conditions during a more typical Saturday. The availability of parking along Porter Street was plotted with the anticipated demand for the RCC. RCC parking demand was estimated as follows:

- The cumulative person-trips for the CPC were determined throughout the day based on counts at the facility.
- The number of cumulative person-trips generated by the CPC during each 15-minute interval throughout the day was multiplied by 1.69 to account for the increase in membership at the RCC.
- Those person-trip projections were then converted to vehicle trips by dividing by an average vehicle occupancy of 3.0, consistent with the trip generation methodology substantiated by the average household size of members already enrolled at the RCC (as described in our response to Comment #3) and approved by DDOT.

As shown below, the available parking on Porter Street within 1/3 mile of the site ranges from eight to 14 spaces throughout the day, which is expected to adequately accommodate anticipated parking from the RCC on a typical Saturday. Importantly, the data shows that eight spaces remain available between the 8:00 and 9:00 PM hour.



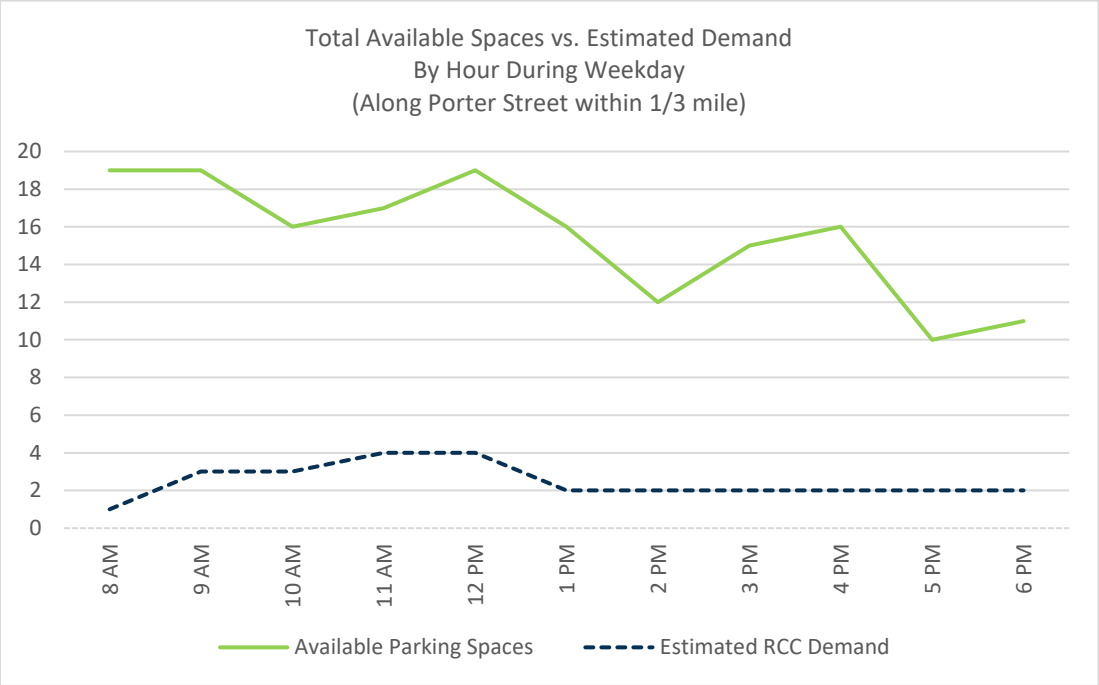
When expanded to the length of Porter Street between the site and Connecticut Avenue, even more parking is available (ranging from 25 to 40 spaces throughout the day), as shown below.



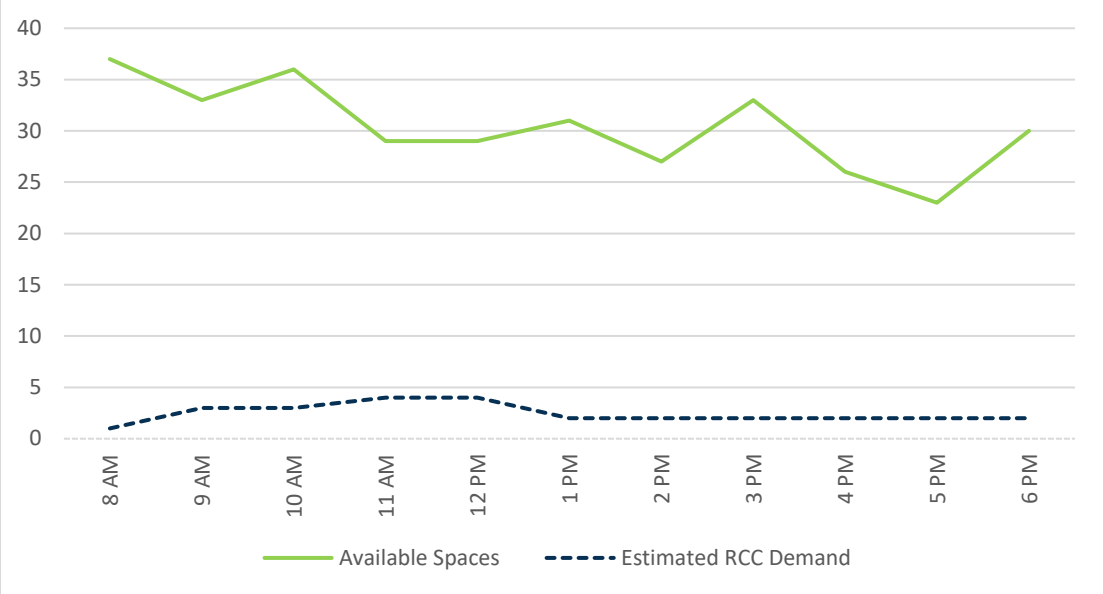
- **The parking surveys do not adequately capture evening parking conditions.** The weekday survey ends at 6:00 PM, while the Club would remain open until 9:00 or 10:00 PM. DDOT's May 2024 CTR Guidelines identify 6:00–10:00 PM as the typical weekday evening peak-demand period for residential uses. Because the surrounding neighborhood is residential, the survey ends just as this typical evening peak-demand period begins and therefore does not establish parking availability during the period when residential and Club parking demand may overlap.

  W+A Response: The last parking sweep for the on-street parking occupancy study was conducted between 6:00 and 7:00 PM for the weekday counts. The parking survey period was chosen to match RCC's peak operating periods when its activity, and therefore parking demand, would be the highest. The purpose of the survey was to determine whether on-street parking would be available when RCC generates the most parking demand, which would occur midday. RCC activity after 7:00 PM is expected to be substantially lower.

  Based on the accumulation of hourly weekday trips, in the hours after 7:00 PM, a maximum of one to two vehicles could be expected to park on the street. As shown below, the available parking on Porter Street within 1/3 mile of the site is expected to adequately accommodate anticipated parking from the RCC throughout the weekday.



When expanded to the length of Porter Street between the site and Connecticut Avenue, even more parking is available, as shown below.



On Saturday, a maximum of three vehicles would be expected to park on the street after 7:00 PM.

Trips to RCC also are discretionary. Unlike trips to work or school, members can choose when to visit the facility and how to get there. Because most members live within walking

or bicycling distance, those who would otherwise drive have practical alternatives. If on-street parking is limited during the evening, members would be expected to walk, bike, take transit, be dropped off, or visit at another time rather than drive and search for a parking space. As a result, limited evening parking availability would tend to reduce the number of members who drive, not increase competition for residential parking.

- **The availability of the 14 on-site spaces for authorized users is not established.** The Proposed Special Conditions restrict the 14 spaces to members with accessibility needs, employees, vendors, and property owners, while the Transportation Statement also identifies emergency response vehicles among the permitted users. The anticipated number of employees and other authorized users who may require parking at the same time is not identified. Accordingly, the materials do not demonstrate whether the 14-space supply is sufficient to accommodate the anticipated peak demand among authorized on-site users.

  W+A Response: Based on the accumulation counts included in Attachment IV, the available on-site parking is expected to accommodate the anticipated parking demand of those authorized to park on-site. The on-site parking demand is expected to range from three to seven vehicles on a Friday and from three to six vehicles on Saturday, as summarized below.

Parking Demand Measure	On-Site†	
	Friday	Saturday
Minimum	3	3
Maximum	7	6

† The on-site parking assumes three employees arrive before the RCC opens and all three drive.

Furthermore, the proposed facility far exceeds both the minimum parking requirements for the proposed use prescribed by the Zoning Regulations and DDOT's Preferred Maximum number of parking spaces. Since the facility is within ½ mile of the Cleveland Park Metro station and within ¼ mile of a high frequency bus route, the facility would only be required to provide three parking spaces if it were not a historic resource. DDOT's CTR Guidelines indicate that a maximum of five spaces should be provided for this use in this location. The proposed on-site parking is nearly five times the minimum required by the Zoning Regulations and nearly three times the maximum preferred by DDOT.

10. Delivery and Trash Operations Lack Necessary Detail

- **The proposed Tuesday delivery schedule does not address all deliveries that may occur during Club operations.** The Proposed Special Conditions state that regular weekly deliveries would occur on the weekday the Club is closed, but the anticipated frequency and timing of other deliveries and service activity are not established, including food and beverage, event-related, vendor, and maintenance activity. A 28-foot vehicle limit and individual turning diagrams do not demonstrate how deliveries occurring during Club operations would interact with PUDO, occupied parking, opposing vehicles on the shared gravel road, and resident access.

W+A Response: The RCC will be closed on Tuesdays so that regular, scheduled deliveries, maintenance, deep cleaning, and trash pickup can happen when no members are present. Delivery and service vehicles that need to access the site during days that the facility is open will be handled as follows:

- **Timing.** Any deliveries and service that need to occur on days the RCC is open will be scheduled outside peak arrival and departure periods and outside pick-up/drop-off activity, with the exception of parcel deliveries (e.g., UPS, FedEx, and Amazon).
- **Location.** As demonstrated in the responses above, on-site parking can accommodate additional service and delivery vehicles throughout the day.
- **Events.** Caterers, rental companies, and other vendors will be required to arrive and leave at least one hour before the event or the first guest arrival window, whichever is earlier, as outlined in the TMP in Attachment I.
- **Coordination.** The RCC's manager and/or Event Coordinator will set delivery times with each vendor and provide access and parking instructions in advance.

- **The proposed trash collection plan does not establish the scale or logistics of the operation.** The plan calls for trash to be stored in rollable containers and moved to the Porter Street Main Entrance for collection. However, the anticipated number and size of containers associated with the Club's operations, including food and beverage service and events, are not identified. Accordingly, the materials do not establish the anticipated collection needs or how the proposed arrangement would function at the scale of the Club.

  W+A Response: RCC has determined that eight trash/ recycling containers (96-gallon toters) picked up twice a week will meet the trash demands for the site. The Applicant consulted with a private trash hauling company that indicated they can pick up as many as five containers at one time (five each for trash and recycling).

11. Transportation Performance Monitoring and Corrective Action Are Undefined

- **The plan does not establish a defined process for monitoring actual transportation conditions or addressing conditions that materially exceed the assumptions supporting the Transportation Statement.** The commitment to monitor member travel behavior and transportation conditions "as appropriate" does not establish a monitoring schedule, duration, or measurable performance standards for conditions such as gravel-road traffic, PUDO activity, and on-street parking. The plan also does not identify thresholds for corrective action, the party responsible for implementing corrective measures, or the timeframe for doing so.

  W+A Response: The TMP included in Attachment I includes a monitoring plan that establishes a daily trip cap for the gravel road as well as a monitoring schedule (three count periods each year). Results will be reported to DDOT and ANC 3C within 60 days of each count period. If a count exceeds the threshold, the Applicant is required to implement a corrective action plan.

- New 10/14/26 Comment: The revised parking commitment would allow Club-related parking on Williamsburg Lane, and RPP would not exclude members with permits for the same parking zone. The September 23 Transportation Statement prohibited members and guests from parking on Williamsburg Lane; the October 5 revision instead "strongly discourages" members from doing so. At least half of the Club's one-mile membership area lies within the same ANC, indicating substantial overlap with the surrounding residential community. Members holding valid permits for the applicable RPP zone could still park on Williamsburg Lane. Supporting an RPP petition therefore does not replace the earlier prohibition or establish that Club-generated parking would be excluded from the block.

  W+A Response: The parking commitment was revised in response to feedback from neighbors and ANC Commissioners who questioned RCC's ability as a private entity to enforce a prohibition on legal parking on a public street. Williamsburg Lane is a public street, and any driver may park there in compliance with posted regulations. RCC has no authority to ticket or tow vehicles who are otherwise legally allowed to park on the street. Tracking member vehicles separate from other vehicles parking on the street (for example, people visiting Rock Creek Park) is challenging.

  Under the revised commitment, the Club will strongly discourage members and guests from parking on Williamsburg Lane, communicating this through membership agreements, program registration materials, and regular reminders. The Club will also support an RPP petition for the block, which would limit parking there to residents with permits for that zone.

  As documented herein, the number of vehicles parking on the street throughout the day is expected to be minimal (four or fewer at any given time). The availability of parking spaces along Porter Street within ⅓ mile of the site coupled with active discouragement would minimize impacts to Williamsburg Place.

ATTACHMENT I
TRANSPORTATION MANAGEMENT PLAN

ROCK CREEK CLUB TRANSPORTATION MANAGEMENT PLAN

To help facilitate traffic operations and to reduce the impact of the proposed community center, Rock Creek Club will implement a Transportation Management Plan that will consist of: 1) a Transportation Demand Management (TDM) Plan, 2) an Event Management Plan, and 3) a Monitoring Plan. Each plan is summarized below.

TRANSPORTATION DEMAND MANAGEMENT

Transportation Demand Management (TDM) refers to a set of strategies aimed at reducing vehicle trips and encouraging the use of alternative modes of travel, including walking, bicycling, transit, and ridesharing. The Rock Creek Club's membership structure, proximity to transit, prevalent walking and biking infrastructure, and direct pedestrian and bicycle access support TDM strategies focused on encouraging and facilitating alternatives to driving. Although TDM planning is most commonly associated with office, residential, and other trip-intensive land uses, the following strategies have been tailored to the Rock Creek Club to reduce the need for single occupant vehicles while supporting safe and convenient multimodal access to the site. The proposed baseline TDM measures for the project are outlined below.

- The Applicant will provide members with information regarding transportation alternatives to driving through its website, member communications, or other appropriate digital means. At a minimum, this information will identify nearby Metrorail stations, Metrobus stops, Capital Bikeshare locations, and other relevant transportation options, as applicable.
- The Applicant will promote the direct Porter Street pedestrian/bicycle entrance as the preferred access for members arriving by non-auto modes.
- All members will be strongly discouraged from parking on Williamsburg Lane. The Club will also support, including by letter to DDOT, any petition by Williamsburg Lane residents to establish Residential Permit Parking on the block.
- The rules and regulations will prohibit unauthorized vehicles from parking at the property. Authorization to park on the site will be limited to members with special access needs, staff, vendors, emergency response vehicles, and owners of the property.
- The Applicant will notify members in advance of known scheduled events that are anticipated to reduce the availability of on-street parking along Porter Street NW (such as holiday services at Adas Israel Congregation). Members will be encouraged and reminded to utilize alternative modes of transportation, including available transit services, bicycling, and walking, to minimize parking demand and reduce the potential impact on on-street parking along Porter Street NW.
- The Applicant will notify members during the application process and send periodic reminders throughout the year that a gate is installed at the entrance to the subject property and that on-site parking is limited to authorized members and users. The circular turnaround located within the subject property, in advance of the gate, allows vehicles to safely turn around without entering the gated area and also accommodates pick-up and drop-off activity.
- The project will provide 40 short-term bicycle parking spaces, five showers, and 100 lockers to support and encourage bicycling and other active travel modes. A minimum of five spaces will include chargers for electric bicycles.
- One EV charging station will be provided on-site.

- The Applicant will monitor member travel behavior and transportation conditions, as appropriate, and oversee the implementation of the project's TDM measures. The Applicant will coordinate with DDOT and goDCgo, as appropriate, regarding applicable TDM requirements, strategies, and any future modifications to the TDM measures.
- Provide employees (part-time and full-time) with the option of a a $120 tax-free monthly transit stipend.

EVENT MANAGEMENT PLAN

This Event Management Plan (EMP) sets the operational parameters and traffic controls for events at the Rock Creek Club (RCC), 2325 Porter Street NW, Washington, DC. The purpose of the EVP is to promote safety for members, guests, and neighbors, establish a level of predictability, and minimize traffic impacts on the surrounding neighborhood.

Events at RCC will fall into one of three categories: Special Events, Family Dinners, and Social Events. RCC will designate an Event Manger who is responsible for implementing this plan for every event. The EVP applies to members, guests, vendors, and contractors.

Vehicular access to RCC is provided via a private gravel roadway that is shared with neighboring residents. Because the roadway is narrow and unpaved, controlling the number and timing of event vehicles on the private roadway is the key objective of the plan.

Event Categories and Limits

Events are limited by category, as shown below.

Category	Frequency	Who May Attend
Special Events	Up to 6 per year	Members and guests
Family Dinners	1 – 2 per week, Friday thru Sunday	Members
Social Events	One at a time	Hosts and invited guests

No events may overlap. For example, a Social Event will not be scheduled at the same time as a Special Event or Family Dinner and a Family Dinner will not be scheduled at the same time as a Special Event.

Special Events

Special Events are the largest events and will be subject to the most controls. Each one will be staffed with traffic control personnel, and attendees will arrive in scheduled, staggered windows.

<u>Traffic Control Personnel</u>

- RCC will provide a minimum of two traffic control personnel for each Special Event beginning at least 30 minutes before the first arrival window for the event until at least 30 minutes after the event has ended.
- Attendants will be stationed near the entrance to the private roadway to prevent unauthorized vehicles from traveling up the gravel road.

- Attendants will wear high-visibility vests and stay in radio or phone contact with the Event Manager.

Restrictions on the Private Roadway

- Only the following vehicles will be permitted to use the gravel road before, during, and after a Special Event:
    - Residents who live along the gravel road and their guests,
    - Emergency vehicles,
    - Vehicles displaying an ADA tag, and
    - Vendors and service vehicles.
- Anyone requiring special accommodation without an ADA tag will need pre-authorization from RCC.
- The attendants will turn away unauthorized vehicles. Vehicles dropping off or picking up passengers will be directed to do so on Porter Street. Vehicles wishing to park will be directed to find a nearby space on Porter Street.
- Emergency vehicles and residents and their guests will always have priority and will not be redirected or turned away.

Staggered Arrival Windows

- Attendees for Special Events will be required to pre-register. Each attendee will be assigned an arrival window when registering. Windows will be 15 to 30 minutes.
- At least seven days prior to the Special Event, RCC will communicate with the attendees, reminding them that parking is limited to those with ADA tags or pre-authorization. Attendees will be encouraged to take transit, walk, bike, or if they must come by car, to carpool. Information on nearby Metrobus routes and Metrorail station will be provided. Those who must drive will be encouraged to park on Porter Street. Those who are dropped off or picked up will be requested to do so on Porter Street.

Advanced Notice

RCC will notify neighboring residents of each Special Event at least 45 days in advance. The notice will give the date, event hours, and the Event Manager's contact information.

Family Dinners

Family Dinners are limited to members only, with no more than 100 attendees. They will be held one or two times per week on Friday, Saturday, or Sunday. Reservations: Members must reserve in advance. RCC will close reservations once 100 attendees are booked.

Social Events

Social Events, such as birthday parties and showers, are limited to 49 attendees. Up to 20 attendees may be guests of RCC members.

- Registration: The host member will register the event with RCC at least three days in advance.
- Guest Information: RCC will give the host information to share with guests including a reminder that parking is limited to those with ADA tags or pre-authorization. Attendees will be encouraged to take transit, walk, bike, or if they must come by car, to carpool. Information on nearby Metrobus routes and Metrorail station will be provided.
- Timing: Only one Social Event can take place at a time. Consecutive Social Events must be scheduled such that a minimum of one hour separates the end of one event and the beginning of the next.

Deliveries, Vendors, and Service Vehicles

Vendor and delivery trips will be scheduled outside guest arrival and departure periods.

- Caterers, rental companies, and other vendors will arrive and leave at least one hour prior to the start of the event or the first arrival window, whichever is sooner.
- All vendor vehicles are required to be made in vehicles up to 28 feet in length.
- All vendor vehicles will park on-site and will not block the private gravel road.
- The Event Manager will provide each vendor with instructions regarding how to access the site, where to park, and when they must arrive.

Community Communication

Neighbors will be provided with a direct contact (the Club Liaison) for any event-related concern. The Club Liaison will respond to concerns raised during an event immediately and to other concerns within one week. The Club Liaison will keep a record of each concern, the date, and how it was resolved.

MONITORING PLAN

The purpose of the Monitoring Plan is to ensure that the TDM Plan and Event Management Plan are functioning as intended. The study will measure the number of vehicle trips that RCC generates on the private gravel road. Counts will be compared to an established trip threshold. The monitoring study will be submitted to DDOT and ANC 3C.

Count Schedule

Counts will take place during three seasonal periods each year in order to reflect school year and summer conditions.

Count Period	Dates	Count Days
Summer (DC Public Schools not in Session)	Mid-June through mid-August	One Friday or One Saturday
Fall	Labor Day through October 31	One Friday or One Saturday
Spring	Mid-March through April 30	One Friday or One Saturday

Counts will not be conducted on federal holidays or holiday weekends.

Event Coverage

Each year's counts must RCC's regular events to ensure that the results measure the impact of events.

- At least one of the three count periods each year will include a Family Dinner.
- At least one of the three count periods each year will include a Social Event.
- For each count day, RCC will record every event held, its start and end times, and its attendances.
- The number of vehicle trips generated associated with RCC using the gravel road on a Friday or Saturday will be determined.

Data Collection Methodology

- Cameras will record every vehicle entering and exiting RCC via the gravel road.
- Counts will be conducted from RCC's opening to closing on each count day, in 15-minute intervals, by direction (entering and exiting).
- Each vehicle entering and exiting the property via the gravel road will be classified as follows:
    - Pick-up/drop-off trip,
    - Personal vehicle parking, and
    - Vendor, delivery, or service vehicle.
- The weather conditions will be recorded for each count day.

Trip Threshold

The daily trip threshold for the RCC will be 68 vehicles per day on the gravel road. The number of RCC vehicle trips on the gravel road will be evaluated against this threshold. Each count day will be evaluated on its own. A count meets the threshold when RCC trips on that day are at or below the threshold.

Reporting

A monitoring summary will be prepared after each count period. The report will be submitted to ANC 3C and 2323, 2327, 2329, and 2331 Porter Street. The report will be submitted within 60 days after the count. Each report will include:

- Count date and hours with raw counts included as an appendix,
- Daily RCC vehicle trips by direction,
- A comparison of daily RCC trips with the trip threshold,
- The events held on the count day, with times and attendance,
- Documentation of weather and any unusual conditions,
- A summary of TDM Plan and EMP measures in place and any change since the prior monitoring report, and
- A list of complaints received since the prior monitoring report, including the date of the complaint and how it was resolved.

After the third count period of each year, RCC will compile all three summaries into an annual report covering all three count periods.

Duration of Monitoring

Monitoring will start with the first full count period after RCC opens for operation and will continue for a minimum of five years.

- After three consecutive years in which every count meets the threshold, monitoring may be conducted once per year during the busiest season based on prior counts.
- After two additional consecutive years in which the count meets the threshold, monitoring may cease.
- If the trip threshold is exceeded after monitoring has been reduced to once per year, the full schedule of three counts per year will resume.

Remedial Strategies

If RCC trips on any count day are above the trip threshold, RCC will take corrective action.

- The monitoring summary will include potential causes for exceeding the trip cap along with a corrective action plan.
- Corrective actions ***may*** include:
    - Lower attendance limits for Family Dinners or Social Events,
    - Increasing incentives for members and employees to walk, bike, or use transit,
    - Adjusting vendor and delivery activity,
    - Requiring reservations for more on-site activities.

ATTACHMENT II
AUTOTURN DIAGRAMS FOR CIRCULAR TURNAROUND

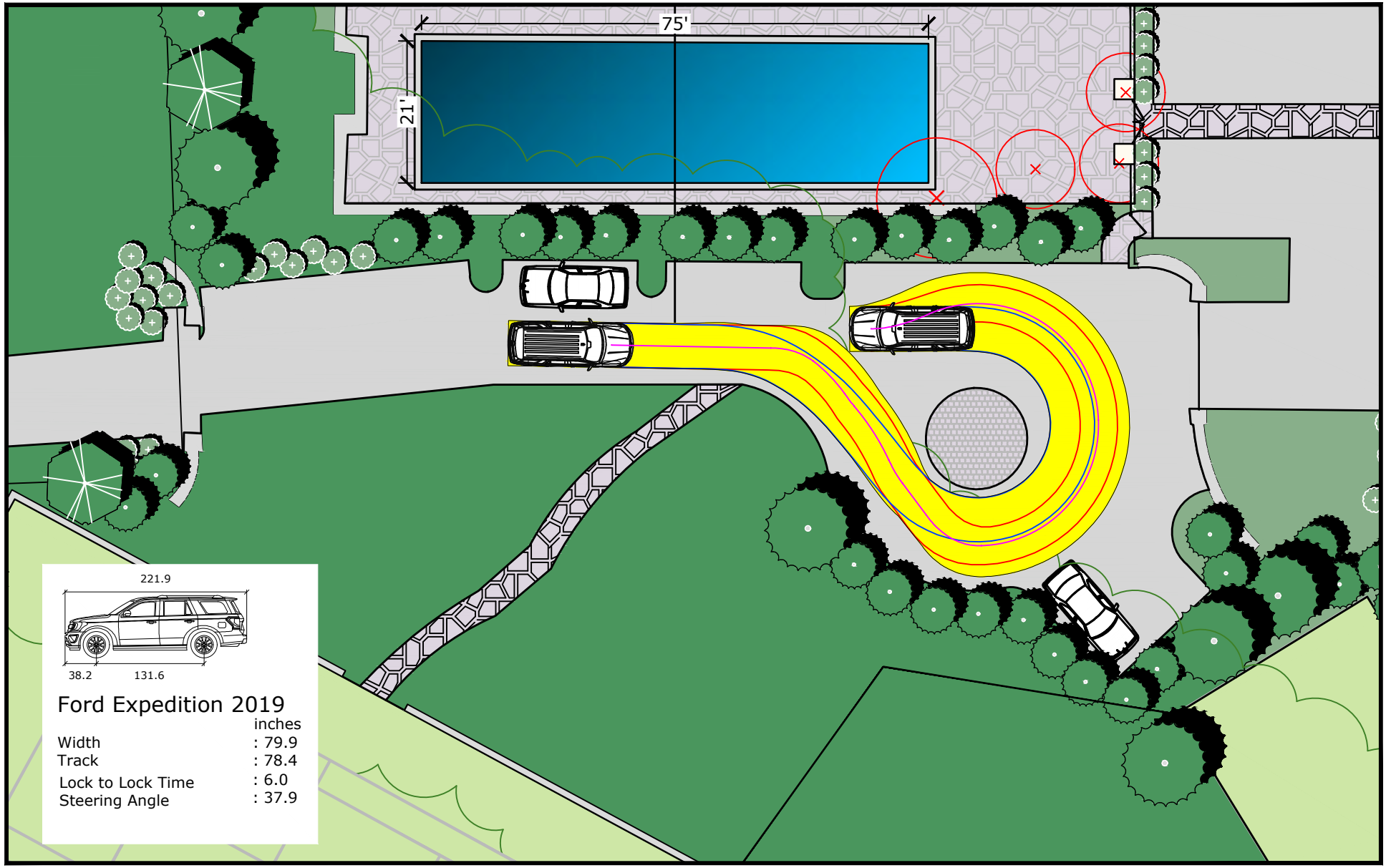


Figure A
Ford Expedition 2019 AutoTURN
*Existing tree layer has been turned off to aid the visibility of the AutoTURN Movement

NORTH
2325 Porter Street NW
Washington, DC

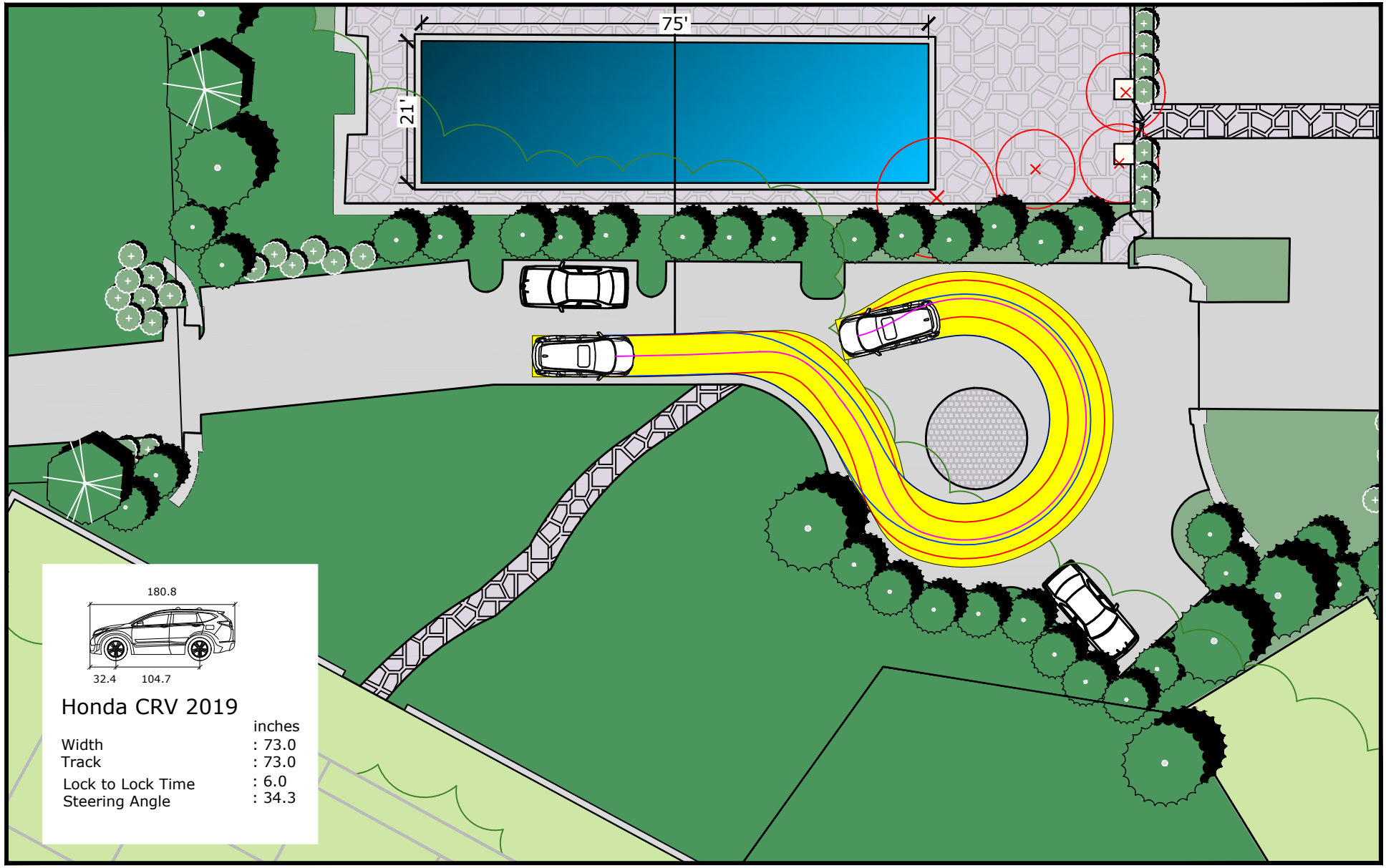


Figure B
Honda CRV 2019 AutoTURN
*Existing tree layer has been turned off to aid the visibility of the AutoTURN Movement

NORTH
2325 Porter Street NW
Washington, DC

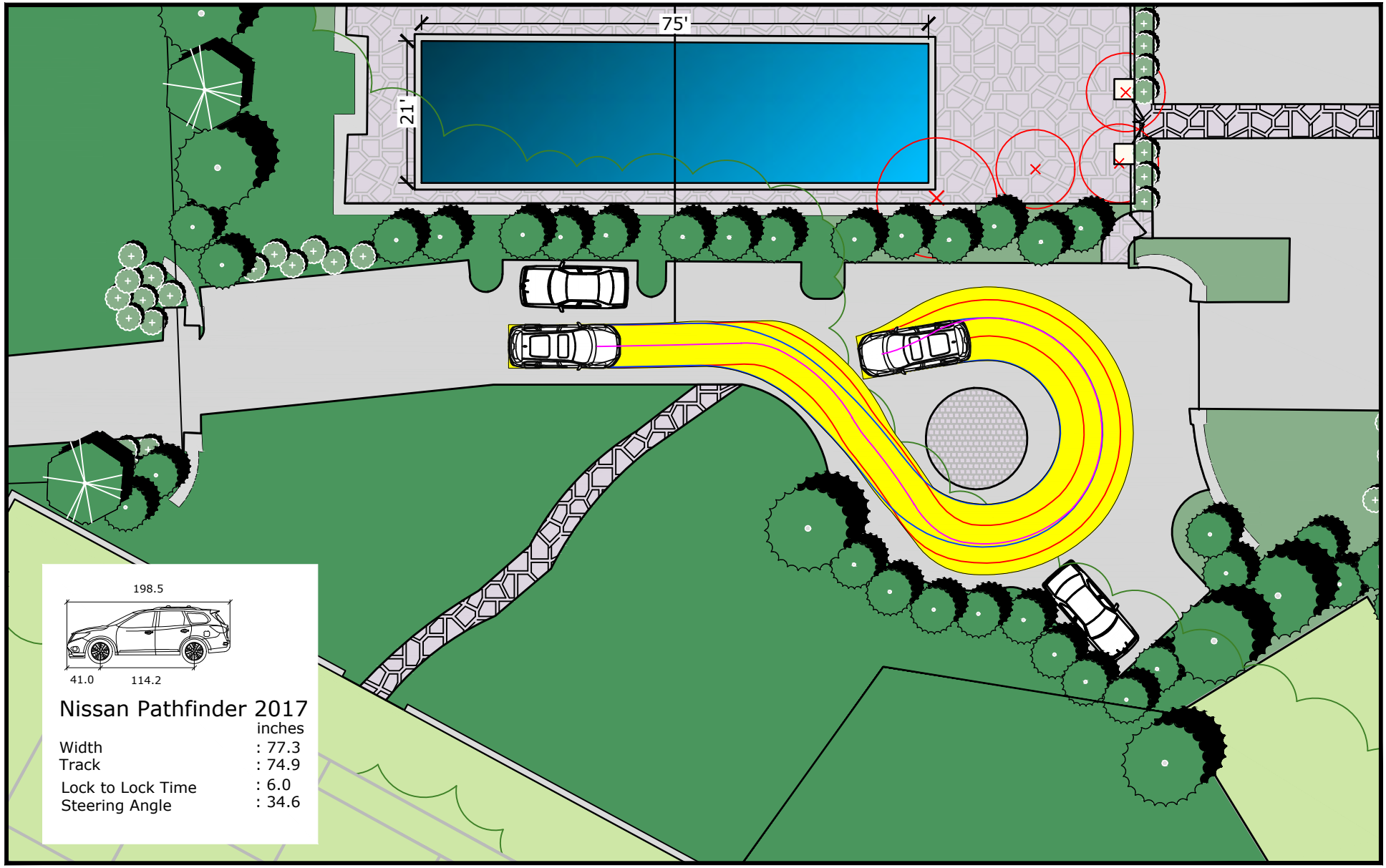


Figure C
Nissan Pathfinder 2017 AutoTURN
*Existing tree layer has been turned off to aid the visibility of the AutoTURN Movement

NORTH
2325 Porter Street NW
Washington, DC

ATTACHMENT III
GRAVEL ROAD PLAN

Gravel road is approximately 19 ft in this area.

Adjacent to the 15-foot mutual easement, Applicant will widen the gravel road to 18 feet on its own property, with the exception of the one set of pillars and a heritage tree.

Gravel road is approximately 18 to 21 ft wide in this area for 147 ft in length.

Gravel road is approximately 21 ft wide in this area.







Gravel road entrance is approximately 16.5 ft wide.

Legend

- 25 FT Easement
- 15 FT Mutual Easement
- Gravel Road

NORTH

2325 Porter Street NW
Washington, DC

Attachment III

ATTACHMENT IV
ADDITIONAL PARKING DATA

Prepared by National Data & Surveying Services

Peds & Bikes Study

Location: Cleveland Park Club Combined Both Entrances
City: Washington, DC

Date: 7/24/2026
Day: Friday

TIME	Peds		Bikes		Scooters		Strollers		E Scooters		Total		Total	Hourly Totals	CPC Accumulation (Persons)	RCC Accumulation (Persons)	Park On-Street (Vehicles)	Park On-Site (Vehicles)
	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT						
7:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	3
7:15 AM	1	0	0	0	0	0	0	0	0	0	1	0	1	3	1	2	0	3
7:30 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	7	1	2	0	3
7:45 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	10	1	2	0	3
8:00 AM	1	1	0	0	0	0	0	0	0	0	1	1	2	31	1	2	0	3
8:15 AM	3	1	0	0	1	0	0	0	0	0	4	1	5	43	4	7	0	3
8:30 AM	3	0	0	0	0	0	0	0	0	0	3	0	3	49	7	12	1	4
8:45 AM	12	7	0	0	0	1	0	0	1	0	13	8	21	51	12	20	1	4
9:00 AM	7	4	2	1	0	0	0	0	0	0	9	5	14	37	16	27	1	4
9:15 AM	8	3	0	0	0	0	0	0	0	0	8	3	11	24	21	35	2	5
9:30 AM	4	1	0	0	0	0	0	0	0	0	4	1	5	13	24	41	2	5
9:45 AM	4	0	3	0	0	0	0	0	0	0	7	0	7	12	31	52	3	6
10:00 AM	0	0	0	0	0	0	0	0	1	0	1	0	1	12	32	54	3	6
10:15 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	12	32	54	3	6
10:30 AM	1	2	0	0	0	1	0	0	0	0	1	3	4	12	30	51	3	6
10:45 AM	1	3	0	3	0	0	0	0	0	0	1	6	7	32	25	42	2	5
11:00 AM	1	0	0	0	0	0	0	0	0	0	1	0	1	25	26	44	2	5
11:15 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	27	26	44	2	5
11:30 AM	22	0	0	0	0	0	1	1	0	0	23	1	24	34	48	81	4	7
11:45 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	14	48	81	4	7
12:00 PM	1	2	0	0	0	0	0	0	0	0	1	2	3	39	47	79	4	7
12:15 PM	3	4	0	0	0	0	0	0	0	0	3	4	7	37	46	78	4	7
12:30 PM	3	1	0	0	0	0	0	0	0	0	3	1	4	39	48	81	4	7
12:45 PM	2	23	0	0	0	0	0	0	0	0	2	23	25	43	27	46	2	5
1:00 PM	1	0	0	0	0	0	0	0	0	0	1	0	1	19	28	47	2	5
1:15 PM	5	4	0	0	0	0	0	0	0	0	5	4	9	18	29	49	2	5
1:30 PM	3	4	0	0	0	0	0	0	0	1	3	5	8	13	27	46	2	5
1:45 PM	0	1	0	0	0	0	0	0	0	0	0	1	1	9	26	44	2	5
2:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	11	26	44	2	5
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4:15 PM	4	0	0	0	0	0	0	0	0	0	4	0	4	40	23	39	2	5
4:30 PM	1	6	0	0	0	0	0	0	0	0	1	6	7	40	18	30	2	5
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5:30 PM	2	0	0	0	0	0	0	0	0	0	2	0	2	29	29	49	2	5
5:45 PM	4	11	0	0	0	0	0	0	0	0	4	11	15	29	22	37	2	5
6:00 PM	2	1	0	0	0	0	0	0	0	0	2	1	3	21	23	39	2	5
6:15 PM	6	3	0	0	0	0	0	0	0	0	6	3	9	20	26	44	2	5
6:30 PM	0	2	0	0	0	0	0	0	0	0	0	2	2	14	24	41	2	5
6:45 PM	0	7	0	0	0	0	0	0	0	0	0	7	7	14	17	29	1	4
7:00 PM	0	2	0	0	0	0	0	0	0	0	0	2	2	15	15	25	1	4
7:15 PM	0	3	0	0	0	0	0	0	0	0	0	3	3		12	20	1	4
7:30 PM	0	2	0	0	0	0	0	0	0	0	0	2	2		10	17	1	4
7:45 PM	0	8	0	0	0	0	0	0	0	0	0	8	8		2	3	0	3
Totals	163	159	5	5	1	3	1	1	2	2	172	170	342					

Note: On-site parking assumes three employees arrive before the RCC opens and all three drive.

Prepared by National Data & Surveying Services

Peds & Bikes Study

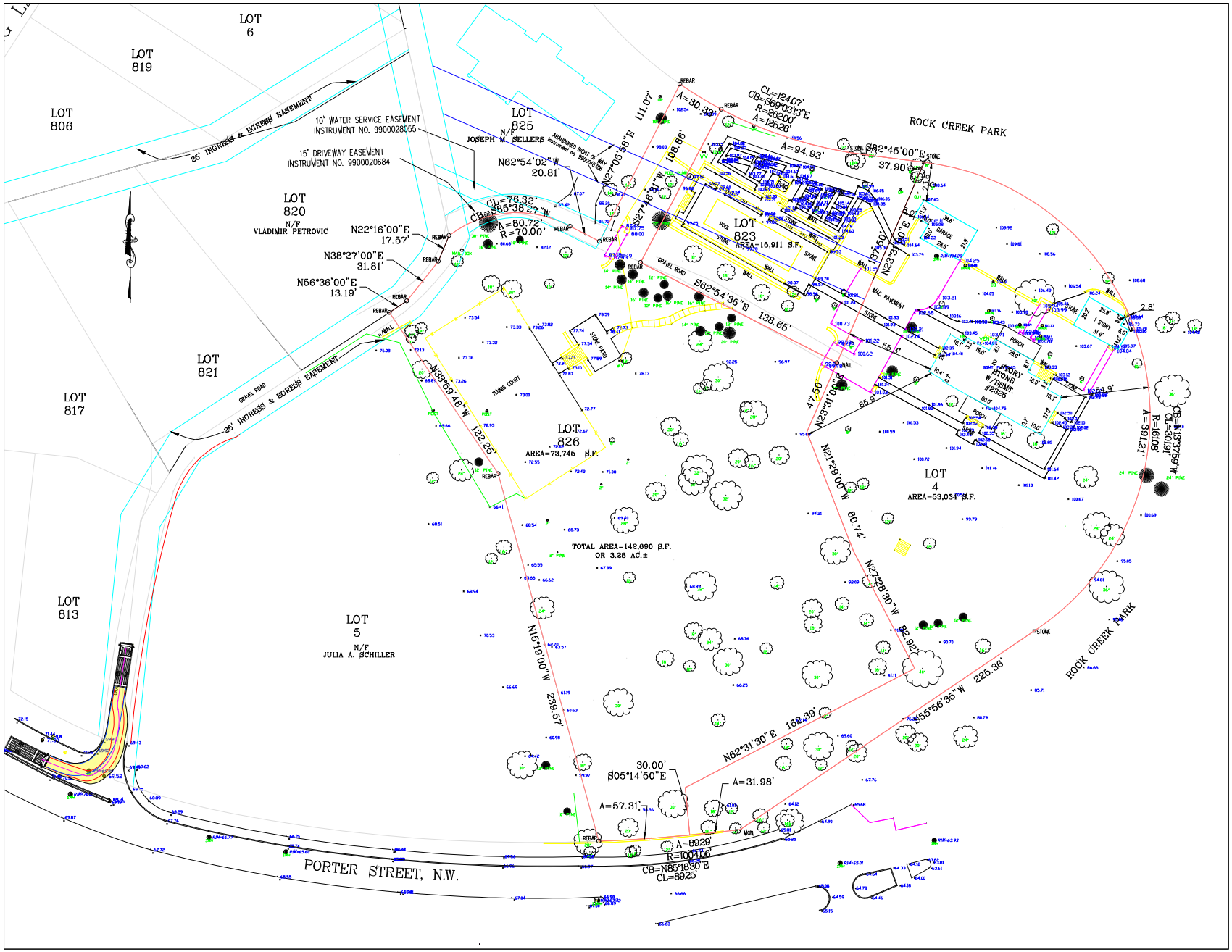
Location: Cleveland Park Club Combined Both Entrances
City: Washington, DC

Date: 7/25/2026
Day: Saturday

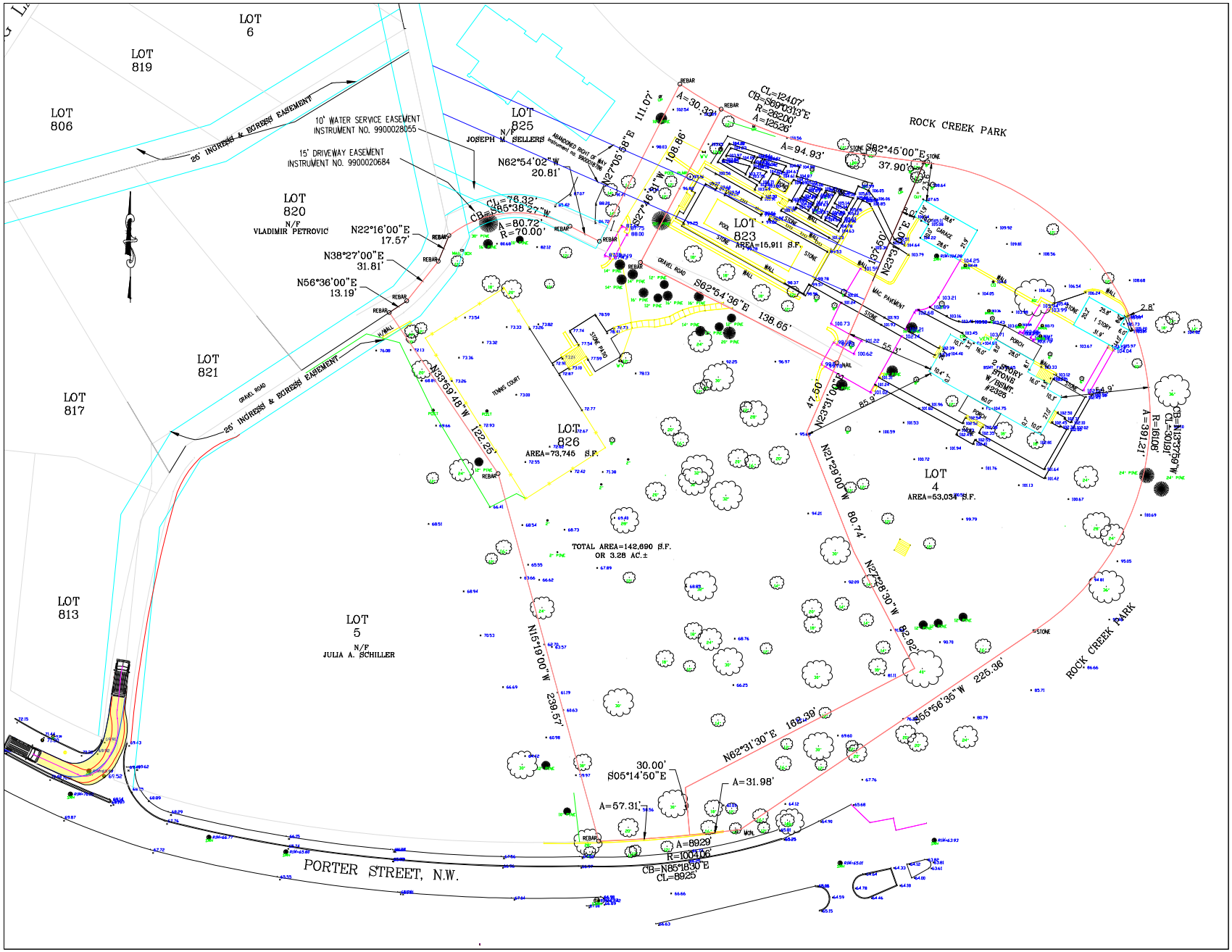
TIME	Peds		Bikes		Scooters		Strollers		E Scooters		Total		Total	Hourly Totals	CPC Accumulation	RCC Accumulation	Park On-Street	Park On-Site
	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT						
8:00 AM	3	0	0	0	0	0	0	0	0	0	3	0	3	6	3	5	0	3
8:15 AM	1	0	0	0	0	0	0	0	0	0	1	0	1	7	4	7	0	3
8:30 AM	0	0	1	0	0	0	0	0	0	0	1	0	1	6	5	8	0	3
8:45 AM	0	1	0	0	0	0	0	0	0	0	0	1	1	11	4	7	0	3
9:00 AM	2	0	2	0	0	0	0	0	0	0	4	0	4	12	8	14	1	4
9:15 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	24	8	14	1	4
9:30 AM	4	2	0	0	0	0	0	0	0	0	4	2	6	29	10	17	1	4
9:45 AM	0	0	0	2	0	0	0	0	0	0	0	2	2	24	8	14	1	4
10:00 AM	13	3	0	0	0	0	0	0	0	0	13	3	16	26	18	30	2	5
10:15 AM	3	2	0	0	0	0	0	0	0	0	3	2	5	23	19	32	2	5
10:30 AM	1	0	0	0	0	0	0	0	0	0	1	0	1	32	20	34	2	5
10:45 AM	4	0	0	0	0	0	0	0	0	0	4	0	4	35	24	41	2	5
11:00 AM	4	9	0	0	0	0	0	0	0	0	4	9	13	34	19	32	2	5
11:15 AM	13	1	0	0	0	0	0	0	0	0	13	1	14	34	31	52	3	6
11:30 AM	1	2	1	0	0	0	0	0	0	0	2	2	4	21	31	52	3	6
11:45 AM	2	1	0	0	0	0	0	0	0	0	2	1	3	22	32	54	3	6
12:00 PM	2	10	0	1	0	0	0	0	0	0	2	11	13	30	23	39	2	5
12:15 PM	0	1	0	0	0	0	0	0	0	0	0	1	1	20	22	37	2	5
12:30 PM	2	3	0	0	0	0	0	0	0	0	2	3	5	19	21	35	2	5
12:45 PM	1	10	0	0	0	0	0	0	0	0	1	10	11	17	12	20	1	4
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1:45 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	25	12	20	1	4
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2:30 PM	10	4	0	0	0	0	0	0	0	0	10	4	14	24	23	39	2	5
2:45 PM	0	5	0	0	0	0	0	0	0	0	0	5	5	15	18	30	2	5
3:00 PM	4	1	0	0	0	0	0	0	0	0	4	1	5	14	21	35	2	5
3:15 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	27	21	35	2	5
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3:45 PM	0	4	0	0	0	0	0	0	0	0	0	4	4	39	18	30	2	5
4:00 PM	9	8	1	0	0	0	0	0	0	0	10	8	18	42	20	34	2	5
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4:45 PM	0	7	0	0	0	0	0	0	0	0	0	7	7	22	26	44	2	5
5:00 PM	2	1	0	0	0	0	0	0	0	0	2	1	3	22	27	46	2	5
5:15 PM	2	4	0	0	0	0	0	0	0	0	2	4	6	19	25	42	2	5
5:30 PM	0	5	0	1	0	0	0	0	0	0	0	6	6	16	19	32	2	5
5:45 PM	1	6	0	0	0	0	0	0	0	0	1	6	7	13	14	24	1	4
6:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	10	14	24	1	4
6:15 PM	1	2	0	0	0	0	0	0	0	0	1	2	3	17	13	22	1	4
6:30 PM	3	0	0	0	0	0	0	0	0	0	3	0	3	14	16	27	1	4
6:45 PM	0	4	0	0	0	0	0	0	0	0	0	4	4	14	12	20	1	4
7:00 PM	0	6	0	0	0	0	0	1	0	0	0	7	7	10	5	8	0	3
7:15 PM	0	0	0	0	0	0	0	0	0	0	0	0	0		5	8	0	3
7:30 PM	0	3	0	0	0	0	0	0	0	0	0	3	3		2	3	0	3
7:45 PM	0	0	0	0	0	0	0	0	0	0	0	0	0		2	3	0	3
Totals	117	115	5	4	0	0	0	1	0	0	122	120	242		2	3	1	3

Note: On-site parking assumes three employees arrive before the RCC opens and all three drive.

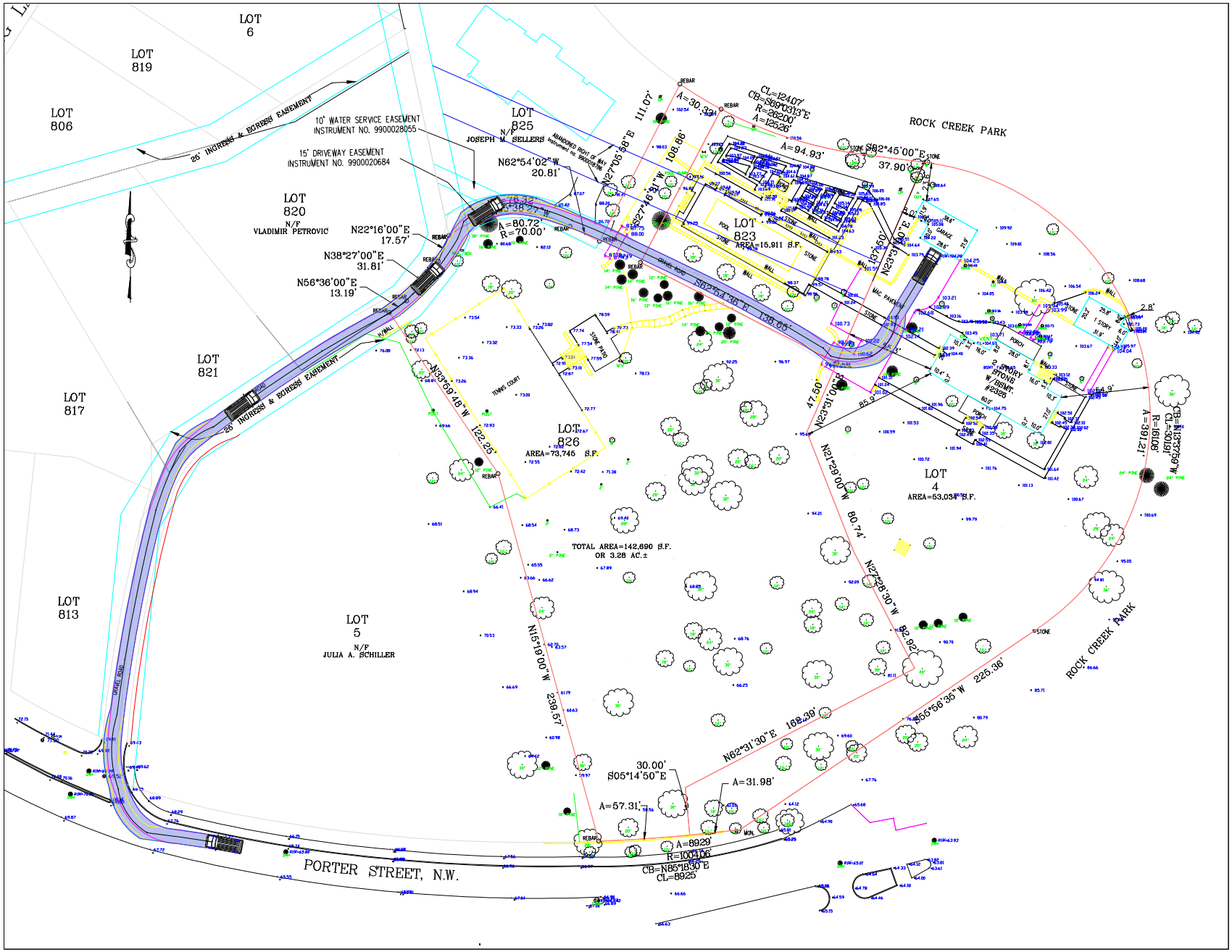
ATTACHMENT V
UPDATED TRUCK AUTOTURN DIAGRAMS



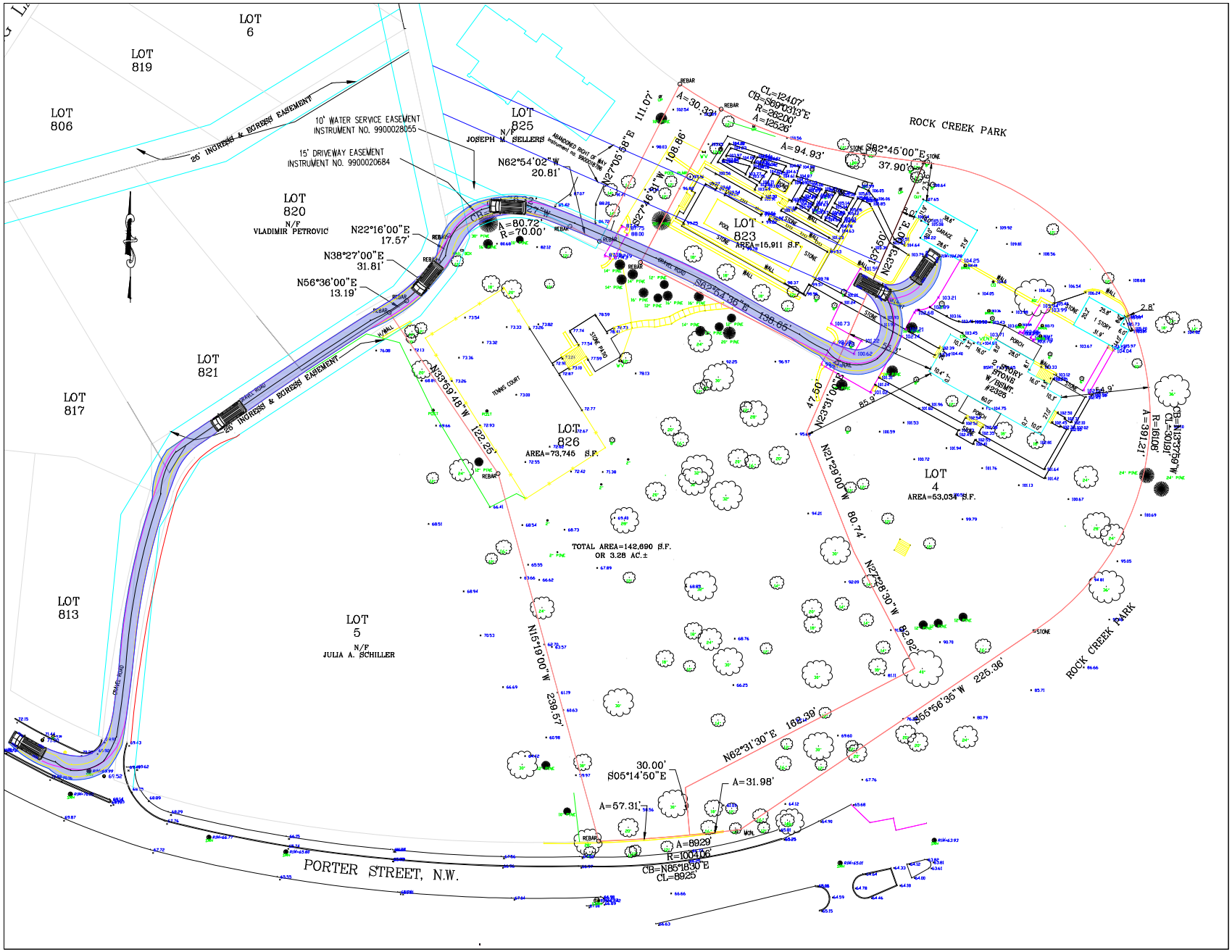
AutoTurn - 28' Box Truck Left In



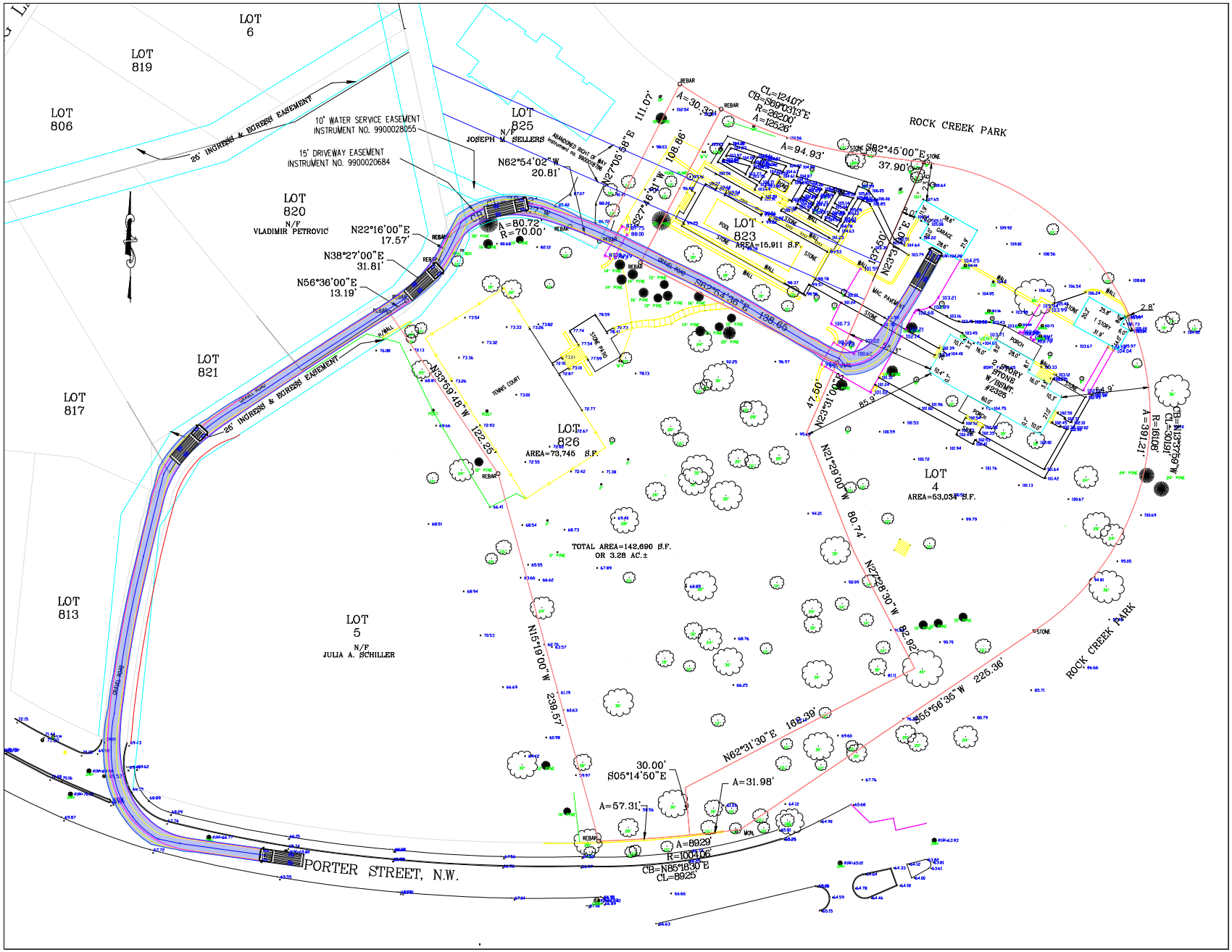
AutoTurn - DL-23 Left In



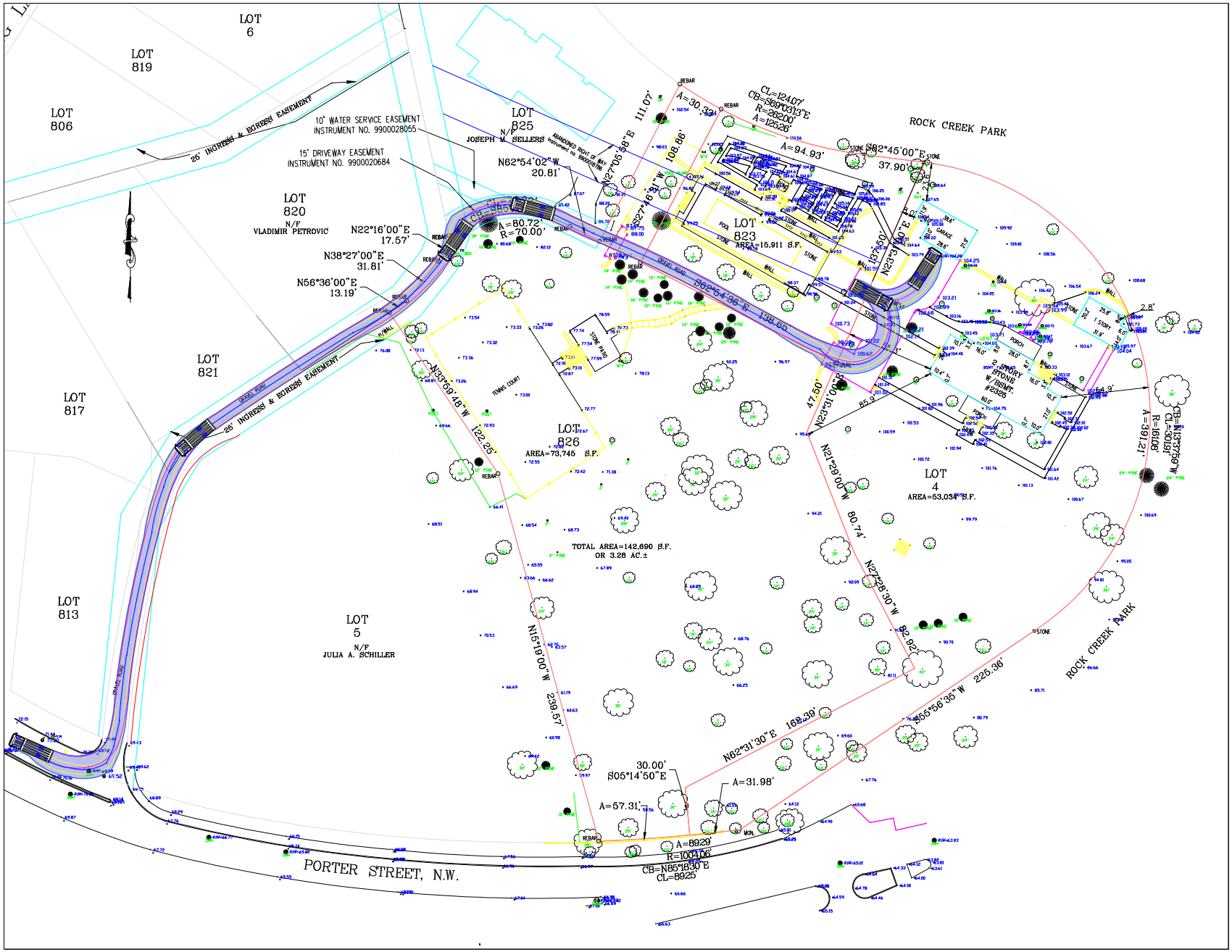
AutoTurn - DL-23 Right In



AutoTurn - DL-23 Right Out



AutoTurn - 28' Box Truck - Right In



AutoTurn - 28' Box Truck - Right Out