

October 15, 2017

VIA IZIS

D.C. Board of Zoning Adjustment
441 4th Street NW, Suite 200S
Washington, DC 20001

RE: BZA Case No. 19599

To Whom It May Concern:

We, the undersigned, are residents at 4342 River Road NW, Washington, DC (i.e. the corner parcel at the intersection of River Road NW, 43rd Place NW and Davenport Street NW), and have lived at this address for the last three years. While we generally are not averse to Georgetown Day School's proposal for the former Safeway parcel, we have very specific concerns about the likely traffic impacts of the proposal, especially in terms of opening a new access to the GDS parking garage on River Road NW.

A review of GDS' traffic report (Exhibit 29A) shows the traffic plans in general, and as to River Road NW more specifically, are likely factually inaccurate and woefully understate the likely traffic impacts of the proposed construction in several respects. First, the traffic volumes and backup levels on River Road NW described in the report do not comport with our own long-term daily observations. While traffic can flow freely at times during morning rush hour along River Road NW on some days, on other days the traffic will back up behind the lights at Wisconsin Avenue NW, 42nd Street NW and Chesapeake Street NW all the way down through the Davenport Street NW intersection, and indeed on some occasions even partway to 44th Street NW--including backing up the entire length of the block between Chesapeake Street NW and 43rd Place NW where GDS' property is located. The backup days occur with substantial frequency, and are not a rare occurrence by any means. Accordingly, the traffic report in Exhibit 29A appears empirically inaccurate, especially as to morning rush hour traffic volumes--which is the most critical traffic window for traffic impact planning purposes for River Road NW as that window will likely see the greatest left-hand turn volume across River Road NW southbound if GDS's proposal is implemented in its present form. Further, it bears mention that, given that most schools concentrate the beginning of their school days within a limited time window, the additional GDS traffic will be hitting during a very narrow drop-off window, further exacerbating traffic effects.

GDS' traffic report has several other readily-apparent defects when attempting to assess likely increases in traffic volume. First, the report makes no attempt to identify what proportion of the likely GDS traffic volume will be coming from which directions toward GDS, such as to determine the relative proportion of traffic focusing on each of the three proposed entrances to the modified GDS property (River Road NW, the alley off Ellicott Street NW, and Davenport Street NW/42nd Street NW). Such an analysis should be readily feasible given that GDS enrollment data and payroll records clearly indicate the

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places of residence of current GDS students and staff, allowing extrapolation of which entrance to parking are likely to receive the most traffic. Given that River Road NW is a major arterial road while Ellicott Street NW and Davenport Street NW/42nd Street are very close to each other while River Road NW is on the opposite side of the property, given that 42nd Street is often backed up many mornings with traffic for the nearby Janney Elementary School, it is likely that a GDS parking entrance on on River Road NW will end up drawing a substantial portion of the GDS traffic (if not the majority or plurality). Further, given the socioeconomics for GDS and District of Columbia weather patterns, it is likely that GDS' assumptions as to rates of use of bicycles and mass transit for GDS students are unrealistic, and that in all likelihood a far larger percentage of GDS students will be arriving by private car than is estimated in the GDS traffic report, resulting in higher traffic.

The report errs in offsetting traffic volumes from the former Safeway against the total traffic impacts, for two reasons. First, Safeway's traffic was solely concentrated through the entrances in the alley off Ellicott Street NW, and Davenport Street NW/42nd Street NW, with no direct entrance on River Road NW. Second, Safeway traffic was spread out across a long business day and night hours for that former supermarket. In contrast, GDS traffic will be highly concentrated on certain narrow student drop-off and pick-up windows, magnifying the traffic impacts during those peak periods.

A comparison for the likely traffic effects is useful. GDS' proposal seeks authorization for maximum enrollment of up to 1,200 students (more than double the present 500 students maximum enrollment presently permitted at this location). A similar comparator private school in the vicinity, Sidwell Friends School, is reported in public sources as having an enrollment of just under 1,100 students at its location on Wisconsin Avenue NW. To accommodate traffic, Sidwell Friends School has two separate traffic lights, and has dedicated left-turn lanes and preferential left-turn cycles. Even so, we have personally observed that traffic volumes in the Sidwell Friends School left-turn lane during peak morning drop-off times (at least during Sidwell's summer camp) can extend most of the block and require 3 or more cycles of the light to safely make the left-hand turn. Further, Sidwell only manages these traffic volumes with carefully-designed internal drop-off traffic circulation patterns which are designed into their parking facility, traffic circulation patterns which do not appear in evidence in the garage plats for the garage area along River Road NW which appear in Exhibit 13A1.

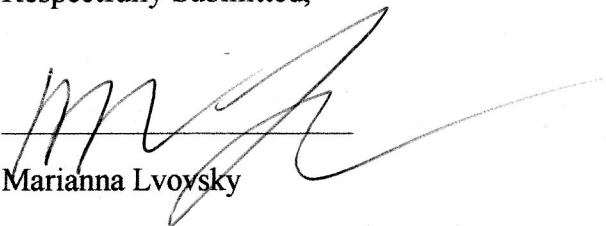
In contrast, the present GDS plan not only does not provide for addition of a traffic light or dedicated left-hand turn lane on River Road NW--it also locates the River Road NW access roughly 1-2 car lengths from intersection at River Road NW, 43rd Place NW and Davenport Street NW. In light of present traffic volumes on River Road NW, redirection of a substantial portion of present GDS traffic to a River Road NW entry and addition of hundreds of extra students and staff with no room for accommodating turns into the GDS garage will likely result in severe backups along River Road NW, especially during morning rush hour, which will both block both GDS and non-GDS traffic (including commercial traffic, given River Road NW's status as a preferred corridor for truck traffic). These backups are not accounted for in the present GDS plan.

As noted, District of Columbia traffic plans currently favor focusing commercial traffic along River Road NW and away from residential streets in American University Park and surrounding neighborhoods, as evidenced by restrictions on right-hand turns off of River Road NW southbound during morning rush hours. and restrictions on truck traffic on nearby roads such as Van Ness Street NW. This policy logically requires free-flowing traffic on River Road NW to the greatest extent practicable. Creating traffic backups along River Road NW would directly impair this policy, and instead drive traffic onto residential streets in contravention of present policy.

Because of these issues, it is vital that the traffic impacts (in particular on River Road NW) be thoroughly and objectively examined prior to granting GDS permission to continue with its present proposals--with particular attention given to whether any additional entrance is even needed on River Road NW, and if so whether additional traffic measures such as installation of a traffic light, placement of a dedicated left-turn lane from River Road NW southbound, moving the garage access proposed for River Road NW further south to give room along the block for turning traffic to wait for turn opportunities, and/or adjusting internal traffic flow patterns inside the GDS garage itself to absorb and facilitate rapid movement of parents dropping off and picking up students. Given the empirical flaws in the present GDS study, we respectfully request that the issue of traffic impacts be thorough examined by DDOT in advance of approval of GDS' proposed site plans and modifications to neighborhood traffic patterns. Absent such reviews and modifications, we respectfully oppose GDS' application in its present form.

We thank you for your attention to these matters.

Respectfully Submitted,



Marianna Lvovsky



Andrew J. Perlmutter