

# WELLS + ASSOCIATES

## MEMORANDUM



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**TO:** Noah Hagen, DDOT

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**RE:** St. Peter School Renovation and Addition  
Transportation Statement

**DATE:** August 28, 2025

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## INTRODUCTION

St. Peter School is a private parochial school that enrolls students in kindergarten through 8<sup>th</sup> grade. The school is generally bordered by 3rd Street on the west, E Street on the south, and rowhouses on the north and east. The site location is shown on Figure 1. The school proposes to construct a 15,431 SF, three-story addition on the existing lower playground on the western portion of the site. The new structure will house an administration suite, multi-purpose room and gymnasium, elevator for ADA access, expanded lobby, new classrooms, rooftop playground with elevator access, and support service spaces and storage. The current student enrollment is 229 students, and enrollment is capped at 283 students. The school currently employs 34 faculty and staff, including six part-time employees. The current faculty/staff cap is 40 employees. No increase in the enrollment or faculty/staff caps are proposed.<sup>1</sup>

Vehicular access to the site currently is provided via an existing curb cut on D Street. Parking for the abutting rowhouses is also provided via the curb cut. Currently, 12 stacked spaces (including five code-compliant spaces) are located on the school's property. The remaining 19 spaces accessed by the alley are on, and service, abutting properties.

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<sup>1</sup> The current Certificate of Occupancy (C.O.) issued in 2008 allows for 283 students and 40 faculty/staff. Since the school pre-dates the zoning regulations in the District of Columbia, no records of any Zoning Commission or Board of Zoning Adjustment (BZA) reviews for a private school on the Property exist. Therefore, the enrollment cap is assumed to be 283 students, and the faculty/staff cap is assumed to be 40 employees.

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The purpose of this Transportation Statement is to evaluate the transportation elements of the proposed project, including bicycle, pedestrian, parking, and loading aspects. This Transportation Statement was scoped with the District Department of Transportation (DDOT). A copy of the agreed upon scope is included in Attachment A.

### TRANSPORTATION NETWORK

St. Peter School is well-served by a variety of transportation options, including Metrobus, Metrorail, Capital Bikeshare, and a connected network of sidewalks. Multi-modal transportation options are shown on Figure 2. Descriptions of each mode are provided below.

#### Transit Services/Facilities

The Capitol South and Eastern Market Metro Stations, which both serve the Blue, Orange, and Silver lines, are located approximately  $\frac{1}{3}$  mile from the site. Metrobus routes run along Pennsylvania Avenue, with stops located within  $\frac{1}{4}$  mile of the site at the 3<sup>rd</sup> Street/Pennsylvania Avenue and 6<sup>th</sup> Street/Pennsylvania Avenue intersections.

WMATA has implemented its Better Bus plan, an initiative to improve bus service in the metropolitan Washington, DC region and create fast, frequent, and reliable bus service that is easier to understand. The updated network plan includes four routes that stop near the project site. Routes D10 and C55 stop within  $\frac{1}{4}$  mile of the school at the Pennsylvania Avenue/6<sup>th</sup> Street intersection. Route D10 operates with approximately 12 minute headways during the PM peak hour and with approximately 20 minute headways at other times. Route C55 operates with headways of approximately 30 minutes.

Route D1X stops within  $\frac{1}{2}$  mile of the school at the Pennsylvania Avenue/8<sup>th</sup> Street intersection and operates with headways of approximately 20 minutes. Route C53 also stops within  $\frac{1}{2}$  mile of the school at the 8<sup>th</sup> Street/D Street intersection and operates with headways of approximately 10 minutes during peak times and 20 minutes during off peak times.

A summary of the key destinations for each route is provided in Table 1.

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Table 1  
Summary of Bus Routes

Route	Nearest Stop	Key Destinations
D10	Pennsylvania Ave SE & 6 <sup>th</sup> St/ Pennsylvania Ave SE & 3 <sup>rd</sup> St	Kennedy Center/GW Hospital – Naylor Road/Southern Ave
D1X	Pennsylvania Ave SE & 8 <sup>th</sup> St/	National Archives – Naylor Rd
C53	8 <sup>th</sup> St & E St/ 8 <sup>th</sup> St & D St	Woodley Park – U Street – Congress Heights
C55	Pennsylvania Ave SE & 6 <sup>th</sup> St	L’Enfant Plaza – Buzzard Point – Navy Yard – Union Station

*MoveDC 2021* is the City’s long-range transportation plan that establishes goals, policies, strategies, and metrics to guide the City’s investment in transportation facilities and programs over the next 25 years. *MoveDC* establishes seven goals in the area of safety, equity, mobility, project delivery, management and operations, sustainability, and enjoyable spaces. These goals are supported by 18 policies and 41 strategies established in the plan to help achieve the goals. *MoveDC 2021* provides a Transportation Needs Map, which evaluates areas of the City for walking, biking, transit, and vehicles and ranks areas based on the greatest need for transit improvements, access to jobs and services, and safer streets. Based on the *moveDC 2021* Transportation Needs Map, the site is located in an area with low need of additional transportation facilities. The ranking is indicative of an area in close proximity to Metrorail service and with sufficient bus service.

*MoveDC 2021* also identifies a transit priority network that includes “streets where infrastructure should be developed to help transit vehicles move more efficiently, improving travel times and reliability for passengers. Transit priority infrastructure could include dedicated transit lanes, better transit stops and/or special treatments for buses at intersections.” Pennsylvania Avenue is an existing priority transit network.

### Pedestrian Facilities

In conjunction with the proposed improvements, Streetscape improvements are proposed in the public right-of-way along the 3rd Street, including ADA access, short term bicycle storage. Preliminary streetscape is generally shown on Figure 3.

According to the pedestrian component of *moveDC*, several opportunities for improvement exist within the District, including:

- Enhancing accessibility, which includes evaluating and improving uncontrolled crosswalks on high-speed multi-lane roadways and improving signalized intersections with high pedestrian crash rates;
- Improving the pedestrian network outside of downtown, which includes providing pedestrian facility enhancements where sidewalks are lacking;

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- Making priority investments, which includes prioritizing pedestrian needs in critical locations near schools, transit stations, and high hazard locations;
- Promoting enforcement, which includes enforcement policy changes; and
- Improving intersection designs, which includes closing gaps in the pedestrian network and improvement in intersection lighting, crosswalks, signage, refuge islands, and pedestrian signalization/phasing.

According to *moveDC* and a review of the study area, sidewalk gaps exist along one side of Virginia Avenue between 3<sup>rd</sup> and 7<sup>th</sup> Streets and along both sides of Navy Place (though Navy Place is outside of the ¼-mile walkshed).

*MoveDC* provides a Pedestrian Friendliness Index (PFI) by census block, which illustrates how walkable the area is relative to other census blocks in the City. The subject site has a high PFI, which is indicative of a highly walkable area with a connected street grid with sidewalks, buildings set close to the street, and intersections and blocks that are manageable for pedestrians.

The ¼ mile walk shed is shown on Figure 4, which shows likely walking routes to transit and sidewalk gaps.

### Bicycle Facilities

Within ½ mile of the subject site, numerous on-street bicycle facilities exist. Existing bike lanes are present on E Street between Canal Street and 6<sup>th</sup> Street. Between 3<sup>rd</sup> and 4<sup>th</sup> Street, only an eastbound bike lane is present. The pick-up/drop-off lane for St. Peter's is located on the north side of E Street on this block. Within ½ mile of the school, bike lanes also are present at the following locations:

- Both sides of North Carolina Avenue, generally between New Jersey Avenue and 4<sup>th</sup> Street and east of 6<sup>th</sup> Street,
- Both sides of South Carolina Avenue, between 6<sup>th</sup> and 7<sup>th</sup> Street,
- Both sides of Pennsylvania Avenue (protected lanes),
- Both sides of East Capitol Street,
- West side of 4<sup>th</sup> Street (southbound),
- Both sides of 2<sup>nd</sup> Street, between East Capitol Street and Independence Avenue, and
- East side of 6<sup>th</sup> Street (northbound).

Additionally, there are several Capital Bikeshare (CaBi) stations located near the school property. The closest stations are located at the 3<sup>rd</sup> Street/D Street SE intersection, which contains 13 docks, and at the 3<sup>rd</sup> Street/G Street intersection, which contains 19 docks.

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The ½ mile bike shed is shown on Figure 5.

According to the *Bicycle Element of moveDC*, several opportunities for improvement exist within the District, including:

- Improving the cycling experience on bridges and approaches to bridges;
- Minimizing barriers such as complex intersections, security barriers, freeway ramps, and driveways;
- Expanding investment in the bicycle network beyond downtown; and
- Improving safety by educating all road users and increasing public awareness.

*MoveDC's Bicycle Priority Network* includes a funded improvement to continue the protected bike lanes on Pennsylvania Avenue between 13<sup>th</sup> Street and Barney Circle. It also includes planned, but not funded, bike lanes on Independence Avenue.

### Safety Evaluation

According to *Vision Zero DC*, the rate of traffic fatalities (per 100,000 residents) decreased from 2017 to 2019; however, since 2019 the rate of traffic fatalities has increased each year.

No roadways were identified as High Injury Network Corridors within ½ mile of the subject site.

The goal of Vision Zero is no fatalities and no serious injuries on the transportation system. In order to achieve the Vision Zero goal, the *Vision Zero 2022 Update* focuses on a Safe System approach to reducing crashes. The Safe System approach includes focus on safe streets, safe people, safe speeds, safe vehicles, and post-crash care. Each component of the Safe System approach is described below:

- The Safe Streets initiative includes the design, construction, operation, and maintenance of the District's roadways.
- The Safe Speeds initiative includes self-enforcing streets, which are streets where the design of the street results in appropriate speeds, automated traffic enforcement, context-sensitive speed limits, and in person speed enforcement.
- The Safe People initiative focuses on education and outreach, enforcement, and legislative rules to ensure all users are traveling safely.
- The Safe Vehicles initiative focuses on both the District's fleet of vehicles and private vehicle safety. The District requires inspections and registration of all District vehicles and has increased fees to register vehicles according to size and weight.

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- The Post-Crash Care initiative seeks to enhance the ability for those involved in crashes to survive “through quick and efficient access to emergency medical care, while creating a safe work environment for those first responders.”

The school’s transportation plan includes strategies that further the Vision Zero goals, as indicated below:

- Reconfiguration of the 3<sup>rd</sup> Street entrance to provide ADA accessibility, which currently does not exist,
- Implementation of a Transportation Demand Management Plan to promote non-auto modes of travel with the goal of reducing vehicular travel, including bicycle safety education for students,
- Enhanced strategies to promote safety and efficiency of the pick-up/drop-off (PUDO) lane and,
- Implementation of a Loading Management Plan.

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### Proposed Modification

St. Peter School has filed a special exception and variance application to construct an addition to the school. The application seeks approval to construct a three-story, 15,431 SF addition, which will house an administration suite, multi-purpose room and gymnasium, elevator for ADA access, expanded lobby, new classrooms, rooftop playground with elevator access, and support service spaces and storage. The Lower playground on the western side of the property will be eliminated to accommodate the addition. Importantly, the proposed addition will provide an accessible route into the school, which is lacking today. No increase in the enrollment or faculty/staff caps are proposed.

### Site Access

Vehicular access to the site currently is provided via an existing curb cut on D Street. Parking for the abutting rowhouses is also accessed via the curb cut. Currently, 12 stacked spaces (including five code-compliant spaces) are located on the school’s property. The remaining 19 spaces accessed by the private alley are on, and serve, abutting properties. A perpetual easement for pedestrian and vehicle ingress and egress, and for utility installation for the abutting properties allow the abutting properties use of the alley.

The main pedestrian routes to the school are via E Street and 3<sup>rd</sup> Street. In the morning, all students enter the school via the E Street door. In the afternoon, students who walk are

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dismissed via the 3<sup>rd</sup> Street door. Students who are picked up in a vehicle are dismissed through the E Street door.

The school’s site circulation plan is shown on Figure 6.

### Vehicular Parking

St. Peter School falls within the “private education” use category under the 2016 Zoning Regulations (ZR16). For private elementary and middle schools, the minimum parking requirement is two spaces for every three teachers and other employees. With a faculty/staff cap of 40, the school would be required to provide a minimum of 27 parking spaces. Because the school’s existence pre-dates any zoning regulations, the Zoning Administrator has determined that the school qualifies for a parking credit of 22 spaces, resulting in a minimum parking requirement of five parking spaces. The school currently provides five zoning compliant parking spaces, as shown on Figure 6. A summary of the parking requirements is presented in Table 2. The Zoning Administrator’s ruling is included in Attachment B.

Table 2  
Summary of Vehicle Parking Requirements

Component	Required		Proposed
	Minimum	DDOT Preferred Maximum (¼ to ½ mi from Metro)	
Private Education, Elementary/Middle School	2 spaces/ 3 employees = 2*40/3 = 27 spaces	≤ 90% of § 701.5 ≤ 0.9* 27 spaces ≤ 24spaces	5 spaces
Credit	22 spaces	---	---
Total	5 spaces	24 spaces	5 spaces

Per Subtitle C, §704.1 of ZR 16, additions to historic resources must provide additional parking spaces for an addition only if: (i) the addition increases GFA by at least 50 percent and (ii) the resulting requirement is at least four spaces. Although the proposed addition will increase the GFA by more than 50 percent, the school is not proposing any increase in the faculty/staff cap. Because the minimum parking requirements for private elementary and middle schools are based on the number of employees, and no increase in the faculty/staff is proposed, no additional parking spaces are required.

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### Bicycle Parking

Per Subtitle C, §802.6 of ZR16, “Additions to historic resources shall be required to provide additional bicycle parking spaces only for the addition’s gross floor area and only when the addition results in at least a fifty percent (50%) increase in gross floor area beyond the gross floor area existing on the effective date of this title.” The proposed expansion will increase the gross floor area by 58.3 percent; therefore, additional bicycle parking for the proposed 15,431 SF addition is required.

Minimum bicycle parking requirements per Subtitle C, Section 802.1 are presented in Table 3.

Table 3  
Summary of Bicycle Parking Requirements

Component	Required		Proposed	
	Long-Term Spaces	Short-Term Spaces	Long-term	Short-term
Education, private school 15,431 SF	1 space/7,500 SF = 2 spaces	1 space/2,000 SF = 8 spaces	2 spaces	14 spaces

As shown on Figure 6, the School proposes to provide eight short-term bicycle spaces in public space on 3<sup>rd</sup> Street near the door to the school and six short-term spaces on private space at the rear of the building near the staff entrance. Two long-term bicycle spaces will be provided on the first floor. All long-term bicycle spaces will be horizontal, on the ground. Two of the spaces will accommodate cargo/tandem bikes. At least one space will be equipped with an outlet for charging.

Per ZR16 Subtitle C, §806.4 and §806.5, no shower and changing facilities are required since the proposed addition is less than 25,000 SF.

### Loading

Per Subtitle C, §901.7 of ZR 16, additions to a historic resource must provide additional loading berths, loading platforms, and service/delivery spaces only for the addition’s gross floor area (GFA) and only when the addition increases GFA by 50 percent or more. The proposed addition to St. Peter School will increase school’s GFA by 58.3 percent (adding approximately 15,431 SF of GFA). However, for private education use, the minimum threshold for triggering a loading requirement is 30,000 SF of GFA. Given that the additional GFA proposed is below 30,000 SF of GFA, there is no requirement to provide additional loading, per Subtitle C, §901.1.

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The school currently provides no loading facilities. Most deliveries occur on E Street or 3<sup>rd</sup> Street. Trash is picked up in the parking lot. Table 4 summarizes the current and anticipated service and delivery operations for the school.

Table 4  
Summary of Deliveries

Delivery/Service Type	Frequency	Location
Parcel deliveries (Amazon, UPS, FedEx)	Daily	3 <sup>rd</sup> Street
Oil delivery	No longer needed after completion of project	
Milk delivery	Weekly	E Street
Pizza delivery	Fridays	3 <sup>rd</sup> Street
Lunch delivery	Monday - Thursday	E Street
Office/janitorial supplies	Twice/Month	E Street
Pest control	Twice/Month	3 <sup>rd</sup> Street or E Street
General maintenance	As needed	Park on-street
Trash/Recycling	Tuesday and Friday	Parking Lot

Due to the constraints in the parking lot, trash trucks current must either back into the alley or out of the alley. Sufficient space does not exist for trash trucks to turn around on site. Although an existing condition, the School will implement a loading management plan to promote safe and efficient operations and to minimize the impact on the surrounding neighborhood. The loading management plan will include the following:

1. The school's custodian currently serves as loading/service coordinator and will continue to serve in this capacity. The coordinator will be on duty during times when service vehicles are required to access the parking lot.
2. To the extent possible, the loading/service coordinator will schedule loading and service activities so as not to conflict with school arrival and dismissal. Some deliveries, such as parcel deliveries, may not be able to be scheduled.
3. The loading/service coordinator shall monitor inbound and outbound truck maneuvers and shall ensure that trucks accessing the service area do not block vehicular, bike, or pedestrian traffic along D Street except during those times when a truck is actively entering or exiting a loading berth.
4. Service vehicles/truck traffic interfacing with D Street traffic shall be monitored during peak periods and management measures shall be taken, if necessary, to reduce conflicts between truck and vehicular movements.
5. The loading/service coordinator will monitor the timing of deliveries to see if any adjustments need to be made to ensure any conflicts are minimized.

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6. Trucks using the service area shall not be allowed to idle and shall follow all District guidelines for heavy vehicle operation, including but not limited to, DCMR 20 – Chapter 9, Section 900 (Engine Idling), the goDCgo Motorcoach Operators Guide, and the primary access routes shown on the DDOT Truck and Bus Route Map ([godcgo.com/freight](http://godcgo.com/freight)).

A copy of the Loading Management Plan is included in Attachment C.

### Trip Generation

Peak hour trip generation for the school is composed of faculty/staff trips and student trips. Each of those components is further made up of walking/biking, vehicle, and transit trips.

Student Trip Generation – The current trip generation for the school was based on counts conducted on March 11, 2025. Vehicular traffic counts were conducted at the private alley on D Street and at the pick-up/drop-off (PUDO) lane on E Street. Vehicles that parked on adjacent streets and were observed picking up or dropping off students also were counted. Pedestrian counts included the number of students entering the building in the morning and exiting the building in the afternoon as well as the number of students alighting and boarding vehicles in the PUDO lane. The number “walkers” was determined by subtracting the number of students entering the school in the morning from the number of students alighting vehicles dropping off students. In the afternoon, all “walkers” exit via the 3<sup>rd</sup> Street door. Therefore, the number of student “walkers” during the PM peak hour was determined from pedestrian counts at the 3<sup>rd</sup> Street door. Traffic count details are included in Attachment D.

Table 4 summarizes the number of student trips by mode during each peak hour. As shown in Table 4, the school currently generates 161 student vehicle trips during the AM peak hour, 65 student vehicle trips during the PM school peak hour, and 44 student vehicle trips during the PM commuter peak hour. “Walkers” account for approximately 47 percent of the trips during the AM peak hour, 30 percent of the trips during the PM school peak hour, and 57 percent of the trips during the PM commuter peak hour.

Trip rates per student were calculated based on the current enrollment of 229 students. The proposed peak hour student trip generation was calculated by applying the current trips rates to the student cap of 283. With an increase of 54 students, the school would generate an estimated 38 additional AM peak hour student vehicle trips (19 inbound, 19 outbound), 16 PM school peak hour student vehicle trips (eight inbound, eight outbound), and 10 PM commuter peak hour student vehicle trips (five inbound, five outbound). The proposed peak hour student trip generation for the school is shown in Table 5.

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Table 5  
Peak Hour Student Trip Generation Summary

Trip Type	AM Peak Hour			PM School Peak Hour			PM Commuter Peak Hour		
	In	Out	Total	In	Out	Total	In	Out	Total
<b>Existing Trip Generation (229 students)</b>									
Total Person Trips	204	0	204	0	98	98	0	67	67
<i>Auto Person Trips</i>	108	0	108	0	29	29	0	38	38
<i>Walk/Bike Person Trips</i>	96	0	96	0	69	69	0	29	29
<i>Transit Trips</i>	0	0	0	0	0	0	0	0	0
Vehicle Trips	81	80	161	32	33	65	21	23	44
<b>Existing Trip Generation Rates</b>									
Total Person Trips	0.89	0.00	0.89	0.00	0.43	0.43	0.00	0.29	0.29
<i>Auto Person Trips</i>	0.47	0.00	0.47	0.00	0.13	0.13	0.00	0.17	0.17
<i>Walk/Bike Person Trips</i>	0.42	0.00	0.42	0.00	0.30	0.30	0.00	0.13	0.13
<i>Transit Trips</i>	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Vehicle Trips	0.35	0.35	0.70	0.14	0.14	0.28	0.10	0.11	0.20
<b>Proposed Trip Generation (283 Students)</b>									
Total Person Trips	252	0	252	0	121	121	0	82	83
<i>Auto Person Trips</i>	133	0	133	0	36	36	0	47	47
<i>Walk/Bike Person Trips</i>	119	0	119	0	85	85	0	36	36
<i>Transit Trips</i>	0	0	0	0	0	0	0	0	0
Vehicle Trips	100	99	199	40	41	81	26	28	54
<b>Net Increase in Trips</b>									
Total Person Trips	48	0	48	0	23	23	0	16	16
<i>Auto Person Trips</i>	25	0	25	0	7	7	0	9	9
<i>Walk/Bike Person Trips</i>	23	0	23	0	16	16	0	7	7
<i>Transit Trips</i>	0	0	0	0	0	0	0	0	0
Vehicle Trips	19	19	38	8	8	16	5	5	10

Faculty/Staff Trip Generation – The school provided information regarding the faculty/staff mode splits, which are summarized in Table 6.

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Table 6  
Faculty/Staff Mode Split Summary

Mode	Percent	Current # of Faculty/Staff (Total = 34)	Projected # of Faculty/Staff (Total = 40)
Auto	56%	19	22
Walk/Bike	29%	10	12
Bus/Metro	12%	4	5
Ride Share	3%	1	1

The current vehicular faculty/staff trip generation was determined based on the traffic counts at the private alley. Outbound trips from the alley during the morning peak hour and inbound during the afternoon peak hours were assumed to be associated with the abutting rowhomes and were not included in the school's trip generation. Since the school's parking lot currently only accommodates 12 stacked vehicles, the remaining seven vehicle trips were assumed to park in the neighborhood. The distribution of trips over the peak period for vehicles parking in the neighborhood and those who walked or took transit was assumed to be the same as the distribution of trips from the counts at the private alley, with the exception of one vehicle that arrived between 8:30 and 8:45 AM (after the start of school), which was assumed to be an anomaly. The one rideshare trip was assumed to arrive before 7:45 AM since the majority of employees arrive before then and was assumed to depart between 5:45 and 6:00 PM since the majority of employees depart during that time period.

Table 7 summarizes the peak hour faculty/staff trip generation by mode. As shown in Table 6, the school currently generates three faculty/staff vehicle trips during the AM peak hour, two faculty/staff vehicle trips during the PM school peak hour, and 11 faculty/staff vehicle trips during the PM commuter peak hour. Non-auto modes account for approximately 25 percent of the trips during the AM peak hour, 33 percent of the trips during the PM school peak hour, and 41 percent of the trips during the PM commuter peak hour.

Trip rates per employee were calculated based on the current employee count of 34 faculty and staff. The proposed peak hour faculty/staff trip generation was calculated by applying the current trips rates to the faculty/staff cap of 40. The increase of six employees would yield just one additional AM peak hour vehicle trip (inbound), no additional vehicle trips during the PM school peak hour, and just two additional vehicle trips (outbound) during the PM commuter peak hour. The proposed peak hour faculty/staff trip generation for the school is shown in Table 7.

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Table 7  
Peak Hour Faculty/Staff Trip Generation Summary

Trip Type	AM Peak Hour			PM School Peak Hour			PM Commuter Peak Hour		
	In	Out	Total	In	Out	Total	In	Out	Total
<b>Existing Trip Generation (34 faculty/staff)</b>									
Total Person Trips	4	0	4	0	3	3	0	17	17
<i>Auto Person Trips</i>	3	0	3	0	2	2	0	10	10
<i>Walk/Bike Person Trips</i>	1	0	1	0	1	1	0	5	5
<i>Transit Trips</i>	0	0	0	0	0	0	0	2	2
Vehicle Trips	3	0	3	0	2	2	0	10	10
<b>Existing Trip Generation Rates (trips per employee)</b>									
Total Person Trips	0.1	0.0	0.1	0.0	0.1	0.1	0.0	0.5	0.5
<i>Auto Person Trips</i>	0.1	0.0	0.1	0.0	0.1	0.1	0.0	0.3	0.3
<i>Walk/Bike Person Trips</i>	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.1
<i>Transit Trips</i>	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.1
Vehicle Trips	0.1	0.0	0.1	0.0	0.1	0.1	0.0	0.3	0.3
<b>Proposed Trip Generation (40 Faculty/Staff)</b>									
Total Person Trips	5	0	5	0	3	3	0	20	20
<i>Auto Person Trips</i>	4	0	4	0	2	2	0	12	12
<i>Walk/Bike Person Trips</i>	1	0	1	0	1	1	0	6	6
<i>Transit Trips</i>	0	0	0	0	0	0	0	2	2
Vehicle Trips	4	0	4	0	2	2	1	12	13
<b>Net Increase in Trips</b>									
Total Person Trips	1	0	1	0	0	0	0	3	3
<i>Auto Person Trips</i>	1	0	1	0	0	0	0	2	2
<i>Walk/Bike Person Trips</i>	0	0	0	0	0	0	0	1	1
<i>Transit Trips</i>	0	0	0	0	0	0	0	0	0
Vehicle Trips	1	0	1	0	0	0	0	2	2

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Combined Trip Generation – The combined trip generation for faculty/staff and students is presented in Table 8. Increases in student and faculty/staff populations to the current caps would result in a net increase of 39 AM peak hour vehicle trips, 16 PM school peak hour vehicle trips, and 13 PM commuter peak hour vehicle trips.

Table 8

Total Peak Hour Trip Generation Summary (Students + Faculty/Staff)

Trip Type	AM Peak Hour			PM School Peak Hour			PM Commuter Peak Hour		
	In	Out	Total	In	Out	Total	In	Out	Total
<b>Existing Trip Generation (229 students)</b>									
Total Person Trips	208	0	208	0	101	101	0	84	84
<i>Auto Person Trips</i>	111	0	111	0	31	31	0	48	48
<i>Walk/Bike Person Trips</i>	97	0	97	0	70	70	0	34	34
<i>Transit Trips</i>	0	0	0	0	0	0	0	2	2
Vehicle Trips	84	80	164	32	35	67	22	33	55
<b>Existing Trip Generation Rates</b>									
Total Person Trips	0.91	0.00	0.91	0.00	0.44	0.44	0.00	0.37	0.37
<i>Auto Person Trips</i>	0.48	0.00	0.48	0.00	0.13	0.13	0.00	0.21	0.21
<i>Walk/Bike Person Trips</i>	0.42	0.00	0.42	0.00	0.31	0.31	0.00	0.15	0.15
<i>Transit Trips</i>	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01
Vehicle Trips	0.37	0.35	0.72	0.14	0.15	0.29	0.10	0.14	0.24
<b>Proposed Trip Generation (283 Students)</b>									
Total Person Trips	257	0	257	0	124	124	0	104	104
<i>Auto Person Trips</i>	137	0	137	0	38	38	0	59	59
<i>Walk/Bike Person Trips</i>	120	0	120	0	86	86	0	42	42
<i>Transit Trips</i>	0	0	0	0	0	0	0	2	2
Vehicle Trips	104	99	203	40	43	83	27	40	67
<b>Net Increase in Trips</b>									
Total Person Trips	49	0	49	0	23	23	0	19	19
<i>Auto Person Trips</i>	26	0	26	0	7	7	0	11	11
<i>Walk/Bike Person Trips</i>	23	0	23	0	16	16	0	8	8
<i>Transit Trips</i>	0	0	0	0	0	0	0	0	0
Vehicle Trips	20	19	39	8	8	16	5	8	13

## MEMORANDUM

To encourage the use of non-auto modes of transportation, St. Peter School has developed a Transportation Demand Management (TDM) Plan that includes a variety of strategies, including incentives, outreach, and education. The detailed TDM Plan is included in the overall Transportation Management Plan, which is included in Attachment E.

### Pick-up/Drop-Off Operation

E Street, along the school's frontage, currently is signed "No Parking, 7 AM – 4PM School Days" and is used as the school's PUDO zone, as shown on Figure 6. The following summarizes the procedures currently in place for the PUDO operation.

Key parameters of the pick-up/drop-off (PUDO) operation for St. Peter School are summarized below:

- School begins at 8:30 AM and dismissal occurs at 3:15 PM.
- Parents who drive their student(s) drop off and pick up students in the PUDO zone along E Street.
- Parent-driven vehicles are required to approach the school from the east (so that they can access the PUDO lane on the north side of E Street). Cars may NOT join the car PUDO line by making a right onto E Street from 4th Street. Parents coming from the north are required to use 6<sup>th</sup> Street to E Street.
- Double parking is prohibited, and parents in the PUDO lane must remain in their vehicles.
- Students enter through the E Street door. Arrival time is between 8:15 AM and 8:28 AM (students must be in their classroom when the 8:30 AM bell rings).
- Faculty/staff and student patrols are present on E Street during morning drop-off and afternoon pick-up.
- Student safety patrols help students into and out of the vehicles. School faculty/staff monitoring the carpool lane and direct vehicles to move up in the line when gaps are present.
- Drop-off and pick-up is prohibited on 3<sup>rd</sup> Street as it is a safety hazard and blocks traffic.
- Caregivers who park in the neighborhood must drop off or pick up their child(ren) at the E Street door, except for the Pre-K and Kindergarten parents who may accompany students to their classrooms.
- At dismissal time, students who walk are dismissed through the 3<sup>rd</sup> Street door. Students who are driven are dismissed via the E Street door.
- Parents picking up child(ren) from Aftercare must enter through the E Street entrance.

# WELLS + ASSOCIATES

## MEMORANDUM

The current PUDO lane on E Street is 210 feet long with a capacity of approximately 10 vehicles (assuming 20 feet per vehicle).

The queues in the pick-up/drop-off lane were recorded every 30 seconds from 7:45 to 8:45 AM and from 2:30 PM to 4:00 PM. The maximum observed queue during the morning drop-off period was eight vehicles, which was sustained for just 3.5 minutes. The maximum observed queue during the afternoon pick-up period was 10 vehicles, which was sustained for five minutes.

During the morning drop-off and afternoon pick-up periods, vehicles approaching the PUDO lane were observed stopping adjacent to cars parked in the RPP zone on the east end of the block while waiting to access the PUDO lane. The times during which these vehicles blocked the travel lane were relatively minimal. A couple of factors contributed to the spillover, as described below:

- Although faculty/staff were on hand to facilitate the PUDO operation, there were times when a vehicle near the head of the line exited but the vacated space was not immediately filled. At times, trailing vehicles did not move into the vacated space because children were actively boarding or alighting the vehicles. However, at times vehicles could have proactively moved forward but did not.
- A number of instances were observed where parents remained in the PUDO lane for unusually long periods of time. In the morning, several vehicles were stopped in the PUDO lane for more than five minutes, including one vehicle that remained in the PUDO lane for more than 12 minutes, the latter driver was observed making a phone call while in the PUDO lane.

Should the school increase its enrollment to the current cap (a potential increase of 54 students) some increases in queuing in the PUDO lane would be expected. Extrapolating the current queues to account for the potential increase in students would yield a maximum queue of 12 vehicles during the AM peak hour and 14 vehicles during the PM peak hour, both of which would exceed the available storage capacity. In order to provide a more efficient pick-up/drop-off operation and minimize the queues in the PUDO lane, the school will adopt an Operations Management Plan (OMP) that will build upon its current PUDO protocol. Together, the OMP and TDM plan would reduce queues in the PUDO lane. The OMP is included as part of the overall Transportation Management Plan, which is included in Attachment E.

### Average Vehicle Occupancy

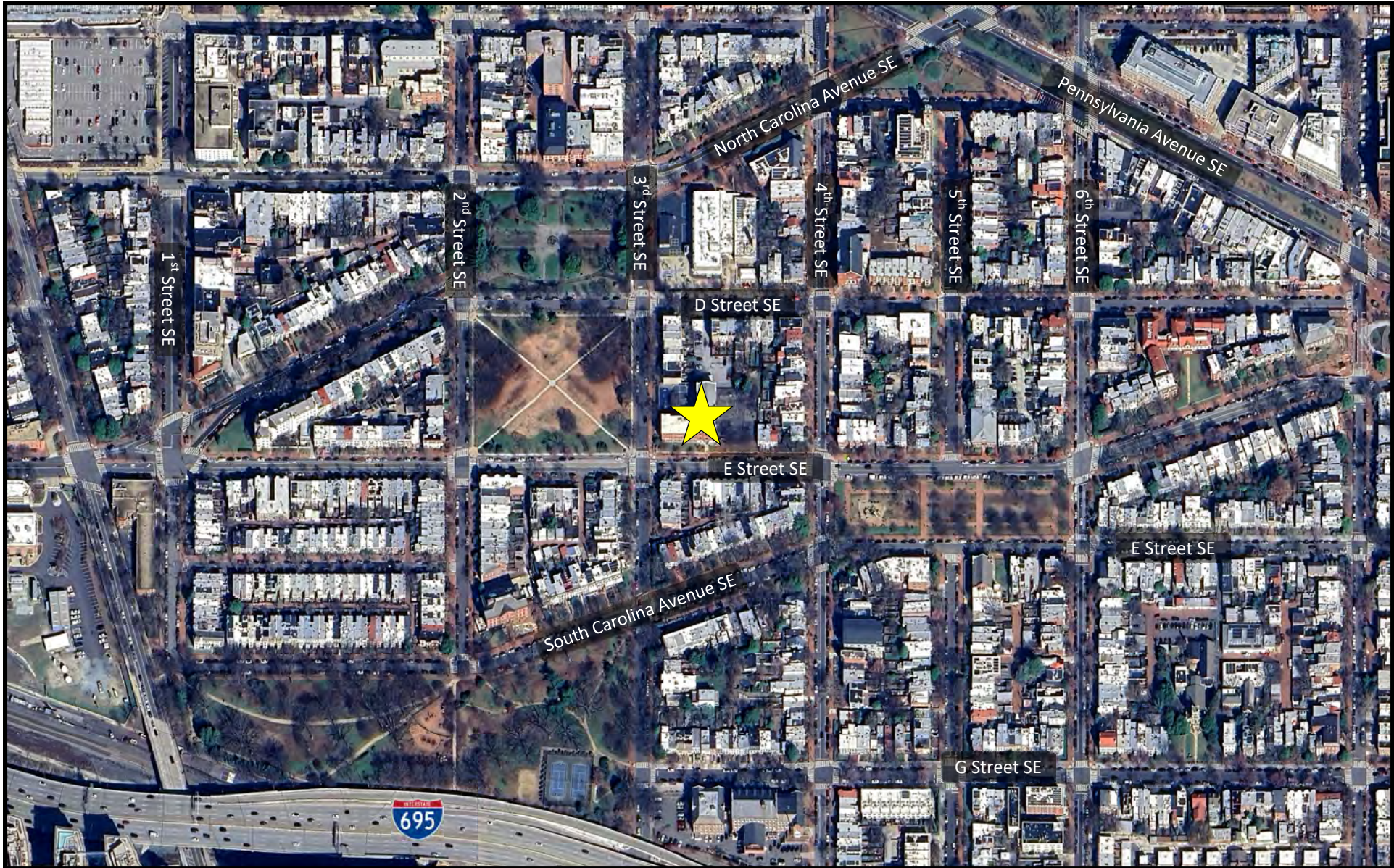
The number of students per vehicle was recorded during the traffic counts conducted on Tuesday, March 11, 2025, during both the morning drop-off period and the afternoon pick-up period to measure the level of carpooling occurring. The average number of students per vehicle in the PUDO lane was 1.38 during the morning drop-off period and 1.27 during the afternoon pick-up period. Details are included in Attachment D.

### CONCLUSIONS AND RECOMMENDATIONS

This memorandum provides an evaluation of the transportation elements of the proposed modification to the St. Peter School approved plan. Below is a summary of the findings of the evaluation.

- St Peter School is not requesting an increase to the existing enrollment cap of 283 students or its faculty/staff cap of 40 employees. Should the school choose to increase its current enrollment of 229 to the current limit of 283 students, the net increase in trips generated would be 38 AM peak hour vehicle trips, 16 PM school peak hour trips, and 10 PM commuter peak hour vehicle trips. An increase in the current faculty/staff count from 34 to 40 employees would result in just one additional AM peak hour vehicle trip and just three additional PM commuter peak hour vehicle trips (and no additional PM school peak hour trips).
- Access to the school will remain unchanged. Pick up and drop off operations will continue to occur on E Street according to the arrival and dismissal plan currently in place.
- The school proposes to install 4 long-term and 14 short-term bicycle parking spaces on campus, exceeding the 2 long-term and 8 short-term spaces required per code.
- The current PUDO lane on E Street has a capacity of approximately 10 vehicles. The maximum observed queue during the afternoon pick-up period was 10 vehicles. At times, vehicles waited in the travel lane to enter the PUDO. The school will implement an Operations Management Plan to improve the efficiency of the PUDO operation and reduce queues. The school is located in a highly walkable area with ample access to transit service located within ½ mile of the school building. Currently 47 percent of students walk to school during the AM peak hour, 70 percent walk during the PM school peak hour, and 43 percent walk during the PM commuter peak hour. Among faculty and staff, 44 percent walk, bike, or take transit.
- The Applicant will implement a TDM Plan to encourage and incentivize non-auto modes of travel.
- Based on the foregoing conclusions and recommendations, the proposed modification is not expected to have any adverse traffic impacts on the surrounding roadway network.

## FIGURES



**Figure 1**  
Site Location

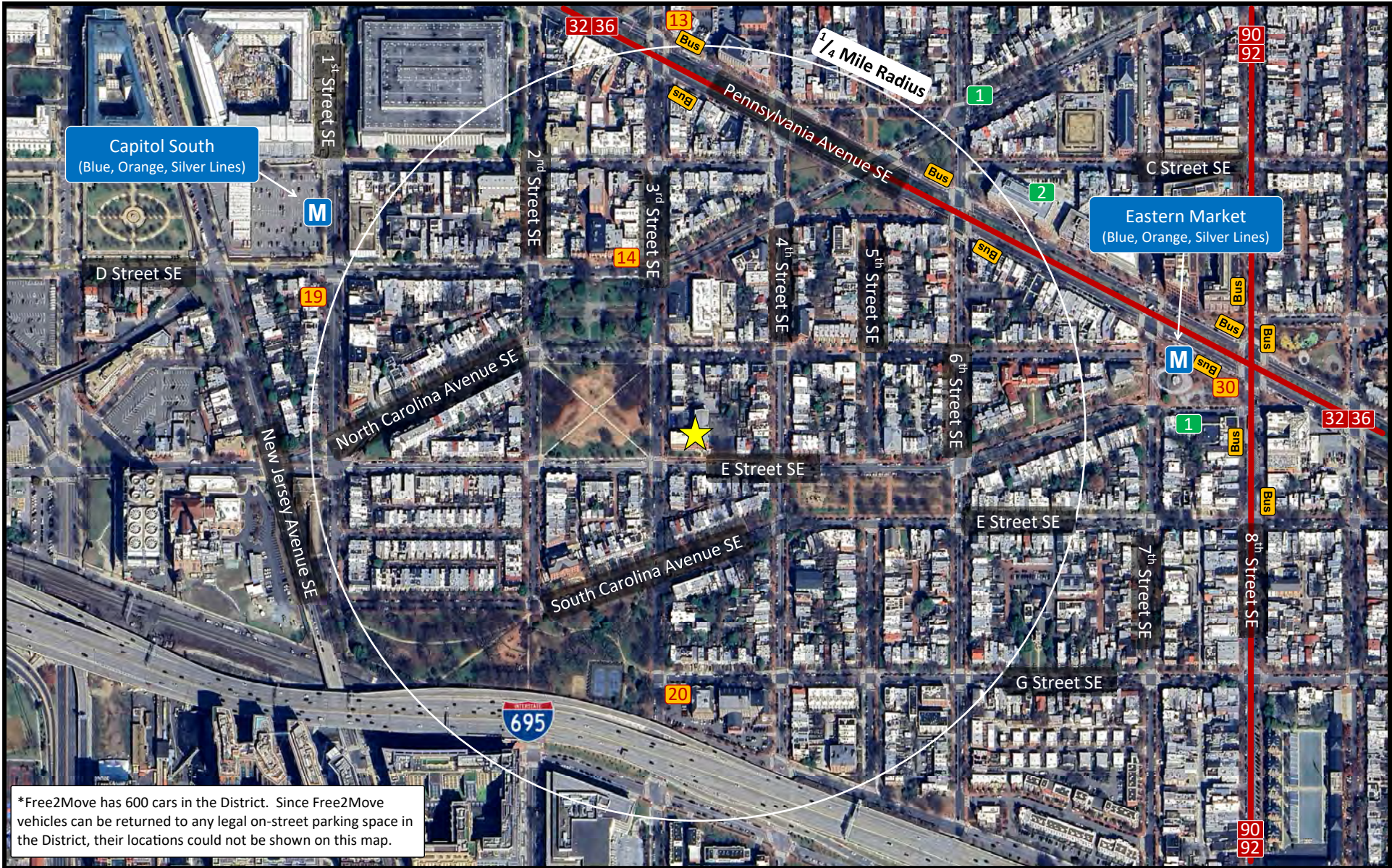


Site



**NORTH**  
422 3<sup>rd</sup> Street SE  
Washington, DC





\*Free2Move has 600 cars in the District. Since Free2Move vehicles can be returned to any legal on-street parking space in the District, their locations could not be shown on this map.

**Figure 2**  
Multi-Modal Transportation Network

-  Site
-  Metro Station
-  Bus Stop
-  Metro Bus Route (Route Number)
-  Capital Bikeshare (Number of Docks)
-  Zipcar (Number of Cars)



**NORTH**  
422 3<sup>rd</sup> Street SE  
Washington, DC



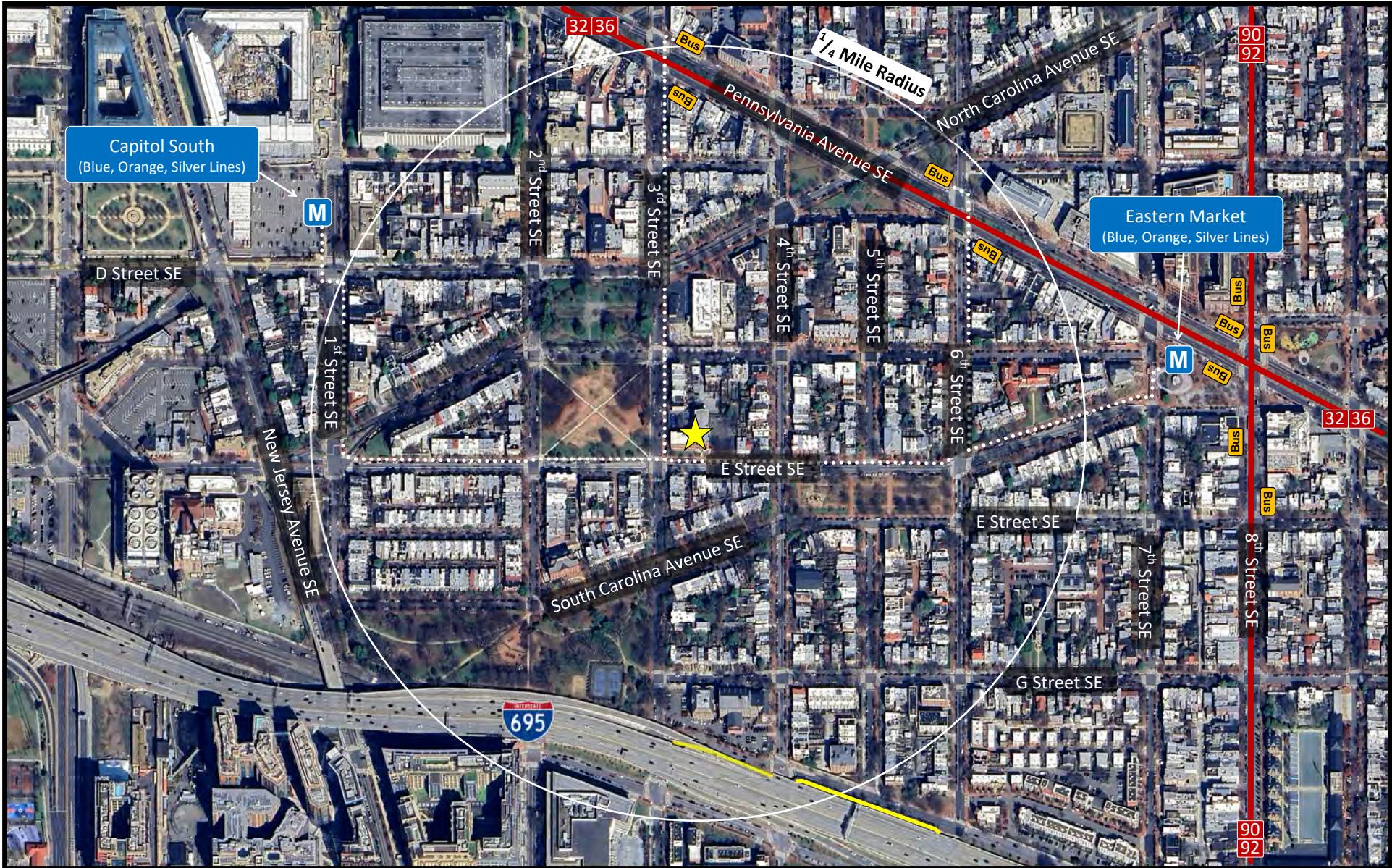


**Figure 3**  
Preliminary Streetscape









**NORTH**  
422 3<sup>rd</sup> Street SE  
Washington, DC





**Figure 4**  
Quarter Mile Walkshed

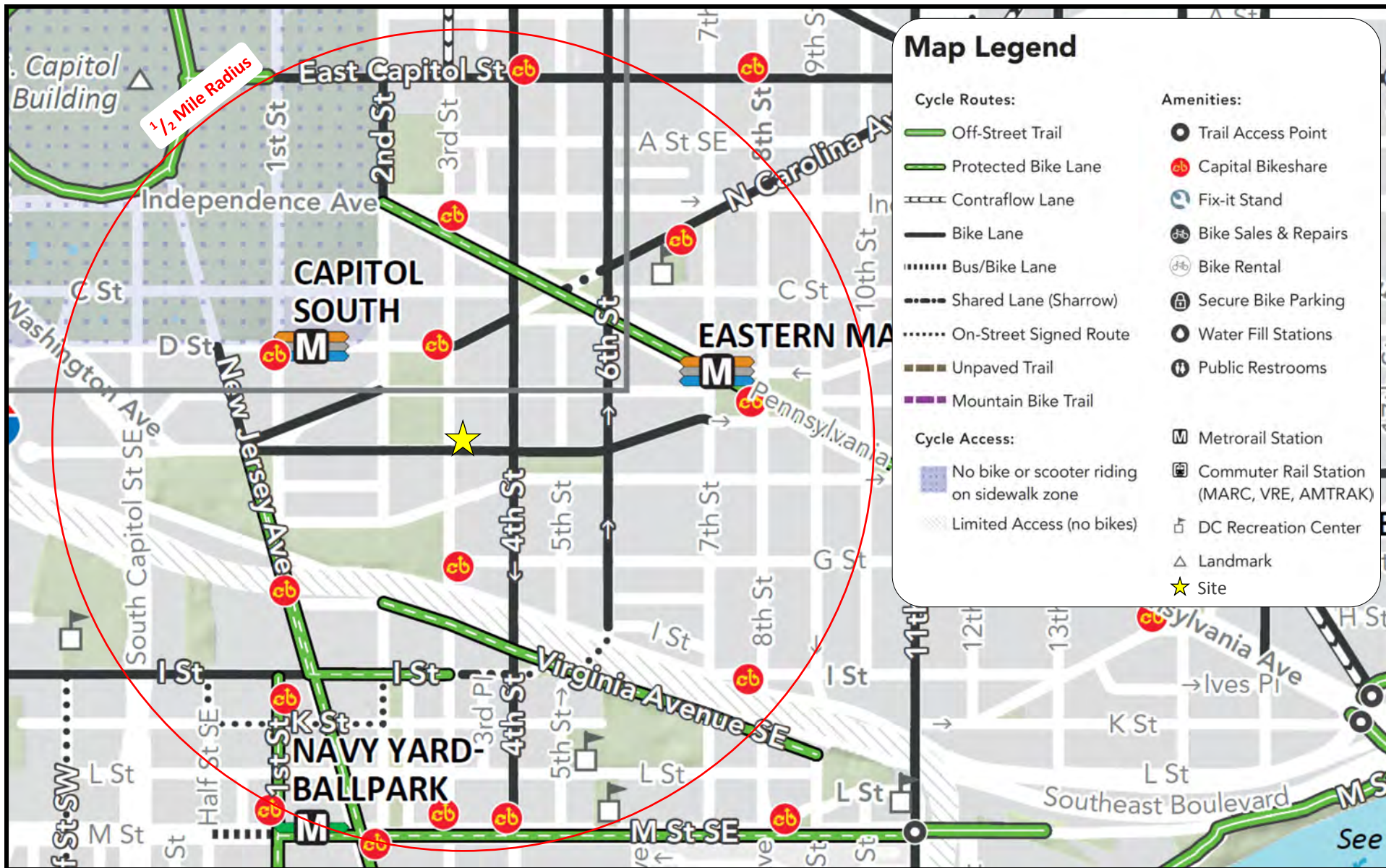
-  Site
-  Metro Station
-  Bus Stop
-  Metro Bus Route (Route Number)

-  Missing Sidewalk
-  Likely Walking Route to/from Transit



**NORTH**

422 3<sup>rd</sup> Street SE  
Washington, DC

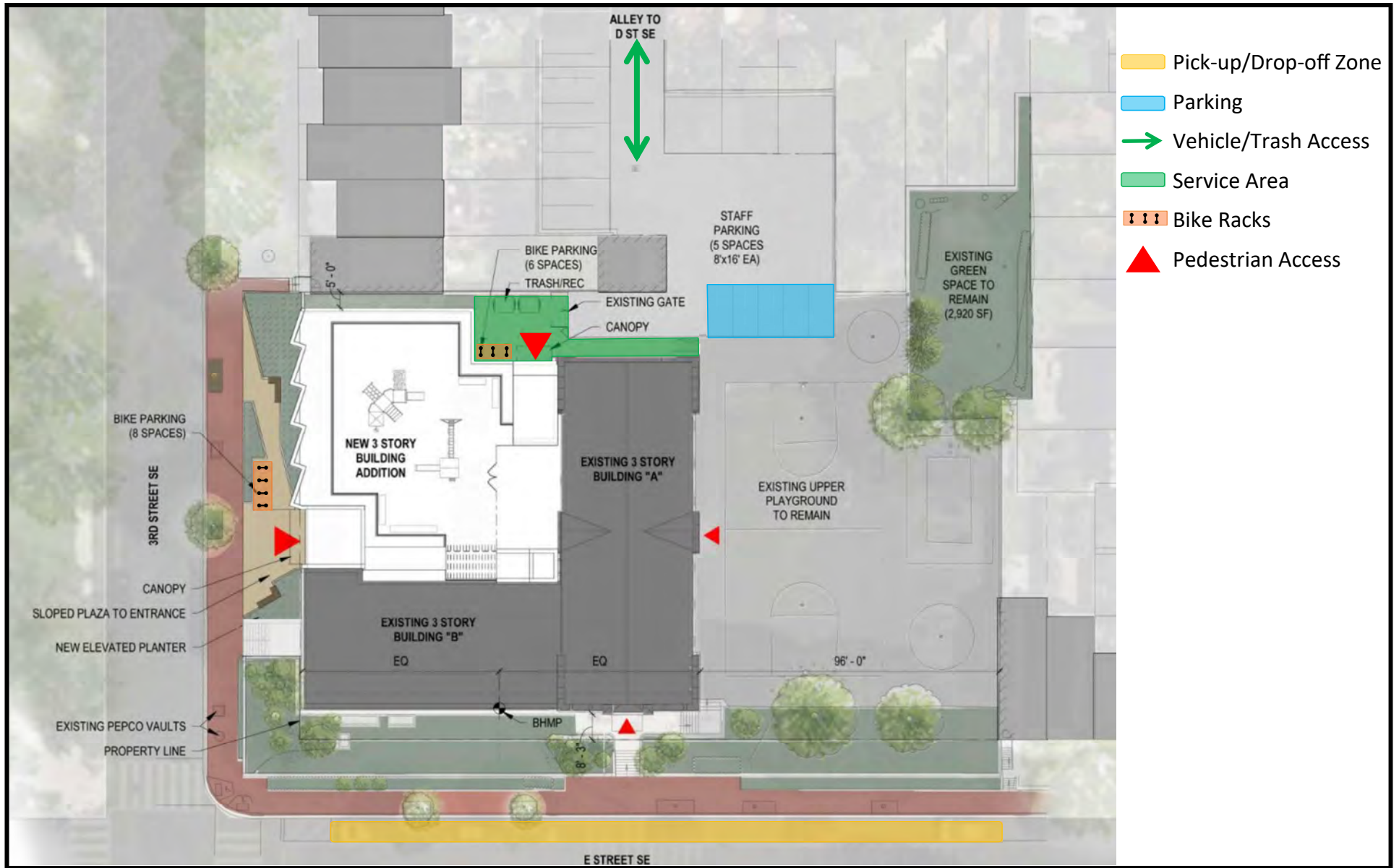


**Figure 5**  
Half Mile Bikeshed



**NORTH**  
422 3<sup>rd</sup> Street SE  
Washington, DC





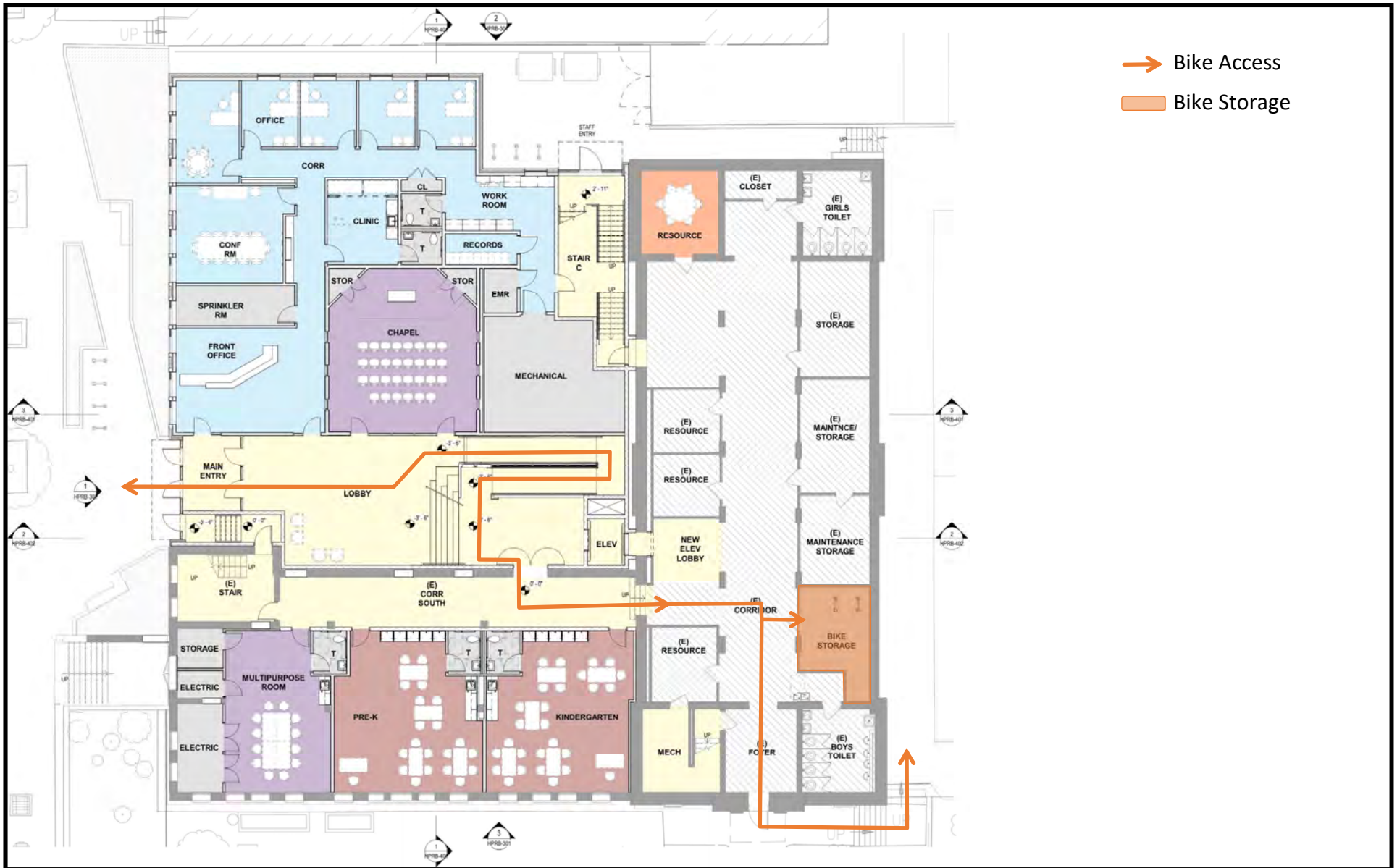
**Figure 6A**  
Site Circulation—Exterior



**NORTH**

422 3<sup>rd</sup> Street SE  
Washington, DC





**Figure 6B**  
Site Circulation—First Floor



**NORTH**  
422 3<sup>rd</sup> Street SE  
Washington, DC



**ATTACHMENT A**  
**DDOT SCOPE DOCUMENT**



## District Department of Transportation (DDOT) Comprehensive Transportation Review (CTR) Scoping Form



The purpose of the Comprehensive Transportation Review (CTR) study is to evaluate potential impacts to the transportation network that can be expected to result from an approved action by the Zoning Commission (ZC), Board of Zoning Adjustment (BZA), Public Space Committee (PSC), a Federal or District agency, or an operational change to the transportation network. The Scoping Form accompanies the *Guidance for Comprehensive Transportation Review* and provides the Applicant an opportunity to propose a scope of work to evaluate the potential transportation impacts of the project.

**Directions:** The *CTR Scoping Form* contains study elements that an Applicant is expected to complete to determine the scope of the analysis. An Applicant should fill out this *Scoping Form* with a proposed scope of analysis commensurate with the requested action and submit to DDOT in Word format for review and concurrence. Accordingly, not all elements and figures identified in the *Scoping Form* are required for every action, and there may be situations where additional analyses and figures may be necessary. The Applicant should fill out as many sections as possible and leave blank any sections that are not relevant to their project. Once a completed *Scoping Form* is submitted, DDOT will provide feedback on the initial proposed scope. DDOT’s turnaround times are four (4) weeks for CTRs with a Traffic Impact Analysis (TIA) and three (3) weeks for all other lower tier studies. After the *Scoping Form* has been finalized and agreed to by DDOT, the Applicant is required to expand upon the elements outlined in this *Form* within the study and comply with all CTR requirements not specifically addressed in this *Form*.

Scoping Information	
Date(s) Scoping Form Submitted to DDOT: 4/4/25	
DDOT Case Manager: Noah Hagen	
Date(s) Scoping Form Comments Returned to Applicant: 5/2/25	
Date Scoping Form Finalized: 5/9/25	
Project Overview	Proposed Development Program
<b>Project Name:</b> St. Peter School Renovation and Addition	<b>Use(s)</b>
<b>Case Type &amp; No. (ZC, BZA, PSC, etc.):</b> BZA	<b>Residential (dwelling units):</b>
<b>Applicant/Developer Name:</b> Saint Peter Catholic Church	<b>Retail (square feet):</b>
<b>Transportation Consultant and Contact Info:</b> Wells + Associates – Jami Milanovich; jlmilanovich@wellsandassociates.com; 202.556.1113	<b>Office (square feet):</b>
<b>Land Use Counsel and Contact Info:</b> Jeff Utz, Goulston & Storrs, JUtz@goulstonstorrs.com	<b>Hotel (rooms):</b>
<b>Site Street Address:</b> 422 3rd Street SE, Washington, DC 20003	<b>Other:</b> Private School - Existing = 26,481 SF of GFA, 229 students, 34 faculty/staff. Proposed = 41,912 SF of GFA, 283 students (current cap), 40 faculty/staff (current cap).
<b>Site Square &amp; Lot:</b> Square 0793, Lot 0025	<b># of Vehicle Parking Spaces:</b> 12 stacked vehicle spaces (4 compliant vehicle spaces)
<b>Current Zoning and/or Overlay District:</b> RF-1/CAP	<b># of Carshare spaces:</b> N/A
<b>Estimated Date of Hearing:</b> November 2025	<b># of Electric Vehicle Stations:</b> N/A
<b>ANC/SMD No. &amp; SMD Commissioner Name:</b> ANC 6B01 – Tyler Wolanin	<b>Bicycle Parking Facilities</b>
<b>OP Small Area Plan (if applicable):</b> Pennsylvania Avenue Southeast Small Area Plan	<b>Long-term / Short-Term spaces:</b> 2 LT and 8 ST proposed

<b>DDOT Livability Study (if applicable):</b> N/A	<b>Showers / Lockers (non-residential):</b> none
<b>Within ½ Mile of Metrorail or ¼ mile of Priority Bus/Streetcar?:</b> The site is located with ¼ mile of Metrobus Route 32 and 36, which are identified as Bus Priority Routes. The site is located within ½ mi of the Capitol South Metro Station and the Eastern Market Metro Station, both of which are served by the Blue, Orange, and Silver lines.	<b>Loading Berths/Spaces:</b> None

**Documents to be Submitted to DDOT:** Any action requiring a CTR or some other evaluation of on-site or off-site transportation facilities must submit one of the following documents to DDOT. It must be appropriately scoped for the specific action proposed and document all relevant site operations and transportation analyses.

- CTR Study** (100 or more total peak hour person trips OR 25 or more peak hour vehicle trips in peak direction, or as deemed necessary by DDOT)
  - TIA Component of CTR Study Triggered** (25 or more peak hour vehicle trips in peak direction, or as deemed necessary by DDOT)
- Transportation Statement** (limited scope based on specifics of project OR if Low Impact Development Exemption from CTR and TIA is requested)
- Standalone TIA** (project proposes a change to roadway capacity, operations, or directionality, has a site access challenge, or as deemed necessary by DDOT)
- Other, specify:** \_\_\_\_\_
- Include PDF of report with appendices, traffic analysis files, and traffic counts in DDOT spreadsheet format (total size of all digital files under 15 MB, if possible)

**Existing Site and Description of Action:** Describe the type(s) of regulatory approval(s) being requested and any background information on the project relevant to the requested action such as the existing uses, amount of vehicle parking, and other notable proposed changes on-site. Also note any other needed regulatory approvals outside of the zoning action discussed in this Form (e.g., Surveyor’s Order for alley closure).

The project is located on a 38,893 SF site generally is bordered by 3<sup>rd</sup> Street on the west, E Street on the south, and rowhouses on the north and east (see Figure 1 for Site Location Map). The site is occupied by a private parochial K-8 school with playgrounds and parking lot. The proposed 14,844 SF, three-story addition will be constructed on the existing lower playground on the western portion of the site. The new structure will house an administration suite, multi-purpose room and gymnasium, elevator for ADA access, expanded lobby, new classrooms, rooftop playground with elevator access, and support service spaces and storage. The current student enrollment is 229 students, and enrollment is capped at 283 students. The school currently employs 34 faculty and staff, including six part time employees. The current faculty/staff cap is 40 employees. No increase in the enrollment or faculty/staff caps are proposed. Vehicular access to the site currently is provided via an existing curb cut on D Street. Parking for the abutting rowhouses also are accessed via the curb cut. Currently, 12 stacked spaces (including 4 compliant spaces) are located on the school’s property. The remaining 19 spaces accessed by the alley are on, and service, abutting properties.


The project will require special exception approval through the BZA due to being a private school in the CAP/RF-1 Zone and for roof structure-related design elements.

**Prior Related Action(s), Conditions, and Commitments:** Note any prior approvals by ZC, BZA, or PSC (e.g., Campus Master Plan, First Stage PUD, student/faculty cap, etc.) for the site and list all relevant conditions and proffers still in effect from the previous approval and status of completion. Attach a copy of the Decision section from the previous Zoning Order if still in effect.

N/A

Section 1: SITE DESIGN		
DDOT reviews the site plan to evaluate consistency with DDOT’s standards, policies, and approach to access as documented in the most recent Design and Engineering Manual (DEM). If the proposal for use of public space is found to be inconsistent with the agency approach, DDOT will note this regardless of its relevance to the action. It is DDOT’s position that issues regarding public space be addressed at the earliest possible opportunity to ensure the highest quality project design and to minimize project delays and the need to re-design a site in the future.		
CATEGORY & GUIDELINES	APPLICANT PROPOSAL	DDOT COMMENTS
<p><b>Site Access and Connectivity</b></p> <p>Show site access points for all modes. Include proposed curb cut locations, curb cuts to be closed, access controls (e.g., right-in/out, signalized), sight distances and sight triangles from access points and new intersections, driveway widths and spacing, on- and off-site parking locations, inter-parcel connections, public/private status of driveways, alleys, and streets, and whether easements, dedications, or ROW closures are proposed.</p> <p><i>See Section 1.1 of the CTR Guidelines for more detailed guidance.</i></p>	<p>The existing parking lot is accessed via a curb cut on D Street. No changes are proposed to the site access/egress. 19 parking spaces for abutting rowhouses also are accessed via the curb cut.</p> <p>Student pick up/drop off occurs on E Street along the property frontage. Students enter the building via the entrance on E Street. During afternoon dismissal, walkers exit via the 3<sup>rd</sup> Street door while the remaining students exit via E Street.</p> <p>General vehicle circulation is shown on Figure 2. More detailed circulation diagrams, including delivery vehicles, bicycle, and pedestrian circulation will be included in the Transportation Statement.</p> <p><input checked="" type="checkbox"/> Scoping Graphic: Project Location Map (See Figure 1)</p> <p><input checked="" type="checkbox"/> Scoping Graphic: Site Circulation Plan (See Figures 2A and 2B)</p> <p><input checked="" type="checkbox"/> Scoping Graphic: Plat for Site’s Square and Lot from Office of the Surveyor (if official plat not available, provide copy from SURDOCS) (See Figure 3)</p>	<p>DDOT 5/2/25: From the site plat, it appears that the connection between D Street and the school is private property. Is there a public access easement or other agreement to allow the rowhouse residents to access their parking spaces?</p> <p>W+A 5/5/25: The alley is on private property owned by the school. While there is not a public access easement, there is a perpetual easement for pedestrian and vehicle ingress and egress, and for utility installation for the adjacent properties.</p> <p>DDOT 5/9/25: DDOT acknowledges.</p>
<p><b>Loading</b></p> <p>Discuss and show the quantity and sizes of loading berths/delivery spaces, trash storage locations, on- and off-site loading locations, turnaround design, nearby commercial loading zones, and anticipated demand, operations, and routing of delivery and trash vehicles. Identify the sizes of trucks anticipated to serve the site and design vehicles to be used in truck turning diagrams. Provide truck turning diagrams in the body of the report not the appendix. Include a Loading Management Plan (LMP) if zoning relief, back-in loading, or curbside loading is proposed.</p> <p><i>See Section 1.2 of the CTR Guidelines for more detailed guidance. A template LMP is provided in Appendix E.</i></p>	<p>Per Subtitle C, §901.7 of ZR 16, “an addition to a historic resource shall be required to provide additional loading berths, loading platforms, and service/delivery spaces only for the addition’s gross floor area and only when the addition results in at least a fifty percent (50%) increase in gross floor area beyond the gross floor area existing on the effective date of this title.” The proposed addition would increase the GFA by 58.3%. However, since the GFA of the addition (15,431 SF) is less than 30,000 SF, no loading is required per §901.1.</p> <p>Most deliveries occur on E Street or 3<sup>rd</sup> Street. Trash is picked up in the parking lot. AutoTURN diagrams will be prepared to determine whether the reconfigured parking lot will be able to accommodate front-in/front-out maneuvers. If not, the Transportation Statement will include a Loading Management Plan. It also will include an estimate of the number of deliveries that occur at both E Street and 3<sup>rd</sup> Street.</p> <p><input checked="" type="checkbox"/> Scoping Graphic: Location of loading area with internal building routing (see Figure 2)</p> <p><input type="checkbox"/> Scoping Graphic: Truck Turning Diagrams (to/from the site, alley, truck routes) To be provided in Transportation Statement.</p>	<p>DDOT concurs.</p>
<p><b>Vehicle Parking</b></p> <p>Identify all off-street parking locations (on- and off-site) and justify the amount of on-site vehicle parking, including a comparison to the number of spaces required by ZR16 and DDOT’s Preferred Maximum rates (Figure 10). Provide parking calculations and parking ratios by land use, including any eligible ZR16 vehicle parking reductions (i.e., within ¼ mile of Priority Bus Route, within ½ mile of Metrorail Station, providing carshare spaces, located within a D zone, etc.). Confirm whether ZR16 TDM Measures will be required per</p>	<p>Per Subtitle C, §901.7 of ZR 16, additions to historic resources shall be required to provide additional parking spaces for an addition only if: (i) the addition increases GFA by at least 50% and (ii) the resulting requirement is at least four spaces. Although the proposed addition will increase the GFA by more than 50%, the school is not proposing any increase in faculty or staff <u>caps</u>. Because the minimum parking requirements for private elementary and middle schools are based on the number of employees, and no increase in the faculty/staff is proposed, no additional parking spaces are required.</p> <p>The current parking area is not striped and is estimated to provide approximately four zoning compliant parking spaces, but the school utilizes stacked parking which allows them to accommodate 12 vehicles. The proposed site plan will reconfigure the parking area which will allow striping for five zoning compliant parking spaces, with additional vehicles accommodated with stacked parking.</p>	<p>DDOT 5/2/25: Include many vehicles will be accommodated on site with stacked parking.</p> <p>In the Transportation Statement, show a comparison between the provided level of parking, ZR16 requirements, and DDOT-preferred parking levels.</p> <p>W+A 5/5/25: The plans are still being refined. The Transportation Statement will include the parking information requested above.</p>

<p>Subtitle C § 707.3 for providing more than double the required amount of parking.</p> <p>See Section 1.3 of the CTR Guidelines for more detailed guidance.</p>	<p><input type="checkbox"/> Scoping Table: Parking Calculations with Comparison to ZR16 and DDOT’s Preferred Maximum Vehicle Parking</p> <p><input type="checkbox"/> Scoping Graphic: Off-Street Parking Locations (both on- and off-site)</p>	<p>DDOT 5/9/25: DDOT acknowledges.</p>												
<p><b>Bicycle Parking</b></p> <p>Identify the locations of proposed bicycle parking and justify the amount of long- and short-term spaces proposed. Provide a calculation of the number of spaces required by ZR16, as well as showers and lockers for non-residential uses, and ensure they are designed appropriately into the project.</p> <p>See Section 1.4 and Appendix F of the CTR Guidelines, and the latest DDOT Bike Parking Guide, for more detailed design guidance.</p>	<p>Per Subtitle C, §802.6 of ZR16, “Additions to historic resources shall be required to provide additional bicycle parking spaces only for the addition’s gross floor area and only when the addition results in at least a fifty percent (50%) increase in gross floor area beyond the gross floor area existing on the effective date of this title.” The proposed expansion will increase the gross floor area by only 58.3%; therefore, additional bicycle parking for the proposed 15,431 SF addition will be provided.</p> <p>Minimum bicycle parking requirements per Subtitle C, Section 802.1 are presented in the table below</p> <table border="1" data-bbox="680 443 1549 602"> <thead> <tr> <th rowspan="2">Component</th> <th colspan="2">Required</th> <th rowspan="2">Long-term</th> <th rowspan="2">Short-term</th> </tr> <tr> <th>Long-Term Spaces</th> <th>Short-Term Spaces</th> </tr> </thead> <tbody> <tr> <td>Education, private school 15,431 SF</td> <td>1 space/7,500 SF = 2 spaces</td> <td>1 space/2,000 SF = 8 spaces</td> <td>≥ 2 spaces</td> <td>8 spaces</td> </tr> </tbody> </table> <p>A graphic depicting the location of the proposed first floor bike storage room will be provided in the transportation statement.</p> <p><input type="checkbox"/> Scoping Graphic: Locations of internal bicycle parking spaces, routing to these spaces, and related support facilities including locker rooms, showers, storage areas, and service repair rooms – figure showing location of existing bicycle parking will be provided in the Transportation Statement</p>	Component	Required		Long-term	Short-term	Long-Term Spaces	Short-Term Spaces	Education, private school 15,431 SF	1 space/7,500 SF = 2 spaces	1 space/2,000 SF = 8 spaces	≥ 2 spaces	8 spaces	<p>DDOT 5/2/25: Is it possible to provide additional bicycle parking, either along 3<sup>rd</sup> or E Streets SE? DDOT understands the applicant is meeting the Zoning requirements for the extension based on Subtitle C, §802.6 of ZR16, but DDOT does not believe four racks will be able to meet the existing or future demand.</p> <p>W+A 5/5/25: We will evaluate the feasibility of providing additional short-term bike racks on 3<sup>rd</sup> or E Streets.</p> <p>DDOT concurs.</p> <p>DDOT 5/2/25: Please ensure bicycle racks abide by the design standards stipulated in the DDOT Bike Parking Guide, meaning: rack must be made of galvanized or stainless steel; rack must be coated with a powdercoat, PVC, or thermoplastic coating; rack must have a locking ring diameter between 1.5” and 2.5”; rack must be securely anchored into the ground, either via surface-mounting or in-ground mounting; rack, if surface-mounted, must have at least one tamper-resistant nut per rack ‘foot’; and, if surface-mounted, rack must not have its anchors arranged along a single axis, leaving the rack vulnerable to a “fulcrum attack”.</p> <p>DDOT recommends the inverted-U style bike rack.</p> <p>W+A 5/5/25: Noted.</p>
Component	Required		Long-term	Short-term										
	Long-Term Spaces	Short-Term Spaces												
Education, private school 15,431 SF	1 space/7,500 SF = 2 spaces	1 space/2,000 SF = 8 spaces	≥ 2 spaces	8 spaces										
<p><b>Streetscape and Public Realm</b></p> <p>Provide a conceptual layout of the streetscape and public realm including at minimum: curb cuts, vaults, sidewalk widths, street trees, grade changes, building projections, short-term bicycle parking, and any existing bus stops. Also provide the permit tracking numbers and PSC hearing date, if known, for any approved public space designs. Note any non-compliant public space elements requiring a DCRA code modification or PSC approval.</p> <p>See Section 1.5 of the CTR Guidelines for more detailed guidance. A summary of public space best practices and DDOT standards are also documented in the DEM, Public Realm Design Manual, and corridor Streetscape Guidelines (if applicable).</p>	<p>In conjunction with the proposed improvements, Streetscape improvements are proposed in the public right-of-way along the 3<sup>rd</sup> Street, including ADA access, short term bicycle storage. Preliminary streetscape is generally shown on Figure 2.</p> <p><input checked="" type="checkbox"/> Scoping Graphic: Preliminary Public Space Concept (see Figures 2)</p>	<p>DDOT 5/2/25: DDOT generally supports the proposed public space upgrades. Along 3<sup>rd</sup> Street NE, consider reducing the length of the raised planter to provide enough pedestrian clear space around the street trees as shown below:</p>												

		 <p>There is an opportunity to add a tree box south of the 3<sup>rd</sup> Street Entry with the entrance shift. Reach out to Jill Keller with UFD (<a href="mailto:jill.keller@dc.gov">jill.keller@dc.gov</a>) to discuss adding a tree box along 3<sup>rd</sup> Street.</p> <p>Tree protection fencing will be required for existing street trees along 3<sup>rd</sup> Street. If any construction is proposed along E Street, tree protection fencing should also be installed.</p> <p>W+A 5/5/25: Noted. The project team will evaluate the suggested changes in connection with other comments we have received from OP and PSRD.</p> <p>DDOT 5/9/25: DDOT acknowledges.</p>
<p><b>Sustainable Transportation Elements</b></p> <p>Identify all sustainable transportation elements, such as electric vehicle (EV) charging stations and carshare spaces proposed to be included in the project. Electrical conduit should be installed in parking garage so that additional EV stations can be provided later. DDOT recommends 1 per 50 vehicle spaces be served by an EV station. Note that District regulations for EV infrastructure is fast evolving and additional requirements may go into effect.</p> <p><i>See Section 1.6 of the CTR Guidelines for more detailed guidance.</i></p>	<p>No EV charging stations are proposed in the existing parking lot.</p>	<p>DDOT concurs.</p>
<p><b>Heritage, Special, and Street Trees</b></p> <p>Heritage Trees are defined as having a circumference of 100 inches or more. They are protected by District law and must be preserved if deemed non-hazardous by Urban Forestry Division (UFD). Special Trees are between 44 inches and 99.99 inches in circumference and may be removed with a permit.</p>	<p>There are no Heritage trees (trees with a diameter greater than 100”) or Special Trees (trees with a diameter between 44-100”) on the site that will be impacted by this project, based on the definitions currently in place. We are aware of the proposed Tree Preservation Enhancement Amendment Act of 2025 (B26-0059) and the changes this legislation may have on the definition of Heritage and Special trees. Our team will monitor compliance with Heritage and Special Trees should B26-0059 become law. Figure 4A shows potential Special Trees impact by the project under the proposed legislation.</p>	<p>DDOT concurs.</p>

<p>Note whether there are existing Heritage Trees on-site or in adjacent public space. The presence of Heritage Trees will impact site design since they may not be cut down. Conduct an inventory of existing and missing street trees within a 2-block radius of the site. Provide a screenshot from UFD’s map of existing and missing street trees.</p> <p><i>See Section 1.7 of the CTR Guidelines for more detailed guidance.</i></p>	<p>One tree on the far west of the property is designated a street tree by DDOT. We will observe DDOT’s permitting and review requirements.</p> <p>See Figure 4B for UFD’s street tree map for trees in public space.</p>	
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**Section 2: MULTI-MODAL TRIP GENERATION**

CATEGORY & GUIDELINES	APPLICANT PROPOSAL	DDOT COMMENTS
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**Mode Split**  
 Provide mode split assumptions with sources and justification. Adjustments to mode split assumptions may be made, as appropriate, if the number of vehicle parking spaces proposed is significantly lower or higher than expected for the context of the neighborhood.

The agreed upon mode split assumptions may not be revised between scoping and CTR submission without amending the scoping form and receiving DDOT concurrence.

*See Section 2.1 of the CTR Guidelines for acceptable data sources and methodologies.*

The student and faculty/staff mode splits are shown below. The student mode split is based on enrollment for 2024-2025 school. The student mode split is based on traffic counts conducted on March 11, 2025. The faculty/staff mode splits are based on information provided by St. Peter School.

Mode	Students			Staff
	7:45 PM – 8:45 AM	2:45 PM – 3:45 PM	5:00 PM – 6:00 PM	
Auto	53%	30%	57%	56%
Walk/Bike	47%	70%	43%	29%
Bus/Metro	0%	0%	0%	12%
Ride Share	0%	0%	0%	3%

*Scoping Table: Mode Split Assumptions by Land Use*

**DDOT 5/2/25:** How were faculty/staff mode splits calculated, and how recently was this data collected?

**W+A 5/5/25:** Faculty/staff mode splits were developed based on an interview with the Head and School and the School’s Director of Communications. Given the small number of faculty/staff, they have personal knowledge of how each faculty/staff member commutes to school.

**DDOT 5/9/25:** DDOT concurs.

**Trip Calculations**  
 Provide site-generated person trip estimates, utilizing the most recent version of ITE *Trip Generation Manual* or another agreed upon methodology such as manual doorway or driveway counts at similar facilities. Estimates must be provided by mode, type of trip, land use, and development phase during weekday AM and PM commuter peaks, Saturday mid-day peak, and daily totals. CTR must also include existing site trip generation based on observed counts. Include estimates for the transit, bicycle, walk, and automobile modes.

The agreed upon trip generation methodology may not be revised between scoping and CTR submission without amending the scoping form and receiving DDOT concurrence. Consult the DDOT Case Manager if site plan, development program, land uses, or density changes significantly.

The current and proposed peak hour trip generation for the school is shown in the following table. Current trip generation was based on counts conducted March 11, 2025. Trip rates per student were calculated based on the current enrollment of 229 students. Proposed peak hour trip generation was calculated by applying the current trips rates to the student cap of 283. With an increase of 54 students to the current cap, the school would generate an estimated 39 additional AM peak hour vehicle trips (20 inbound, 19 outbound), 16 PM school peak hour trips (8 inbound, 8 outbound), and 13 PM commuter peak hour trips (5 inbound, 8 outbound).

Trip Type	AM Peak Hour			PM School Peak Hour			PM Commuter Peak Hour		
	In	Out	Tot	In	Out	Tot	In	Out	Tot
<b>Existing Trip Generation (229 students)</b>									
Total Person Trips	208	0	208	0	101	101	0	84	84
Auto Person Trips	111	0	111	0	31	31	0	48	48
Walk/Bike Person Trips	97	0	97	0	70	70	0	34	34
Transit Trips	0	0	0	0	0	0	0	2	2
<b>Vehicle Trips</b>	84	80	164	32	35	67	22	33	55

**DDOT 5/2/25:** Although faculty trips are not changing based on the trip generation, please split the Existing trip generation into sections specifically for students and then for faculty.

**W+A 5/5/25:** We have projected increases in faculty/staff trips to account for the fact that the current faculty/staff count is 34 and the school has the ability to increase to 40. We have attached separate trip generation tables for faculty/staff and students.

**DDOT 5/9/25:** DDOT concurs

**DDOT 5/2/25:** Is there also a sibling rate that is applied for future student cap trip generation?

**W+A 5/5/25:** The current student-body includes 101 families with one child, 52 families with two

See Section 2.2 of the CTR Guidelines for guidance on auto occupancy rates, acceptable trip reductions, and other methodologies.

Existing Trip Generation Rates									
Total Person Trips	0.91	0.00	0.91	0.00	0.44	0.44	0.00	0.37	0.37
Auto Person Trips	0.48	0.00	0.48	0.00	0.13	0.13	0.00	0.21	0.21
Walk/Bike Person Trips	0.42	0.00	0.42	0.00	0.31	0.31	0.00	0.15	0.15
Transit Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01
Vehicle Trips	0.37	0.35	0.72	0.14	0.15	0.29	0.10	0.14	0.24
Proposed Trip Generation (283 Students)									
Total Person Trips	257	0	257	0	125	125	0	104	104
Auto Person Trips	137	0	137	0	38	38	0	59	59
Walk/Bike Person Trips	120	0	120	0	87	87	0	42	42
Transit Trips	0	0	0	0	0	0	0	3	3
Vehicle Trips	104	99	203	40	43	83	27	41	68
Net Increase in Trips									
Total Person Trips	49	0	49	0	24	24	0	20	20
Auto Person Trips	26	0	26	0	7	7	0	11	11
Walk/Bike Person Trips	23	0	23	0	17	17	0	8	8
Transit Trips	0	0	0	0	0	0	0	1	1
Vehicle Trips	20	19	39	8	8	16	5	8	13

Scoping Table: Multi-Modal Trip Gen Summary (with mode split and applicable reductions, as appropriate)

children, and eight families with three children, which results in an average of 1.42 students per family. For purposes of estimating future trip generation, we have assumed that the average of 1.42 students per family will be maintained.

DDOT 5/9/25: DDOT concurs

DDOT 5/2/25: In reviewing the total person trips (assumed to be strictly students and not faculty/parent drop-off/pickup), should the AM total person trips (208) be closer or equivalent to the existing enrollment (229), with the caveat of student absences?

W+A 5/5/25: The school reported that 209 students were in attendance the day we performed the data collection on which our trip generation estimates were based. Of the 209 students, seven were marked tardy, but two of those who were late arrived within the AM peak hour window. In the afternoon, 133 students left at the 3:15 dismissal, and 76 stayed for aftercare. Our traffic counts accounted for 204 students leaving between 2:30 and 6:00 PM. Therefore, the peak hour trip generation presented herein is aligned with the number of students who attended school on the day that data was collected. The school has indicated that the day counts were conducted is reflective of a typical school day.

DDOT 5/9/25: DDOT concurs

DDOT 5/2/25: The student modal split for transit is 0%, yet two (2) outgoing trips are shown in the table to the left (highlighted in yellow).

W+A 5/5/25: The trip generation table originally provided reflected the combined trips for faculty/staff and students. The transit trips were associated with the faculty/staff trips.

DDOT 5/9/25: DDOT concurs

DDOT 5/2/25: Please verify that the "Vehicle Trips" field (highlighted in yellow in the table to the left) is based on driveway counts and please specify if these counts are only for student drop-offs/pickups (ex. Not including faculty).

W+A 5/5/25: The vehicle trips include the following: (1) vehicles entering/exiting the PUDO lane, (2) vehicles entering/exiting the private

		<p>alley (although outbound trips exiting the alley during the morning peak hour and entering during the afternoon peak hours were assumed to be associated with the abutting rowhomes and were not included), (3) vehicles parking on adjacent streets dropping-off or picking up students, and (4) faculty staff parking on adjacent streets (estimated based on the number of faculty/staff who drive (19) minus those who park in the parking lot (12)).</p> <p><b>DDOT 5/9/25: DDOT concurs</b></p> <p><b>DDOT 5/2/25: The trip generation rates presented indicate that vehicles only enter and do not exit during the AM peak hour (and vice versa during the school and commuter PM peak hours). How are pick-up/drop-off vehicles being captured during this? Wouldn't these vehicles be entering/exiting during all peak hours (and only staff/faculty vehicles entering only during AM and exiting only during PM commuter/peak)?</b></p> <p><b>W+A 5/5/25: The trip generation originally presented included faculty/staff trips as well as student trips. As shown in the new tables, which separate student trips and faculty/staff trips, the inbound and outbound student vehicle trips are nearly identical during each of the peak hours. The minor discrepancies reflect vehicles that entered before the start of the peak hour but exited during the peak hour or vehicles that already were present in the PUDO lane at the start of the peak and exited during the peak hour.</b></p> <p><b>DDOT 5/9/25: DDOT concurs</b></p>
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**Section 3: MULTI-MODAL NETWORK EVALUATION**

A multi-modal network evaluation is required in the CTR or Transportation Statement if the project generates 100 or more total person trips (combined inbound and outbound) OR 25 or more vehicle trips in the peak direction (highest of inbound or outbound) during any peak hour period. Existing site traffic, pass-by, TDM, internal capture or other reductions may not be taken in the calculation to determine if the project meets these thresholds. However, the reductions may be applied in the analysis, as appropriate, if a study is triggered. Multi-modal analyses in this section are required in all CTRs, unless otherwise specified. A Transportation Statement may only require some of the following sections depending on the specifics of the project and zoning action.

Requirement for a CTR may be waived if site is within ½ mile from Metrorail or ¼ mile from Priority Transit, total vehicle parking supply is below the max amount for its distance to transit (see Figure 10), site has a maximum of 100 parking spaces, a Baseline TDM Plan is implemented, site access and loading design are acceptable, an off-site safety or non-auto improvement is constructed, and long-term bike parking requirements are exceeded. Additional criteria may be found in the Low Impact Development Exemption section of the *CTR Guidelines*.

<b>CATEGORY &amp; GUIDELINES</b>	<b>APPLICANT PROPOSAL</b>	<b>DDOT COMMENTS</b>
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<p><b>Strategic Planning Elements</b></p> <p>List any relevant planning efforts and demonstrate how the proposed action is consistent with District-wide planning documents, as well as localized studies. Note in any recommendations from these documents relevant to the development proposal.</p> <p><i>See Section 3.1 of CTR Guidelines for a list of strategic planning documents. Details on additional relevant plans and studies may be provided by the DDOT Case Manager.</i></p>	<p>The following documents will be reviewed and any relevant recommendations from each will be included in the Transportation Statement:</p> <ul style="list-style-type: none"> <li>• Move DC</li> <li>• DDOT Vision Zero Action Plan</li> <li>• DC Comprehensive Plan</li> <li>• Capital Bikeshare Development Plan</li> <li>• WMATA Better Bus Plan</li> <li>• Pennsylvania Avenue SE Corridor Development Plan</li> </ul>	<p><b>DDOT concurs.</b></p>
<p><b>Pedestrian Network</b></p> <p>Evaluate the condition of the existing pedestrian network and forecast the project’s impact. Evaluation must include, at a minimum, critical walking routes, sidewalk widths, network completeness, and whether facilities meet DDOT and ADA standards. Study area will include, at a minimum, all roadway segments and multi-use trails within a ¼ mile radius from the site, with a focus on connectivity to Metrorail, transit stops, schools, and activity centers, and other neighborhood amenities.</p> <p><i>See Section 3.2 of the CTR Guidelines for more detailed guidance.</i></p>	<p>The ¼ mile walk shed will be included in the Transportation Statement.</p> <p><input checked="" type="checkbox"/> <i>Scoping Graphic: Pedestrian Study Area with Walking Routes to Transit, Schools, Activity Centers, and Neighborhood Amenities (See Figure 5 for preliminary pedestrian study area)</i></p>	<p><b>DDOT concurs.</b></p>
<p><b>Bicycle Network</b></p> <p>Evaluate the condition of the existing bicycle network and forecast the project’s impact, including to Capital Bikeshare (CaBi). Evaluation must include, at a minimum, bicycle network completeness, types of facilities, and adequacy of CaBi locations and availability. Study area will include, at a minimum, all roadway segments and multi-use trails within a ½ mile radius from the site, with a focus on connectivity to Metrorail, transit stops, schools, major activity centers, and other bicycle trails or facilities. Look for opportunities to convert traditional bike lanes to protected bike lanes.</p> <p><i>See Section 3.3 of the CTR Guidelines for more detailed guidance.</i></p>	<p>The ½ mile bike shed will be included in the Transportation Statement.</p> <p><input checked="" type="checkbox"/> <i>Scoping Graphic: Bicycle Study Area with Bicycling Routes to Transit, Schools, Activity Centers, and Other Bicycle Facilities and Trails (see Figure 6 for preliminary bicycle study area)</i></p>	<p><b>DDOT concurs.</b></p>
<p><b>Transit Network</b></p> <p>Evaluate, at a minimum, existing transit stop locations, adjacent bus routes and Metro headways, planned transit improvements, and an assessment of existing transit stop conditions (e.g., ADA compliance, bus shelters, benches, wayfinding, etc.). Study area is 1.0 mile for Metrorail stations and ½ mile for Streetcar, Circulator, and buses.</p> <p><i>See Section 3.4 of the CTR Guidelines for more detailed guidance.</i></p>	<p>The Capitol South and Eastern Market Metro Stations, which both serve the Blue, Orange, and Silver lines, are located approximately ⅓ mile from the site. Metrobus routes 32 and 36 run along Pennsylvania Avenue, with stops located within ¼ mile of the site at the 3<sup>rd</sup> Street/Pennsylvania Avenue intersection. Additional routes serving Pennsylvania Avenue with stops within ½ mile of the site include Metrobus Routes 90 and 92.</p> <p><input checked="" type="checkbox"/> <i>Scoping Graphic: Transit Study Area with Adjacent Routes and Stations (see Figure 5)</i></p> <p><input checked="" type="checkbox"/> <i>Scoping Graphic: Screenshots from DDOT Transit Maps Showing Where the Site Falls within Buffers from Metrorail and Priority Transit (see Figure 7)</i></p>	<p><b>DDOT concurs. Updated DDOT comment 5/9/25: Be sure to show the updated WMATA route network to be implemented in July 2025:</b></p> <p><a href="https://www.wmata.com/initiatives/plans/Better-Bus/index.cfm">https://www.wmata.com/initiatives/plans/Better-Bus/index.cfm</a></p>

<p><b>Safety Analysis</b></p> <p>Qualitatively evaluate safety conditions at intersections and along blocks within the vehicle study area using professional expertise. This might identify geometric design issues, missing critical signage or restrictions, or unforeseen pedestrian desire lines, for example. Perform a review of DDOT Vision Action Plan. Note whether any study intersections have been identified by DDOT as high crash locations, if any safety studies have been previously conducted, and discuss the recommendations.</p> <p><i>See Section 3.5 of the CTR Guidelines for more detailed guidance.</i></p>	<p>DDOT’s Vision Zero Action Plan will be reviewed. Any high crash locations (as identified by DDOT) within a 2-block radius of the site will be noted.</p>	<p>DDOT concurs.</p>
<p><b>Curbside Management</b></p> <p>Propose a preliminary curbside management plan that is consistent with current DDOT policies and practices. Curbside signage / restrictions reset with new development and the Applicant is responsible for installing meters if required. The curbside management plan must delineate existing and proposed on-street parking designations/restrictions, including but not limited to pick-up/drop-off zones, loading zones, multi-space meters, RPP, and net change in number of on-street spaces as a result of the proposal.</p> <p><i>See Section 3.6 of the CTR Guidelines for more detailed guidance.</i></p>	<p>No changes to curbside use along 3<sup>rd</sup> Street or E Street are proposed.</p> <p><input type="checkbox"/> <i>Scoping Graphic: Existing Curbside Designations (minimum 2 block radius of site)</i></p>	<p>DDOT 5/2/25: Be sure to include a graphic of curbside management in the Transportation Statement.</p> <p>W+A 5/5/25: Noted.</p>
<p><b>Pick-Up and Drop-Off Plan</b></p> <p>Required for all new and existing schools and daycares with 20 or more students. May also be required for churches, hotels, or any other use expected to have significant pick-up/drop-off operations, as necessary. The plan will identify pick-up/drop-off locations and demonstrate adequate circulation so that the flow of bicycles and vehicles on adjacent street is not impeded and queueing does not occur through the pedestrian realm.</p> <p><i>See Section 3.6.4 of the CTR Guidelines for more detailed guidance.</i></p>	<p>The PUDO plan will be included in the Transportation Statement. Existing PUDO queues will be extrapolated based on the project increase in students. The PUDO plan will demonstrate how PUDO queues will be accommodated.</p>	<p>DDOT 5/2/25: The PUDO plan should include a discussion of any current PUDO issues (does E Street support current operations sufficiently? Is there double parking? Etc.) and how they will be mitigated.</p> <p>W+A 5/5/25: Noted</p> <p>As part of the PUDO plan, the applicant should implement daylighting at 3<sup>rd</sup> &amp; E and 4<sup>th</sup> &amp; E using pavement markings and flexposts to prevent vehicles from stopping within the crosswalk and intersection setback during PUDO.</p> <p>W+A 5/5/25: Noted.</p>
<p><b>On-Street Parking Occupancy Study</b></p> <p>This analysis is required if relief from 5 or more on-site vehicle parking spaces is being requested. It may also be required as part of a zoning or permitting case if DDOT has concerns about site-generated vehicles parking in adjacent residential neighborhoods.</p> <p><i>See Section 3.6.5 of the CTR Guidelines for more detailed guidance on study periods and analysis requirements.</i></p>	<p>N/A</p> <p><input type="checkbox"/> <i>Scoping Graphic: Study Area and Block Faces</i></p>	<p>DDOT concurs. N/A</p>

<p><b>Parking Garage/Drive-Thru Queuing Analysis</b></p> <p>If site contains 150 or more vehicle parking spaces AND direct access to a public street OR site contains a drive-thru, evaluate on-site vehicle queueing demand and provide analysis demonstrating parking entrance/ramps or drive aisle can properly process vehicles without queuing onto public streets.</p> <p><i>See Section 1.3.4 of CTR Guidelines for more detailed guidance.</i></p>		DDOT concurs. N/A
<p><b>Motorcoaches</b></p> <p>Propose methodology for data collection and analysis. Describe and show the parking locations, anticipated demand, existing areas on- and off-site for loading and unloading (and desired loading times restrictions, if any), and potential routes to and from designated truck routes. If on-street motorcoach parking is proposed, a plan for installation of signage and meters is required, subject to DDOT approval. This section is typically only required for uses that generate significant tourist activity (hotels, museums, cruises, concerts, etc.).</p> <p><i>See Section 3.7 of the CTR Guidelines for more detailed guidance.</i></p>	N/A	DDOT concurs. N/A
<p><b>Section 4: TRAFFIC IMPACT ANALYSIS (TIA)</b></p>		
<p>The TIA component of a CTR is required when a development generates 25 or more vehicle trips in the peak direction (higher of either inbound or outbound vehicles) during any of the critical peak hour periods, after mode split is applied. Existing site traffic, pass-by, TDM, internal capture or other reductions may not be applied when calculating whether a TIA is required. However, trip reductions may be used in the multi-modal trip generation summary and assignment of trips within the TIA, as appropriate and agreed to by DDOT. A standalone TIA may also be required if the project proposes a change to roadway capacity, operations, or directionality; has a site access challenge; or as otherwise deemed necessary by DDOT.</p>		
CATEGORY & GUIDELINES	APPLICANT PROPOSAL	DDOT COMMENTS
<p><b>TIA Study Area and Data Collection</b></p> <p>Identify study intersections commensurate with the impact of the proposed project and the travel demand it will generate. Study area must include all major signalized and unsignalized intersections, intersections expected to realize large numbers of new traffic, and intersections that may experience changing traffic patterns.</p> <p><i>See Sections 4.1 and 4.2 of the CTR Guidelines for more detailed guidance on study intersection selection and TMC count periods.</i></p>	<p>N/A</p> <p><input type="checkbox"/> <i>Scoping Graphic: Proposed Study Intersections</i></p> <p><input type="checkbox"/> <i>Will provide hard copies of TMCs in CTR appendix and electronic copies in DDOT spreadsheet format at time of submission.</i></p>	DDOT concurs. N/A
<p><b>TIA Study Scenarios</b></p> <p>Propose an appropriate set of scenarios to analyze. These commonly include Existing, Background (No Build), Total Future, and Future with Mitigation. Note the anticipated build-out year and project phasing.</p> <p><i>See Section 4.3 of CTR Guidelines for guidance on study scenarios.</i></p>	N/A	DDOT concurs. N/A

<p><b>TIA Methodology</b></p> <p>Propose an appropriate methodology for the capacity analysis including the type of software program to be used. Per DEM 38.3.5.1, HCM methodology will be used to determine Level of Service (LOS), v/c, and vehicle queue lengths. LOS must be reported by intersection approach and v/c by lane group. DDOT prefers Synchro 9 or newer software for capacity and queueing analyses.</p> <p><i>See Section 4.4 of the CTR Guidelines for more detailed guidance. DDOT's required standard Synchro and SimTraffic inputs/settings are provided in Appendix H.</i></p>	<p>N/A</p> <p><input type="checkbox"/> Will provide copies of Synchro, SimTraffic, and other analysis software printouts in study appendix and electronic copies of analysis files at time of CTR submission.</p>	<p>DDOT concurs. N/A</p>
<p><b>Transportation Network Improvements</b></p> <p>List and map all roadway, transit, bicycle, and pedestrian projects funded by DDOT or WMATA, or proffered by others, in the vicinity of the study area and expected to open for public use prior to the proposal's anticipated build-out year. Review the STIP, CLRP, and proffers/commitments for other nearby developments.</p> <p><i>See Section 4.5 of the CTR Guidelines for more detailed guidance.</i></p>	<p>N/A</p> <p><input type="checkbox"/> Scoping Graphic: Locations of Background Transportation Network Improvements and Anticipated Completion Years</p>	<p>DDOT concurs. N/A</p>
<p><b>Background Development / Local Growth</b></p> <p>List and map developments to be analyzed as local background growth. This will include known matter-of-right and zoning-approved developments within ¼ mile of site and others more than ¼ mile from site if their traffic is distributed through study intersections. Document the portions of developments anticipated to open by the projected build-out year.</p> <p><i>See Section 4.6.1 of the CTR Guidelines for more detailed guidance.</i></p>	<p>N/A</p> <p><input type="checkbox"/> Scoping Graphic: Background Development Projects Near Study Area</p> <p><input type="checkbox"/> Scoping Table: Completion Amounts/Portions Occupied of Background Developments</p>	<p>DDOT concurs. N/A</p>
<p><b>Regional Traffic Growth</b></p> <p>Propose a methodology to account for growth in regional travel demand passing through the study area. An appropriate methodology could include reviewing historic AADT traffic counts, MWCOG model growth rates, data from other planning studies, or recently conducted nearby CTRs. These sources should only be used as a guide.</p> <p>Generally, maximum annually compounding growth rates of 0.5% in peak direction and 2.0% in non-peak direction are acceptable. Adjustments to the rates may be necessary depending on the amount of traffic assumed from local background developments or if there were recent changes to the transportation network.</p> <p><i>See Section 4.6.2 of the CTR Guidelines for more detailed guidance.</i></p>	<p>N/A</p> <p><input type="checkbox"/> Scoping Table and Graphic: Projected Regional Growth Assumptions (dependent on methodology), Show Growth rates by Road, Direction, and Time of Day</p>	<p>DDOT concurs. N/A</p>

<p><b>Trip Distribution</b></p> <p>Provide sources and justification for proposed percentage distribution of site-generated trips. Additionally, document proposed pass-by distributions and the re-routing of existing or future vehicles based on any changes to the transportation network. Percentage distributions must be shown turning at intersections throughout the transportation network and at site driveways and garage entrances to ensure appropriate routing assumptions.</p> <p>The agreed upon trip distribution methodology may not be revised between scoping and CTR submission without amending this scoping form and receiving concurrence by DDOT Case Manager.</p> <p><i>See Section 4.7 of the CTR Guidelines for more detailed guidance.</i></p>	<p>N/A</p> <p><input type="checkbox"/> <i>Scoping Graphic(s): Percentage Distribution by Land Use, Direction, Time of Day (must be shown turning at intersections and driveways)</i></p>	<p>DDOT concurs. N/A</p>
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**Section 5: MITIGATION**

The completed CTR must detail all proposed mitigations. The purpose of discussing mitigation at the scoping stage is to highlight DDOT’s Significant Impact Policy, DDOT’s approach to mitigation, and to give the Applicant an opportunity to gain initial feedback on potential mitigations that are under consideration. Any mitigation strategies discussed and included in the *Scoping Form* are considered non-binding until formally evaluated in the study and committed to in documentation submitted as part of the case record.

CATEGORY & GUIDELINES	APPLICANT PROPOSAL	DDOT COMMENTS
<p><b>DDOT Significant Impact Policy</b></p> <p>DDOT has two primary impact mitigation tests for development projects: 1) off-street vehicle parking supply, and 2) capacity impacts at intersections.</p> <p><i>See Section 5.1 of the CTR Guidelines for detailed policies and metrics for each of the two impact tests.</i></p>	<p><input checked="" type="checkbox"/> <i>The Applicant acknowledges DDOT's Significant Impact Policy in Section 5.1 of the CTR Guidelines.</i></p> <p><input checked="" type="checkbox"/> <i>The study will comply with all other policies in the CTR Guidelines not explicitly documented in the Applicant Proposal or DDOT Comments columns.</i></p> <p><input checked="" type="checkbox"/> <i>The study will include all of the required graphics, tables, and deliverables for the relevant sections determined during scoping, as shown in Figure 7 of the CTR Guidelines.</i></p>	<p>DDOT acknowledges.</p>
<p><b>DDOT's Approach to Mitigation</b></p> <p>DDOT's approach to mitigation prioritizes (in order of preference) optimal site design, reducing vehicle parking, implementing TDM strategies, making non-automotive network improvements, and making a monetary contribution to DDOT's Mitigation Fund for non-auto improvements, before considering options that increase roadway capacity or alter roadway operations.</p> <p><i>See Section 5.2 and Figure 18 of the CTR Guidelines for more detailed guidance on mitigation selection.</i></p>	<p><input checked="" type="checkbox"/> <i>The Applicant acknowledges DDOT's approach to mitigation in Section 5.2 of the CTR Guidelines.</i></p>	<p>DDOT acknowledges.</p>
<p><b>Transportation Demand Management (TDM)</b></p> <p>A TDM Plan is typically required to offset site-generated impacts to the transportation network or in situations where a site provides more parking than DDOT determines is practical for the use and surrounding context. Document all existing TDM strategies being implemented on-site (even outside of a formal TDM Plan) and those being proposed and committed to by the Applicant. Elements of the TDM Plan included in CTR must be broken down by land use and user.</p> <p><i>See Section 5.3 of the CTR Guidelines for more detailed guidance. Sample TDM plans by land use and tier can be found in Appendix C.</i></p>	<p><input checked="" type="checkbox"/> <i>The study will include at least a Baseline TDM Plan. The TDM plan will increase to depending on the parking supply and other impacts identified in the study.</i></p>	<p>DDOT acknowledges.</p>
<p><b>Performance Monitoring Plan (PMP)</b></p> <p>DDOT may require a PMP in situations where anticipated vehicle trips are large in magnitude, unpredictable, or necessitate a vehicle trip cap. Typically, this is required for campus plans, schools, or large developments expected to have a significant amount of single occupancy vehicle trips. Document any existing performance monitoring Plans in effect and any proposed changes.</p> <p><i>See Section 5.4 of the CTR Guidelines for more detailed guidance. Sample PMPs can be found in Appendix D.</i></p>	<p>N/A</p>	<p>DDOT concurs. N/A</p>

<p><b>Roadway Operational and Geometric Changes</b></p> <p>Describe all proposed roadway operational and geometric changes in CTR with supporting analysis and warrants in the study appendix. Detail must be provided on any ROW implications of proposed mitigations. Note any preliminary ideas being considered.</p> <p><i>See Section 5.7 of the CTR Guidelines for more detailed guidance.</i></p>	<p>N/A</p>	<p>DDOT concurs. N/A</p>
<p><b>Section 6: ADDITIONAL TOPICS FOR DISCUSSION DURING SCOPING</b></p>		
<p><b>CATEGORY &amp; GUIDELINES</b></p>	<p><b>APPLICANT PROPOSAL</b></p>	<p><b>DDOT COMMENTS</b></p>
<p><b>ANC Discussions and Feedback</b></p> <p>Provide an update on the status of Community Benefits Agreement (CBA), any on-going ANC discussions/meetings, and any concerns expressed by the community. DDOT can provide ideas and a feasibility check for transportation items to be included in the CBA.</p>	<p>The Applicant anticipates reaching out to the SMD Commissioner in the coming weeks to confirm the schedule with the ANC. We anticipate presenting the HPRB application to ANC 6B at its meeting on May 13<sup>th</sup> and subsequent meetings with the ANC regarding the BZA application to be filed in the future.</p>	<p>DDOT acknowledges.</p>
<p><b>Miscellaneous Items for Discussion</b></p> <p>Any relevant on-going conversations with DOEE, SHPO, DMPED, GSA, NPS, neighboring jurisdictions, Historic Preservation, etc.?</p> <p>Seeking direction on other types of analyses such as traffic calming, TOPP, TMP, IMR/IJR, etc.?</p> <p>Anything unusual proposed not covered under other sections, such as air-rights, right-of-way actions, removal from Highway Plan, removal of BRLs, or construction under or close to a bridge?</p>		

**ATTACHMENT B**  
**ZONING ADMINISTRATOR'S RULING**

## Dettman, Shane

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**From:** Vitale, Elisa (DOB) <elisa.vitale@dc.gov>  
**Sent:** Wednesday, August 20, 2025 3:16 PM  
**To:** Dettman, Shane; DOB Kustomer CRM  
**Cc:** Utz, Jeffrey  
**Subject:** RE: Request for Confirmation | St. Peter School | Various Zoning Items  
**Attachments:** St\_Peter\_ZA\_Confirmation\_Info.pdf

Good afternoon Shane, hope you and your family are well.

As we discussed during our March 28, 2025 meeting the St. Peter School (“SPS”) is proposing a renovation and expansion project (the “Project”) at 422 3<sup>rd</sup> Street SE (Square 793, Lot 25) (the “Property”). The attached diagrams, plans, architectural drawings and renderings and other related information were reviewed during the meeting (the “Drawings”).

The Property is an irregularly shaped lot with approximately 38,802 square feet of land area and has frontage on E Street SE on the south, 3<sup>rd</sup> Street on the west, and a narrow pipestem of frontage along D Street on the north. The northern portion of the Property is encumbered by a perpetual utility and access (vehicular and pedestrian) easement that benefits the neighboring properties that abut said easement. The location of the easement is shown on **Sheet 2** of the Drawings. The Property is located in the RF-1/CAP zone and is within the Capitol Hill Historic District.

SPS currently operates under a Certificate of Occupancy (CO168303) that was issued on June 27, 2008, for a private school with a maximum of 283 students and 40 faculty and staff. The current certificate of occupancy was issued for a change of ownership, and is the only record available on DOB eRecords. A copy of the current Certificate of Occupancy and associated application form are included on **Sheet 3** of the Drawings. Since SPS predates the DC Zoning Regulations, there is no record of any Zoning Commission or Board of Zoning Adjustment (“BZA”) reviews for a private school on the Property.

### Existing Improvements on the Property

Existing improvements on the Property include the school building located in the southwest corner of the Property, which is comprised of the original structure built in ~1867, approximately mid-block along E Street SE, and a later addition constructed in ~1936 that is located at the corner of E and 3<sup>rd</sup> Streets SE. Overall, the existing school building contains approximately 26,481 square feet of gross floor area (“GFA”). Photos of the existing school building are included on **Sheets 4 and 5** of the Drawings. The existing school building is a contributing structure to the Capitol Hill Historic District, and thus a “historic resource” as defined under the 2016 Zoning Regulations (“ZR16”). To the east of the school building is a large open space / play field (“Upper Play Area”), and to the north of the 1936 building addition is a smaller paved play area (“Lower Play Area”). A modest sized paved parking area is located to the north of the large play field. The parking area is currently unstriped but is estimated to accommodate five (5) zoning compliant parking spaces. To the north of the parking area is a paved access drive that leads to D Street SE.

### Proposed Project

As shown on **Sheets 6 – 11** of the Drawings, the proposed addition to the existing school building will be located directly north of the school building’s 1936 addition, on the location of the current Lower Play Area. The Project will add approximately 15,431 GFA to the existing school building on three stories. As shown in the Drawings, the first floor of the addition will include a new main school lobby that is accessed from 3<sup>rd</sup> Street. The lobby will provide ADA access to the building from 3<sup>rd</sup> Street and lead to an interior elevator that will provide ADA access to all levels of the

building, which are currently not accessible. The first floor will also include a new school front office, clinic, administrative office space, records storage, and mechanical space. A new, double-height gymnasium/multi-purpose room will occupy the large majority of the second floor of the addition. The remainder of the second and third floors will contain new restrooms, storage, smaller breakout / resource rooms, and a pantry. A new outdoor play area is proposed at the roof level of the proposed addition, which will include play equipment and movable seating. The play area will be enclosed with fencing that is approximately 10-feet in height. Additionally, the roof level of the proposed addition will contain an enclosed mechanical yard, an elevator lobby and override, and two rooftop egress stair towers. Although the Project will increase the overall GFA of the school, SPS is not proposing any increases in the maximum number of students and faculty / staff beyond what is authorized under the current Certificate of Occupancy.

## **Determination Requests**

### **1. Location of Building Height Measuring Point (“BHMP”) and assignment of yards for purposes of zoning**

As shown on **Sheet 2** of the Drawings, the Property is a corner lot fronting on three streets. The proposed addition is subject to the rules of measurement for building height in residential zones (B-308). Under those rules, the BHMP for the Project shall be established at the adjacent natural or finished grade, whichever is the lower in elevation, at the mid-point of the building façade of the principal building that is closest to a street lot line (B-308.2), and the height of a building with a flat roof shall be measured from the BHMP to the highest point of the roof excluding parapets and balustrades not exceeding four feet (B-308.3). Furthermore, per B-308.7, where a building fronts on more than one street, “any front may be used to determine street frontage; but the basis for measuring the height of the building shall be established by the street selected as the front of the building.”

Based on the above, the BHMP for the Project can be located at the top of the existing raised berm at the midpoint of the school’s façade along E Street, and that the height of the proposed addition shall be measured from this BHMP on E Street to the highest point of the roof and may exclude the parapet, provided the parapet does not exceed 4 feet in height.

Regarding the assignment of yards, the 3<sup>rd</sup> Street frontage of the school building may be treated as the “front” for purposes of zoning, and thus the required rear yard shall be measured along the east side of the school building for the full width of the Property. The open spaces on the north and south sides of the expanded school building shall be considered side yards and the proposed side yard along the north side of the proposed addition shall have a minimum depth of five (5) feet that runs the full depth of the structure.

**The BHMP for the Project may be located at the elevation of the existing raised berm at the midpoint of the building façade along E Street. The 3<sup>rd</sup> Street frontage of the school building may be considered the “front” for purposes of zoning, thus making the east façade of the school building the “rear,” and the north and south facades of the school building the “sides” for purposes of assigning and measuring yards.**

### **2. Roof egress stair setback and enclosing walls**

As shown on **Sheet 12** of the Drawings, the Project contains a rooftop egress stair tower on the west side of the addition, just north of the school’s 1936 addition, and a second rooftop egress stair tower on the north side of the addition, just west of the school’s original 1867 building. The two proposed rooftop egress stair towers are contained in separate enclosures. As shown in the renderings on **Sheet 12** of the Drawings, the two proposed rooftop egress stair towers have walls of unequal height that support roofs that slope away from the edge of the roof upon which they sit.

**Per C-1504.1(a) the western rooftop egress stair tower must be setback 1:1 because it is located along a front building wall. Per C-1504.1(c)(1), the northern rooftop egress stair tower must also be setback 1:1 because it is located along a side building wall that is not located on a property line. Per C-1503.4(d) rooftop egress stairs are not required to have enclosing walls of a single uniform height.**

### 3. Calculation of minimum parking requirement

As stated above, SPS was established and has continually operated on the Property since 1867, and thus predates the DC Zoning Regulations, which were first established in 1920. The school was later expanded in 1936. The Zoning Regulations in effect at that time did not contain minimum parking requirements, which were first established with the adoption of the 1958 Zoning Regulations (“ZR58”).

Under the current ZR16, the minimum parking requirement for a use falling within the “Education, Private (Elementary School)” use category is 2 for each 3 teachers and other employees, which is generally the same minimum requirement at the time ZR58 was adopted (which was “2 for each three teachers and other employees except custodial personnel”). Per C-709.4, the number of teachers or employees shall be computed on the basis of “the greatest number of persons to be employed at any one period during the day or night, including persons having both full-time and part-time employment.”

During our meeting, we discussed how to calculate the minimum parking requirement for the proposed Project, considering parking credits available to the school since the existing improvements predate the DC Zoning Regulations, and the provisions under ZR16 regarding parking for additions to historic resources. Regarding parking credits, based upon the current minimum parking requirement for a private school, and the maximum 40 faculty/staff permitted under the school’s current Certificate of Occupancy, the minimum parking requirement for the school would be 27 spaces ( $40 \text{ faculty/staff} / 3 = 13.333 \times 2 = 26.666$ ). As stated above, it is estimated that SPS provides approximately five zoning-compliant parking spaces in the paved parking area located to the north of the Upper Play Area (shown on **Sheet 13** of the Drawings), thus generating a parking credit of 22 spaces (27 spaces – 5 spaces).

Per C-704.2, “additions to historic resources shall be required to provide additional parking spaces for an addition only if: (a) The addition results in at least a fifty percent (50%) increase in gross floor area beyond the gross floor area existing on the effective date of this title; and (b) The resulting requirement is at least four (4) parking spaces.” As stated above, the Project will increase the school’s GFA from approximately 26,481 square feet to 41,912 square feet, or by 58.3%, but SPS is not intending to increase the maximum 40 faculty / staff permitted under the current Certificate of Occupancy. As such, while the proposed addition will increase the school’s overall GFA by more than 50%, the resulting parking requirement will not increase because no changes are being proposed to the maximum permitted number of faculty / staff.

As noted above and shown on **Sheet 13** of the Drawings, the paved parking area on the Property is estimated to provide at least five zoning compliant parking spaces. As a result of the Project, the parking area will be properly striped to provide a minimum of five zoning compliant parking spaces, which is the minimum number of required parking spaces SPS must provide after considering the allowable parking credit of 22 spaces. At which time, the Property will be deemed to provide a total of 27 parking spaces (5 legal spaces and 22 “credits” for parking spaces).

**The Project will maintain the five parking spaces that currently exist in the parking area and that constitute the minimum parking requirement for the Project after considering the 22 available parking credits, albeit now the five parking spaces will fully comply with all applicable location, size, and layout requirements under Subtitle C, Chapter 7. The Property will be deemed to provide 27 parking spaces – 5 actual spaces and 22 “credit” parking spaces.**

### 4. Calculation of minimum loading requirement

Similar to the above discussion on parking, the existing school was established and expanded prior to the DC Zoning Regulations containing minimum loading requirements. As such, the school does not currently contain any onsite loading facilities (berths, delivery spaces, or loading platforms).

As previously stated, the Project will increase the school’s overall GFA from approximately 26,481 square feet to approximately 41,912 square feet, or by approximately 58.3%. Pursuant to C-901.1, the minimum loading

requirement for an “Education” use with 30,000 – 100,000 GFA is 1 loading berth and 1 delivery space. However, per C-901.7, an addition to a historic resource shall be required to provide additional loading berths, loading platforms, and service/delivery spaces only for the addition’s GFA and only when the addition results in at least a fifty percent (50%) increase in gross floor area beyond the gross floor area existing on the effective date of this title. In this instance, while the Project will increase the school’s overall GFA by over 50%, the size of the proposed addition itself (approximately 15,431 GFA) is not enough to trigger additional loading under C-901.7.

**No additional loading would be required because while the proposed addition will increase the school’s GFA by over 50%, ZR16 currently only requires required loading for an addition to a historic resource to be based upon the GFA of the addition, and the GFA of the proposed addition is well below the 30,000 GFA threshold to trigger a loading requirement for an Education use.**

#### 5. Calculation of pervious surface requirement

Pursuant to E- 211.1, the minimum pervious surface requirement for lots larger than 2,000 square feet is 20%. Per C-501.2, for a property containing a historic resource, “the minimum pervious surface requirement shall be applicable only in conjunction with the following: ...(d) an addition to a historic resource that increases the existing lot occupancy at the time of building permit application by twenty-five percent (25%) or more.”

ZR16 does not provide any guidance on how the increase in lot occupancy shall be measured for purposes of C-501.2. During our meeting, we discussed that for purposes of C-501.2 an increase in lot occupancy is intended to be measured using an absolute approach, in part because the standard under the provision is “increases in lot occupancy,” which is measured as a percentage, and not increases in building area, which is a measured in square feet. In this case, the school has an existing percent lot occupancy of approximately 23.6%, and after construction of the Project the school will have a percent lot occupancy of approximately 39.2%. Using an absolute approach, the Project would increase lot occupancy by approximately 15.6% ( $39.2\% - 23.6\% = 15.6\%$ ), and thus would not trigger pervious surface requirements. In contrast, using a relative approach, the Project would appear to increase lot occupancy by approximately 66.1% ( $15.6\% / 23.6\% = 66.1\%$ ), and thus would trigger pervious surface requirements. To demonstrate how the relative approach is not the appropriate way to determine pervious surface applicability, it was noted that the Project will only add approximately 6,070 square feet of building area (i.e. the proposed addition will only occupy an addition 6,070 square feet of the lot), which equates to a lot occupancy of approximately 15.6%.

**The “absolute approach” is a reasonable method for determining an increase in lot occupancy for purposes of C-501.2. Using this approach, the Project would increase lot occupancy by approximately 15.6% and would not trigger a pervious surface requirement.**

#### 6. Measurement of elevator override height from top of existing school roof

Pursuant to E-402.1, the maximum permitted height of a penthouse or roof structure on the school is 10 feet and one story. As shown on **Sheet 14** of the Drawings, the Project includes an elevator that is centrally located at the point where the 1867 and 1936 portions of the school building come together. The proposed elevator extends to the roof to provide access to the rooftop play area. Given its location on the proposed addition’s roof, the elevator and associated override also abut the roofs of the 1867 and 1936 portions of the school building, which both differ in height compared to the height of the proposed addition. Specifically, as shown on **Sheet 14** of the Drawings, the height of the proposed elevator override is approximately 14’-10” above the structural roof of the proposed addition, approximately 11’-10” above the structural roof of the 1936 portion of the school building, and approximately 9’-7” above the structural roof of the 1867 portion of the school building.

The zoning regulations do not provide any guidance on how the height of a penthouse or roof structure shall be measured; however, C-1500 speaks to the height of a penthouse or rooftop structure in relation to the roof upon which it sits. When measured from the roof of the proposed addition the elevator and associated override measure approximately 14’-10” in height, which exceeds the 10-foot and one story maximum permitted height in E-402.1.

**The proposed elevator and associated override exceed the maximum permitted height in E402.1 and require special exception relief pursuant to C-1506.1.**

7. Height and setback of rooftop play space enclosing screens

We also discussed the height and setback of the enclosing screens for the proposed rooftop play space. The proposed enclosing screens are shown on **Sheet 15** of the Drawings. As currently proposed, the screens have a maximum height of 10 feet and are set back 1:1 from the edge of the structural roof upon which they sit along 3<sup>rd</sup> Street, and are set back approximately 5 feet along the northern side building walls of the addition.

**The proposed enclosing screens would be considered roof structures for purposes of zoning and thus are permitted a maximum height of 10 feet and must comply with the 1:1 setback requirement under C-1504, unless they fall into one of the setback exemptions set forth in C-1504.2 – C-1504.4.**

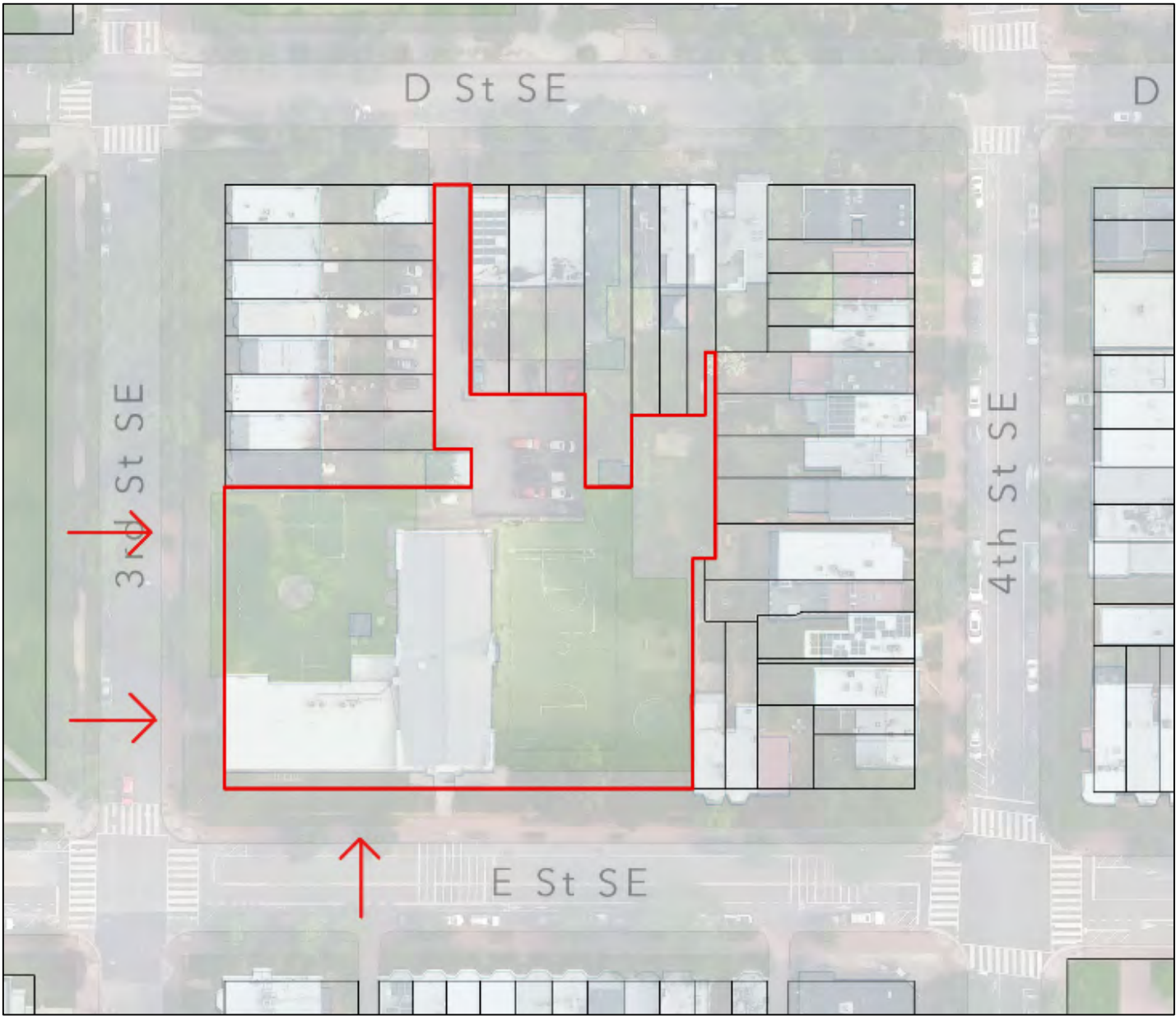
I apologize for the delay in responding to this request. Please feel free to reach out should you have any additional questions related to the Project.

Thank you, Elisa

**DISCLAIMER:** This email is issued in reliance upon, and therefore limited to, the questions asked, and the documents submitted in support of the request for a determination. The determinations reached in this email are made based on the information supplied, and the laws, regulations, and policy in effect as of the date of this email. Changes in the applicable laws, regulations, or policy, or new information or evidence, may result in a different determination. This email is **NOT** a “final writing”, as used in Section Y-302.5 of the Zoning Regulations (Title 11 of the District of Columbia Municipal Regulations), nor a final decision of the Zoning Administrator that may be appealed under Section Y-302.1 of the Zoning Regulations, but instead is an advisory statement of how the Zoning Administrator would rule on an application if reviewed as of the date of this email based on the information submitted for the Zoning Administrator’s review. Therefore this email does **NOT** vest an application for zoning or other DOB approval process (including any vesting provisions established under the Zoning Regulations unless specified otherwise therein), which may only occur as part of the review of an application submitted to DOB.

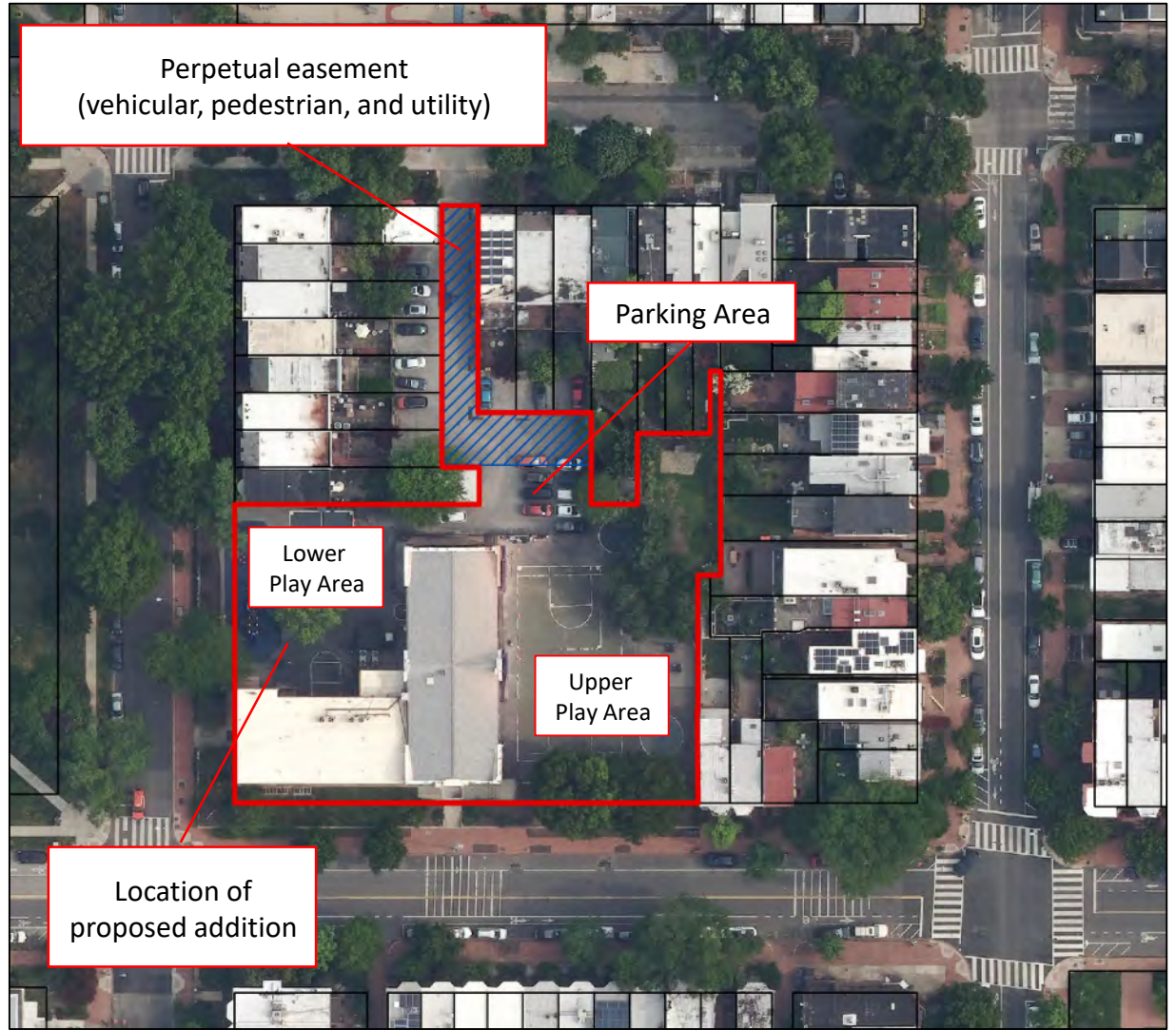
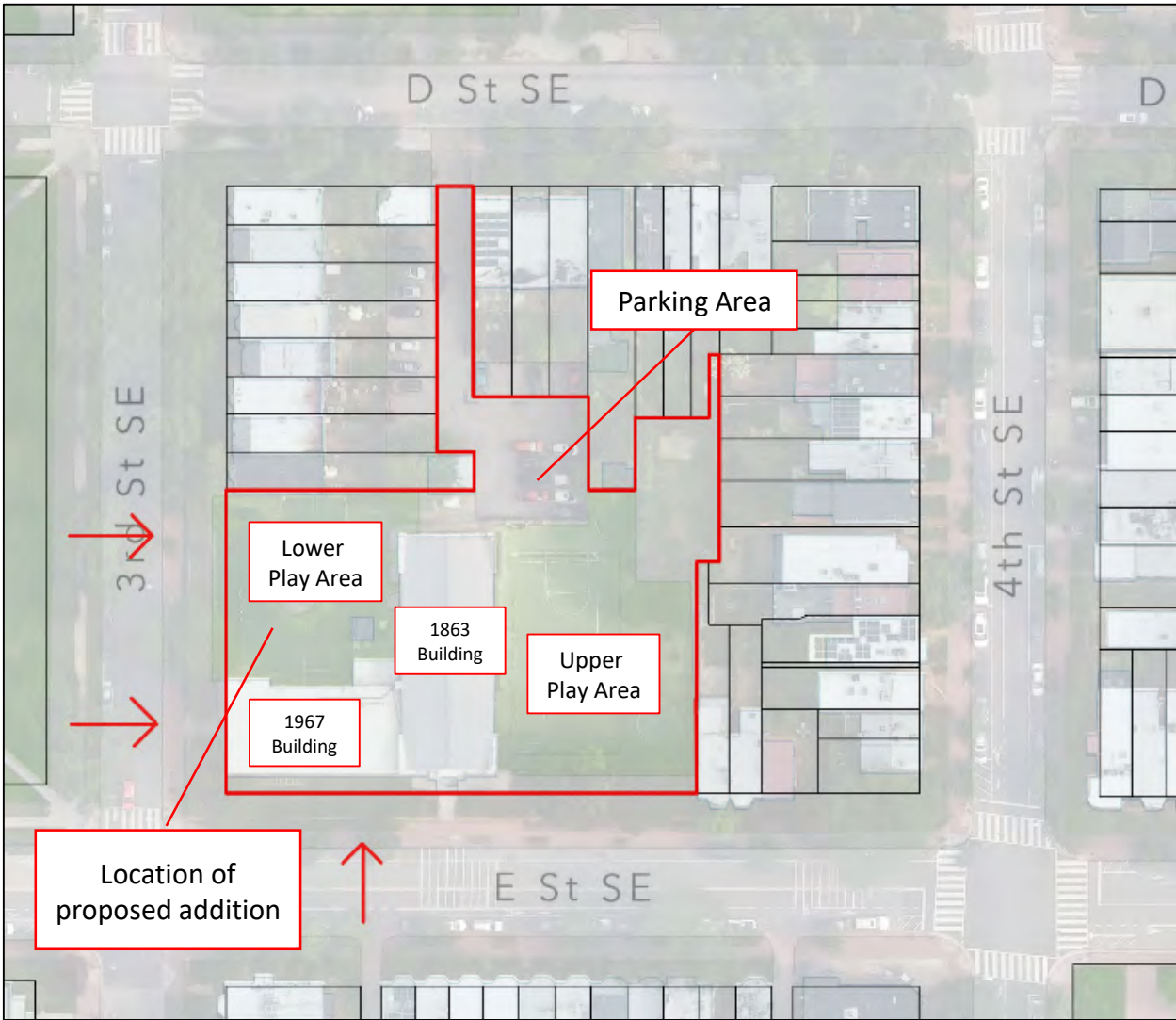
**Elisa Vitale, AICP** | Deputy Zoning Administrator  
The Department of Buildings  
[elisa.vitale@dc.gov](mailto:elisa.vitale@dc.gov) | 1100 4th St SW, DC 20024  
main: 202.671.3500 | cell: 202.286.5899  
[dob.dc.gov](http://dob.dc.gov)





Subject Property:  
422 3<sup>rd</sup> Street SE (Square 0793 Lot 0025)

- Land area: 38,802 square feet
- Zoning: RF-1/CAP
- Capitol Hill Historic District (Contributing)
- Existing GFA: approx. 26,481 square feet (1874 + 1936 structures)
- Current Cert. of Occupancy (issued for change of owner)
  - Private school for 283 students and 40 faculty/staff
- No prior BZA reviews for private school



**C of O**

**CERTIFICATE OF OCCUPANCY**

PERMIT NO. **CO 168303** THIS PERMIT IS VALID ONLY FOR THE PREMISES OF THE PROJECT ADDRESS DATE: **6/27/2008**

ADDRESS: **422 3RD ST SE** FLOOR(S): **1ST, 2ND, 3RD FLR** PRCLID: (square) **049** WARD: **049** ZONE: **049**

PERMISSION IS HEREBY GRANTED TO: CORPORATION: **THE ROMAN CATHOLIC ARCHDIOCESE OF WASHINGTON** TRADING AS: **THE ARCHBISHOP OF WASHINGTON** ID No.:

APPROVED USES: **PRIVATE SCHOOL** PREVIOUS USES: **PRIVATE SCHOOL**

TYPE: **CHANGE OF OWNERSHIP** OZA NO.: OCCUPIED SQ. FOOTAGE: **28,440** OSCUR. LOAD: **283** EXPIRATION DATE: **NONE**

DESCRIPTION OF USE: **ST. PETERS INTERPARSHISH SCHOOL - 283 STUDENTS, 40 STAFF** FEE: **\$169.00**

THIS CERTIFICATE SHALL BE POSTER CONSPICUOUSLY ON THE ABOVE PREMISES AT ALL TIMES. IT IS VALID INDEFINITELY, UNLESS AN EXPIRATION DATE IS LISTED, VALID ONLY FOR THE PREMISES AT THE ABOVE ADDRESS OR PART THEREOF, AND IS NOT TRANSFERABLE TO ANOTHER PERSON OR PREMISES UNDER ANY CONDITIONS. ANY CHANGE IN THE TYPE OF BUSINESS, OWNERSHIP OF BUSINESS, OR PART OF PREMISES USED THEREOF, WILL RENDER THIS CERTIFICATE VOID AND A NEW CERTIFICATE MUST BE OBTAINED.

Director: *Linda K. Argo* PERMIT CLERK: **PAMELA THORNTON** *[Signature]*

*Approved  
 PG 6/27/08*

DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS  
 BUILDING AND LAND REGULATION ADMINISTRATION  
 APPLICATION FOR CERTIFICATE OF OCCUPANCY  
 Date: **6/27/08** Receipt No: **00280389**  
 Application Fee \$33.00 Non Refundable Certificate Fee 1.5 Based on square footage **168303** Cashier's No: **NCA24**

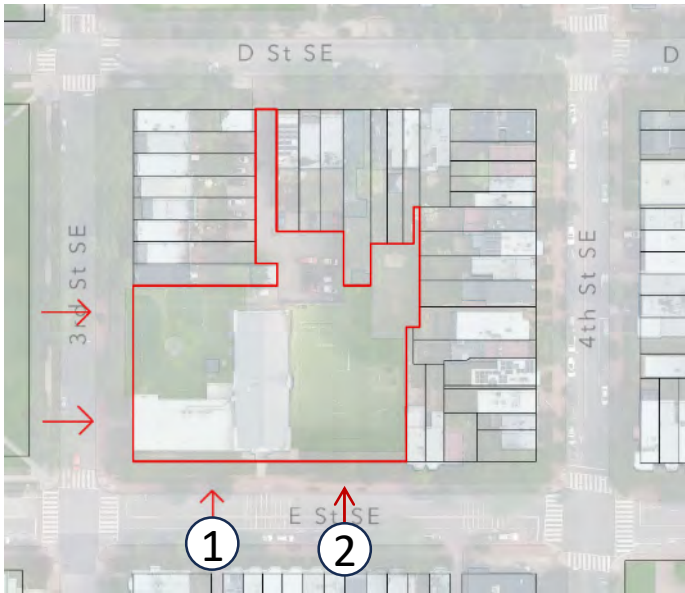
1 Premise Address: **422 3rd St, SE** Suite/Room No:  
 2 Business Telephone No: Fax No: Lot: **25** Square: **793**  
 3 Trade Name of Business: **Archbishop of Washington**  
 4 Is Business Incorporated? Y/N: Partnership? Y/N: Sole Proprietor? Y/N: New/Existing:  
 5 Corporate Name: **The Roman Catholic Archdiocese of Washington, a corporate sole, and his successors in office**  
 6 President: Vice President: Secretary:  
 7 Sole Proprietor: **The Roman Catholic Arch bishop of Washington**  
 8 Business Owner's Mailing Address: **5001 Eastern Ave Hyattsville MD 20872** phone # (day/ama) **301 853 4521**

8.  Ownership Change  Partial Occupancy  New Bldg.  Use change  Load Change  B 2 A No  
 10. Proposed Use of Premises: **School - Private**  
 11. Prior Use of Premises: **School Private**  
 12. Proposed Occupancy Load: **283 Students/40 Staff** Square Feet Occupied: **28440**  
 13. Floors to be Occupied: **All 1st, 2nd, 3rd** Basement?  Yes  No  
 14. Is this Business Sexually Oriented according to the DC Zoning Regulations?  Yes  No

15. Building Owner: **The Roman Catholic Arch bishop of Washington, a corporate sole, and his successors in office** Telephone No: **301 853 4521**  
 16. Building Owner's Address: **5001 Eastern Ave Hyattsville MD 20872**  
 17. Square feet: **28440** Number of floors: **3** Basement: **Yes NO SF**

I certify that all of the statements on this application are true to the best of my knowledge and belief. I agree to comply with all applicable laws and regulations of the District of Columbia.  
 18. Owner of Business: \_\_\_\_\_ Date: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 If Authorized Agent for owner of Business (Attach Authorization):  
 19. Agent's Name: **David Fontana** *[Signature]* Date: **5/12/08**  
 Print Clearly: \_\_\_\_\_ Signature: \_\_\_\_\_  
 20. Agent's Address: **10505 Judicial Dr., #200 Fairfax, VA 22030-5157**

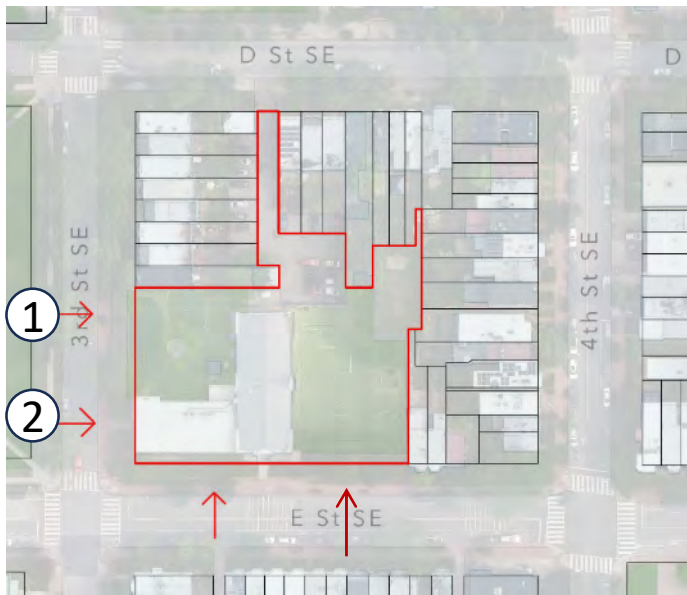
*0028053*



1) E Street – south facades of 1867 and 1936 portions of existing school building



2) E Street – Upper Play Area



**1) 3<sup>rd</sup> Street – Lower Play Area (Location of proposed addition)**



**2) 3<sup>rd</sup> Street – west façade of 1936 portion of existing school building**

**SITE & ZONING INFORMATION**

**TOTAL LOT AREA:**

MIN REQUIRED: 4,000 SF  
 EXISTING: 38,802 SF

**GROSS FLOOR AREA:**

EXISTING TOTAL: 26,481 SF  
 PROPOSED ADDITION: 15,431 SF  
 PROPOSED TOTAL: 41,912 SF

**LOT OCCUPANCY:**

MAX ALLOWABLE: 15,521 SF, 40%  
 EXISTING: 9,145 SF, 23.6%  
 PROPOSED: 15,215 SF, 39.2%

**PERVIOUS AREA:**

EXISTING: 5,100 SF, 13.14%  
 PROPOSED: 5,954 SF, 15.34%

**BUILDING HEIGHT:**

ALLOWABLE: 35'-0"  
 PROPOSED: 35'-0"

**ROOFTOP STRUCTURE HEIGHT:**

ALLOWABLE: 10'-0" ABOVE ROOF STRUCTURE  
 PROPOSED:  
 STAIRS: 10'-0" ABOVE NEW ROOF STRUCTURE

ROOF PLAY AREA ENCLOSURE:  
 10'-0" ABOVE NEW ROOF STRUCTURE  
 (3'-6" PLANTER + 6'-6" FENCE)

ELEVATOR: 14'-10" ABOVE NEW ROOF  
 11'-10" ABOVE BLDG B ROOF  
 5'-10" ABOVE BLDG A ROOF

**SETBACKS:**

FRONT YARD  
 MIN REQUIRED: 0'  
 PROPOSED: 0' (ALIGN W/ NEIGHBORS)  
 SIDEYARD:  
 MIN REQUIRED: 5'  
 PROPOSED: 5'  
 REAR YARD:  
 MIN REQUIRED: 20'  
 PROPOSED: 97' (NO CHANGE)

**PARKING:**

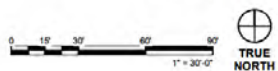
EXISTING: 4 (DUE TO PARKING CREDITS)  
 PROPOSED: 5

**LOADING:**

PROPOSED ADDITION IS GREATER THAN 50% GFA,  
 BUT LESS THAN 30,000 SF,  
 THEREFORE, NO LOADING REQUIRED.

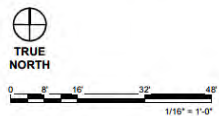
**BICYCLE STORAGE:**

REQUIRED: 2 LONG TERM, 8 SHORT TERM  
 PROPOSED: 2 LONG TERM (INSIDE BUILDING)  
 8 SHORT TERM (IN PUBLIC SPACE)  
 6 SHORT TERM (ON SITE)



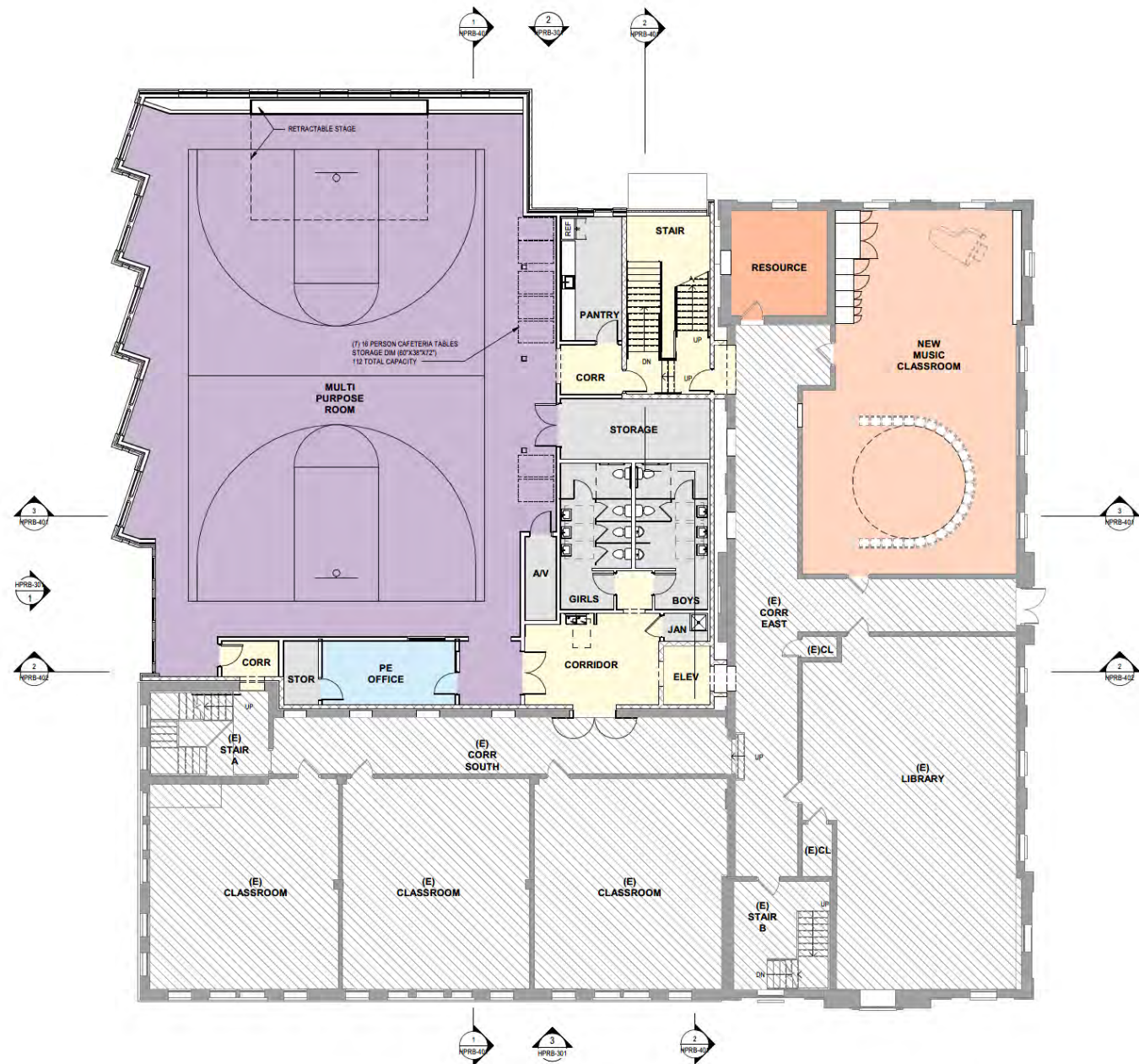
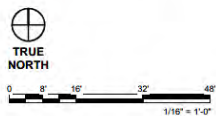
**SPACE LEGEND**

- ADMINISTRATION
- CIRCULATION
- GENERAL LEARNING AREA
- MULTI-PURPOSE
- RESOURCE ROOM
- SUPPORT ROOM



**SPACE LEGEND**

- ADMINISTRATION
- CIRCULATION
- GENERAL LEARNING AREA
- INSTRUCTIONAL LIBRARY
- MULTI-PURPOSE
- RESOURCE ROOM
- SUPPORT ROOM

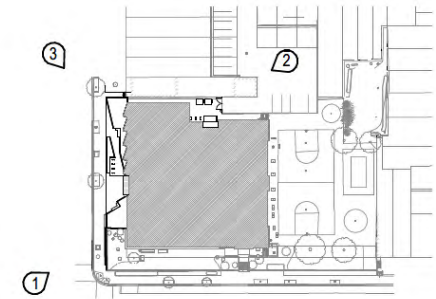








1. PROPOSED WEST FACADE LOOKING FROM THE CORNER OF 3RD AND E STREET SE



KEY - SITE PLAN



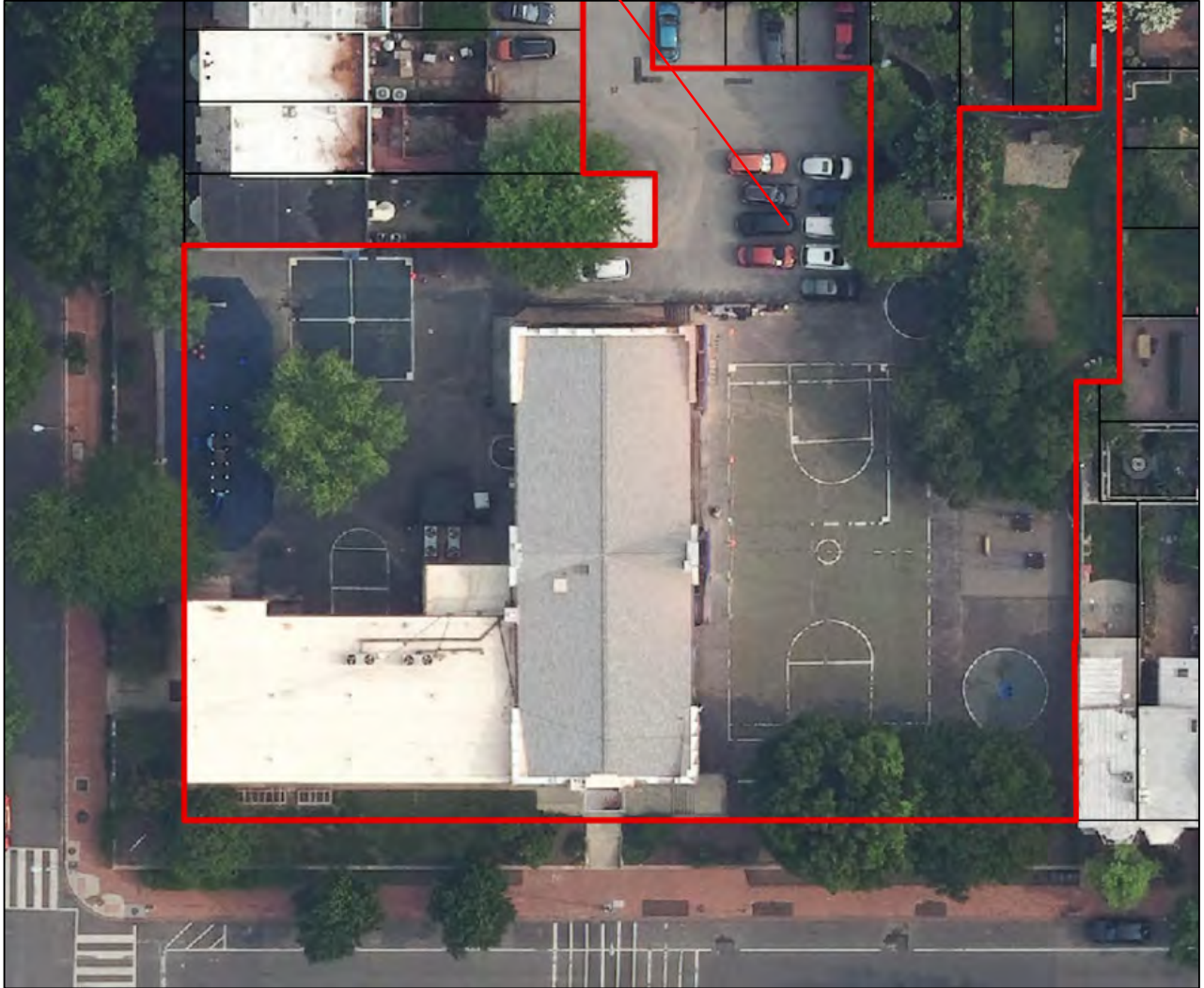
2. PROPOSED NORTH FACADE AERIAL VIEW FROM OVER THE PARKING LOT



3. PROPOSED WEST FACADE FROM 3RD ST SE

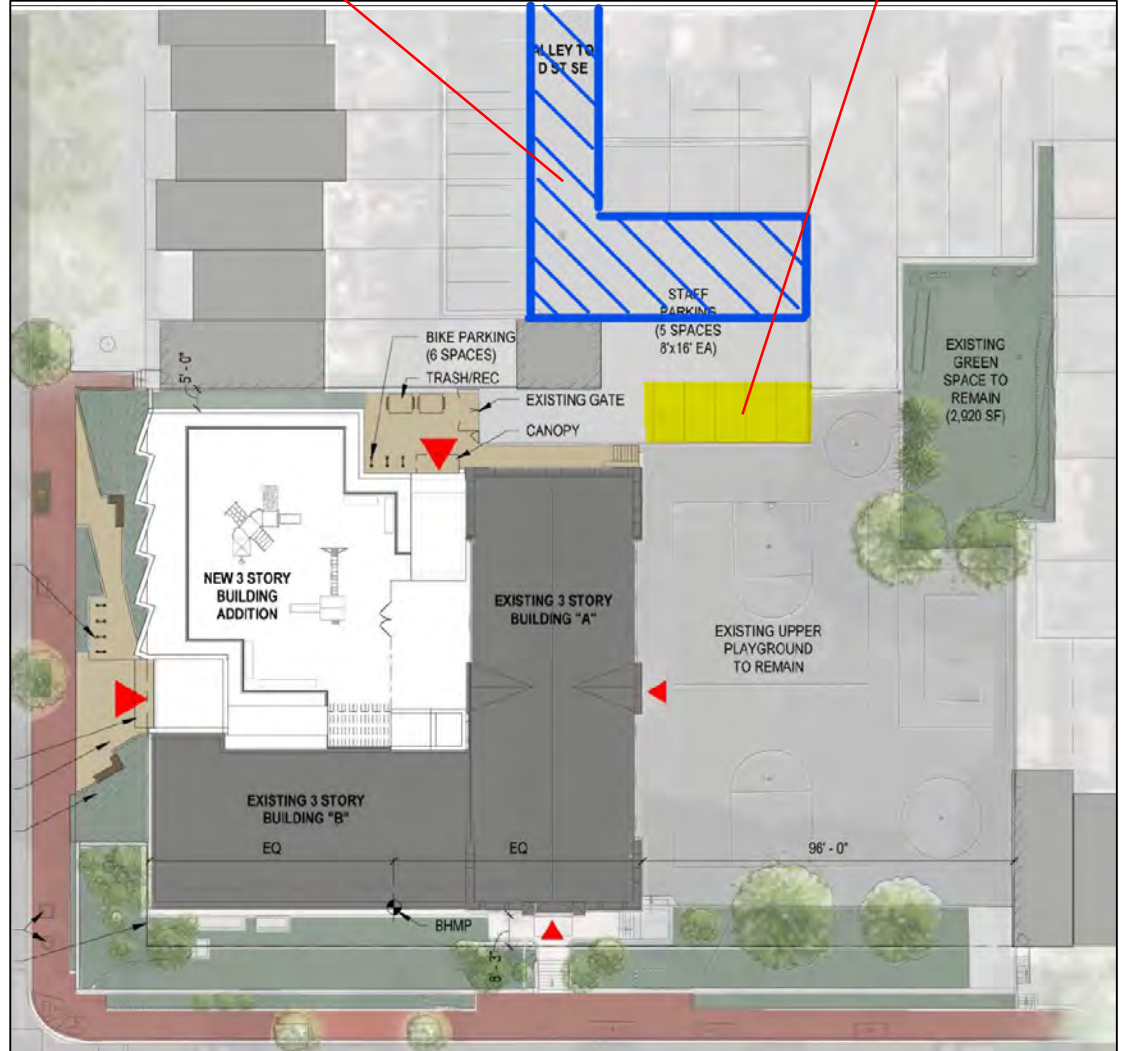


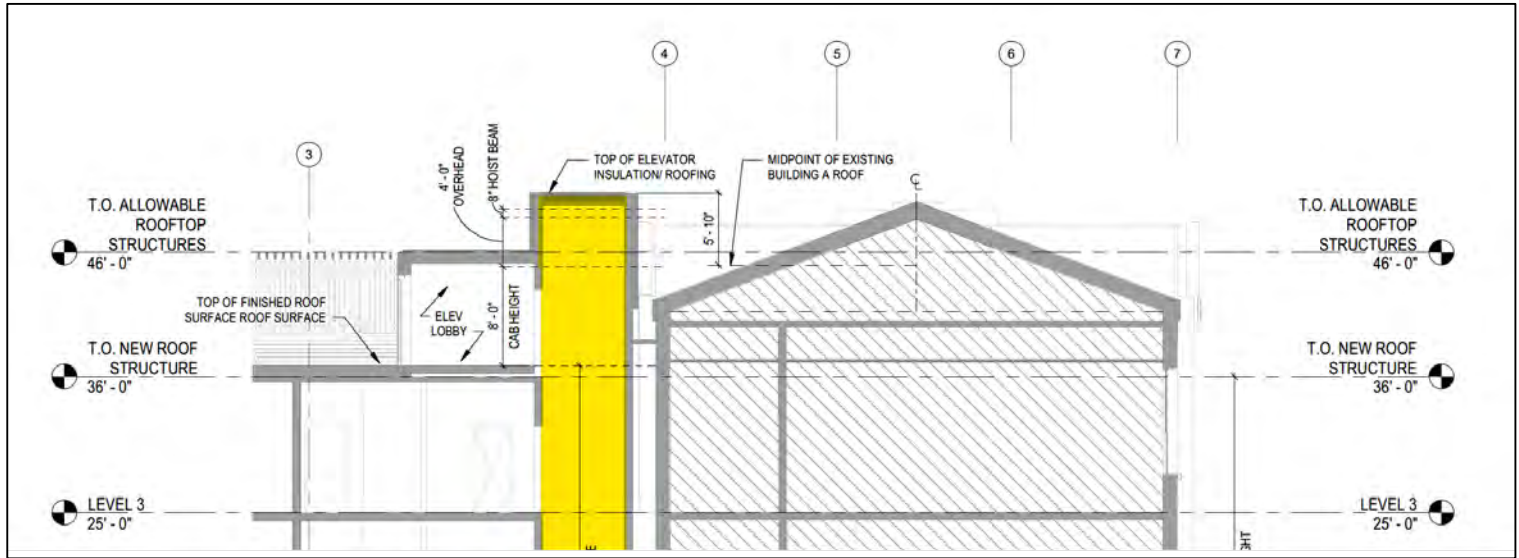
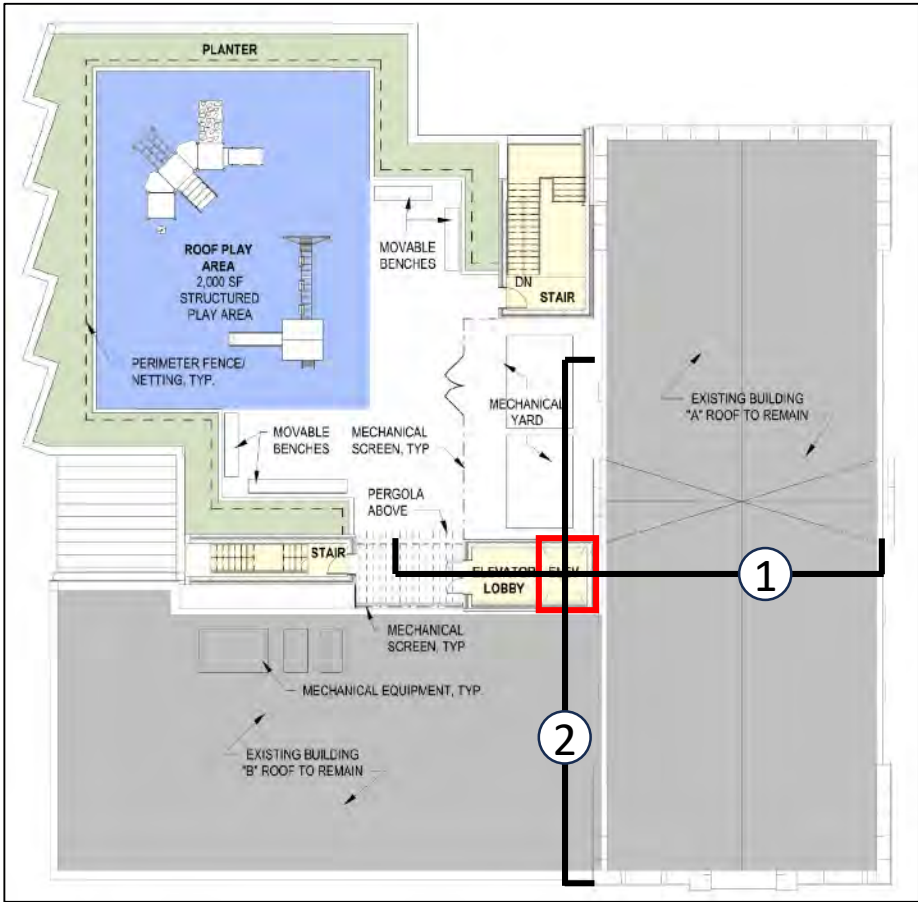
Existing unstriped parking area



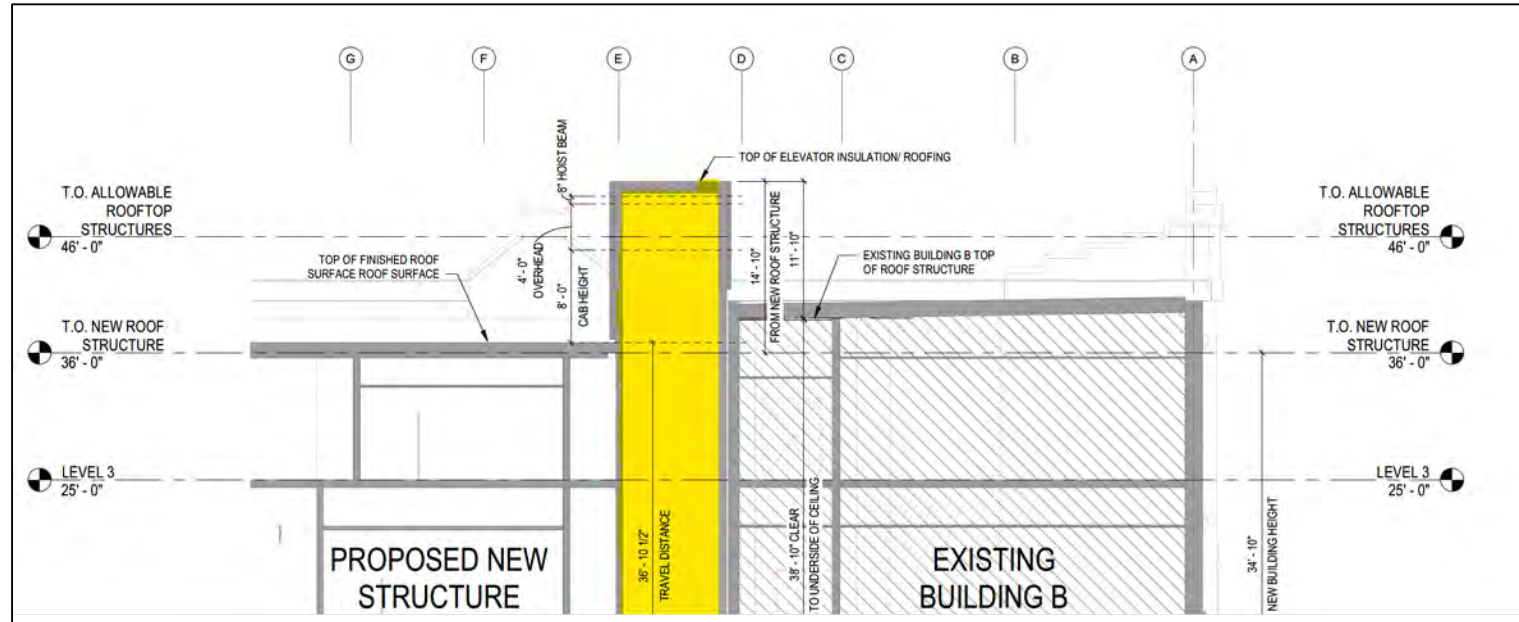
Perpetual easement (vehicular, pedestrian, and utility)

Proposed reconfigured and striped parking area





1



2



**ATTACHMENT C**  
**LOADING MANAGEMENT PLAN**



## **ST. PETER SCHOOL LOADING MANAGEMENT PLAN**

St. Peter School will implement a loading management plan to promote safe and efficient loading operations and to minimize the impact on the surrounding neighborhood. The loading management plan will include the following:

1. The school's custodian currently serves as loading/service coordinator and will continue to serve in this capacity. The coordinator will be on duty during times when service vehicles are required to access the parking lot.
2. To the extent possible, the loading/service coordinator will schedule loading and service activities so as not to conflict with school arrival and dismissal. Some deliveries, such as parcel deliveries, may not be able to be scheduled.
3. The loading/service coordinator shall monitor inbound and outbound truck maneuvers and shall ensure that trucks accessing the service area do not block vehicular, bike, or pedestrian traffic along D Street except during those times when a truck is actively entering or exiting a loading berth.
4. Service vehicles/truck traffic interfacing with D Street traffic shall be monitored during peak periods and management measures shall be taken, if necessary, to reduce conflicts between truck and vehicular movements.
5. The loading/service coordinator will monitor the timing of deliveries to see if any adjustments need to be made to ensure any conflicts are minimized.
6. Trucks using the service area shall not be allowed to idle and shall follow all District guidelines for heavy vehicle operation, including but not limited to, DCMR 20 – Chapter 9, Section 900 (Engine Idling), the goDCgo Motorcoach Operators Guide, and the primary access routes shown on the DDOT Truck and Bus Route Map ([godcgo.com/freight](http://godcgo.com/freight)).

**ATTACHMENT D  
TRAFFIC COUNT DATA**



Vehicular Trip Counts at St. Peter School  
 3/11/2025  
 7:45-8:45 AM, 2:30-6:00 PM

TIME	Vehicles PUDO Lane		Vehicles Neighborhood		Driveway Vehicles		Off-Site Faculty/ Staff Vehicles*		Faculty/Staff Rideshare**		Total Vehicles	
	Entering	Exiting	Entering	Exiting	Entering	Exiting	Entering	Exiting	Entering	Exiting	Entering	Exiting
7:45 AM	3	3			0	0	0	0	0	0	3	3
8:00 AM	20	11			1	0	1	0	0	0	22	11
8:15 AM	52	57			0	0	0	0	0	0	52	57
8:30 AM	6	9			1	0	0	0	0	0	7	9
<b>Sub-total</b>	<b>81</b>	<b>80</b>			<b>2</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>84</b>	<b>80</b>
2:30 PM	0	0	0	0	0	1	0	1	0	0	0	2
2:45 PM	2	0	2	0	0	0	0	0	0	0	4	0
3:00 PM	6	0	6	0	0	0	0	0	0	0	12	0
3:15 PM	5	12	5	13	0	1	0	1	0	0	10	27
3:30 PM	1	3	2	3	0	0	0	0	0	0	3	6
3:45 PM	3	1	4	1	0	0	0	0	0	0	7	2
<b>Peak Hour trip gen</b>	<b>15</b>	<b>16</b>	<b>17</b>	<b>17</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>32</b>	<b>35</b>
<b>Sub-total</b>	<b>17</b>	<b>16</b>	<b>19</b>	<b>17</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>36</b>	<b>37</b>
4:00 PM	0	1	1	2	0	1	0	1	0	0	1	5
4:15 PM	2	1	0	1	0	2	0	1	0	0	2	5
4:30 PM	0	1	0	0	0	1	0	0	0	0	0	2
4:45 PM	3	1	1	0	0	0	0	0	0	0	4	1
5:00 PM	6	3	1	1	0	0	0	0	0	0	7	4
5:15 PM	7	4	1	1	0	0	0	0	0	0	8	5
5:30 PM	5	10	0	1	0	2	0	1	0	0	5	14
5:45 PM	1	3	0	0	0	4	0	2	1	1	2	10
<b>Peak Hour trip gen</b>	<b>19</b>	<b>20</b>	<b>2</b>	<b>3</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>3</b>	<b>1</b>	<b>1</b>	<b>22</b>	<b>33</b>
<b>Sub-total</b>	<b>24</b>	<b>24</b>	<b>4</b>	<b>6</b>	<b>0</b>	<b>10</b>	<b>0</b>	<b>5</b>	<b>1</b>	<b>1</b>	<b>29</b>	<b>46</b>
<b>Totals</b>	<b>122</b>	<b>120</b>	<b>23</b>	<b>23</b>	<b>2</b>	<b>12</b>	<b>1</b>	<b>7</b>	<b>1</b>	<b>1</b>	<b>147</b>	<b>155</b>

\* Assumes one faculty/staff member per car. Assumes that faculty/staff who park off-site arrive and depart following the same distributions as those who park in the parking lot (with the exception of the one person that arrived between 8:30 and 8:45 AM, which was assumed to be an anomaly).

\*\* Assumes that the faculty/staff member who uses rideshare arrives before 7:45 since the majority of employees arrive before 7:45, and assumes they depart between 5:45 and 6:00, since that is the interval when most employees leave.

Pedestrian Trip Counts at St. Peter School  
 3/11/2025  
 7:45-8:45 AM, 2:30-6:00 PM

TIME	Students					Faculty/Staff													Total			
	Children by Cars in PUDO Lane		Children by Cars in Neighborhood		Walkers	Total		Parking Lot*		Off-Site Parkers		Walk/Bike		Transit		Rideshare		Total Faculty/Staff				
	Dropped Off	Picked Up	Dropped Off	Picked Up		Entering	Exiting	Entering	Exiting	Entering	Exiting	Entering	Exiting	Entering	Exiting	Entering	Exiting	Entering	Exiting	Entering	Exiting	
7:45 AM	4	0	0	0	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0	4	0	
8:00 AM	16	0	0	0	71	87	0	1	0	1	0	1	0	0	0	0	0	0	3	0	90	0
8:15 AM	79	0	0	0	25	104	0	0	0	0	0	0	0	0	0	0	0	0	0	104	0	
8:30 AM	9	0	0	0	0	9	0	1	0	0	0	0	0	0	0	0	0	0	1	0	10	0
Sub-total	108	0	0	0	96	204	0	2	0	1	0	1	0	0	0	0	0	4	0	208	0	
2:30 PM	0	0	0	11	0	0	11	0	1	0	0	0	1	0	0	0	0	0	0	2	0	13
2:45 PM	0	0	0	10	1	0	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11
3:00 PM	0	0	0	2	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2
3:15 PM	0	19	0	1	61	0	81	0	1	0	1	0	1	0	0	0	0	0	3	0	84	0
3:30 PM	0	5	0	2	8	0	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15
3:45 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Peak hour total	0	24	0	5	69	0	98	0	1	0	1	0	1	0	0	0	0	0	3	0	101	0
Sub-total	0	24	0	26	70	0	120	0	2	0	1	0	2	0	0	0	0	0	5	0	125	0
4:00 PM	0	1	0	3	1	0	5	0	1	0	1	0	1	0	0	0	0	0	3	0	8	0
4:15 PM	0	2	0	1	0	0	3	0	2	0	1	0	2	0	1	0	0	0	6	0	9	0
4:30 PM	0	3	0	0	4	0	7	0	1	0	1	0	1	0	0	0	0	0	3	0	10	0
4:45 PM	0	2	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0
5:00 PM	0	4	0	1	5	0	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10
5:15 PM	0	7	0	1	5	0	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	13
5:30 PM	0	19	0	1	8	0	28	0	2	0	1	0	2	0	1	0	0	0	6	0	34	0
5:45 PM	0	5	0	0	11	0	16	0	4	0	2	0	3	0	1	0	1	0	11	0	27	0
Peak hour total	0	35	0	3	29	0	67	0	6	0	3	0	5	0	2	0	1	0	17	0	84	0
Sub-total	0	43	0	7	34	0	84	0	10	0	6	0	9	0	3	0	1	0	28	0	112	0
Totals	108	67	0	33	200	204	204	2	12	1	7	1	11	0	3	0	1	4	33	208	237	

\* Assumes one faculty/staff member per car. Does not include faculty/staff that parking offsite. Per the school, faculty/staff must arrive by 8:00 AM, so majority of faculty/staff trips fall outside of the AM peak hour. Faculty/staff must depart after 4:00 PM, so all faculty/staff trips should be outside of the PM school peak hour. Most faculty staff leave between 4:30 and 5:30. Aftercare staff leaves after 6:00 PM.

\*\* Assumes that faculty/staff who park off-site or take another mode of transportation other than auto, arrive and depart following the same distributions as those who park in the parking lot (with the exception of the one person that arrived between 8:30 and 8:45 AM, which was assumed to be an anomaly). Also assumes that four faculty/staff depart after 6:00 PM.

## AVERAGE VEHICLE OCCUPANCY COUNTS

**Location:** E St SE Bet 3rd St SE & 4th St SE

**City:** Washington

**Date:** 3/11/2025, Tue

CURB OBSERVATION (# OF VEHICLES & # OF STUDENTS)				
TIME	No. of Students		No. of Vehicles	
	Picked Up	Dropped Off	Entering	Exiting
7:45 AM	0	4	3	3
8:00 AM	0	16	20	11
8:15 AM	0	79	52	57
8:30 AM	0	9	6	9
<b>Sub-total</b>	<b>0</b>	<b>108</b>	<b>81</b>	<b>80</b>
2:30 PM	0	0	0	0
2:45 PM	0	0	2	0
3:00 PM	0	0	6	0
3:15 PM	19	0	5	12
3:30 PM	5	0	1	3
3:45 PM	0	0	3	1
<b>Sub-total</b>	<b>24</b>	<b>0</b>	<b>17</b>	<b>16</b>
<b>Totals</b>	<b>24</b>	<b>108</b>	<b>98</b>	<b>96</b>

AVO AM = 1.33

AVO PM = 1.50

Prepared by National Data & Surveying Services  
**SNAPSHOT QUEUE STUDY**

**Location:** E St SE Bet 3rd St SE & 4th St SE

**City:** Washington

**Date:** 3/11/2025, Tue

Queue Length (No. Of Vehicles)		
TIME	Pick-up/Drop-off Lane Queue (includes cars parked in RPP zone)	Pick-up/Drop-off Lane Queue
7:45:00 AM	4	0
7:45:30 AM	4	0
7:46:00 AM	4	0
7:46:30 AM	4	0
7:47:00 AM	4	0
7:47:30 AM	4	0
7:48:00 AM	4	0
7:48:30 AM	4	0
7:49:00 AM	4	0
7:49:30 AM	4	0
7:50:00 AM	4	0
7:50:30 AM	4	0
7:51:00 AM	4	0
7:51:30 AM	4	0
7:52:00 AM	4	0
7:52:30 AM	4	0
7:53:00 AM	4	0
7:53:30 AM	4	0
7:54:00 AM	5	1
7:54:30 AM	4	0
7:55:00 AM	4	0
7:55:30 AM	5	1
7:56:00 AM	5	1
7:56:30 AM	5	1
7:57:00 AM	5	1
7:57:30 AM	5	1
7:58:00 AM	4	0
7:58:30 AM	4	0
7:59:00 AM	4	0
7:59:30 AM	4	0
8:00:00 AM	5	1
8:00:30 AM	5	1
8:01:00 AM	7	3
8:01:30 AM	7	3

Queue Length (No. Of Vehicles)		
TIME	Pick-up/Drop-off Lane Queue (includes cars parked in RPP zone)	Pick-up/Drop-off Lane Queue
8:02:00 AM	5	1
8:02:30 AM	5	1
8:03:00 AM	5	1
8:03:30 AM	5	1
8:04:00 AM	5	1
8:04:30 AM	5	1
8:05:00 AM	5	1
8:05:30 AM	5	1
8:06:00 AM	5	1
8:06:30 AM	5	1
8:07:00 AM	5	1
8:07:30 AM	5	1
8:08:00 AM	5	1
8:08:30 AM	5	1
8:09:00 AM	7	3
8:09:30 AM	7	3
8:10:00 AM	10	6
8:10:30 AM	10	6
8:11:00 AM	12	8
8:11:30 AM	12	8
8:12:00 AM	12	8
8:12:30 AM	12	8
8:13:00 AM	12	8
8:13:30 AM	12	8
8:14:00 AM	12	8
8:14:30 AM	11	7
8:15:00 AM	10	6
8:15:30 AM	10	6
8:16:00 AM	10	6
8:16:30 AM	7	3
8:17:00 AM	11	7
8:17:30 AM	11	7
8:18:00 AM	11	7
8:18:30 AM	9	5
8:19:00 AM	6	2
8:19:30 AM	5	1
8:20:00 AM	4	0
8:20:30 AM	7	3
8:21:00 AM	5	1
8:21:30 AM	5	1
8:22:00 AM	4	0
8:22:30 AM	7	3

Queue Length (No. Of Vehicles)		
TIME	Pick-up/Drop-off Lane Queue (includes cars parked in RPP zone)	Pick-up/Drop-off Lane Queue
8:23:00 AM	6	2
8:23:30 AM	9	5
8:24:00 AM	5	1
8:24:30 AM	5	1
8:25:00 AM	5	1
8:25:30 AM	7	3
8:26:00 AM	7	3
8:26:30 AM	8	4
8:27:00 AM	7	3
8:27:30 AM	9	5
8:28:00 AM	8	4
8:28:30 AM	10	6
8:29:00 AM	8	4
8:29:30 AM	12	8
8:30:00 AM	9	5
8:30:30 AM	7	3
8:31:00 AM	9	5
8:31:30 AM	5	1
8:32:00 AM	5	1
8:32:30 AM	6	2
8:33:00 AM	6	2
8:33:30 AM	6	2
8:34:00 AM	6	2
8:34:30 AM	7	3
8:35:00 AM	6	2
8:35:30 AM	6	2
8:36:00 AM	6	2
8:36:30 AM	6	2
8:37:00 AM	6	2
8:37:30 AM	6	2
8:38:00 AM	5	1
8:38:30 AM	5	1
8:39:00 AM	5	1
8:39:30 AM	5	1
8:40:00 AM	6	2
8:40:30 AM	6	2
8:41:00 AM	6	2
8:41:30 AM	5	1
8:42:00 AM	5	1
8:42:30 AM	5	1
8:43:00 AM	5	1
8:43:30 AM	5	1

Queue Length (No. Of Vehicles)		
TIME	Pick-up/Drop-off Lane Queue (includes cars parked in RPP zone)	Pick-up/Drop-off Lane Queue
8:44:00 AM	5	1
8:44:30 AM	5	1
8:45:00 AM	5	1
2:30:00 PM	5	1
2:30:30 PM	5	1
2:31:00 PM	5	1
2:31:30 PM	5	1
2:32:00 PM	5	1
2:32:30 PM	5	1
2:33:00 PM	5	1
2:33:30 PM	5	1
2:34:00 PM	5	1
2:34:30 PM	5	1
2:35:00 PM	5	1
2:35:30 PM	5	1
2:36:00 PM	5	1
2:36:30 PM	5	1
2:37:00 PM	5	1
2:37:30 PM	5	1
2:38:00 PM	5	1
2:38:30 PM	5	1
2:39:00 PM	5	1
2:39:30 PM	5	1
2:40:00 PM	5	1
2:40:30 PM	5	1
2:41:00 PM	5	1
2:41:30 PM	5	1
2:42:00 PM	5	1
2:42:30 PM	5	1
2:43:00 PM	5	1
2:43:30 PM	5	1
2:44:00 PM	5	1
2:44:30 PM	5	1
2:45:00 PM	5	1
2:45:30 PM	5	1
2:46:00 PM	5	1
2:46:30 PM	5	1
2:47:00 PM	5	1
2:47:30 PM	5	1
2:48:00 PM	5	1
2:48:30 PM	5	1
2:49:00 PM	5	1

Queue Length (No. Of Vehicles)		
TIME	Pick-up/Drop-off Lane Queue (includes cars parked in RPP zone)	Pick-up/Drop-off Lane Queue
2:49:30 PM	5	1
2:50:00 PM	5	1
2:50:30 PM	5	1
2:51:00 PM	5	1
2:51:30 PM	5	1
2:52:00 PM	6	2
2:52:30 PM	6	2
2:53:00 PM	6	2
2:53:30 PM	6	2
2:54:00 PM	6	2
2:54:30 PM	6	2
2:55:00 PM	6	2
2:55:30 PM	6	2
2:56:00 PM	6	2
2:56:30 PM	6	2
2:57:00 PM	7	3
2:57:30 PM	7	3
2:58:00 PM	7	3
2:58:30 PM	7	3
2:59:00 PM	7	3
2:59:30 PM	7	3
3:00:00 PM	7	3
3:00:30 PM	7	3
3:01:00 PM	7	3
3:01:30 PM	7	3
3:02:00 PM	7	3
3:02:30 PM	7	3
3:03:00 PM	7	3
3:03:30 PM	7	3
3:04:00 PM	7	3
3:04:30 PM	7	3
3:05:00 PM	7	3
3:05:30 PM	7	3
3:06:00 PM	6	2
3:06:30 PM	7	3
3:07:00 PM	7	3
3:07:30 PM	8	4
3:08:00 PM	9	5
3:08:30 PM	10	6
3:09:00 PM	10	6
3:09:30 PM	10	6
3:10:00 PM	12	8

Queue Length (No. Of Vehicles)		
TIME	Pick-up/Drop-off Lane Queue (includes cars parked in RPP zone)	Pick-up/Drop-off Lane Queue
3:10:30 PM	11	7
3:11:00 PM	12	8
3:11:30 PM	12	8
3:12:00 PM	13	9
3:12:30 PM	13	9
3:13:00 PM	14	10
3:13:30 PM	14	10
3:14:00 PM	14	10
3:14:30 PM	14	10
3:15:00 PM	14	10
3:15:30 PM	14	10
3:16:00 PM	14	10
3:16:30 PM	14	10
3:17:00 PM	14	10
3:17:30 PM	14	10
3:18:00 PM	14	10
3:18:30 PM	13	9
3:19:00 PM	13	9
3:19:30 PM	14	10
3:20:00 PM	13	9
3:20:30 PM	13	9
3:21:00 PM	12	8
3:21:30 PM	10	6
3:22:00 PM	9	5
3:22:30 PM	8	4
3:23:00 PM	7	3
3:23:30 PM	7	3
3:24:00 PM	7	3
3:24:30 PM	7	3
3:25:00 PM	7	3
3:25:30 PM	7	3
3:26:00 PM	6	2
3:26:30 PM	6	2
3:27:00 PM	6	2
3:27:30 PM	5	1
3:28:00 PM	5	1
3:28:30 PM	6	2
3:29:00 PM	6	2
3:29:30 PM	6	2
3:30:00 PM	6	2
3:30:30 PM	5	1
3:31:00 PM	5	1

Queue Length (No. Of Vehicles)		
TIME	Pick-up/Drop-off Lane Queue (includes cars parked in RPP zone)	Pick-up/Drop-off Lane Queue
3:31:30 PM	5	1
3:32:00 PM	5	1
3:32:30 PM	5	1
3:33:00 PM	5	1
3:33:30 PM	5	1
3:34:00 PM	5	1
3:34:30 PM	5	1
3:35:00 PM	5	1
3:35:30 PM	4	0
3:36:00 PM	4	0
3:36:30 PM	4	0
3:37:00 PM	4	0
3:37:30 PM	4	0
3:38:00 PM	4	0
3:38:30 PM	4	0
3:39:00 PM	4	0
3:39:30 PM	4	0
3:40:00 PM	4	0
3:40:30 PM	4	0
3:41:00 PM	4	0
3:41:30 PM	4	0
3:42:00 PM	4	0
3:42:30 PM	4	0
3:43:00 PM	4	0
3:43:30 PM	4	0
3:44:00 PM	4	0
3:44:30 PM	4	0
3:45:00 PM	4	0
3:45:30 PM	4	0
3:46:00 PM	4	0
3:46:30 PM	4	0
3:47:00 PM	4	0
3:47:30 PM	5	1
3:48:00 PM	5	1
3:48:30 PM	5	1
3:49:00 PM	5	1
3:49:30 PM	5	1
3:50:00 PM	5	1
3:50:30 PM	5	1
3:51:00 PM	5	1
3:51:30 PM	5	1
3:52:00 PM	5	1

Queue Length (No. Of Vehicles)		
TIME	Pick-up/Drop-off Lane Queue (includes cars parked in RPP zone)	Pick-up/Drop-off Lane Queue
3:52:30 PM	5	1
3:53:00 PM	5	1
3:53:30 PM	6	2
3:54:00 PM	6	2
3:54:30 PM	6	2
3:55:00 PM	6	2
3:55:30 PM	6	2
3:56:00 PM	6	2
3:56:30 PM	6	2
3:57:00 PM	6	2
3:57:30 PM	6	2
3:58:00 PM	6	2
3:58:30 PM	6	2
3:59:00 PM	6	2
3:59:30 PM	6	2
4:00:00 PM	6	2

AM Peak Period	
Max Queue	12
85th Percentile	9
Average	6

PM School Peak Period	
Max Queue	14
85th Percentile	9
Average	7

**ATTACHMENT E**  
**TRANSPORTATION MANAGEMENT PLAN**

## **ST. PETER SCHOOL TRANSPORTATION MANAGEMENT PLAN**

### **Overview**

To help facilitate ingress to and egress from the School and to reduce the impact of the proposed development, St. Peter School will implement a Transportation Management Plan that will consist of a Transportation Demand Management (TDM) Plan and an Operations Management Plan. Each component is summarized below:

### **Transportation Demand Management**

Traffic and parking congestion can be solved in one of two ways: 1) increase supply or 2) decrease demand. Increasing supply requires building new roads, widening existing roads, building more parking spaces, or operating additional transit service. These solutions are often infeasible in constrained urban conditions and, where feasible, can be expensive, time consuming, and in many instances, unacceptable to businesses, government agencies, and/or the general public. The demand for travel and parking can be influenced by Transportation Demand Management (TDM) plans. Typical TDM measures include incentives to use transit or other non-auto modes of transportation, bicycle and pedestrian amenities, parking management, alternative work schedules, telecommuting, and better management of existing resources. TDM plans are most effective when tailored to a specific project or user group.

### Proposed Components of the TDM Plan

The TDM Plan is intended to be flexible in order to respond to changes in School demographics, technology, transportation services, and various mitigation options available. Accordingly, it is envisioned that over time, new approaches in addition to those listed below will be identified and programs developed to respond to these changes. St. Peter School proposes the following strategies as part of their TDM “toolbox”:

### General Strategies

1. Designate a TDM coordinator who will be responsible for organizing, marketing, and accomplishing the tasks in the TDM plan and who will act as a liaison with DDOT and the community. The TDM coordinator position may be part of other duties assigned to the individual.
2. Create a transportation section on the School’s website with up-to-date information regarding all transportation options available to students, parents/guardians, and employees, including but not limited to public transportation, biking facilities and amenities (including on-site bicycle parking), and carpooling.
3. The updated TDM plan will be incorporated into the student and family handbook.

4. Fourteen bike spaces (six more than required by ZR16) will be provided. Four inverted U-racks (eight spaces) will be provided on 3<sup>rd</sup> Street near the school's entrance and three inverted U-racks (six spaces) will be provided at the rear of the building near the faculty/staff entrance.
5. Two long-term bike spaces will be provided on the first floor of the building.
6. The TDM Coordinator will demonstrate to goDCgo that the school is in compliance with the DC Commuter Benefits Law and participates in one of the three transportation benefits outlined in the law (employee-paid pre-tax benefit, employer-paid direct benefit, or shuttle service), and the Parking Cash-Out Law.

### Strategies for Students

#### *Rideshare:*

1. Register with and promote Commuter Connections School Pool Program to assist parents in finding other parents in their neighborhood to form carpools, walking groups, or biking groups.

#### *Incentives:*

1. Provide transit/alternate commute incentives to encourage students to use non-auto modes of transportation to travel to school. Incentives would include:
  - Encourage District of Columbia students/families to take advantage of the WMATA's Kids Ride Free program, which allows students who live in DC to ride free on Metrorail and Metrobus;
  - Encourage Montgomery County students/families to get a Youth Cruiser SmarTrip Card, which allows students who live in Montgomery County to ride free on all MCDOT buses and most Metrobuses within Montgomery County. Value can be added to the card for use on Metrorail, Metrobuses outside Montgomery County, and other transit systems in the area.
  - Encourage Arlington County students/families to get an iRide SmarTrip Card, which allows students who live in Arlington County to ride the ART bus and select Metrobus routes for free. Value can be added to the card for use on Metrorail and other Metrobus routes.

#### *Outreach and Education:*

1. Provide outreach and education events to stress the importance of using non-auto modes of transportation and make information more readily available. Outreach and educational events could include:
  - Hold a "Transportation to School" event at the beginning of each school year, stressing the importance of public transportation, carpooling, biking, etc.
  - Participate in DDOT's Safe Routes to School Program – The program encourages students and their parents to walk and bicycle to school by examining conditions

around schools and conducting projects and activities to improve safety and accessibility. The program also provides pedestrian and bicycle safety training in the classroom.

- Utilize resources available through goDCgo's School Services to encourage students and their parents to use sustainable transportation.
- Establish interclass and intergrade competitions and prizes for the classes that take transit, walk, and bike the most.
- Host a Walk to School/Bike to School day each year.
- Promote walking/biking in communications with parents.

### Strategies for Faculty/Staff

#### *Rideshare:*

1. Encourage carpooling by providing carpool matching assistance for faculty and staff. Assistance programs could include:
  - Support faculty/staff in identifying other faculty/staff members that live in the same area or along their commute to aid in carpooling.
  - Register with Commuter Connections and promote Commuter Connections' Ride-matching Service.

#### *Incentives:*

1. Provide transit/alternate commute incentives to encourage faculty/staff to use non-auto modes of transportation to travel to school. Incentives would include:
  - a. Allow employees to set aside \$315/month in pre-tax funds (or current amount allowed under federal law) through their paycheck for transit or vanpool expenses;
  - b. Enroll in Guaranteed Ride Home, which provides employees who regularly take transit, vanpool, carpool, walk, or bike to work with a reliable ride home when an unexpected emergency arises; and

#### *Outreach and Education:*

1. Provide training for the faculty/staff at the beginning of each academic year to implement and enforce the TDM Plan.

### Operations Management Plan

In addition to the TDM plan, St. Peter School will implement an Operations Management Plan to ensure that drop-off/pick-up procedures do not adversely impact the surrounding neighborhood. The following are the components of the plan:

Enhance the current drop-off/pick-up protocol for parents and other caregivers. The protocol will be as follows (new items are shown in **bold text**):

- Parents who drive their student(s) drop off and pick up students in the PUDO zone along E Street.
- Parent-driven vehicles are required to approach the school from the east (so that they can access the PUDO lane on the north side of E Street. Cars may NOT join the car PUDO line by making a right onto E Street from 4th Street. Parents coming from the north are required to use 6<sup>th</sup> Street to E Street.
- Double parking is prohibited, and parents in the PUDO lane must remain in their vehicles.
- Students enter through the E Street door. Arrival time is between 8:15 AM and 8:28 AM (students must be in their classroom when the 8:30 AM bell rings).
- Faculty/staff and student patrols are present on E Street during morning drop-off and afternoon pick-up.
- Student safety patrols help students into and out of the vehicles.
- Staff monitor the carpool lane and direct vehicles to move up in the line when gaps are present. **The school should increase the number of staff monitoring the carpool lane to ensure enough monitors are present for efficient operation of the PUDO lane.**
- **Staff monitoring the PUDO lane will direct parents to exit the lane if they are lingering in the PUDO lane after dropping off their child(ren).**
- Drop-off and pick-up is prohibited on 3<sup>rd</sup> Street as it is a safety hazard and blocks traffic.
- Caregivers who park in the neighborhood must drop off or pick up their child(ren) at the E Street door, except for the Pre-K and Kindergarten parents who may accompany students to their classrooms.
- At dismissal time, students who walk are dismissed through the 3<sup>rd</sup> Street door. Students who are driven are dismissed via the E Street door.
- Parents picking up child(ren) from Aftercare must enter through the E Street entrance.
- Parents are permitted to drop-off students between 8:15 and 8:28 AM. Current policy imposes a Before Care fee for students arriving before 8:15 AM. Should the school increase their enrollment to 250 or more students, the permitted drop-off window will be extended by ten minutes to distribute the student arrival over a longer time period and reduce queues in the PUDO lane.
- **Prior to the beginning of the school year, faculty and staff will receive training on PUDO operations, including an emphasis on the need to direct traffic to move into vacated spaces in the PUDO lane.**
- **Prior to the beginning of the school year, the School will send communications to parents describing the PUDO protocol. The communication also will remind parents of the following:**
  - **Parents are required to move up in the PUDO lane if a space ahead of them is vacated, unless a student is physically boarding or alighting their vehicle.**

- **Parents are obligated to pay attention in the PUDO lane and follow directions from staff managing the operations of the PUDO lane.**
- **During morning drop-off, parents are not permitted to linger in the PUDO lane before or after dropping off their child(ren).**
- **Parents are not permitted to exit their vehicles while in the PUDO lane. Staff and student safety patrols will be on-hand to assist students.**