

# GOVERNMENT OF THE DISTRICT OF COLUMBIA

## ADVISORY NEIGHBORHOOD COMMISSION 3A



District Department of Transportation  
Capital Planning Division  
250 M Street SE  
Washington, DC 20003

March 18, 2025

RE: ANC 3A Comments on DDOT NOI #25-27-CPD  
Proposing a Bus Stop on 39<sup>th</sup> Street NW south of Klinge Place NW

To the Capital Planning Division:

I am writing on behalf of the Advisory Neighborhood Commission (ANC) 3A about the Notification of Intent NOI-25-27-CPD, that was sent by the DC Department of Transportation (DDOT) to the ANC Commissioners dated February 18, 2025.

DDOT asked for public comments on the proposal to modify traffic and/or parking requirements, notably:

Curbside Changes: New Bus Stop - Remove 3 parking spaces ("2 Hour Parking 7AM-8:30PM Monday-Friday – Zone 3 Permit Holders Excepted") and convert to new northbound bus stop at 39th St and Klinge Pl NW for new D96 route.

WMATA is planning for the D96 Metrobus route to go into operation on June 29, 2025, running between Bethesda Metro station, Friendship Heights, Ward Circle, Glover Park, and Dupont Circle (and Potomac Park on weekdays), in partial replacement of the current D2 and N2/N6 Metrobus routes. We are sharing our comments and concerns with WMATA, which has authority over operations and routing choices, including the frequency of bus stops.

The ANC has given careful consideration to DDOT's NOI and has requested comments, consulted with constituents, and held deliberations on the matter at the duly-noticed ANC 3A public meeting on March 18, 2025. The Commission voted to submit the following comments.

In particular, we want to express concerns about the effects of the location of the proposed bus stop on safety, in addition to effects on traffic and parking. We also have questions about the need for a bus stop on those blocks. If a bus stop is located on 39<sup>th</sup> Street between Cathedral Avenue and Massachusetts Avenue, we would recommend that it be installed farther north, beyond the entrance driveway serving Annunciation School at 3825 Klinge Place NW and Annunciation Church at 3810 Massachusetts Avenue NW, which would alleviate many of the problems with the location of a bus stop south of Klinge Place. See below for more details.

ANC 3A, with the support of Ward 3 Councilmember Matt Frumin and dozens of nearby residents, strongly opposed WMATA's proposals to operate a Metrobus route on the two blocks of 39<sup>th</sup> Street NW between Cathedral Avenue and Massachusetts Avenue for safety reasons. That included both the C85 weekday peak hour bus in the Preliminary Visionary Network Map released in April 2024 and the D96

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Advisory Neighborhood Commissioners (January 1, 2025-December 31, 2026) Website: [www.anc3a.org](http://www.anc3a.org)

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proposed to run 7 days a week throughout the day as part of the Revised 2025 Network released in October 2024. In our comments to WMATA on those proposals, we noted special concern about the effects that bus operations would have on safety for pedestrians on those blocks of 39<sup>th</sup> Street, particularly for school children going to and from the Annunciation School located on the northeast corner of 39<sup>th</sup> Street and Klinge Place, serving students in grades K-8. The main entrance is from the parking lot off 39<sup>th</sup> Street, on the interior of the Annunciation property, and elementary students use a door on 39<sup>th</sup> Street. Other doors are used in emergencies. Many Annunciation students who walk to or from school use 39<sup>th</sup> Street and cross Klinge Place at the intersection with 39<sup>th</sup> Street. Both 39<sup>th</sup> Street and Klinge Place are one-way streets at that location. There is on-street parking on both sides of 39<sup>th</sup> Street on the blocks between Cathedral Avenue and Massachusetts Avenue, and also on the south side of Klinge Place.

Installation of a Metrobus stop on 39<sup>th</sup> Street NW just south of Klinge Place would add to the pedestrian safety hazards and also create new concerns about traffic and parking.

### 1. Safety Considerations

If a bus stop is installed on 39<sup>th</sup> Street just south of Klinge Place, when a Metrobus is stopped there the bus would block sightlines:

- a. for drivers going north on 39<sup>th</sup> Street to see pedestrians on the curb and beginning to cross 39<sup>th</sup> Street from the east, where they would not be visible because of the bus
- b. for drivers going north on 39<sup>th</sup> Street to see vehicles turning onto 39<sup>th</sup> from Klinge Place
- c. for drivers going north on 39<sup>th</sup> Street to see the STOP sign on 39<sup>th</sup> at Klinge Place
- d. for drivers going west on Klinge Place approaching a right turn onto 39<sup>th</sup> Street to see vehicles coming north on 39<sup>th</sup> Street alongside the stopped Metrobus.

Those problems all could create the conditions for pedestrians to be hit by vehicles and for vehicles to collide with each in broadside crashes or sideswipes, if a vehicle or pedestrian moves into the intersection from the east at 39<sup>th</sup> Street at the same time a vehicle enters the intersection on 39<sup>th</sup> proceeding north. There are STOP signs on both streets for a reason.

Obscuring the sight lines by placing a bus stop on the southeast corner of the intersection would conflict with the goal of maintaining safety for pedestrians, bicyclists, users of any micromobility device, or people in motor vehicles at that location.

### 2. Parking

As we often hear in our area, finding parking is a continuing challenge. While the proposed elimination of 3 RPP parking spaces that would result from installation of a bus stop on 39<sup>th</sup> Street at Klinge Place would not make a significant change in total parking spaces in the area, there are residents who depend on access to that curbside parking. There is one private residence with its main entrance on 39<sup>th</sup> Street in that block between Cathedral Avenue and Klinge Place. If a delivery service, a visitor or a resident arrives at that residence and finds there are no legal parking or loading/unloading spaces, they could try to find a space on Klinge Place but that would require driving the equivalent of two long city blocks. And they would still be around the corner from the entrance, which would not be at all accommodating for anyone with heavy objects to carry, for small children and strollers, or for people with disabilities.

### 3. Traffic Patterns

DDOT is required to issue a Notification of Intent for any change in the configuration of a street or other infrastructure if it would cause a change in on-street parking or traffic configuration, traffic patterns, or traffic control. The installation of a bus stop on the east side of 39<sup>th</sup> Street would not change the direction of traffic movement, the nature of traffic control, traffic signals, or posted speed limit, and it is not clear if it would affect the volume of private vehicle traffic beyond the addition of Metrobus traffic. Addition of a bus stop could, however, change the behavior of drivers of other vehicles, who might be tempted to go

around a bus that is stopped at the bus stop, or potentially speed up to get beyond the bus if the driver perceived the bus might be about to pull out of the bus stop. That could create additional safety risks for drivers and particularly pedestrians on the street, if vehicles are moving at increased speed or coming around the bus as it approaches, stops, or leaves the bus stop. See Safety Considerations above.

Recommendation: To avoid the safety risks associated with locating the proposed bus stop on 39<sup>th</sup> Street just south of intersection with Klinge Place, as well as the consequences of eliminating the 3 parking spaces alongside the one private residence facing those blocks of 39<sup>th</sup> Street, our constituents in that area have suggested that the bus stop could instead be located on 39<sup>th</sup> Street one block north, just beyond the driveway serving Annunciation School and Annunciation Church.

The ANC would support that change, which is not at an intersection, would not block the sightlines to a STOP sign or crosswalk, and would not eliminate the only on-street parking spaces in front of a residence.

#### 4. Need and Basis for Locating a Bus Stop on 39<sup>th</sup> Street NW

We have not seen a map or list of all the bus stops that are planned on the D96 route. It does not appear, however, that WMATA is proposing to close the existing bus stops on the 4000 block of Cathedral Avenue NW or the 4000 block of Massachusetts Avenue, which are the next nearest bus stops along the proposed D96 route and within a half a block or a block of the proposed bus stop on 39<sup>th</sup> Street south of Klinge Place. That is such closer spacing of bus stops than WMATA provides or recommends except in areas of extremely dense population or other special needs.

We also are not aware of marketing studies or location research to indicate that a significant number of future Metrobus riders on the D96 would need a bus stop on 39<sup>th</sup> Street at Klinge Place.

- Riders going to or from the condominiums at 3901 Cathedral Avenue have a safe route to the bus stop in front of the Westchester in the 4000 block of Cathedral Avenue, using the signalized crosswalks at the intersection of 39<sup>th</sup> Street and Cathedral Avenue. The other apartments on 39<sup>th</sup> or near the intersection of 39<sup>th</sup> Street and Massachusetts Avenue have safe access to the Metrobus stops in the 4000 block of Massachusetts Avenue, using signalized crosswalks at that intersection.
- Bus riders going to or from Annunciation School or Annunciation Church also have good access to the existing Metrobus stops on Massachusetts Avenue or on Cathedral Avenue, which we expect will continue to be maintained by WMATA. The Annunciation Church website currently directs people using Metrobus to get on or off the bus at those bus stops.

It appears from a check of available digital maps that the existing bus stop in front of the Westchester at 4000 Cathedral Avenue NW (Bus stop 1002025) is approximately 615 feet from the proposed bus stop on 39<sup>th</sup> Street NW south of Klinge Place, and the proposed bus stop on 39<sup>th</sup> Street NW south of Klinge Place is about 700 feet from the existing bus stop on the north side of Massachusetts Avenue NW, just west of Idaho Avenue (Bus stop 1002094). Those two existing bus stops are about 1,350 feet apart.

The standards that WMATA has shared for bus stops on local bus routes indicate an ideal spacing of 1,200 to 1,300 feet between bus stops, or 4 to 5 per mile, which is considerably fewer stops than 3 stops in 0.3 miles, as the recommended new stop on 39<sup>th</sup> Street would provide. From our experience with the decisions on locating bus stops on other local Metrobus routes, we would be surprised to have a new bus stop so close to existing bus stops.

It may be that when WMATA examines the final recommendations for bus stops on the proposed routes, an additional bus stop on the D96 located at 39<sup>th</sup> Street NW south of Klinge Place may not be found necessary.

Recommendation:

The ANC urges WMATA and DDOT to review the location of the new bus stop proposed on the D96 bus route in ANC 3A in relation to: a) other nearby bus stops on the route, b) the standards for spacing and frequency of bus stops on the Metrobus system, and c) estimates of riders expected to board or exit the D96 at the proposed new bus stop, to determine if addition of a new bus stop on the D96 route along those two blocks of 39<sup>th</sup> Street NW is needed or justified.

SUMMARY

Based on safety, parking and traffic considerations, we do not support the location of a Metrobus stop at the proposed location on 39<sup>th</sup> Street NW south of Klinge Place NW.

We also question whether a bus stop is needed or advisable on those blocks.

If DDOT and WMATA decide that a Metrobus stop is necessary on 39<sup>th</sup> Street between Cathedral Avenue and Massachusetts Avenue NW, we would urge that the bus stop be located one block north, beyond the entrance driveway to Annunciation School and Annunciation Church, where it would not create the same safety risks as the proposed bus stop south of Klinge Place. That would reduce safety risks at the proposed bus stop and satisfy WMATA's current recommendations to locate bus on the far side of an intersection or the far side of a driveway.

Please evaluate fully the need for a new bus stop on 39<sup>th</sup> Street on the D96 route and also give careful consideration to the important safety implications of placing a bus stop on 39th Street south of Klinge Place as the community prepares for the launch of the D96 bus route.

Thank you for your consideration.

Sincerely,



Thaddeus Bradley-Lewis  
Chair

cc. Peter Cafiero, Managing Director, Service Planning and Scheduling, WMATA  
Ann Chisholm, Government Relations, WMATA

This resolution was approved by the Commission by a vote of 5-0 at its duly-noticed public meeting on March 18, 2025, at which a quorum was present. (Three of the five Commissioners constitute a quorum.)