



## **ADVISORY NEIGHBORHOOD COMMISSION 3E**

**TENLEYTOWN AMERICAN UNIVERSITY PARK FRIENDSHIP HEIGHTS**  
c/o Lisner-Louise-Dickson-Hurt Home 5425 Western Avenue, NW Washington, DC 20015  
[www.anc3e.org](http://www.anc3e.org)

### **RESOLUTION SUPPORTING APPLICATION FOR SPECIAL EXCEPTION**

#### **WHEREAS:**

#### Policy Background

1. Private schools are among the land uses that generate the greatest number of automobile trips, and thus impose the greatest burdens on neighboring communities and the environment generally.
2. DC law imposes similar requirements to avoid traffic burdens on both Planned Unit Developments (PUDs) and special exceptions for private schools to operate in residential areas. Yet, large mixed-use PUDs typically generate a fraction of the trips that private schools generate.
3. Although we have not conducted an empirical study, our impression is that traffic generated from mixed-use projects generates far more attention in zoning proceedings than traffic from private schools, even though the latter often creates far more traffic.

#### The Instant Application and its Relation to Broader Policy Considerations

4. Georgetown Day School (GDS) has applied for a special exception to relocate its lower and middle schools (LMS) to its current high school campus in Tenleytown. In doing so, GDS seeks an initial enrollment increase to 1075, with two additional increases, the last to 1200, contingent on meeting trip reduction goals.
5. GDS and the ANC, with extensive input from the community at large, have worked together for many months to arrive at a Memorandum of Understanding (MOU), attached hereto, embodying a set of conditions that fairly balances the respective needs of the parties.
6. Chief among those conditions are a set of trip goals, maturing into a hard-and-fast trip cap.
7. In particular, GDS has agreed to limit trips during the AM peak period to 595 at full enrollment.
8. This is a number higher than many large mixed-use projects generate. Yet it is a number lower than most, and perhaps all, DC private K-12 institutions of a similar size generate.
9. Most saliently to our constituents, the BZA recently approved an expansion of Sidwell's campus on Wisconsin Avenue, near our ANC boundaries. Adjusted for slight size differences between the schools, *Sidwell will generate more than 50% more trips under its approved Transportation Management Plan (TMP) than GDS will generate under its TMP.* Given its location, many trips to and from Sidwell cross through our neighborhood and impose a burden directly on our constituents.
10. The Sidwell example, and others like it, were a good part of the reason the ANC needed to work with GDS so long to reach the present MOU and TMP. GDS (and no doubt other similarly-

situated schools) point to examples of schools like Sidwell and ask why they should be held to a higher standard.

11. In the end, GDS agreed with the ANC that traffic standards are applied disparately to PUDs and special exceptions for private schools, and that is wrong from a policy perspective. Moreover, GDS has a longstanding commitment to social justice and environmental stewardship, and believes that its TMP, which is among the most aggressive of any private school in DC, vindicates those values.

12. We laud GDS for reaching this decision, which makes them a leader among private schools. By the same token, however, we believe that going forward, GDS' TMP should be average, and not an outlier.

13. In short, if DC is to do what it can and must to protect the environment, and if it is to enforce restrictions on traffic equitably, we respectfully believe that BZA must require all private schools to adopt TMPs at least as aggressive as GDS'.

#### Other Aspects of the Instant Application

14. GDS has agreed to permit use of its playground and (with reasonable prerequisites) its athletic fields during daylight hours when the school is not using the facilities. We thank DDOT for being a good neighbor in this respect, and we believe this further strengthens GDS' application from the neighborhood's perspective.

15. GDS has agreed to requests for screening and related items by adjacent neighbors, and we believe this likewise strengthens the application.

16. GDS will continue to prohibit parking by students on neighborhood streets.

17. One aspect of the application which we are concerned about, however, is GDS' plans to raze two private residences it owns. Like the Office of Planning, we are concerned that this is not consistent with some aspects of the Comprehensive Plan and, like the Office of Planning, we hope GDS will avoid razing these structures if an alternative can be found.

18. Likewise, we hope GDS will increase porosity of the campus, both by adding a pedestrian entrance at River Road and extending the hours that the 43<sup>rd</sup> Street pedestrian entrance is available.

#### **NOW THEREFORE BE IT RESOLVED:**

1. In reliance on GDS' proposed conditions and the attached MOU, which we join GDS in asking the BZA to incorporate fully into its order regarding the above-referenced application, ANC 3E supports the application. Be it further resolved,

2. ANC 3E respectfully calls on BZA to require TMPs at least as aggressive as GDS' from all private school applicants in the future.

The resolution passed by a vote of 5-0-0 at a properly noticed special meeting held on November 20, 2017, at which a quorum was present, with Commissioners Bender, Ehrhardt, Hall, McHugh, and Quinn in attendance.

ANC 3E

---

by Jonathan Bender  
Chairperson