**Philip G. Hampton, II**

1439 Juniper Street N.W.
Washington, D.C. 20012

March 31, 2000

BY HAND

Sheila Cross Reid, Chairman
District of Columbia
Board of Zoning Adjustment
441 Fourth Street, N.W. Room 220
Washington, D.C. 20001

**Re: BZA Application No. 16556 – Request for Reconsideration**

Dear Chairman Reid:

This letter is submitted on behalf of the parties in opposition to BZA Application No. 16556. The parties in opposition respectfully request that they be given until at April 7, 2000 to file written responses to any exhibits, information or briefs submitted between the end of the hearing and the close of business today.

11 DCMR 3121.6 states:

> The board shall allow all parties to the case, an opportunity to file written responses to any exhibits, information or briefs submitted after the close of the hearing.

11 DCMR 3121.7 specifically mandates that that the written responses shall be filed within seven (7) days. Consequently, by granting this request, the Board would merely be following its own rules.

Philip G. Hampton, II
Representative of the Parties in Opposition

cc: Ms. Madeleine H. Dobbins
Mr. Joseph H. Hairston

DC01/329137.1

BZA
Case No. 16556
Exhibit No. 334

Board of Zoning Adjustment
District of Columbia
CASE NO.16556
EXHIBIT NO.334

BZA Application No. 16556

**SUPPLEMENTAL STATEMENT**
**of**
**PHILIP G. HAMPTON, II**

The subject of BZA Application No. 16556 is the use of two parcels of land, 7701 16th Street, N.W. and 7712 16th Street, N.W., as a private school. As shown in Exhibit A, attached hereto, the individual homeowners located within several hundred feet of the locations of proposed private school are nearly unanimous in their opposition. (Exhibit A is an 8 ½" x 11" version of a demonstrative exhibit referred to during the hearing by the parties and other persons, opposed to the proposed special exception). The neighboring homeowners have expressed their opposition by sending letters to the Board, signing petitions, placing signs in their yards and donating to a neighborhood fund. The almost unanimous opposition is based upon the increases in vehicular traffic, increases in noise and litter and the lack of available on-site parking. All of these impediments to the neighbors' quiet enjoyment of their property will be exacerbated by the reconstruction of 16th Street.

Many other neighbors and residents within Shepherd Park and Colonial Village are opposed to the proposed private school. Exhibit B, attached, is the petition circulated and signed around the time of the meeting of ANC 4A on March 7, 2000. While many of the signatories live within close proximity of the proposed locations, others live throughout Shepherd Park and Ward 4. The petition cites noise, traffic and the number of students as some of the objectionable conditions which would accompany the proposed private school.

Community-wide opposition to the location of the school is further evident by the letters in opposition filed by the largest two civic associations covering the Shepherd Park/Colonial Village area – the Shepherd Park Citizens' Association and Neighbors, Inc. Attached hereto as Exhibit C is a petition signed by some of the attendees at a Neighbors, Inc. dinner/meeting held on March 17, 2000. It should be noted that these associations objected to the proposed location

BZA
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Exhibit No.

of the school on the basis of objectionable traffic, noise and safety issues, prior to being told of the impending reconstruction of 16th Street.

Similarly, on March 21, 2000, the President of Shepherd Elementary School PTA formally opposed the special exception requested by Applicant. In his letter, Mr. Reed specifically pointed out the problems of traffic congestion at Shepherd Elementary School and gave reasons why the Board should not find credible the assertions that the private school's parents would not use Kalamia Road or 14th Street around Shepherd School.

In light of the tremendous neighborhood and community opposition, the Board should not grant the special exception requested by BZA Application No. 16556.

Respectfully submitted,



Philip G. Hampton, II
Representative of Parties in Opposition

DC01/329069.1

Exhibit A




● Neighbors opposed to Appln. No. 16556

× Group or Non-Resident owners

Exhibit B

# PETITION

To: Board of Zoning Adjustment
of the District of Columbia

We, the undersigned residents of Shepherd Park or Colonial Village, oppose Application No. 16556, in which the Jewish Primary Day School of the Nation's Capital requests a special exemption in order to establish a private school at 7701 16th Street, N.W. and 7712 16th Street, N.W. We oppose the special exception because such a private school would become objectionable to adjoining and nearby property due to noise, traffic, number of students and other objectionable conditions.

| Date | Name | Address |
|---|---|---|
| 3/3/2000 | Barbara Bailey | 1448 Juniper NW |
| 3/3/00 | Raymond Bailey | " " |
| 3/7/00 | Audrey B. Little | 1439 Juniper St N.W. |
| 3/7/00 | Larry W. Brown & Carrye | 1413 Primrose Rd., N.W. |
| 3/7/00 | Derrick A. Humphries | 1428 Juniper St, NW |
| 3/7/00 | Betty F. Pringle | 900 Madison St NW |
| 3/7/00 | Janice L. Spencer | 1423 Iris St. N.W. |
| 3/7/00 | Rosa M Gills | 1406 Jonquil St NW |
| 3/7/00 | Vera M. Carter | 7405-9th St. NW |
| 3/7/00 | Mattie M. Jones | 7519 8th St. NW. |
| 3/7/00 | Helen V. Harris | 1443 Juniper St. N.W. |
| 3/7/00 | Eleanor R. Frederick | 7725 16th Street NW |
| 3/7/00 | Arthur W. Lewis | 1446 Jonquil St N.W. |
| 3/7/00 | Betty Dan Lawton | 1600 Juniper St NW |
| 3/7/00 | William F. Lawton Jr | 1600 JUNIPER ST., N.W. |

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| Date | Name | Address |
|---|---|---|
| 3/7/00 | FRANK A. BONDURANT | 7923 14th ST NW |
| 3/7/00 | SALLY ETHELSTON | 1425 Juniper St NW |
| 3/7/00 | JAN D. GRAY | 1650 Jonquil St. N.W |
| 3/7/00 | Jackie Bynum Seaborn | 7619 13th St. NW. |
| 3/7/00 | Larry Smith | 1434 Jonquil St-NW |
| 3/7/00 | Jim Patton | 7709 14th St NW |
| 3/7/00 | TOM LEWIS | 7017-16TH ST N.W |
| 3/7/00 | MARTHA FORD GLADDEN | 1505 KANSAS Rd. NW. |
| | Pam Payton | 1438 Jonquil |
| 3/7/00 | A. Livingston Stanley | 7616 14th St N.W. |
| 3/7/00 | Grant P. Thompson | 1426 JONQUIL ST NW |
| 3/7/00 | Joyce Stanley Battaglia | 1648 Jonquil St NW |
| 3/7/00 | Ernie E. Jackson | 1425 Juniper St, NW |
| 3/7/00 | Jacqueline W. Cole | 1725 Juniper St N.W. |
| 3/7/00 | C. Bruce Johnson | 1619 Jonquil St NW |

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| Date | Name | Address |
|---|---|---|
| 3/7/00 | Elizabeth D. Bacon | 7712-14th St. N.W. 20012 |
| 3-7-00 | Marilyn Tholston | 7603-16th St. N.W. 20012 |
| 3-7-00 | [illegible] | 1350 Peegate NW 20012 |
| 3-7-00 | [illegible] | 7811 12th ST NW 20012 |
| 3-7-00 | Eleanor Anderson | 7521 Morningside DR NW 20012 |
| 3-7-00 | Glenda Carter Burdette | 1623 Juniper St. NW 20012 |
| 3-7-00 | [illegible] | 1650 Jonquil St. NW 20012 |
| 3/7/00 | Sondra D Raspberry | 1301 Iris St. N.W. 20012 |
| 3/7/00 | [illegible] | 7616 14th St NW, WDC 20012 |
| 3-7-00 | [illegible] | 1623 Juniper St. NW 20012 |
| 3-7-00 | Kathie Thompson | 1358 Jonquil St. NW 20012 |
| 3-7-00 | [illegible] | 1609 Kalmia Rd NW |
| 3-7-00 | Carrye Brown | 1413 Primrose Rd NW 20012 |
| 3/7/00 | Elizabeth Holston | 7603 16th St NW DC 20012 |
| | | |

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| Date | Name | Address |
|---|---|---|
| 3/7 | Janice Bryant | 1421 Juniper St NW |
| 3/7 | Vanessa Murray | 1560 Hemlock St NW |
| 3/7 | J. R. Thornton | 1433 Juniper St. N.W. |
| 3/7 | Stacy Watts | 1407 Juniper St. N.W. |
| 3/7 | Diane Hines | 1407 Juniper St. N.W. |
| 3/7 | Rockwood C. Watts | 1407 Juniper St. N.W. |
| 3/7 | Dolores Watts | 1407 JUNIPER ST. N.W. |
| 3/7 | Barbara B. Williams | 7605 16th St. N.W. |
| 3/7 | [illegible] | 1414 Juniper St. N.W. |
| 3/7 | [illegible] | 747-7th St., NW. WDC |
| 3/7 | [illegible] | 709 Peabody St NW |
| 3/7 | Frances Andrea | 1446 Jonquil St NW |
| 3/7 | MARIE MERIDA | 147 Roxanna Rd N.W. |
| 11 | & Ned SLOAN | 1639 PRIMROSE RD NW |
| " | Natalie Howard | 1407 IRIS ST NW 20012 |

Please sign and pass on

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| Date | Name | Address |
|---|---|---|
| 03/07/00 | FRANK JASMINE | 7711 17th St. NW |
| 3/7/00 | Celma Gray | 1424 Juniper St. NW |
| 3/7/00 | Richard Streaty | 1410 Juniper St. N.W |
| 3/7/00 | Melanie Grosvenor | 1324 Jonquil NW |
| 3/7/00 | [illegible] | 1220 Floral st NW Wash DC 20012 |
| 3/7/00 | Raymond Bailey | 1448 Juniper st. NW. Wash DC 20012 |
| 3/7/00 | Doris Sprowell | 1437 Primrose Rd NW |
| 3/7/00 | David Howard | 1401 Iris St NW |
| | Marie Peoples | 1429 Geranium St. NW |
| | Chas Gross | 7714 13th St. NW |
| 3/7/00 | Michael Bonner | 8144 Eastern Ave. NW |
| 3/7/00 | Wilma Bonner | 8144 Eastern Ave NW |
| 3/7/00 | Stanley Washington | 414 Longfellow St. NW |
| 3.7.00 | HORACE JONES | 1451 JENIFER |
| 3.7.00 | OSWALD THOMPSON | 1358 JONQUIL ST NW |

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| Date | Name | Address |
|---|---|---|
| 3/7/00 | [signature] | 1546 Hemlock St. NW |
| 3/7/00 | Norma H. Kelly | 1619 Juniper St. N.W. |
| 3/7/00 | Viola McIver | 1426 Roxanna Rd. N.W |
| 3/7/00 | Ruth Robeson | 1441 Roxanna Rd NW |
| 3/7/00 | Mary H. Gee | 1432 Juniper St. N.W. |
| 03/07/00 | [signature] | 1439 Juniper St. NW |
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We the undersigned, Members of Neighbors Inc., oppose the BZA exception, No. 16556.

Friday, March 17,. 2000

| Name | Address |
|---|---|
| Allyce F. Gaither | 7519 16th Street N.W. |
| Laura Howell-Smith | 7542 Alaska Ave, NW |
| ALTON E. DUNCANSON | 7500 14th ST N.W. WASH, DC 20012 |
| Jacqueline D Holt | 1204 Kalmia Rd NW Wash, DC 20012 |
| Doris J. Collie | 7519 12th. St, N.W. Wash, D.C. 20012 |
| Edna J Washington | 7546 Alaska Ave N.W Washington DC 20012 |
| Rasemy E Reed Muller- | 1300 Geranium St NW Wash DC 20012 |
| Charles C Smith | 7519 16th St N.W DC 20012 |

Exhibit C