William Lawton
1600 Juniper Street, NW
Washington, DC 20012

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DISTRICT OF COLUMBIA

February 26, 2000

RE: Application Number 16556

Board of Zoning Adjustment
Suite 210
441 Fourth Street, NW
Washington, DC 20001

Dear Members of the Board of Zoning Adjustment:

Subject: Request for Party Status

An application has been filed by Jewish Primary Day School of the Nation's Capital ("JPDS") for a special exception to establish a private school for 215 students and 32 teachers and staff in a residential neighborhood. JPDS proposes to locate its school at two synagogues on 16th Street, NW -- Ohev Sholom at 7712 16th Street (zoned R-1-A) and Tiffereth Israel at 7701 16th Street (zoned R-1-B). We, William and Betty Lawton, are the owners of property at 1600 Juniper Street, NW, which is within 200 feet of the property involved in BZA application No. 16556. For the reasons set forth below, we strongly oppose the application of JPDS for a special exception.

The proposed operation of a private school for 215 students and 32 teachers and staff at these locations will create objectionable traffic and safety conditions in our residential neighborhood.

- Increased traffic and congestion can reasonably be expected from 215 students and 32 teachers and staff traveling to and from the synagogues, which are both located at uncontrolled intersections on 16th Street.

- The traffic management plan proposed by JPDS would impede access to 16th Street from Jonquil and Juniper Streets and cause traffic congestion on Jonquil and Juniper Streets. Similarly, access to Jonquil and Juniper Streets from 16th Street would be impeded.

- The plan for student loading and unloading operations would require vehicles to use the public alleys behind the synagogues and between Jonquil and Juniper Streets as one-way thoroughfares and drop-off/pickup sites, thereby blocking access of adjoining and nearby property owners to the alleys and private garages.

BZA
Case No. 16556
Exhibit No. 61

Board of Zoning Adjustment
District of Columbia
CASE NO.16556
EXHIBIT NO.61

In addition, the proposed operation of a private school for 215 students and 32 teachers and staff at the two locations is likely to create parking problems for the adjoining and nearby property owners.

- On-site parking space is extremely limited at both synagogues. Currently, there are lined spaces for 7 cars at Tiffereth Israel (and currently cars utilizing these spaces partially block the alley) and 18 cars at Ohev Sholom. We have serious reservations about the plan to reconfigure the existing spaces so that JPDS would have the number of on-site parking spaces required under 11 DCMR Section 2101.1 – two spaces for each three teachers and other employees or 22 spaces.

- There is no space to create on-site parking spaces for parents and others who will regularly visit the school. Parents and visitors can be expected to park on Jonquil and Juniper Streets, thereby adversely impacting adjoining and nearby property owners.

Further, the operation of a private school for 215 students and 32 teachers in close proximity to residential property is certain to cause other objectionable conditions, including increased noise and litter.

- The queues that are likely to result in the alleys adjoining streets would interfere with trash collection as well.

- The planned reconfiguration of the parking spaces at both synagogues will impact their ability to dispose of and have collected the trash and garbage generated by 247 additional people each day, thereby increasing the risk of rodent infestation.

The peace and tranquility of our residential neighborhood has already been adversely impacted by the traffic, parking, noise and pollution created by the existing four schools and two synagogues.

We respectfully request the right to appear and participate as a party at the hearing of this matter, which is scheduled for March 15, 2000. Unless circumstances change due to the actions of applicants, we will not be represented by counsel.

Sincerely,

William Lawton

Betty Lawton