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2002 MAR 26 AM 10: 10

4901 Ashby Street NW
Washington, D.C. 20007-1046

March 1, 2002

Dear John;

This states our opposition to the effort of St. Patrick's School to obtain a zoning exception to the residential status of 4925 MacArthur Boulevard N.W. in order to locate its junior high school at that location.

I (Douglas) have been well acquainted with this neighborhood since 1956, and we have resided in the immediate neighborhood of 4925 MacArthur Boulevard N.W., at the above address, for 33 years, since 1969. We are within 200 yards and line of site of the premises in issue.

We purchased our home primarily because of the residential character of the immediate neighborhood. The portion of MacArthur Boulevard, N.W. from V Street N.W. to Dana Place N.W. and its off streets such as Ashby Street N.W. have always been residential. Reaffirming the residential nature of this area is the fact that the only material change in this immediate neighborhood has been the reversion of the former St. John's Development Center site, at MacArthur and Chain Bridge Roads N.W., from educational to residential use about five years ago.

Our block of Ashby Street is narrow. The intrusion of 60 twelve/thirteen year olds plus twelve faculty proposed by St. Patrick's would cause irremediable harm in terms of overcrowding, traffic, loss of parking, noise and trash, clear violations of the concept of residence.

While each request for an exception stands on its own, St. Patrick's School has, in its proposal, cited the exception granted the present owners of this property, The Washington Psychoanalytic Society and Institute, as precedent for its (St. Patrick's) application. Its supporters have repeated this assertion as late as last night. This is demonstrably wrong. The only similarity is in the number of persons to inhabit the premises, 60 student plus twelve faculty members. The similarity ends here.

BZA Case # 16852

BZA
Case No. 16852
Exhibit No. 52

Board of Zoning Adjustment
District of Columbia
CASE NO.16852
EXHIBIT NO.52

The Institute exception limits it to a "... post graduate school of psychoanalysis for physicians." - adults, --- people of 35 years or older. St. Patrick's proposes to teach 12/13 year olds, at a middle school.

Moreover, the Institute's exception specifically limits the class use of the premises, in monthly terms, to four and a half-hours on Saturday mornings, plus two Wednesday nights a month. This provides a tentative monthly use of the premises to from 27 to 31.5 hours a month. Making reasonable allowance for faculty meetings and preparation of eight hours a month and the total class time usage for the Institute is from 35 to 39.5 hours per month.

And this usage only concerns the regular academic year. The Institute does not run summer classes.

Contrast that with the St. Patrick's proposal. For the regular school year, it proposes to use the premises five days a week, from student arrival at 7:30 AM to at least 4 PM and possibly 6:00PM. Of course, the faculty must be on hand when the students arrive, providing for a minimum of an additional half-hour on each end of the student use. Thus, there is a minimum 9.5-hour day, five days a week. Using 22 days per month as the usual school time, there will be a total of 209 hours a month use of the premises, at a minimum.

In other words, St. Patrick's plans to use the premises over 5 times as much as The Institute --- 209 hours a month compared with 39.5 hours a month.

Viewed another way, the 22 day school month contains 528 hours. St. Patrick's proposes to use the premises 209 hours, almost 40 percent of the time, as compared with the Institute's seven percent usage. St. Patrick's has left open the possibility of using the premises for summer school activities.

There is no reasonable way the Institute's exception is a precedent for St. Patrick's. This proposal will cause overcrowding, overuse and their attendant problems of traffic, parking, noise and trash.

The inappropriateness of this requested exception is also evidenced by the experience of the previous owners of these premises, The German School. On June 21, 1961, the Board of Zoning Adjustment granted the school a limited exception, for a trial period of two years, to operate a school for 25 students with an adult couple resident on the upper floors of the building. There was no community opposition.

One year later, on July 18, 1962, the school asked for an expansion of the exception by 50 students. This request was denied because of, "... noise, traffic, and number of students. Further, the Board is also of the opinion that the granting of this exception would not be in harmony with the general purpose and intent of the Zoning Regulations and maps, and would tend to affect adversely the use of neighboring property in accordance with said zoning regulations and maps." The Board further stated, " (2) There was considerable opposition to the granting of this appeal registered at the public hearing."

On the present issue, other letters from immediate neighbors have detailed the problems of traffic, parking, noise and trash. We agree with the substance of those complaints.

Finally, the above negative factors, overcrowding, traffic, parking restrictions, noise and trash are the same factors that have a negative effect on nearby real property values. While this is not a "zoning element" it is non-the-less very real to us immediate neighbors. It has been said that a nearby school can increase property values. That is only true for public schools. High priced private schools do not carry the advantage of no cost enrollment.

The situation of the neighborhood has not changed. It is still residential. For these reasons, we urge the ANC to vote to deny St. Patrick's request for an exception.

Sincerely,

Ana R. Ormerod

Ana R. Ormerod

Douglas S. Ormerod

Mr. John W. Finney, Chair
ANC 3-D
5275 Watson Street N.W.
Washington, D.C. 20016-5343

RECEIVED
D.C. OFFICE OF ZONING
2002 MAR 26 AM 10: 10

4901 Ashby Street N.W.
Washington, D.C. 20007-1046

January 30, 2002

Dear Mrs. Bradley,

I have been directly associated with this neighborhood since 1956, the last 33 years as a resident at the above address.

We have followed very closely the materials you have sent us with respect to St. Patrick's proposal to insert its Middle School at 4925 MacArthur Boulevard N.W. We are within clear line of site of that property. Moreover, we have attended the two informal presentations St. Patrick's has made to the PCA Board in January and the December Plenary meeting. We have discussed this proposal with many neighbors.

We realize that all the data from the various studies St. Patrick's is undertaking are not yet in. Yet, even at this point it is clear that the proposal is fundamentally incongruent with the essentially residential character of this neighborhood. No amount of tinkering can correct this. The gap between the essential character of the neighborhood and your proposal is simply too great.

This gap consists, in the first place, of unacceptable levels and types of new inhabitants of the neighborhood, with totally differing visions of where this neighborhood should be heading. Your proposal will increase the neighborhood population by more than 100 percent. St. Patrick's proposed population is totally different from that which now exists. Additionally, noise of various sorts, traffic, light, and parking problems will arise, inevitably, regardless of St. Patrick's efforts to ameliorate them. In return for our having to bear these new burdens you offer us nothing. In fact, St. Patrick's has provided this community nothing in the years it has existed in the Palisades.

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BZA
Case No. 16852
Exhibit No. 52A

Indirectly, St. Patrick's does offer one thing ---- a reduction in neighborhood property values. The more than doubling of the neighborhood population and associated noise, traffic light, and parking problems will reduce the values of our homes if, by any chance, St. Patrick's is successful in gaining its exception. As a former member of the Board of Real Property Assessment and Appeals for the District of Columbia, I think I have fair professional experience in what negative homeowner value factors are.

By now you have heard formally and informally from other line-of-site neighbors. It should be dawning on St. Patrick's Board that this is a very ill conceived idea. You should be seeking actively another site, and cut your losses in the process.

We will be opposing your attempted imposition at all levels of the process which you will follow in your approach to the BZA.

Sincerely,

_____
Ana R. Ormerod

_____
Douglas S. Ormerod

Mrs. Katherine B. Bradley, Chair
St. Patrick's Episcopal Day School
4700 Whitehaven Parkway, N. W.
Washington, D.C. 20007-1586

cc: Peter Barrett, Head Of School
St. Patrick's
Erik Gaull, President, PCA
Eleanor R. Lewis, Chair, ANC 3D
Alma Gates, 4911 Ashby Street N.W.