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March 27, 2002

Government of the District of Columbia
Commissioners, Board of Zoning Adjustment
441 4th Street NW, Suite 210-S
Washington, DC 20001

Re: Case no. 16852, St. Patrick's School's request for a special exception.

Dear Commission Members,

Although I serve as Chairman of the Palisades Citizens Association's zoning committee, I write this letter as a private citizen supporting St. Patrick's request for use of 4925 MacArthur Blvd. for its 7th and 8th middle school program. After carefully reviewing all materials related to this application, I remain confident that the school has been forthcoming in its proposed use of this site.

St. Patrick's satisfies the requirements of Section 206, Sub-sections 1-3 of the Municipal Code with regard to parking, noise, the environment and the objectionable standard. The school has addressed traffic concerns, suggesting solutions for school related traffic management, and for suggesting steps to mitigate drainage problems that have plagued the site and one immediate neighbor for years yet left unresolved by the recent property owner.

The idea of granting a special exception is related to reasonableness; that is, whether or not a proposed use *might* place unbearable burdens on immediate property owners. In spite of neighbors who have raised recognizable concerns about traffic, I maintain that this application and proposed use is modest and ought to be granted by the Board of Zoning Adjustment for the following reasons:

- **Neighborhood Concerns** – The school has listened carefully to the concerns of the immediate neighbors and the greater community, and has been creative in its approaches to problem solving.
- **Traffic and Traffic Management** – St. Patrick's has submitted an extensive plan that addresses concerns of the immediate neighbors through its proposed use of shuttle buses. It also has proposed to collaborate with the Lab School, GW @ Mt. Vernon and the Field School on the larger issue of traffic management in Foxhall/Whitehaven Parkway corridor.

ALAN Z AICHES

5839 Sherier Place NW
Washington, DC 20016

P: 202.364.2412
F: 202.364.2464
www.aichesdesign.com
aiches@aichesdesign.com

BZA
Case No. 16852
Exhibit No. 69

Board of Zoning Adjustment
District of Columbia
CASE NO.16852
EXHIBIT NO.69

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- **Student cap** – Use would be restricted to 60 students.
- **Historic and Environmental Preservation** – Such use would preserve the Victorian building [dated 1903-05] along with its site [green space and tree canopy consisting of 9 mature trees].
- **Existing Scale and Context** – The use would retain the property as is and remain in keeping with the surrounding area.
- **Structure** – The building suits the seminar style based program the school offers: small classes of 12 students or less.
- **Recreational Facilities** – No athletics or such facilities will be allowed or built on site.
- **Parking** – No on-street parking will be required by the school's staff or visitors. Fifteen parking spaces already exist on site, seven more than required by the code.
- **Noise** – Reports confirm that the ambient noise from MacArthur Blvd. would be louder than any noise created by students, who would be in the classrooms most of the day except for lunch or brief breaks.
- **Trash** - This will be removed daily in the afternoons by maintenance staff, thus eliminating odors, pests, the need for dumpsters and trash trucks and their attendant noise.
- **The Objectionable Standard** – There is little if any reason that this use is objectionable by any standard.

Residents of the Palisades strongly identify the neighborhood as a village: an attachment as a sense of place. It is appealing because its visual scale embraces us as human beings without overwhelming us and allows us to encounter our friends and shopkeepers, thus feeling a sense of comfort, belonging and a part of something larger than ourselves. But villages are more than merely a physical presence; they include the ability to converse along with a healthy respect for others.

Urban villages began as small enclaves on the outskirts of larger cities where land-use traditionally was mixed: residential, business, commercial, educational and as well as institutional. Their size allowed people to walk most places in a short period of time: schools, the train station, the courthouse, the grocery, the pharmacy, banks, professional offices, and the movie theatre.

The New Urbanism, a planning idea that sprang to life in the 1980s, harks back to these principles. Why? Because in the aftermath of growth since WWII, planners found cities devoid of housing while suburban development had become too dependent on the automobile. The downtowns were dying, services were fleeing and cities realized the mistake of over-building office space at the expense of housing and other uses, resulting in the need to try something else. Since the mid-1980s, there's been an effort to correct that imbalance.

In reviewing the St. Patrick's case, over attention has been paid to details, which are simply a road map to the beginning of the decision-making process. They tell us if we're on the right track, but they are not a substitute for the human experience we have with one another, nor the end result. Since special exception applications rely on the principle of reasonableness, we should not deny them solely on the basis that modest changes might upset the balance in residential areas. If we do, then we make the reverse mistake cities made with office space, which is to reserve residential areas only for housing.

St. Patrick's has agreed, in principle, to the following list of conditions appearing in the PCA zoning committee's report that the applicant would abide by should the BZA rule in its favor. The committee felt there was room for compromise on the St. Patrick's matter, and I encourage you to consider what's been suggested.

"That St. Patrick's be granted a three-year exception renewable if it can be shown that the school has created no detrimental impact on the adjacent residential properties and that it is adhering to the provisions of the initial BZA filing along with the following.

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- That it has maintained a cap of 60 students (including any 9th graders that would attend classes in the building for a one-year period if St. Patrick's decides to locate a high school elsewhere)
- That it has maintained the exterior of building
- That it has maintained the original footprint of the building besides that which would be necessary to provide for life, fire, safety, and for handicapped access as required by law
- That it has maintained the landscaping and the health of the mature tree canopy
- That it has undertaken no new construction or physical expansion of the premises
- That it has successfully implemented and enforced the recommendations of the traffic consultant suggesting the best methods for controlling traffic in the neighborhood
- That it has undertaken collaborative efforts to control traffic with other area schools
- That it has not permitted any athletics or such facilities on the site
- That it has completed a buffer between the school's parking lot and the two adjacent neighbors, and that it be created out of appropriate plant material [selected by a landscape architect] to dampen noise and better screen the parking lot."

Over 200 children of families in the neighborhood and surrounding area attend St. Patrick's, whose presence adds vitality. While their parents are committed to a quality education, they are also the future of the Palisades as a community. If a modest proposal cannot be supported, then we will be overcome by progress when we would have had the opportunity to embrace it.

Respectfully submitted,

Alan Z. Aiches