Testimony of Gregory B. Craig
October 28, 2003

My name is Greg Craig, and I live with my family at 3155 Highland Place, two houses away from NCRC. I have attached to this testimony a timeline which the Board may find helpful. It sets forth some of the school's history up to February 2002 when it first disclosed to the neighbors NCRC's plan to expand.

When NCRC announced its plans to expand in February 2002, my family and numerous others formed a group to consider the proposal and to coordinate a response. The group designated eight people to serve as a coordinating committee and to speak on behalf of the neighbors at many of the public hearings held by the ANC and others. Our smaller group also participated in discussions with representatives of NCRC that were held on our own initiative and other mediation efforts at the request of the ANC, the Office of Planning and one city council member. At both the public meetings and the less public conversations, we heard NCRC's explanation of its need to grow its enrollment, to increase the size of its facilities and to expand its operations. We attempted to persuade the school that, in our view, it was possible to deal with all the school's current space needs without expanding its enrollment and doubling the size of its physical plant. We took the position that we are taking here before the BZA, that the current operations already so adversely affect the lives of its neighbors, that the school's effort to expand will only make bad and unsafe conditions worse.

We urged the school to address the existing problems immediately and not to use promises of traffic mitigation as bargaining leverage with the neighborhood. When we first entered into this process of dialogue and consultation, the neighbors were upset at the school's failure to meet existing commitments to reduce traffic, and we were astonished to hear from the leadership of the school that it did not know that there was a problem

BZA
Case No. 16970
Exhibit No. 259
Board of Zoning Adjustment
District of Columbia
CASE NO.16970
EXHIBIT NO.259

In the course of the past year and a half, I have talked to most, if not all, the neighbors who form the larger group and who have signed the petition opposing this project. I think I know their views. I listened repeatedly to the school's explanation of this proposal, of the sudden need for it, and of its plans for the future. As a neighbor whose family is directly affected by the current situation and by the proposed aggravation of it – and as a participant in the neighbors' efforts to find a resolution – I would like to make a few points which seem to me to be beyond dispute.

First, this project is an expansion, not a renovation or a modification. And it is not a modest expansion. The new construction that is proposed would double the size of the facilities. In the words of NCRC's early literature describing this project, it would create a campus where a single residence once stood. This proposed construction – whatever you think of its aesthetics or its impact on the neighborhood – would permanently transform this property in both appearance and function. The property would be changed -- irreversibly -- from one that is residential into one that is institutional.

Second, there is no event or combination of events which as created a crisis inside NCRC that requires this expansion. According to NCRC, enrollment has not increased significantly since 1990. Class sizes have been what they are and where they are for many years. Today's leadership of NCRC faces the exact same set of circumstances as did the NCRC leadership in 1998 that assured the neighbors that they contemplated no increase in enrollment and no construction and no change in operations. The only thing that has changed is the name of the school administrator and the membership of the board of trustees. The result has been a radical change in the ambitions of the school, what this school should become. Make no mistake: Your decision on the NCRC application does not in any way implicate the mission of this school. The mission of the school is not in jeopardy. Its ability to grow is.

This highlights a very important fact that is evermost in the minds of the neighbors: Five or six years ago when we last had our discussions with NCRC about development and growth and population, none of the people who have appeared before you and testified on behalf of NCRC in these proceedings – whether school administrator, members of the board or parents – none of those people were involved or even present then. The neighbors are the same people today as we were six years ago. Six years from now, it is fair to predict that we, the same neighbors who are here before you today, will be dealing with a whole new set of NCRC leaders with their own ideas and plans and ambitions. That is why the neighbors have been so adamant in their quest to persuade the school to agree to a permanent self-enforcing cap on the size of the population that uses the school property. It is not that adding ten new students is such a huge new burden on the neighborhood – although there is no question that it will be an additional burden. It is the prospect that we will be here again in five or ten years arguing over the same issues. And it is the reason that we were so disappointed that it was impossible to obtain such an enforceable cap and so angry when we hear NCRC witnesses testifying that they have agreed to a cap.

Third, the schools assertion that it must increase the size of its enrollment to reduce its class size is, on its face, an indefensible proposition.

Fourth, Highland Place is a very small and very narrow street – a street that was never intended to accommodate five to six waves of cars per day. It is not a through street. There is a very simple reason why parents park illegally, drive illegally and walk in the middle of the road. When NCRC traffic is coming and going on Highland Place, there is just not enough room in the streets to drive, on the side of the streets to park, and on the sidewalks of the streets – such as they are or aren't – to walk. That is a reality that no one can change.

Fifth, the neighbors' opposition to this application is broad and deep. It is inaccurate to characterize the opposition as small in number and mean-spirited. You have the petition. You have the map. There is virtual unanimity among the people affected. To be at odds with this school is the last thing that we want. My friends and neighbors are not mean-spirited nor are they intractable. They do not oppose the school. On the contrary, they are as one in support of the school's mission, particularly when it comes to issues of special education and diversity. They have been forced to oppose this application because it simply ignores the limits on growth imposed by location and access, and because it will undeniably have an adverse impact on the street, on sidewalk congestion and on personal safety.

Sixth, as you have seen and as Mr. Welch testified, it has been difficult to get timely and accurate information about NCRC's proposal, including the number of students, the number of faculty and staff, the number of events and its traffic study and plan. We do know now that the accurate number of non-students who go to and from school is far greater than the 28 it is permitted. The school is correct when it says that it modified its original proposal and cut it back to the current proposal that is before this Board today. I do wish that the members of the Board could have seen the size and scope of the original proposal. That proposal – grandiose and simply immense – gave some hint as to the school's true ambitions when it first embarked on this plan. That proposal was a warning to the neighbors as to what would happen if NCRC was left to its own devices to grow and expand and develop as it saw fit.

Finally, the impact on this neighborhood from the school's traffic is real and the depiction of it that has been presented to you today is not an exaggeration. There is no question that the school has expanded operations, expanded hours, expanded enrollment, expanded staff, expanded summer camp, and expanded conference programs.

If there were space for the school to meet its ambitions, we would not be here. The reality is that the school exists in a space which limits its ability to accomplish those ambitions. Those ambitions have absolutely nothing to do with the school's mission which can and should continue. The neighbors do not want the school to leave. But the neighbors should not have to endure a massive transformation in their daily lives because, after these many years, the current leadership of NCRC and the current administrator of NCRC, unlike all previous ones, have decided that this school simply must grow whatever the consequences to others.

NCRC TIME LINE

Date	Activity
1928	National Child Research Center (NCRC), research facility, founded in residence at 3209 Highland Place (nursery school evolved at later time – date unknown)
May 31, 1935	3209 Highland Place sold to NCRC
October 23, 1963	NCRC has enrollment of 70 children (25 in radius of one mile); seeks BZA approval to erect new school building and increase enrollment to 80 children. DENIED – "not reasonably necessary or convenient to neighborhood." Further, "school must be primarily limited to children residing in the neighborhood."
March 1981	NCRC receives approval for 90 students. No application found in DC files.
1994	Refurbishes playground (application and/or hearings and orders missing)
Summer 1994	NCRC does complete remodeling of playground. Erects new permanent play structures, paved walkways, sand boxes, stairs and removes numerous mature trees. The school obtained no permit. Neighbors complained, NCRC made agreement with neighbors
September 20, 1996	DC Department of Consumer and Regulatory Affairs (DCRA) inspector notes that school has C of O for 90 students (school has more students on site.) "Center must obtain new C of O to increase license capacity." 166 students actually enrolled.
1996	NCRC applies to DCRA (Application #513293) to increase C of O. No application found in DC files.

January 1, 1997	Application 513293 DENIED due to need for Board of Zoning Adjustment (BZA) approval
June 5, 1997	DCRA measurement of NCRC's facility shows a maximum capacity for 108 students.
October 24, 1997	Kay Stafford, NCRC Acting Director, writes letter to neighbors advising (1) its new application "is a completely paper matter," (2) that the "school is not contemplating any construction or change in the maximum number of students, which currently stands at 108," and (3) that there will be "no change" in daily operations.
October 24, 1997	Matthew Watson, legal counsel to NCRC, writes letter to ANC3C Chair Phil Mendolson stating that "in actual fact, the school enrollment is now 108, 12 less than the license capacity...."
November 11, 1997	NCRC applies to BZA for increase in "number of students to 108."
November 21, 1997	NCRC announces Susan Piggott's appointment as new director, effective 7/1/98
November 24, 1997	BZA informs Advisory Neighborhood Commission (ANC) 3C of NCRC's application.
December 18, 1997	BZA director attests that "letters of notice" have been mailed to owners of property within 200 feet of property "based on list submitted by applicant." Bechner, Taylor, Neely, Craig, Kaufman, Ince not on list.
December 18, 1997	BZA announces NCRC's hearing will be January 21, 1998. The figure "120 students" is referenced as NCRC's requested increase number.

January 21, 1998	First BZA hearing on NCRC's application "to establish a child development center for 120 children and 28 faculty." Hours of operation 8 a.m. to 4 p.m. "children are on the premises from 8:35 to 3:30. Staff is there from 8:00 to 4:00"
January 27, 1998	Resident and neighbor Barbara Haas writes letter of complaint to BZA about inadequate notice. Phil Mendelson, ANC 3C chair, writes letter to BZA requesting new hearing.
February 19, 1998	BZA announces NCRC's second hearing will be April 1, 1998.
March 25, 1998	Phil Mendelson, ANC 3C chair, writes letter to BZA reciting NCRC's representations and advising of ANC recommendations for BZA's conditional approval with specific traffic mitigating conditions.
March 27, 1998	Department of Public works (DPW) issues memo to BZA recommending NCRC's application based on 108 students.
April 1, 1998	BZA hearing on Application of "NCRC to establish a child development center for 120 students." Hours of operation change from 8-4 to 8-5 to accommodate "some staff who work late."
April 29, 1998	Phil Mendelson, ANC 3C chair, writes letter to BZA specifying conditions to remedy traffic.
June 17, 1998	BZA releases summary order with conditions for January 21, 1998 hearing.
Mach 3, 1999	BZA releases Summary Order for April 1, 1998 hearing. Application for Special Exceptions approved for 8 years with traffic mitigation conditions.
February, 2002	NCRC announces plans to increase student enrollment to 190, staff to 38, and expand facility by 11,000+ ft..