Henry Little

Statement of ~~Gregory B. Craig~~

November 4, 2003

Mr. Chairman, Members of the Panel:

As ~~Mr. Little~~ I see this situation, NCRC is seeking permission from the BZA to increase its licensed enrollment by fifty percent and to construct new facilities on its property that will double the size of the school's physical space. Mr. Little urges the Board to deny this application.

~~On behalf of Mr. Little~~, I would remind the Board of the following:

Each of the three parties who owns property directly adjoining NCRC has testified against the proposal and described material adverse impacts that the proposed construction will have on each of them.

Virtually all the neighbors in the immediate vicinity of the school have either testified against the proposed expansion or signed petitions opposing the proposed expansion. There is an outpouring of feeling on this issue, and there is unanimity in the neighborhood.

Every civic organization that has taken up the issue of NCRC's proposed expansion has considered the proposal, discussed the proposal, heard both sides of the argument and gone on record opposing the proposal. That list would include the ANC, the Cleveland Park Civic Association and the Cleveland Park Historical Society.

The ward's representative in the City Council, Ms. Kathy Patterson, has registered her opposition to NCRC's proposal as has our Councilman at Large, Phil Mendelson.

With respect to traffic issues:

The Department of Transportation has found the current traffic conditions unsafe because of the volume of traffic generated by the school. The Department has recommended reducing the volume of traffic going to and from the school as one way of handling this situation. No such outcome is possible if the application to increase the population of the school is granted.

The Metropolitan Police Department has testified that the traffic conditions on Highland Place are currently unsafe because of the traffic generated by the school.

BZA
Case No. 16970
Exhibit No. 276

Board of Zoning Adjustment
District of Columbia
CASE NO.16970
EXHIBIT NO.276

Residents of the neighborhood – and a transportation expert – have provided the Panel with quantities of evidence to support DOT's conclusions and the Police Department's opinions. That evidence has taken the form of studies, photographic evidence, video tape, and direct testimony.

In addition, residents have submitted other evidence showing that the school's traffic management plan has failed to alleviate the hardship on the neighbors resulting from the current population. In the view of the neighbors, despite every good faith effort to implement the plan, NCRC cannot realistically be expected to resolve a problem that is caused by NCRC's location.

There are ~~three~~ two additional points to make that have some important technical significance, I think, to the issue of the variance:

Denying the application does not prevent NCRC from continuing to use its property effectively and successfully. On the contrary, there is no crisis at NCRC that has required it to launch such an ambitious plan of expansions. Whatever space problems the school does have can be handled with more modest renovations. The school will not experience any significant hardship if its plan to expand is rejected.

The proposed expansion is totally inconsistent with the comprehensive zoning plan for the city which provides for single-family residential with respect to all property in this neighborhood.

Mr. Chairman, the record is clear, and the evidence is overwhelming. We hope that the BZA will do its job, and that it will remain true to both the spirit and the letter of the law. On behalf of Mr. Little, I respectfully request that NCRC's application be denied.

In fact, the neighborhood enthusiastically supports the mission of this school .. particularly with respect to its special education programs and its commitment to diversity.

→ This tape shows her view from the ~~the~~ her property

6 minutes

limited purpose of showing the view that would be of the

the security

take off the needles

Henry P. Little
1336 Shrader Street
San Francisco, CA 94117-4232
(415)753-0535—home
(415)281-0406—office
hlittle@tnc.org

November 4, 2003

Mr. Geoffrey Griffis, Chairman
Board of Zoning Adjustment
441 4th Street, N.W.
Washington, D.C. 20001

Re: Henry P. Little's Testimony at the October 28, 2003 BZA Hearing Regarding BZA Application No. 16970 National Child Research Center 3209 Highland Place, N.W.; Square 2072, Lot 30

Dear Chairman Griffis and Members of the Board:

Attached are materials I have prepared to accompany my testimony today regarding Application No. 16970.

Should the BZA board members or others have any questions about my testimony, please do not hesitate to let me know.

Respectfully yours,

Sincerely,

Henry P. Little

Henry P. Little is the owner of a home at 3220 Ordway Street, N.W., Washington, D.C., 20008, immediately adjacent to NCRC.

BZA
Case No. 16970
Exhibit No. 276

HENRY P. LITTLE
1336 LAUREL STREET
SAN FRANCISCO, CALIFORNIA 94117

Materials to Accompany My Videotaped Testimony Which Is To Be Presented at the October 7, 2003 BZA Hearing Regarding BZA Application No. 16970, National Child Research Center, 3209 Highland Place, N.W.; Square 2072, Lot 30

Exhibit A: **Location Map: 3220 Ordway Street, N.W., and NCRC**

Exhibit B: **Proposed Expansion of NCRC relative to 3220 Ordway St., N.W.**

Exhibit C: **View of NCRC looking east from backyard/terrace of 3220 Ordway St., N.W.**

Exhibit D: **Visual, light and air flow impacts on 3220 Ordway St., N.W. of NCRC's proposed expansion**

Exhibit E: **Height measurement of NCRC's proposed expansion adjacent to 3220 Ordway St., N.W., as taken by neighbors**

Exhibit A: **Location Map: 3220 Ordway St., N.W. and NCRC**

6. 1900-1902 Lots Surviving 2002, Reconfigured to Present, in "Study Area" Superimposed on Tax Plat Map

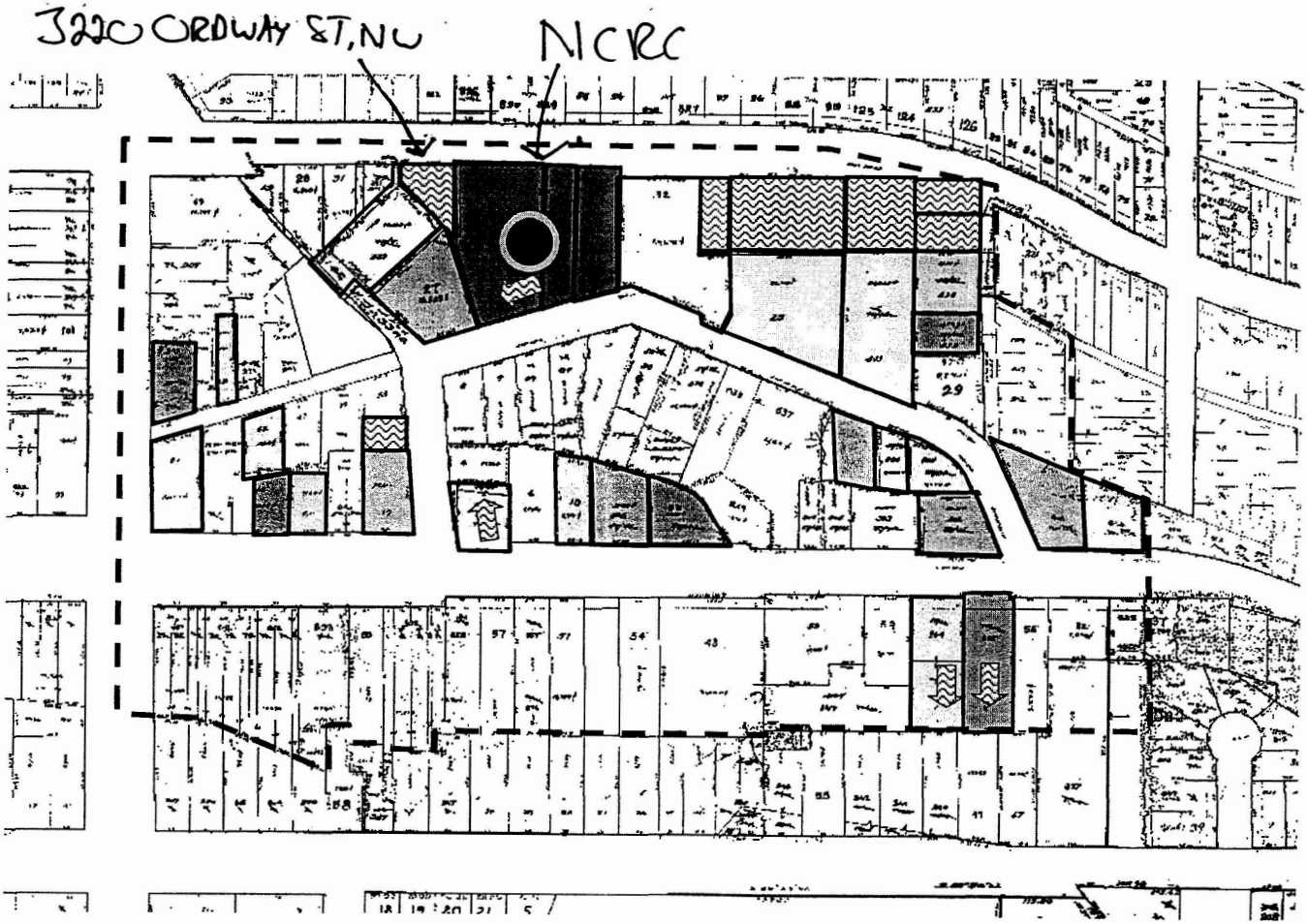


Exhibit B: Proposed Expansion of NCRC relative to 3220 Ordway St., N.W.

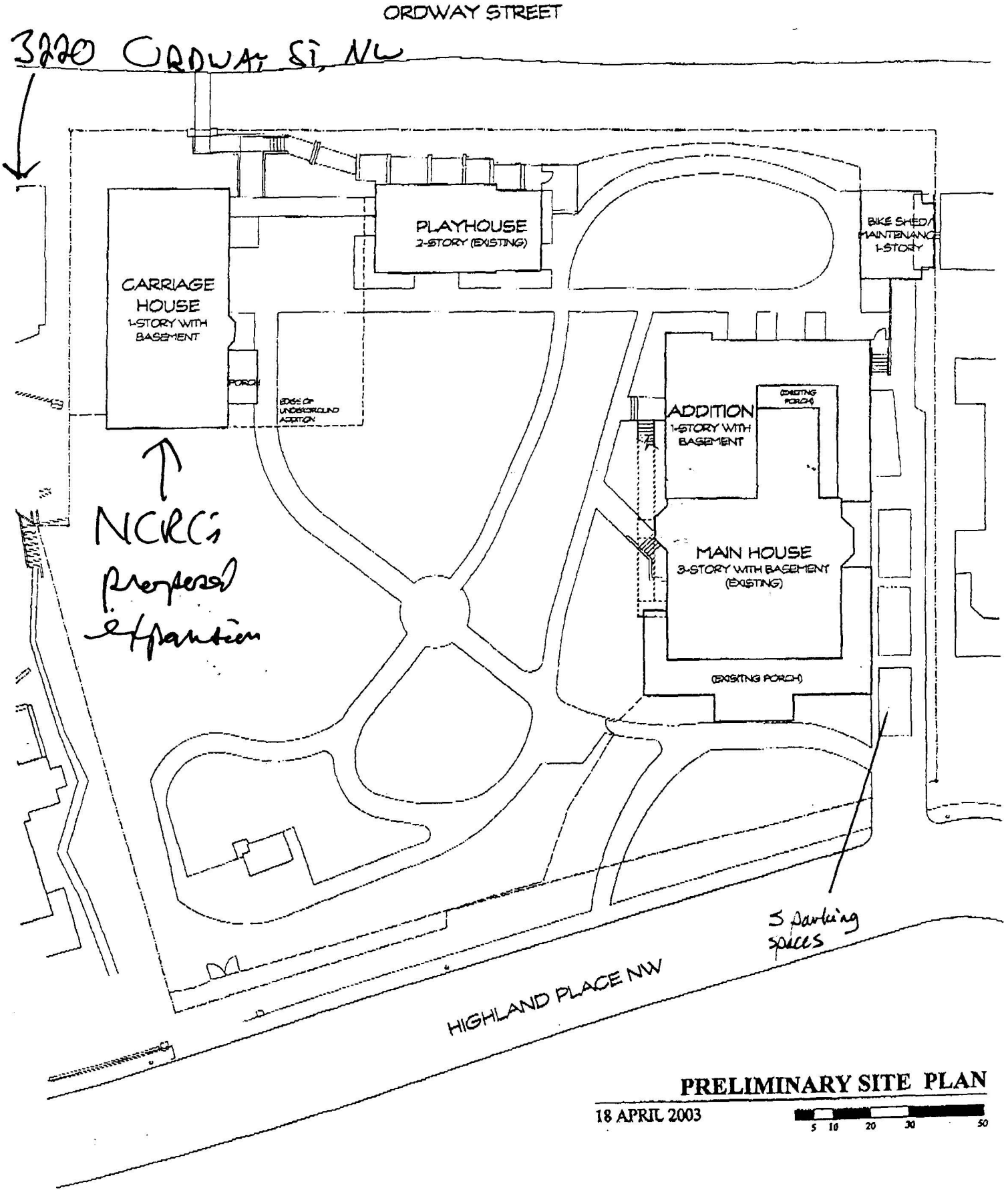


Exhibit C: View of NCRC looking east from backyard/terrace of 3220 Ordway St., N.W.





Exhibit E: **Height measurement of NCRC's proposed expansion adjacent to 3220 Ordway St., N.W., as taken by neighbors**

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November 4, 2003

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Board of Zoning Adjustment
441 4th Street, N.W.
Washington, D.C. 20001

Re: Henry P. Little's Testimony at the October 28, 2003 BZA Hearing Regarding BZA Application No. 16970 National Child Research Center 3209 Highland Place, N.W.; Square 2072, Lot 30

Dear Chairman Griffis and Members of the Board:

I have asked Gregory Craig, an attorney with Williams and Connelley law firm of Washington, D.C., to represent me as a party in opposition to NCRC's application number 16970 before the Board of Zoning Adjustment and assist me in my testimony before the BZA. Mr. Craig is duly authorized to fully and completely represent me and to bind me in any manner he deems appropriate in representing my interests.

Respectfully yours,

Sincerely,

Henry P. Little

Henry P. Little is the owner of a home at 3220 Ordway Street, N.W., Washington, D.C., 20008, immediately adjacent to NCRC.

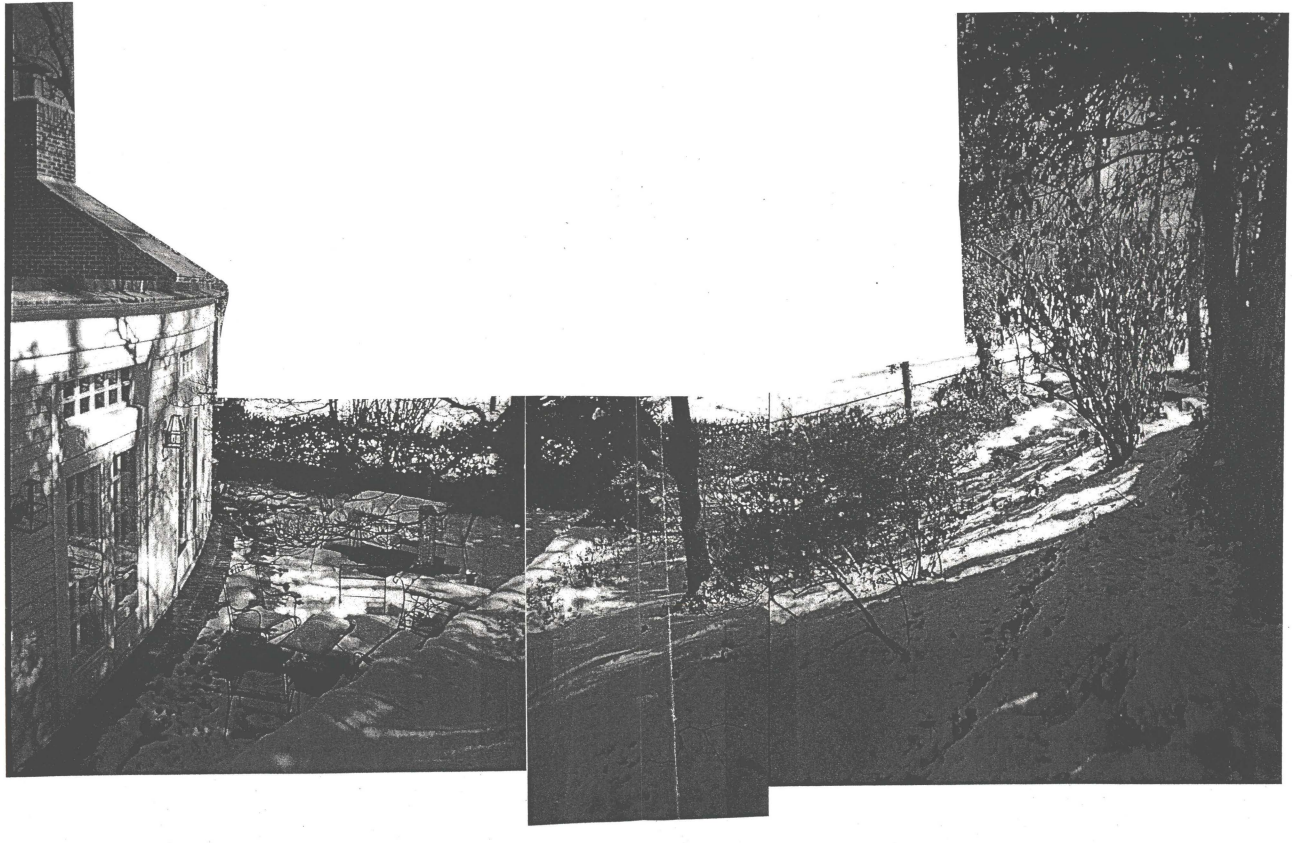


Exhibit D: **Visual, light and air flow impacts on 3220 Ordway St., N.W. of NCRC's proposed expansion**