BEFORE THE BOARD OF ZONING ADJUSTMENT
OF THE DISTRICT OF COLUMBIA

BZA Application No. 16970 **Public Meeting: April 13, 2004**
National Child Research Center

FRIENDS OF NCRC POSTHEARING SUBMISSION

I. Introduction

The Board of Zoning Adjustment, at its March 9, 2004, hearing on this case, re-opened the record to permit the parties to make written submissions (with citations to the existing record) addressing whether or not NCRC's proposed new construction meets the special exception requirements of Section 205.5 of the Zoning Regulations. This section of the Regulations states:

> The center, including any outdoor play space provided, shall be located and designed so that there will be no objectionable impacts on adjacent or nearby properties due to noise or activity, or visual or other objectionable conditions.

The Friends of NCRC is a party proponent in this case and firmly believes that NCRC's proposed new Carriage House, the addition to the main building, and the enhancement of the maintenance shed are entirely appropriate for the site, will cause no adverse impact on the adjoining properties and the surrounding neighborhood, and satisfy all requirements of the Zoning Regulations. At the Board's October 7, 2004 public hearing, Anne Large and Jon Thoren testified on behalf of the Friends of NCRC and submitted certain exhibits in connection with this testimony. Portions of their testimony and the exhibits relate to the proposed new construction and its compliance with Section 205.5. The highlights of these are set forth below.

II. Friends of NCRC Petition (Exhibit 243 of the record)

Jon Thoren submitted a petition of support of NCRC's project that contains the signatures of approximately 205 District of Columbia residents. This petition noted that the NCRC's Board of Trustees had found several key deficiencies with respect to its current facilities:

- An indoor space where the children can run and play in inclement weather;

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- A separate space for the library and the music room;
- A teacher workspace;
- A few small meeting spaces where teachers can meet privately with parents;
- Two new classrooms, the addition of which will allow NCRC to reduce the number of children in each existing classroom; and
- Moving children from the top (third) floor of the main house to enhance their safety.

In addition, the petition observed that, in response to neighbor concerns, NCRC "redesigned the new building so that much of it could be built underground, eliminating 40% of the structure originally planned for above the ground." The petition also observes that, after the proposed project is completed "more than 80% of NCRC's land will remain open playground and green space."

III. Testimony of Anne Large (October 7, 2003 Public Hearing

During her testimony before the Board, Anne Large noted, "The project that the school is proposing is a sorely needed upgrade of its existing facilities. As an alumna, I care very deeply about the school's mission to integrate children with special needs into its student body." (Tr. of 9/16/03 public hearing, p. 73.). With respect to the lack of adequate indoor space, Ms. Large said:

> "I know that my two year old son spent more than three weeks either inside a classroom or inside a home during the sniper crises, because NCRC does not have an indoor play space. And I spent a back-to-school night huddled outside under an umbrella, straining to hear what teachers and administrators were saying inside the playhouse, because there is not a room large enough to accommodate us." (Tr. of 9/16/03 public hearing, p. 74.)

Ms. Large also endorsed the design of the new construction: "As a long time Cleveland Park resident, I value the historic character of the neighborhood, its architecture and its institutions. And I believe that the beautiful, respectful design for the School's renovation is wholly compatible with this neighborhood character." (Tr. of 9/16/03 public hearing, p. 74.) Moreover, the vast amount of open space was recognized by Ms. Large, "And I am pleased that the playground which currently occupies 90 percent of the School's property would continue to occupy the vast majority of it, more than 80%, under this proposed renovation." (Tr. of 9/16/03 public hearing, p. 75.)

IV. Testimony of Jon Thoren (October 7, 2003 Public Hearing)

As part of his testimony, Jon Thoren presented a series of photographs of the existing Ordway Street elevation (Exhibit 302 of the record) to show that the vast majority of the existing homes in the vicinity of the proposed location of the Carriage House are three and four stories tall. (Tr. of 9/16/03 public hearing, p. 78.) Mr. Thoren's testimony generally indicated that the proposed carriage house would complement the existing houses on Ordway. (See Tr. of 9/16/03 public hearing, pages 78-79.)

Mr. Thoren stated that most of these homes are quite close together; some are only five feet from their side-lot property lines. (Tr. of 9/16/03 public hearing, p. 78.). "The predominant homes on Ordway are three stories," he said. (Tr. of 9/16/03 public hearing, p. 78.). By contrast, the Carriage House is designed to be two stories, the same height as Henry Little's house, which would be next to it to the west. (Tr. of 6/24/03 public hearing, p.158.).

V. CONCLUSION

There is substantial evidence in the record that indicates that NCRC meets the requirements of Section 205.5 of the special exception under the Zoning Regulations. Accordingly, the Friends of NCRC hereby requests the Board to render a prompt and favorable decision permitting the new construction sought by NCRC.

Respectfully submitted by,

Jon Thoren, on behalf of
The Friends of NCRC

CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2004, a copy of the foregoing letter was sent to the following parties:

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