NEIGHBORS ALLIED FOR THE REASONABLE DEVELOPMENT OF SCHOOLS
DEIRDRE KLOMAN KARAMBELAS
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June 24, 2003

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District of Columbia Office of Zoning
Board of Zoning Adjustment
441 4th St., NW
Suite 210-S
Washington, DC 20001

RE: Application Number 17022

To the Commissioners:

I am writing to protest the recent request by some neighbors to delay the hearing of Burke School Application No. 17022. I believe that the request for delay is purely tactical and has no merit on the facts.

Burke School has involved the community at every step of this process. For the past year the school has met with a group of neutral neighbors (i.e., those not involved in the previous application process, eight pro or opposed) consulting on the design of the building and traffic management plans. After many months of hard work, the process was opened to include those members of the community who had been vehemently opposed to Burke School's previous expansion application. The entire group was involved in the development of the enforcement plan.

In addition, the school has held five (5) open neighborhood meetings in the last six months and has provided monthly updates and calendars delivered to each door on Upton St. and to the surrounding apartment buildings. The have continually provided their contact information and invited neighbors to call with any questions.

The Edmund Burke School has consulted with our neighborhood extensively and has developed their final plan for application. There are those in the neighborhood who oppose the application and those who support it. I respectfully ask the Board to allow all of these neighbors to be heard on July 15, 2003 without delay.

I represent NARDS and am enclosing informational material from our group. We have requested party status for this hearing. Thank you for your time and attention to this matter.

Sincerely,

Deirdre Karambelas

BZA
Case No. 17022
Exhibit No. 42

Board of Zoning Adjustment
District of Columbia
CASE NO. 17022
EXHIBIT NO. 42

Neighbors Allied for the Reasonable Development of Schools

2938 Upton Street, NW
Washington, DC 20008
202-363-2733
deirdre20008@yahoo.com

Learn more about supporting Edmund Burke School -- Tuesday, June 10 at 7:00 pm, the Community Room, 3883 Connecticut Ave., NW, just south of Tilden. Refreshments will be served.

We are a group of neighbors of Edmund Burke School who support Burke's application to expand the school's facilities on Upton Street and Connecticut Avenue. We invite you to join with us to achieve constructive dialogue, sensible solutions and peaceful co-existence between urban schools and their neighbors.

Last year, the Board of Zoning Authority (BZA) denied Edmund Burke's application to expand due largely to concerns about traffic impact and the proposed enrollment size. Over the past year, Burke has worked with a dedicated advisory committee of neighbors who have been willing to engage in ongoing dialogue and problem solving to help the school create the best proposal possible for all concerned. In particular, Edmund Burke has:

1. Implemented a voluntary traffic management plan that has dramatically reduced morning traffic volume and congestion;
2. Lowered its proposed enrollment cap from 360 to 300, with the potential to increase to 320, but only if strict accountability measures are met.
3. Redesigned the proposed architectural plan to reorient the school and traffic flow to Connecticut Avenue.
4. Worked to develop rigorous enforcement and accountability measures so that neighbors can assess how well Burke is living up to its promises and have meaningful recourse if Burke does not meet its obligations;
5. Implemented policies and programs designed to benefit the neighborhood, including monthly information calendars and bulletins, weekly trash pickups, snow removal in the adjacent alley, and library privileges.

1. Voluntary Traffic Management Plan: Over One Year of Proven Success

For over one year, the school has instituted a traffic management plan that has dramatically decreased traffic volume and congestion on Upton Street and the Van Ness-Upton Street alley. The plan provides incentives for public transportation use, a morning shuttle bus service from Shoemaker Street, three-person carpool-only drop-offs, specified drop-off points for non-carpoolers that are monitored by school staff and parents, and the continued presence of off-duty police in the morning and afternoon. The plan is working. Traffic volume and congestion have improved significantly.

2. Lower Enrollment Figure-from 360 to 300 (with a ladder to 320)

Burke has reduced its requested enrollment increase from 360 to 300, with a ladder to 320 if the school meets clear benchmarks of success. This reduction in their request is a compromise that we believe illustrates their continuing commitment to listening to the neighborhood and working through challenges.

We understand that Burke lowered its enrollment to 295 students this year (2002-2003) and will reduce further in the 2003-2004 school year to 290 students. The school has shown good faith in taking these measures to move closer toward compliance with the current enrollment cap of 270. However, we recognize that the cap was set in 1983, and that demand for private schools has skyrocketed over the past 20 years. Burke is not the only private school to face strong demand for its services. We believe that communities must be realistic about the pressing need for private education

in our city. We believe that Burke's request will not adversely impact the neighborhood or compound the traffic situation. Burke's request is moderate, reasonable and should be approved by the BZA. Finally, Burke's requested possible ladder to 320 will only be permitted if the school meets certain stringent requirements.

3. Burke's Improved Building Design and Traffic Plan

We understand that the proposed 4-1/2 story addition to Burke will house additional classrooms, performing and visual arts spaces, and a black-box theater. The building height at 53 feet is well below the maximum 90-foot height permitted in the school's building zone. The new addition will be joined to the original building by an elevated walkway. The new glass and brick addition will complement the mixed-use nature of the neighborhood while echoing traditional elements of Burke's original building. The entire school will be reoriented from Upton Street to Connecticut Avenue including its main entrance.

Burke's new building design and traffic plan will further alleviate traffic problems.

- Vehicles will only be able to enter the school from Connecticut Ave., not Upton Street. Vehicles must be traveling north on Connecticut in order to make a right turn into the school; southbound traffic will not be permitted to turn left into the school. This will be monitored by off-duty police.
- Vehicles will loop around the school -- entirely on the school's property – on two dedicated lanes that run parallel to but do not encroach on the public alley. These two drop-off/pick-up lanes will merge into a single exit lane that will be monitored by off-duty police in the mornings and afternoons. Right of way will be given to public alley traffic.
- The new plan has space for up to 15 cars to be in queue on the school's site for drop-offs and pick-ups, rather than the current five drop-off spaces in front of the school.
- On-site parking will almost triple from the current 24 spaces to 70, due to a new two-story underground parking garage on the property. This commitment to maximize on-site parking further demonstrates Burke's responsiveness to the neighborhood.
- The school will continue to enforce the current traffic management plan, including the public transportation incentives, shuttle bus service, carpool only drop-offs, and monitoring of unauthorized drop-off locations.

4. Enforcement and Accountability Standards

Burke has developed a strict set of rules and procedures for students and parents to follow, including fines for infractions, and Burke's School Neighborhood Enforcement Plan is an aggressive mechanism for joint neighborhood/school evaluation of the school's performance.

A neighborhood school Enforcement Committee will apply clear guidelines to monitor and assess the impact the school's traffic and parking is having on 11 identified impact areas, including Van Ness, Upton, and Tilden Streets and their public alleys. Additionally, it will monitor and assess the school's compliance with student and faculty/staff limits. The committee will issue three reports a year to the neighborhood and BZA and levy substantial fines against the school if the school does not achieve an acceptable standard.

5. Burke Is a Good Neighbor

In keeping with its good neighbor policy, the school has undertaken a number of measures to strengthen its relationship with the neighborhood. The school has provided neighbors summer fitness courses, use of the school's library and its collection, weekly litter pick-up on Upton Street, complementary tickets to Burke performances and the plowing of alleys during snowstorms. The school has also sought to improve communications with its neighbors. Burke is trying to keep neighbors better informed through monthly updates, monthly school calendars, school program notes, and special announcements. The school has also been working with a dedicated committee of neighbors who have been willing to engage in an advisory capacity as the school developed its architectural, traffic, and enforcement plans. Though there have been and continue to be differences of opinion, the school has sought to foster positive, constructive dialogue and reasonable outcomes.

Robust City Schools Help Sustain Urban Communities

The Districts' private schools need to be renovated and updated in order to continue to

provide the essential services they provide. The denial of reasonable growth hurts the District and those residents who rely on private school education. Policymakers need to protect all of the city's various educational institutions and they need to support reasonable and responsible growth.

Guiding our efforts is a belief that education is of utmost importance and city residents can and should embrace educational facilities when the schools are reasonable and willing to work with the community, as Burke has done and continues to do.

On a more self-serving note, we believe that whatever else might go on the currently vacant lot could be far more disruptive to the neighborhood than Burke. Several types of buildings and facilities could be constructed on the lot with no BZA approval, such as a 90-foot high apartment building or an assisted living/ nursing home. These facilities could generate more traffic year round and cause other problems. The neighbors would have neither an enforcement plan as recourse nor responsive school administrators to query.

We want to make sure that our views are heard by the ANC and the BZA at this time and that we are included in the process of reviewing this application. If you have any questions or would like more information, please feel free to contact Deirdre Karambelas at 202-363-2733 or email deirdre2008@yahoo.com. You can also go to Burke's website (www.eburke.org) to review the executive summary from their BZA filing or go to the school's library to read it in its entirety. You can also visit www.anc3f.org to view the entire application as well.

Please join with us at 7:00 PM on Tuesday, June 10, at 7pm in the Community Room at 3883 Connecticut Ave., NW (just south of Tilden) to learn more about how we can make sure that our urban neighborhood will remain vibrant for its residents and its valued schools.

Very Truly Yours,

Deirdre Karambelas, 2938 Upton St., NW
Nick Karambelas, 2938 Upton St., NW
Denise Couture, 2934 Upton St., NW
Gerald Davis, 2902 Upton St., NW
Amy Goldson, 4015 28th Place, NW
Alfred Goldson, 4015 28th Place, NW
Ramsey Khraishah 4107 Conn. Ave. NW
Zanat Khraishah 4107 Conn. Ave. NW
Dr. Gregory Pappas 3016 Tilden Street NW

Form 140
(Revised 03/15/02)

Case [redacted]17022

PARTY STATUS APPLICATION

Notice: See other side of party status form for instructions. CLICK HERE.

NAME, Last	First	Middle L
Karambelas, Deirdre	Representing: Neighbors Allied for the Reasonable Development of Schools	(NARDS)

ADDRESS. Street	Apt # (if any)	City	state	Zip Code
2938 Upton Street, NW		Washington	DC	20008

Phone No.	Fax No.	E-Mail
202-363-2733	202-363-2882	deirdre20008@yahoo.com

I hereby request to appear and participate as a party. Signature: Deirdre Karambelas Date: 6/27/03

Will you appear as a(n) ☒ Proponent ☐ Opponent

Will you appear through legal counsel? ☐ Yes ☒ No

If yes, please enter the name and address of such legal counsel.

NAME, Last	First	Middle L

ADDRESS: Street	Ste, # (if any)	City	state	Zip Code

Phone No.	Fax No.	E-Mail

Please answer all of the following questions referencing why the above person should be granted party status
(If you require additional space, please attach an additional sheet)

1). How will the property owned or occupied by such person, or in which the person has an interest be affected by the action requested of the Board?

The property of Deirdre Karambelas as well as that of the other members of NARDS is on the same block as the site proposed for Edmund Burke School expansion. These neighbors are directly affected by traffic and parking by the proposed expansion and by whatever other development might occur on the property if the Burke expansion is denied.

2). What legal interest does the person have in the property? (i.e. owner, tenant, trustee, or mortgagee)

None

3). What is the distance between the person's property and the property that is the subject of the appeal or application before the Board? (Preferably no farther than 200ft.)

Within 200 feet

4). What are the environmental, economic or social impacts that are likely to affect the person and/or the person's property if the action requested of the Board is approved or denied?

If the Burke expansion is denied, these neighbors will be directly affected by alternative development, such as a matter-of-right apartment building.

5). Describe any other relevant matters that demonstrate how the person will likely be affected or aggrieved if the action requested of the Board is approved or denied.

In addition to the above matters, NARDS members have a strong commitment to living in a diverse community and taking steps to ensure that residential and institutional neighbors come to workable solutions to community-wide problems. We feel that the vitality of our community will be reduced if Burke leaves this site to be developed as an apartment building or as any of the other possible developments that could occur as a matter of right.

6). Explain how the persons interest will be more significantly, distinctively, or uniquely affected in character or kind by the proposed zoning action than that of other persons in the general public.

As with the neighbors in opposition who were granted party status (NULS), the members of NARDS are more affected than the general public due to our geographic proximity to the school. Members of NARDS live on the same block as Edmund Burke School and will be affected to a greater degree than persons in the general public by whatever development occurs on this site.

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