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RE: BZA Application #17149

June 16, 2004

Mr. Geoffrey Griffs, Chair
Board of Zoning Adjustment
441 4th Street, Suite 210S
Washington, D.C. 20001

Dear Mr. Griffs:

Next week, the BZA Board will begin hearing the Sidwell Friends School application for a multi-year, multi-building expansion project. As the Board moves into the review, we are sure that you share with the community the realization this is a huge, multifaceted application which will need a lot of attention as high quality analysis.

The Board will be receiving a report from the Office of Planning, a document which is now available to the public and even reviewed in the Northwest Current newspaper.

We are concerned about the OP report. It has multiple factual inaccuracies and a large number of assumptions which are not substantiated in the Report. The BZA needs better support than has been provided to aid the review of the Sidwell application.

Since the OP report is taken with great weight by the BZA, it is important that the Board be informed of the problems we have found in this document. We did try to contact the Director of the Office of Planning via email but he has not responded.

Item 1. **Description of the project**. On page 1, Op states the application is "for additions and enhancements to the existing school structures".

This statement could be understood as there are only going to be changes in the existing school structures. At a minimum, it is ambiguous. The fact is Sidwell application is for more than to just add to or enhance the existing school structures. The applicant proposes 3 new, major structures as well as enhancing existing school structures.

Item 2. Height of buildings. On page 2, OP states "no building will be higher than 40 feet above grade".

This description serious understates the net height and visual impact of both the Middle School addition and the new gym. These 2 structures can be defined as "objectionable" under Section 206.2, due to the location on the northern border of the subject project and the siting on an existing high hill.

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The current Middle School is 42 feet high. The addition is to be within the code of 40 feet, to the interior ceiling. The proposed addition of the Middle will be built on the northern most edge of the property and will be located on a hill approximately 15 feet above the sidewalk. Therefore, the net effect and visual impact of this addition will not be of a 40 foot high building but one 55 feet or more in height from the sidewalk.

The proposed new gym will be 50 feet high on the outside. It too will be located on the northern boundary where the hill slopes up. The net effect and visual impact will be close to 65 to 70 feet high from the sidewalk and The Washington Home property.

It is essential that BZA grasp that the net height over grade of these two buildings is particularly objectionable given their location immediately abutting the Washington Home property, a low, flat roofed structure. As well as their location diagonally across a residential street from an established neighborhood of single family, 2 story homes. These homes are ½ the net height of the proposed Middle school and even smaller compared to the new gym.

Item 3. Inaccurate statement about property use. On page 3, OP states: "The subject property has been used mainly as an educational institution for the past 65 years." This assertion is repeated on page 9.

The fact is the original Sidwell property was in a very small corner of the northwest portion of the site. By 1952, when the Middle School was built, the applicant expanded its property holdings through to 37th Street. But even then the parcel to the north of the Middle School was held by the Washington Home and to the south by a family.

The truth is the current 15 acres was not assembled until Sidwell purchased The Highlands from the Grayson family in the 1960s. Thus, the subject property has been used as an educational institution in the past 40 years, not 65 years as stated by OP.

Item 4. Changes minimized by the design. OP states, on page 3, that "Institutional changes seem to be minimized through improved design and environmental considerations". This is an inaccurate statement.

The changes place 2 major structures right up against the northern border, in close proximity to institutional and residential neighbors as well as remove existing green screening. This is not an improvement in design. Further the environmental concerns for improving green space are ignored on this boundary, with current proposal for planting of deciduous trees, which local landscape architect says will not thrive.

It is the community's position that this expansion of the Middle School and the new gym constitute violation of the provisions under 206.2 because of their objectionable nature.

Item 5. Abutting property. On page 3, OP states : "the subject property does not abut any residential properties." This statement may be technically correct in zoning regulations but does not reflect the residential aspect of the Home.

As is clearly evident from the page 3 map titled Location, the subject property abuts the Home property. Though the Home is an institution, it serves as a legal residence for many elderly people. Residents at the Home may use this address as their address for voter registration.

Item 6. Non-existent alley. On page 3, OP states that the applicant " is separated by an alley from the Washington Home."

There is no alley. There is a driveway for the Home which runs west about 1/3 of the way along property line starting at the east edge. The remainder of the subject property directly abuts the Washington Home property.

Item 7. Landscaping for proposed tennis courts. On page 3, OP states "While the Home's patio faces the proposed tennis courts, it would be screened by evergreen trees."

The most recent landscape "plan", as presented by the applicant to ANC3C on June 7, 2004 (and is likely the one used by the Op staff to write this report) clearly states "existing trees and hedge at Washington Home to remain". Since the existing trees and hedge are not evergreen, the statement is incorrect.

Item 8. Noise and playground areas. On page 4, OP states "The buildings, which help to contain play in this area, would act as a buffer for anticipated noise." This signals that OP thinks it is important to buffer playground noise.

Currently there is no specially designated outdoor play yard for the Middle School. They use the asphalted interior court yard just to the west of the Middle School building.

Clearly visible in the applicant's plan as submitted to the BZA, there is proposed a new s "play yard" shown on the extreme northern border. This will be an asphalted play space. No screening or sound proofing is proposed. Thus noise from this open play yard will carry to the Washington Home property. Is this an issue? Yes.

The play yard is very near the back area of the Washington Home and not far from the beautiful outdoor patio between the parking lot and the easternmost face of the facility. Noise from outdoor play, not buffered by plantings or other sound deadening devices will carry into this peaceful seating area. This will be objectionable, under Section 206.2, as it will disrupt the quiet times for Home residents and their guests.

Item 9. Comparison of statements on traffic. Please compare the OP section on traffic starting on page with the actual one page, DDOT report presented to the BZA, dated June 1, 2004.

OP reports "DDOT believes that if all drop-off and pick-ups occurred off the proposed Wisconsin Avenue access, cut-through commuter traffic through the neighborhoods in the morning and afternoon rush hour periods would increase." DDOT makes no such statement in their report to the BZA on June 1, 2004.

Item 10. Zoning Regulations on parking compared with Sidwell reality. The applicant's current parking space demand and utilization suggests a need for substantial revision of the ratios used under Zoning Regulations. Currently usage shows a 1 to 1 ratio for teacher and staff parking and a 7 to 10 ratio for high school students old enough to drive.

Under the 206.3 regulation for provision of "ample parking" for students teachers and visitors, the regulation guideline of 2 spaces per 3 teachers is inadequate. Currently Sidwell currently fills the 192 on site parking spaces with staff and bans parking for all students. The current usage at Sidwell for teachers and staff is close to a 1 to 1 ratio.

Sidwell demonstrates there is a need for 7 parking spaces for every 10 high school student old enough to have a driver's license. There are currently 124 student drivers, which is about 70% of the senior class and half the junior class.

Item 11. Footnote reference. At the bottom of page 3, there is a footnote citation but no indication to which this footnote refers.

Item 12. Increase in student drivers as result of increase in enrollment. On page 4, OP states, " If the same percentage of students drive to school, only 4 more students will drive to school" is incorrect.

OP did not understand the ambiguous data as presented by Sidwell. OP uncritically accepted the applicant's statement that 27% of high school students drive to school. However, since we all know that not all High School students can drive because they do not have licenses, a more accurate figure is based on ½ the junior class and all the senior class. Using this percentage, about 70% of Sidwell High School students drive to school on a daily basis.

Understanding this percentage, the OP conclusion is wrong. They say that an increase in enrollment resulting in 14 junior and senior high school students, will produce 4 additional student drivers or 27% of 14 students. The more accurate should be 70% of 14 or 10 new, driving students.

Assuming no change in number of drivers, the new total with expansion to 850 would be 134 student drivers. Along with the 192 to 186 spaces, the net space demand would be 320-326 for teachers, staff and students. And, this data is based on the figure provided by the applicant of 124 drivers, which may not be accurate.

Item 13. Increase enrollment needed to offset expanded garage. OP repeats without consideration the applicant's claim of the need for additional students (and their tuition) to cover costs of the expanded garage.

The BZA and OP should challenge this assertion by the applicant.

If Sidwell had paid attention to Zoning regulations with regard to the provisions for "ample parking "for staff, visitors AND students, the 2nd tier of the parking garage would have been a part of the original plan and initial budgeting decisions.

The understated assumption is Sidwell will provide the on-site parking at no cost. If this is their policy choice, they should be responsible for obtaining additional revenue elsewhere.

The applicant already has a precedent for charging for transportation services. They charge for use of the shuttle between the Lower School and Wisconsin Avenue campuses. If Sidwell were to charge all students for use of the parking garage at the going rate, it would not take long retire the added costs of the 2nd tier and the garage would become an income generator.

The 2nd tier of the garage is an income generator not a "financial risk" as claimed by the applicant.

Finally, OP analysis should have looked at the need in the first place for the parking garage. The garage is the applicant's transportation policy response to students driving to school.

- They could have taken a much more environmentally sensitive tack, like the Field School, and banned all students from driving to the campus.
- They could have placed substantial limits on on-site parking for both faculty and students with incorporation of vehicular traffic reduction strategies employed by neighboring schools such as Burke and GDS.
- They could provide extensive incentives and support services for use of mass transit and set as a goal a usage of 25 or 50%, which would be in keeping with the environmental commitment of the "green" design.

In sum, if the application chooses to place no constraints on number of student drivers, this is a policy decision for when they should assume the financial burden of this cost without condition for increased enrollment.

Item 14. The Zartman House. On Page 8, OP refers to the Zartman House or The Highlands as a "rural historic structure". This description is not accurate description of this structure and does not acknowledge the importance of this significantly important Category II federally landmarked structure.

Item 15. North Cleveland Park Commission? On page 8, OP states " The application for the proposed changes has been reviewed by adjacent neighbors and the large

community, including ANC3F and ANC3C, the McLean Gardens Condominium Association and the North Cleveland Park Commission.

What is the North Cleveland Park Commission OP refers to? Since ANC3F is already listed in the sentence, do they mean the Cleveland Park Citizens Association? This misnaming indicates how little contact with the community OP had on this project.

Item 16. Respecting sensitive features. On page 10 , OP states " respecting the massing on the site in relation to the site's sensitive features such as the Zartman House".

In fact, HPRB rejected the location initially proposed by the applicant for the Meeting House because it was too close to the Zartman House. This does not reflect the sensitivity claimed by OP.

Item 17. Enrollment inaccuracy. On page 10, in the next to last paragraph, the enrollment information is wrong:

"The maximum total enrollment shall be limited to 800 students in grades 7 through 12". Sidwell Friends School, Wisconsin Avenue campus, enrolls students in grades 5 through 12, not 7 through 12.

In conclusion, many of us have been working very hard on generating a constructive resolution to the applicant's proposals for expansion. We have put a lot of time into this effort since early December. It is a complex proposal with many components still in the "concept" stage.

We need the BZA to join with us in a careful and thorough review of this application. We are very disappointment in the quality of the document presented to the BZA by the Office of Planning.

Cordially,

Members of Citizens Concerned about Sidwell Expansion

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