

November 12, 2017

Chunmeng Bai & John Giles  
1501 Gallatin St NW  
Washington, DC 20011

Chairman Fred Hill or Current Chairman  
D.C. Board of Zoning Adjustment  
441 4th Street, NW, Suite 200S  
Washington, DC 20001

**RE: Opposition to Specific Features of Application #19581: Latin American Montessori Bilingual (LAMB) Public Charter School Application to Increase the Number of Students from 300 to 600 at 5000 14<sup>th</sup> St NW**

Dear Chair and Members of the Board:

We, Chunmeng Bai and John Giles, live at 1501 Gallatin St NW, on the corner of Gallatin St NW and Piney Branch St NW, which is diagonally across from the Kingsbury School at 5000 14<sup>th</sup> Street NW. We would like to stress that we are not adamantly opposed to LAMB moving to the Kingsbury property, but feel that the concerns of the neighbors over the traffic and noise impacts of the proposed move have not been adequately addressed.

Since sending our initial letter to you (dated October 31, 2017), we have attended an ANC Meeting and listened to parents of LAMB children, read the recommendations of the office of Planning, and the interpretation of our ANC representative's opinion regarding the needs of Building Hope/LAMB. Our initial concerns were related primarily with the likely increase in traffic along Piney Branch Rd on the morning commute, but the Office of Planning report and other interactions have raised additional concerns for us. We detail these below.

**Traffic on Piney Branch.** We are concerned about plans for the Latin American Montessori Bilingual School (LAMB) Public Charter move to the Kingsbury property, and in particular, the likely increase in traffic along Piney Branch Rd NW. Traffic along Piney Branch, and likely congestion and backups at Piney Branch and Gallatin St NW, were not considered in the traffic study commissioned by the Applicants (Building Hope and LAMB). We believe this to be a serious deficiency in the study, and feel that any plans to allow entry or exit of vehicles on Piney Branch during morning drop off or afternoon pick up from the Kingsbury/LAMB property will have significant detrimental effects on the community.

Piney Branch is an unimproved road with no pedestrian walkways, no parking lanes in either direction and is frequently restricted to one lane of travel with cars parked along it. Nonetheless, for students traveling from north and east of Kingsbury in the morning windows, GPS systems set to 1501 Farragut St NW (which is across from the rear entrance to Kingsbury) highlight a path down Colorado St NW to Piney Branch and to the rear of Kingsbury as the best route to the school. (See the attached screen shot of a map from Google Maps taken at 8:13 AM on November 13, 2017). This deficiency in the traffic study suggests that parents in a hurry in the morning are very likely to choose expedited travel along this narrow and unimproved road.

Apart from the likely difficulties this will cause for those of us in the neighborhood who need to commute to work, those of us who are parents of young children are particularly concerned about the possibility of anxious LAMB parents driving at high speeds down Piney Branch RD in their efforts to get to school on time. We strongly believe that Piney Branch should not be used for child drop off and pick up.

**On the Gradual Increase in the Student Population.** Several of the earnest and well-meaning LAMB parents speaking at the ANC meeting, none of whom were immediate neighbors of the Kingsbury property, urged those of us on the border of LAMB not to worry, because the student population would increase gradually and that we would hardly notice. We did not find these heartening, but instead were reminded of the poor fate of the “boiling frog” in a famous children’s story. In this parable, a frog is enticed to relax in a pot of water that is currently tepid and comforting, but doesn’t notice as the heat is gradually raised to boiling, and eventually the poor frog is cooked. As the Applicant’s representatives comfort us with assertions that the student population will not rise all at once, we are hearing an invitation to jump in the pot, with a promise that the “temperature” will rise only very slowly.

The one failsafe mechanism (to save us “frogs”) can be found in the DC Office of Planning recommendation that the Applicant return to the BZA for further review when Kingsbury departs the property and the student population for LAMB increases from 310 to 600. (In addition, the Office of Planning urges that LAMB submit details of the gymnasium to the BZA for review prior to construction either as part of the review for expansion of the LAMB population, or as a modification to the approved LAMB application.) As the Applicant is requesting a 500 percent increase in the student population at the Kingsbury property, there is really no ability to project whether the transportation arrangements will work or how closely they will be adhered to. We believe that a future review with expansion of the commuting student population (as Kingsbury students tend to be bussed), provides appropriate incentives for LAMB to institutionalize arrangements that will limit impact on the immediate neighbors.

**On the Need for Building Hope/LAMB to Secure BZA Approval for 600 Students.**

After the ANC-4C voted 5-2 to support the conditions proposed by the DC Office of Planning, one of which was a new review by BZA upon Kingsbury School's exit from the property and before LAMB's proposed expansion to a population of 600 students and teachers. Our local ANC representative, Maria Barry, wrote a separate letter stating that she dissented from follow-up review condition because it would place an undue burden on the developer, Building Hope, in its effort to raise financing for the purchase of the building. We have heard that other neighbors, in their conversations with Building Hope, have heard similar assertions. For us this raises two issues, which we would like the BZA to consider:

First, we may be naïve on these matters, but we were not aware that the BZA's role extended to coordinating the financing for development projects in the district. If the Applicant cannot afford the property under the existing zoning rules, there is a very simple solution: they should find a property that brings LAMB under one roof and for which they can arrange financing.

Second, by stating that reexamination of traffic and congestion by the BZA at a later date will cause problems raising funds, Building Hope is suggesting that the elaborate transportation plans suggested by LAMB and its well-intentioned parents is not credible. Why? Those parties with a financial stake in an investment (either Building Hope or the investors/bankers that they hope to bring to the table) have "skin in the game" and a very strong financial incentive to correctly address all the facts and the situations behind their investment. If everyone shares the expectations that LAMB will be successful at keeping down congestion problems with its first expansion to 310 students, then there should be no reason to worry about whether they will have difficulty securing community and BZA support for an eventual expansion to 600 students. This requirement should not impede financing if LAMB's transportation management plan is credible.

The simple fact that Building Hope believes they cannot find financing under this circumstance raises a worrisome red flag. The request for a one-step clearance to 600 commuting LAMB students, if granted, would fully shift the risk that LAMB will not be able to manage the commuting patterns of its parents from investors onto homeowners in the neighborhood. We, as "neighbors with standing," believe that LAMB/Building Hope needs to devise a traffic/congestion/noise abatement plan for the community that is sufficiently credible that they can "take it to the bank." The phased expansion, which is explicit in the Office of Planning's recommendation that LAMB return to the BZA when expanding its student population implicitly suggests a reasonable requirement that LAMB, Building Hope and their investors share the congestion risk with the neighbors of standing. We believe that this is an important part of the process of guaranteeing that LAMB and

Building Hope are appropriately incentivized to uphold their commitments regarding mitigation of traffic congestion in the neighborhood.

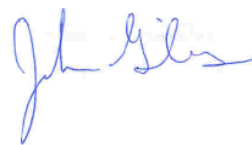
**Hours of Operation.** The application states that hours of operation would not include weeknights or weekends, but special events occur at all schools (e.g., orientations, parent-teacher meetings, school picnics), and visitor parking is likely to be a challenge. The neighborhood is home to several religious institutions that use available street parking during large portions of the weekend, as do visitors to Carter Barron Amphitheatre and Rock Creek Park. While there is ample parking for staff during normal operating hours, visitor parking during school-wide events would severely tax neighborhood streets.

**The Benefits of LAMB Moving to the Neighborhood.** Again, we are not adamantly opposed to LAMB's move to the Kingsbury property. LAMB is regarded as a well-run public charter school. We recognize that LAMB parents within Ward 4 have a significant private interest in LAMB's move to a nearby location, but as LAMB is a public charter school that immediate neighbors may only access through a highly competitive lottery, the substantial benefits of the school are not shared by its neighbors, and if congestion is not sufficiently mitigated, can only have detrimental effects on property values of the immediate neighbors. Time permitting, I will go more into the microeconomics supporting this conclusion in our discussion at the hearing on November 15, 2017.

In summary, to protect the interests of the residents of standing, we urge the BZA to follow the recommendations of the Office of Planning and the full ANC-4C in its decisions over the conditions under which LAMB may relocate to the Kingsbury.

Sincerely,

*Chunmeng Bai*



Chunmeng Bai  
John Giles

**Annex A – Best Route to Piney Branch Entrance to Kingsbury from Points North East**  
Reproduced from Google Maps at 8:13 AM on November 1

