

Cochran, Patricia (DCOZ)

From: Anne Chrun <annechrun@gmail.com>
Sent: Wednesday, October 27, 2021 12:41 PM
To: DCOZ - BZA Submissions (DCOZ)
Cc: Young, Paul (DCOZ); Reid, Robert (DCOZ)
Subject: Submission on Behalf of Tenleytown Preservation Association in Opposition to River School Application #20472

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Dear Mr. Young,

As discussed with Mr. Reid this morning, this is a submission of my testimony as one of the lead speakers for the Tenleytown Preservation Association in opposition to the River School application #20472. When called upon to testify, I will also request the board to allow me to submit this.

With thanks and best regards,
Anne Chrun
202-468-0816

BZA Case #20472 OPPOSITION

Tenleytown Preservation Association:

CLINIC PRESENTATION

Dear Chairman Hill and Members of the Board of Zoning Adjustment.

My name is Anne Chrun and I live 4340 Verplanck Place which is two blocks from the site at 4220 Nebraska. I have lived at this address for 18 years now and I have witnessed a few expansions plans close to my home. This is the first time I am speaking before your board.

I believe in development: it's the sign of the vibrancy of a community.

I have attended all the ANC meetings for the last 8 months and tried to understand the filings made by the River School. I have come to the conclusion that this project is different.

Our ANC3e who is pro-development and who has the most direct knowledge of the neighborhood and the site, has after extensive consideration and engagement with the River School resolved decisively to oppose the application. That opposition is based on issues of traffic volume, use of local streets for queuing, intersection performance, lack of commitment to alternative transit modes in the TMP, and lack of consequences for non-compliance.

There are many objectionable issues related to the River School zoning exception request including that the property is zoned as R-1-B and the applicant clearly understood that when making a bid on the property.

However, the main issue I would like to discuss is the size and scope of the proposed clinic at 4220 Nebraska. The objectives for the clinic have not been clearly spelled out by the River School and could substantially add to the traffic and other adverse impacts of the plans on the neighborhood.

Even without a further expansion of the clinic, the plan is not compatible with zoning regulations as the plan would have **objectionable and irreversible adverse effects** on the neighborhood. One of the gravest adverse effects would be **to endanger** the many pedestrians, cyclists and scooter riders (**especially children walking to the 12 nursery, public and private schools within one mile** of the River School proposed site) using our sidewalks and **to increase the loads on intersections** already graded as dangerous (9 intersections graded "F" or "failing" by DDOT) and possibly increase incidents and accidents.

The River School plan would not only add a *large* school and a *large* child care center 440 (350 students + 90 faculty) to a 2.¼ acres property, smaller than all but one private school in DC but it would **also add** a *large new* National Center for Hearing Innovation (NCHI) for which the River School clearly has ambitious goals.

The existing River School location has an audiology clinic called the “Potomac River Clinic.” The clinic serves the needs of its student population *of which less than 18% has corrected hearing, more likely 10%-15%.* According to its website, the clinic also serves young children with hearing loss “throughout the region.” It is described as “a non-profit organization co-located in The River School, which serves the greater Washington, DC area. It provides children with hearing loss and their families a wide range of services, including auditory-verbal therapy, hearing aid and cochlear implant programming, occupational therapy, psycho-educational assessments, educational supports, speech-language therapy and other services”.

The proposal for the River School does not simply include a clinic as an accessory to a school. It would include a 9,000-14,000 square foot facility to house this new entity, the National Center for Hearing Innovation or NCHI. This NCHI would not just be a specialized center for students of the River school which would be the norm for a local independent school as a learning center or specialized health care office.

The proposed new NCHI would be an ancillary, currently unfunded, entity, which would be outside of the mission of the school, would be staffed by many non full-time employees such as researchers, fellows or specialists and would serve a wider public and host national conferences as part of its proposed activities. Please refer to the River School strategic planning, item 4 in footnote 2.

It clearly would not be “an accessory clinic”, it would be much more, yet the River School has declined to provide or has omitted details related to this “clinic” about the long term plans, where on the proposed property it would be located, how many visitors and non-full time equivalent (“FTE”)’s there would be each day, where would they park, what the non-FTE staffing hours would be, and the actual size of the center, and how many annual conferences they plan to hold, how many participants will be at each, will they occur during the school day or on weekends?

The Zoning Regulations define accessory use as, “a use customarily incidental and subordinate to the principal use and located on the same lot with the principal use. Except for short-term rentals and unless otherwise specifically permitted, *an accessory use shall be limited to twenty percent (20%) of the gross floor area.*” (11-B DCMR §100) The clinic has been noted in several documents to be either 9,300 or 14,000 square feet. The fact that the school has said that it would only occupy approximately 11.5% of the overall square footage on site contradicts their other planning documents.

The concerns about the clinic add to the wider concerns already raised about traffic and other adverse effects that would stem from the relocation of the school.

Our community has not had its safety concerns (safety of people and vehicles) addressed despite years of requesting actions. The current analysis has failed to respond to these concerns adequately.

Chairman Hill and members of the Board, I therefore respectfully request that you deny the River School request for zoning exceptions.

The proposal is objectionable due to the size and scope and the irreversible adverse impacts it will have in the short and long term on the community related to safety, and traffic.

In addition, the school has omitted key details in their BZA application about this National Hearing Center for Innovation which is plainly on their website in the 2020-2025 Strategic Plan section as a major initiative they are planning to focus on if they complete the purchase of the property at 4220 Nebraska.

TRS has stated the clinic has been deemed as “accessory use” by the DC Zoning Administrator (pre Hearing statement dated 10/6 at page 3), but has not produced the determination. Did the BZA place any limitations on this determination? Why has the determination not been made public?

The OP estimates approximately 20 non-students will use the clinic each day, and goes on to state these 20 are not counted in the 350-maximum students per day estimate provided by TRS. So the actual number of attendees is 370 (students and non-students at the clinic). Is 20 non-students a cap, or just an estimate? (See OP report at page 4). Are clinic staff included in the traffic counts?

Thank you for your consideration.

Citations:

1.*“...almost all private schools now have a learning center with learning specialists—ten, 15 years ago, there wasn’t a dedicated department with trained specialists there to support not only kids and families but also to work with faculty in their professional development,” Washingtonian Magazine, “Private School Confidential: 25 Things Washington Parents Need to Know,” by Sherri Delphonse, Meaghan Hnna Davant, Kristen Hinman, Luke Mullins. October 18, 2018 [Access article link here.](#)

2. Item 4 of the River School 2020-2025 strategic plan (https://riverschool.net/wp-content/uploads/2020/04/River_school_strategic_plan.pdf):

“The River School will join with university, hospital and industry partners to develop a National Center for Hearing Innovation (NCHI) in Washington, DC. The goal is to improve access for all individuals with hearing loss to new hearing and listening technologies and to promote collaboration, clinical research and services, professional training, outreach and advocacy.

» Establish NCHI to better integrate the efforts of new and existing partners to improve treatment and outcomes for children and adults with hearing loss.

» Initiate collaborations that will provide the financial support needed to create NCHI and add value to The River School program through enhanced opportunities for research and development.

» Conduct a fundraising campaign to provide financial support for the establishment of NCHI.»
Acquire a new facility to house NCHI and an expanded school, and build clinical capacity.”