

Timothy Harr
4106 42nd Street NW Washington, DC 20016

October 5, 2021

Frederick Hill
Chairman
District of Columbia Board of Zoning Adjustment

Re: **BZA No. 20472 – The River School: LETTER IN OPPOSITION**

Dear Chairman Hill-

Zoning and City Planning are not pointless or unimportant; they help create livable cities. They are a covenant between the City and its citizens that, if a citizen puts down roots in a neighborhood planned and zoned for particular types of structures and uses, the City will protect that neighborhood against developments inconsistent with and adverse to that planning and zoning. DC's Comprehensive Plan is the tool approved by the City Council to guide future decisions on what goes where. Under applicable Zoning and Planning, the referenced application must be denied.

I live only two houses and across the street from the leafy site for which The River School (TRS) is seeking a Special Exception to build a large institutional development in our R-1-B neighborhood. TRS did not initially contact me, but I learned about their plans from other neighbors. Since that time, I have sought to understand the TRS plans, which have been evolving, and I have raised concerns with TRS about the adverse effects such a large development would have on the neighbors.

To be granted a Special Exception to build both a large school and a public clinic on a residential lot, TRS must show the BZA that they would not affect adversely the neighbors, in particular that they would not be objectionable to neighbors because of traffic, number of students, or for other reasons. TRS cannot show this. In fact the neighbors have objected, as most people would, to a developer trying to move hundreds of people and big buildings onto a nearby 2.27-acre residential lot. TRS's proposed development would have major adverse effects on neighbors. These include:

1. Increased traffic congestion and traffic safety risks – From a residential site generating only a handful of car trips through the neighboring streets each day, the TRS development would generate hundreds. There clearly would be an adverse effect on

neighbors trying to use the same streets. There would also be adverse safety effects because the surrounding streets and sidewalks are often used by residents, their children, local college students, friends and visitors, walking, riding bikes, scooters, etc. at all hours of the day, particularly now that schools are back in session.

2. Increased parking congestion – On a residential site generating basically no cars parking on local streets, the TRS filing says it would put a school with 350 children and 90 employees, plus a hearing clinic with a staff and outside patients, but would provide only 42 compliant (and some non-compliant) parking spots. Once those spots are filled, anyone else driving to the site, including the other employees, parents visiting students or teachers, parents bringing children to the clinic, school applicants, colleagues visiting for professional meetings, friends and family of the staff or students, service providers, waiting ride-share drivers, etc., would all have to park on the neighboring streets.

3. Density out of scale with a residential neighborhood – On a single R-1-B residential site housing only a handful of residents, TRS plans to pack roughly 450 people, the equivalent of about 200 average DC households. This density of about 200 occupants per acre is very inconsistent with an R-1-B zone. The large TRS concentration of people and activities, with attendant cars, congestion, disruption, construction, and big buildings, would all adversely affect neighbors and violate R-1 density norms.

4. Buildings out of scale for a residential neighborhood – Where there is now a two-story cottage-like primary residence and gatehouse, surrounded by trees and bushes, TRS proposes to put institutional buildings to accommodate its 450 people, as TRS significantly increases its current school population and triples the size of its physical plant, from 22,000 to 66,000 square feet. The TRS filings and plans show large institutional-looking buildings massed on the property perimeter, with exterior facade designs totally out of character with a residential neighborhood and streetscape. TRS should choose a larger, more appropriate location for its expansion.

While TRS has suggested possible measures it could impose to reduce these adverse effects on neighbors, there are at least two reasons why such measures would be unlikely to remedy most of the adverse effects, if TRS were permitted to build its large school and its clinic on this residential lot:

First, TRS provides no compelling sanctions if TRS administrators should fail to impose the suggested measures. The suggested consequences do not seem strong enough to

ensure that TRS would do whatever is necessary to compel such measures in the face of parent resistance, once the buildings were built, the tuitions were paid, and the students were in place. Who would enforce TRS compliance? What would TRS be required to do? What sanctions would be powerful enough to get TRS to forcibly impose measures opposed or ignored by its all-important parents? Before considering any promised remediation measures, the BZA must assess whether TRS would be able to and could be compelled to impose those measures in the face of parent opposition.

Second, the suggested measures, even if successfully imposed, would reduce the adverse effects only somewhat. It would be virtually impossible for TRS to operate a complex of 450 individuals (most of whom generate two commutes per day) on a limited residential lot, without significant adverse effects on the neighborhood in terms of traffic, parking, general commotion, and permanent large institutional buildings.

The BZA has to draw the line somewhere when large private schools serving the greater metropolitan area want to move hundreds of people onto small properties in the District's R-1 residential neighborhoods. There is a point at which the BZA should say: "No, the development is simply too big for such a small space, the adverse impacts are too substantial, and remediation efforts cannot realistically be expected to minimize them." This proposed project is such a case, and the BZA should step up and protect the DC zoning and planning map for this neighborhood.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Timothy Harr', written in a cursive style.

Timothy Harr

Cc:
ANC3E Commissioners;
DC Historic Preservation Review Board
DC Department of Transportation
Councilmember Mary Cheh