

WINFIELD P. CRIGLER

14 October 2021

Frederick Hill
Chairman
District of Columbia Board of Zoning Adjustment

RE: BZA 20472 – The River School: LETTER IN OPPOSITION

Dear Chairman Hill:

I am a nearby neighbor of the Under Oak site (4220 Nebraska Avenue, NW) where The River School proposes to relocate and substantially expand its school and clinic. While I totally agree that The River School has an admirable educational purpose, it is simply too large for the proposed site and will have irremediable adverse effects on the surrounding R-1-B neighborhood, particularly with respect to the substantial additional traffic it will generate in an area that has several dangerous intersections and is already overly clogged during school pick-up and drop-off times.

The proposed school is too large for the site. The parcel that The River School wishes to purchase is approximately 2 and ¼ acres. They want to put on the site a school with 350 children and 90 faculty and staff, plus a hearing clinic with 10 clinicians who will see 50 patients each day, 40% of whom will be members of the general public.

The school claims that 4220 Nebraska Avenue, NW is an “unusually large site.”¹ While that may be true for the single residence that currently occupies the property, it is only two residential lots in an area zoned R-1-B. “The purposes of the R-1-B zone are to:

- Protect quiet residential areas now developed with detached dwellings and adjoining vacant areas likely to be developed for those purposes; and
- Stabilize the residential areas and promote a suitable environment for family life.

The R-1-B zone is intended to provide areas predominantly developed with detached houses on moderately sized lots.”² Large institutional buildings placed at the perimeter of the site do not comply with the purpose of the R-1-B zone. Under Oak is simply not a large enough property for a school as large as that proposed by The River School.

The River School cites the Edmund Burke School as its only example of private schools in DC on even smaller lots. However, Burke is the typical “exception that proves the rule.” It is the opposite of The River School in that Burke currently serves 300 students in Grades 6-12, of whom 75% are in high school.³ These students can easily use the metro and bus system all by themselves (which 90% of the very young River School students cannot do). The Burke campus is zoned RA-4, which permits far more residential density including

¹ BZA Case No. 20472, The River School, Exhibit 51A (Prehearing Statement: Tab A (Supplemental Statement)), p. 7.

² See <https://handbook.dcoz.dc.gov/zones/residential/r-1-b/> (last viewed October 11, 2021)

³ See <https://www.burkeschool.org/about-us/fast-facts> (last viewed October 11, 2021)

apartment buildings, and in addition, “permits the construction of those institutional and semi-public buildings that would be compatible with adjoining residential uses and that are excluded from the more restrictive residential zones.”⁴ Moreover, Burke’s small lot has required it to arrange for play areas and other amenities at close-by universities. Thus, Burke’s lot size is deceptive and not an appropriate example.

Virtually all other private elementary schools in an R-1 zone have much more property -- National Presbyterian School, Beauvoir, St. Patrick’s, Field School, Lowell, Washington International School (primary school campus) just to name a few. Moreover, their buildings are set back from the street, whereas The River School proposes to mass its large building as close to the street as possible. And even with their larger land areas, current nearby private school traffic spills out into the public streets during pick-up and drop-off times.

The parking that the school proposes to provide does not meet the minimum parking requirements of the zoning regulations. The zoning regulations provide for parking requirements which are the minimum floor required for occupancy: “Ample parking space, but not less than that required by this title, shall be provided...” The fact that the River School acknowledges that it cannot meet these minimum parking requirements is proof that the proposed project is too large for the site.⁵ In addition, the school is requesting that current street parking on Nebraska Avenue close to the school be eliminated. Given the strong adverse impact on the neighborhood from having over 450 people use this site, including members of the general public visiting the hearing clinic, the school must, at a minimum, provide at least the required parking. **The BZA should not grant The River School an exception to the minimum parking requirements.**

The additional traffic caused by The River School will cause irreversible adverse effects on the neighborhood, endangering the many pedestrians and bicycle and scooter riders already on our sidewalks, and increasing the loads on intersections already deems dangerous. There are currently at least 14 daycare centers, nursery schools, public and private schools and colleges within one mile of the proposed River School site⁶:

- National Presbyterian School (0.1 miles)
- American University Law School (0.1 miles)
- Broadcast House Daycare (???)
- St. Alban’s Early Childhood Center (0.2 miles)
- American University (0.3 miles)
- Janney Elementary School (0.4 miles)
- St. Columba’s Nursery School (0.4 miles)
- Sidwell Friends School (0.6 miles)
- Wilson High School (0.6 miles)
- Alice Deal Middle School (0.7 miles)

⁴ See <https://handbook.dcoz.dc.gov/zones/residential-apartment/ra-4/> (last viewed October 11, 2021)

⁵ BZA Case No. 20472, The River School, Exhibit 51A (Prehearing Statement: Tab A (Supplemental Statement)), p. 8.

⁶ All distances calculated using Google maps “walking distance from 4220 Nebraska Avenue, NW”

- Hearst Elementary School (0.7 miles)
- Metropolitan Methodist Church Nursery School (0.7 miles)
- Georgetown Day School (0.8 miles)
- Horace Mann Elementary School (0.8 miles)

The pre-school and post-school traffic caused by the existing schools is already more than substantial, with gridlock occurring at the beginning and end of the school day. And several schools have already received permission to expand, the consequences of which have not yet been felt by the neighborhood, either because of the pandemic (Georgetown Day School) or because the expansion has not yet occurred (Sidwell Friends School).

In addition to the traffic caused by the drop-off and pick-up at all these nearby schools, we currently have major construction of large residential complexes in the nearby neighborhood– for example, City Ridge, Upton Place, The Broadcast, and the Dancing Crab. These complexes, which are already approved but not yet completed, will add to the neighborhood traffic congestion and parking issues

The sidewalk along Nebraska Avenue where The River School’s entrance and exit are proposed is used by many pedestrians, especially American University students, to reach the Tenleytown Metro stop and the bus lines that serve Wisconsin Avenue. The American University Washington College of Law (AU Law) campus will also host undergraduate classes, which will increase the pedestrian traffic between the main campus and AU Law. In addition to pedestrians, bikes and scooters frequently use the sidewalk. It is hard to imagine how this traffic will be able to successfully cross over both the entrance and exit to the proposed school during pick-up and drop-off times without incident.

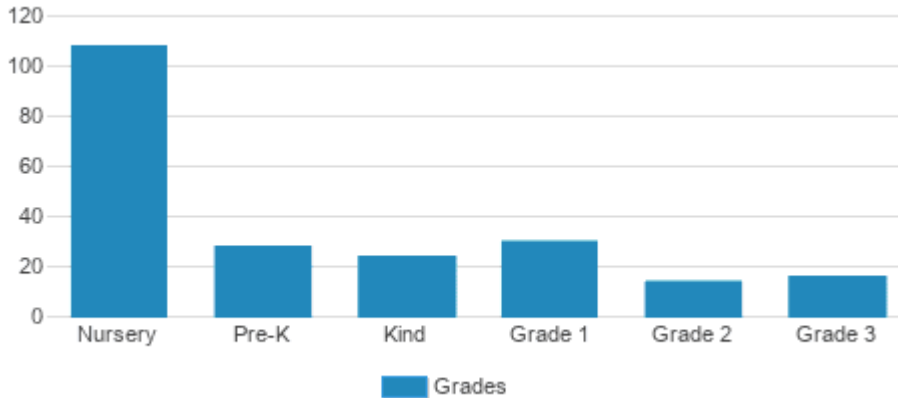
The intersection of Nebraska Avenue at Van Ness Street is already acknowledged to be dangerous. The American University’s 2021 Campus Plan includes in its Comprehensive Traffic Report (CTR) Crash Rate Tables (Exhibit I), which list the number of crashes at intersections near the campus during the period 2016-2019.⁷ The intersection of Nebraska Avenue at Van Ness Street had by far the highest crash rate (0.35) of any of the 40 intersections examined.

The latest addendum to The River School’s CTR seems to acknowledge that there are many failing intersections in the area but to claim that the new school won’t make it that much worse. That is not an acceptable approach. In fact, the additional burden of The River School moving to 4220 Nebraska Avenue may well prove to be the proverbial “straw that breaks the camel’s back.”

The ages and geography of the children attending the school preclude most of the transportation mitigation strategies that the school is proposing. According to the 2021-22 profile of the school on PrivateSchoolReview.com, most of the children attending

⁷ See <https://www.american.edu/communityrelations/campus-plan/upload/american-university-2021-campus-plan-ctr-appendices-feb-4-2021.pdf> (last viewed October 11, 2021)

The River School are very young. More than half of the current student body is in nursery school or Pre-K.⁸



In addition, according to the numbers provided by The River School, almost half of the current student body lives in Maryland or Virginia. And only a handful of students live near the proposed new school location. The combination of all these facts means that walking, biking, and the use of shuttle buses will not constitute meaningful mitigation of the traffic issues that the school will cause.

I therefore respectfully request that the BZA deny the application of the River School for special exceptions to the zoning requirements of the R-1-B zone.

Sincerely,

Winfield P. Crigler

CC: ANC3E Commissioners
District Department of Transportation
DC Office of Planning
DC Historic Preservation Review Board
DC Councilmember Mary Cheh
DC Council Chairman Phil Mendelson

⁸ See <https://www.privateschoolreview.com/the-river-school-profile> (last viewed October 11, 2021)