

dbF Associates, Architects

June 12, 2006

Ms. Carol Mitten, Chair
Zoning Commission
Government of the District of Columbia
One Judiciary Square
441 4th Street, NW
Suite 210S
Washington DC 20001

RE: CASE 06-06: Text Amendment for Public Schools

Dear Ms Mitten,

The rushed adoption of emergency zoning regulations, described as an attempt to "clarify" school planning issues in residential zones, have been hastily written by the planning staff, and can only be enacted as written without a thoughtful consideration of the comprehensive implications of the changes.

The emergency, while it is doubtful one ever existed, was that the zoning administrator chose to ignore ten years worth of precedent and the BZA determination that charter schools were public schools. It made sense to clarify that issue so that schools' certificates of occupancy and building permits were not held up. It made no sense to couple that recognition with new minimums in lot size, frontage, and square footage that had not been properly thought through with input from stakeholders, affected agencies and the broader community.

Those concerned with preserving the widest range of educational alternatives to the current status of public education in the District must have concerns over the practical implications of the recent emergency regulations, in particular the greatly expanded one-size-fits-all approach to schools. The regulations call for a minimum street frontage of 110' in residential districts (a 175% increase over the established 40' requirement), ostensibly to permit student drop-off and pickup without disruption to residents. This standard is indiscriminately applied to a school of any size, with an enrollment of 30, 50, 200, 500 or even more, if one is located in the affected district.

Long used rules of thumb for educational spaces suggest a relationship between gross building area and student population, in the range of 150 to 200 sf per student, depending on the specific educational program. With a student enrollment of 50, a structure could be expected to contain 7,500 to 10,000 sf. An enrollment of 200 would be expected to require 30,000 to 40,000 sf, and under the proposed regulation, both would require the same 110 feet of frontage! Furthermore, when one considers multistory construction, the 110' requirement becomes even more arbitrary, and since there are very few one story buildings in the District, the consideration is quite real. A three story

McLean

6821 Whittier Avenue McLean, VA 22101 ph: 703.356.2215 fax: 703.356.4304

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CASE NO.06-06
EXHIBIT NO.53

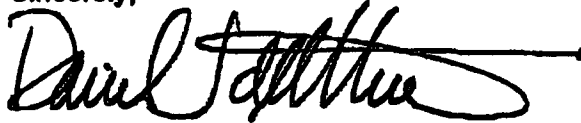
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building of 10,000 sf, with 3,400 sf on each level and the mandated 110' frontage, would be only 30' deep, and where does that exist?

In response to a created "emergency" to the longstanding ordinance, the planning department has chosen to insert itself directly into educational policy, and it is not hard to see the negative implications of this formal policy shift. One obvious result is to force small schools (often housing the youngest and most vulnerable children) to become tenants in larger multi-function buildings, whether surplus schools or other commercial buildings. If the supposed important issue is automobile drop-off, then the policy should address the issue. Other responses to the concern of drop-off are used throughout the country and do not depend on a simplistic frontage requirement. Maximum school enrollment, scheduled drop-off, attended greeters and car-pooling have proven quite effective elsewhere, and should be considered as effective planning and zoning tools for small school flexibility.

The response to a classic NIMBY argument is not necessarily the knee jerk adoption of a modified ordinance that does not carefully consider the larger implications of the changes. I urge the zoning commission to reject these measures and continue to allow the widest range of educational choices for the District's children.

Sincerely,



Daniel J. deBettencourt, AIA
President

dbf Associates, Architects

6821 Whittier Avenue, McLean, Va 22101
ph: 703.356.2215 fax: 703.356.4304
email: contact@dbfassociates.com

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Company: Zoning Commission Chair

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Message:

For your consideration

**ZONING COMMISSION
District of Columbia**

CASE NO. 06-06

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