

Lowell School

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Modification of an Approved Planned Unit Development Supplemental Submission

1640 Kalmia Road, NW (Square 2745F, Lot 817)

7775 17th Street, NW (Square 2745F, Lot 815)

June 11, 2010

ZONING COMMISSION
District of Columbia

CASE NO. 97-16A
EXHIBIT NO. 21

TABLE OF CONTENTS

DEVELOPMENT TEAM.....	i
LIST OF EXHIBITS.....	ii
PREFACE.....	iii
I. Introduction.....	1
A. Summary	1
B. The Applicant.....	2
II. The Proposed PUD Project	2
A. PUD Site	2
B. Project Description, Goals and Objectives	3
C. Zoning and Development History of Property.....	7
D. Existing Zoning.....	8
E. Flexibility.....	13
F. Phasing.....	14
III. Evaluation Standards	14
A. Public Benefits and Amenities of PUD	14
B. Impacts on Surrounding Area and District Operations are Acceptable.....	19
C. The Project is Not Inconsistent with the Comprehensive Plan.....	19
1. Compliance with Citywide Elements.....	20
2. Compliance with Rock Creek East Area Element	23
3. Compliance with Future Land Use Map	24
IV. Conclusion	24

DEVELOPMENT TEAM

APPLICANT:	The Lowell School 1640 Kalmia Road, NW Washington, DC 20012
ARCHITECTS:	Bowie Gridley Architects 1010 Wisconsin Avenue, N. W. Washington, D.C. 20007
TRANSPORTATION CONSULTANTS:	Symmetra Design, LLC 1152 15th Street, NW Suite 935 Washington, DC 20005
LAND USE COUNSEL:	Goulston & Storrs 2001 K Street, N.W. Washington, D.C. 20006

LIST OF EXHIBITS

<u>Description</u>	<u>Exhibit</u>
Architectural Plans, including Elevations	A
Zoning Commission Orders No. 387, 849 and 849-A	B
Portion of the Comprehensive Plan Generalized Land Use Map	C
Traffic Impact Study	D
Photographs of Property	E
Resumes for Expert Witnesses	F
Traffic Management Plan	G
Construction Management Plan	H
Demolition Plan	I

PREFACE

This pre-hearing statement is submitted by the Lowell School (“**Lowell**” or “**School**”) in support of its application to modify an approved Planned Unit Development (“**PUD**”) to allow the School to expand its operations and renovate its infrastructure within the existing enrollment cap on the student population. The School is proposing to expand its services to include 7th and 8th grades and to increase its faculty and staff to 100 individuals. In addition to adding two grades, the School is proposing renovations to the physical facilities located on-site. It is proposing to renovate its Middle School, including an addition to the building located along 17th Street, NW (commonly referred to as “**Parkside**”); to reconfigure its pick-up procedure; to raze Fraser Hall and replace it with a new below-grade parking deck with a playing-field located on its roof (at grade level); and to expand the existing gymnasium building.

The School is located at 1640 Kalmia Road, NW, between 16th and 17th Streets, NW in Square 2745, Lots 815 and 817 (“**Property**”). This application is before the District of Columbia Zoning Commission in conformity with Chapter 24 and Section 102 of the Zoning Regulations.

**SUPPLEMENTAL STATEMENT OF THE LOWELL SCHOOL IN SUPPORT OF ITS
APPLICATION FOR A MODIFICATION OF AN APPROVED PLANNED UNIT
DEVELOPMENT**

I. Introduction

A. Summary

Pursuant to Chapter 24 of the Zoning Regulations, the Lowell School submits this supplemental statement and the attached documents in support of its application filed on December 14, 2009, to modify a Planned Unit Development (“PUD”). The PUD was initially approved by the Zoning Commission in Order No. 387 and subsequently modified by Order No. 849 for property located at Square 2745F, Lots 815 and 817, more commonly referred to as 1640 Kalmia Road, NW. The Property consists of approximately 361,378 square feet of land area and is located in the R-I-A Zone District.

Lowell is seeking approval to expand its operations to include 7th and 8th grades, increase the number of faculty and staff to 100, and to renovate the facilities on its campus. The Lowell School will maintain the existing cap of 400 students and is not seeking to expand the boundaries of the campus.

The specific improvements of School facilities includes an addition to Parkside, to accommodate grades 7 and 8, creation of an alternate ingress for pick-up operations to facilitate improved transportation operations and ease queuing impacts, razing an existing building and constructing a below-grade parking deck with a field on its roof in its place; and expanding the existing gym to improve its athletic resources, particularly the swimming pool. In all, Lowell will be reducing the floor area ratio (“FAR”) of the campus from .36 to .34, a reduction of approximately 7,305 square feet of development. The deck will add a gross total of 64 parking

spaces (but a net of 42 spaces since it will eliminate 22 existing surface spaces), which will accommodate the increase in faculty and staff as well as better serve parents and visitors on the campus.

B. The Applicant

The Lowell School is a private, non-profit, non-sectarian, co-educational school in Northwest Washington. It started as the Lowell Street School in 1965 in the Cleveland Park Congregational Church at 34th and Lowell Streets, NW and in 1978, the School moved across Rock Creek Park to the Sixth Presbyterian Church on 16th Street, NW, where it became known simply as Lowell School. The Lowell School later moved to the Himmelfarb Mansion on 16th Street, NW in 1988 and ultimately to its current location in 1998.

The School teaches children in pre-school through sixth grade and currently has approximately 315 students ages 3 through 6th grade. Approximately 18 students are in each class. The School has approval for an enrollment of up to 400 students and a faculty and staff not to exceed 60 individuals. The campus is centered around one main building and three supporting facilities. Its facilities include generous indoor and outdoor spaces, including a gym, pool, fields, technology lab, two libraries, woodshop, three art workshops, and a dance studio.

II. The Proposed PUD Project

A. PUD Site

The PUD site is located in the R-1-A Zone District and consists of nearly 9 acres of land. Lot 815 consists of approximately 298,682 square feet of land area and Lot 817 consists of approximately 62,696 square feet of land area. The Property is situated on Kalmia Road, NW,

between 16th and 17th Streets, NW, in the Colonial Village neighborhood of Ward 4. It is located along the upper 16th Street corridor, just east of Rock Creek Park. The site includes approximately 780 feet of frontage along Kalmia Road and approximately 620 feet of frontage on 17th Street.

There is a significant grade change on the Property – from the northwest corner of the site, at Kalmia Road and 17th Street, the site slopes gradually upward approximately 35 feet to the rear of the property. The rolling topography of the Property lends itself to the School's thoughtful design and attractive landscaping. Indeed, the changing topography of the Property helps make excavation for the below-grade deck affordable for the School.

The Property is split into two separate parcels by a main drive that connects through to 17th Street and Kalmia Road. Each of the School's buildings is located along the main drive. The property east of the drive is largely improved with School facilities while the property to the west of the drive is primarily open space for student recreation and community use. The open space also includes a meandering creek that adds to the picturesque setting of the campus.

The School faces Rock Creek Park to its west and single-family residences to its north, south and east. The School is surrounded by low-density properties in the R-1-A Zone District.

B. Project Description, Goals and Objectives

1. *Seventh and Eighth Grades*

The School is a private school that currently teaches children up to the sixth grade level. The Applicant would like to expand to include 7th and 8th grade for a number of reasons. The local school jurisdictions have all changed the structural organization of their grade groupings.

The standard model for schools is now Kindergarten through 5th Grade (Primary or Elementary Schools), 6th grade through 8th grade (Middle Schools), and 9th grade through 12th grade (High School), this has left the Lowell School's program (Pre-Primary through 6th grade) in a design that does not align well with the programs that most of its matriculating students wish to attend. As a result, Lowell has students leaving earlier than the program is designed for, and in some cases students are not applying to Lowell who are looking for the more standard program design of Pre-Primary through 8th grade. It is also evident that students and parents are much more informed about choosing programs that fit the needs of their children at the end of 8th grade as compared to the end of 6th grade. With Lowell having the opportunity to continue the education of these children through 8th grade there will be many more options for the parents and students to choose from. This gives the Lowell students access to schools that do not begin until 9th grade. Finally, it is essential for Lowell to have the enrollment that supports and sustains this beautiful campus. The original goal of having 400 students in this facility still makes the most economic sense; it is just that the program design of a Pre-Primary through 6th grade will not allow this goal to be accomplished. The School believes that incorporating 7th and 8th grade satisfies this economic need, but more importantly, will better serve its students.

The School will establish the two additional grade levels in phases. The 7th grade will grow organically from the students in the existing 6th grade class and the 8th grade will be phased in the following year to accommodate those 7th graders. One - sixteen student section of each grade can be added without any additions to existing facilities.

2. *Faculty and Staff Cap*

The School also seeks approval to increase the cap on its faculty and staff from 60 individuals to 100 individuals. There is a trend in the educational field to decrease the student to teacher ratio to increase the attention each student receives. The Applicant has discovered the difficulty in serving its student population with the number of faculty and staff the Commission approved in 1998. The School believes that it is more realistic to serve 400 students with 100 faculty and staff members rather than the 60 that were approved by the Commission.

3. *Physical Improvements*

The physical improvements the School is proposing will accommodate the new Middle School in the Parkside building. The proposed addition to Parkside will include computer labs, art studios, a state-of-the-art theater, new library, and student gathering places. The addition will incorporate sustainable design features and will be ADA-accessible. In connection with the changes being made to the building, the School is creating an alternate pick-up operation for afternoon ingress to the School from Kalmia Road. The new ingress for afternoon pick-up will eliminate queuing on 17th Street and will increase on-site vehicle capacity, while also improving efficiency of pick-up procedures. This will have a favorable effect on the neighborhood because the School will reduce the number of queuing vehicles and will be able to absorb more queuing vehicles on its campus. See Traffic Impact Study attached as Exhibit E. The School will simultaneously extend the sidewalk network on the campus side of Kalmia to the Kalmia Road intersection with Myrtle Street. This will aid in pedestrian access to the School for those who live in the neighborhood.

Finally, the School proposes to raze Fraser Hall and replace it with a below-grade parking deck with a play field on top. Fraser Hall was constructed as a dormitory and fell into disrepair once Gallaudet University discontinued its use in the early 1990s. Lowell has no use for the building and would like to raze it to add more light and air to the campus and make way for more efficient use of the space. In the process of studying the building for removal, Lowell discovered that there are trace amounts of asbestos in the stucco on the exterior of the building. Accordingly, Lowell will take every precaution to ensure that its removal is consistent with all applicable rules and regulations and that the building will be removed safely. To that end, the School has proposed the demolition plan attached as Exhibit I to underscore its commitment to satisfying community concerns on this issue.

The parking deck that will be constructed in place of the Fraser building will be one level and will include 64 parking spaces. The top of the deck will be a non-regulation size playing field. The playing field will mask the visual impacts and minimize the environmental impacts of a deck. Replacing an existing four-story building with a playing field will maximize the open space on campus and increase available light and air for adjacent buildings. The playing field will be used for physical education classes and after school programs. Due to the dimensions of the field, no organized upper level interscholastic lacrosse, soccer, baseball, football or field hockey games will be played. The field will be fenced and gated and it will not be lighted except for required security lights.

The School also proposes to expand the existing pool deck and gymnasium. The 5,100 square foot addition to the gym will be a modest increase but will make the School's facilities competitive with other private grade schools in the District. It will enhance the existing pool area by providing deck space, a locker room and bleachers.

C. Zoning and Development History of Property

The Property was first developed in 1924 as the Marjorie Webster Junior College, a post-secondary education, residential institution. At the time of the comprehensive rezoning of the city in 1958, the Property was zoned R-1-A. Around 1971, the University Research Corporation acquired the Property and continued to use the Property as a junior college. In 1977, the United States Fire Administration purchased the Property for use as a fire academy. Because the United States Fire Administration was an entity of the federal government, the Property was rendered unzoned since federal property is not subject to local zoning laws. The government subsequently transferred the property in 1981 to Gallaudet University.

In light of the Property's designation as unzoned property, Gallaudet sought approval for a PUD and a PUD-related map amendment to establish the Property in the R-1-A Zone District. By Order No. 387, dated December 13, 1982, the Zoning Commission approved the application and authorized Gallaudet to use the Property for university purposes. The R-1-A Zone District is generally consistent with low-density residential uses; however, in this case, the Commission found it appropriate for low-density institutional use.

The School acquired the Property from Gallaudet and modified the PUD in 1998 to allow it to operate on the Property. The Zoning Commission approved the application subject to twenty conditions. The School's proposed modifications to the existing conditions are outlined in detail below.

D. Existing Zoning

In connection with Case No. 387, the Property was zoned via a PUD-related map amendment to the R-1-A Zone District. A copy of Order No. 849 is attached as Exhibit C. A maximum height of 40 feet and a maximum FAR of .36 was imposed as a condition from the Commission. The modifications to the campus that are being proposed in connection with the instant application will reduce the gross floor area of the campus by approximately 7,305 square feet. This will decrease the FAR from .36 to .34 but the lot occupancy will increase from 13% to 15%. The R-1-A Zone District otherwise permits a 40% lot occupancy, which would effectively allow a FAR of 1.2 for the Property (no FAR is prescribed for the R-1-A Zone District); accordingly, the proposed FAR and lot occupancy are still well within the limits permitted as a matter-of-right in the R-1-A Zone District. The proposed construction will have a modest effect on the zoning tabulations of the property as demonstrated in the chart below:

	Existing	Proposed	Matter-of-Right R-1-A development	R-1-A PUD
FAR	.36 ¹	.34	None prescribed; 1.2 if calculated from lot occupancy	.4
Height	40 feet	40 feet	40 feet	40 feet
Lot Occupancy	12.72%	14.89%	40%	40%

¹ This number excludes three single-family houses and related land area that had been a part of the original campus but were removed per Order No. 849.

The Applicant is also proposing modifications to the conditions the Zoning Commission imposed in Order No. 849. The Commission established twenty conditions under which the Applicant currently operates. The Applicant would like to modify those conditions and to propose new ones as detailed below:

Existing Condition	Proposed Condition
1. The planned unit development shall be developed in accordance with the drawings and plans prepared by Bowie Gridley Architects, dated February 15, 1998 and marked as Exhibit 13 of the record, as modified by the guidelines, conditions, and standards of this orders;	The planned unit development shall be developed in accordance with the drawings and plans prepared by Bowie Gridley Architects, dated _____ and marked as Exhibit _____ of the record, as modified by the guidelines, conditions and standards of this order;
2. The planned development shall be the campus of the Lowell School. The maximum permitted height shall be 40 feet. The maximum permitted floor area ratio (FAR) is .36. The maximum permitted percentage of lot occupancy is 12.72 percent;	The planned unit development shall be the campus of the Lowell School. The maximum permitted height shall be 40 feet. The maximum permitted floor area ration (FAR) is .34. The maximum permitted percentage of lot occupancy is 15%;
3. The planned unit development shall be used by the Lowell School for a private educational institution comprised of nursery and elementary school programs through grade six. There shall be a maximum of 400 students enrolled, with faculty and staff not to exceed 60 persons.	The planned unit development shall be used by the Lowell School for a private educational institution comprised of nursery and elementary school programs through grade eight. There shall be a maximum of 400 students enrolled, with faculty and staff not to exceed 100 persons.
4. The regular school year will consist of twelve months including a summer session;	The regular school year will consist of twelve months including a summer session;
5. The Applicant shall institute a Traffic Management Plan which shall include the following: • Access to the property will be counter-clockwise with ingress via 17th Street, NW and egress via Kalmia Road, NW, during peak morning and afternoon arrival and departure periods; • The Applicant will provide manual traffic	The Applicant shall institute a Traffic Management Plan which shall include the following: • Prior to completing the drive depicted in the site plan attached hereto as <u>Exhibit A</u>, access to the property will be counter-clockwise with ingress via 17th Street, NW and egress via Kalmia Road, NW, during peak morning and afternoon arrival and departure

Existing Condition	Proposed Condition
control at both access points during weekday peak activity periods, as well as during major special events; • The Applicant will discourage the parents of its students from utilizing the neighborhoods streets to the south, (i.e., Juniper, Holly, and Jonquil) to access the site via 17th Street entrance; • During off-peak periods, the 17th Street, NW entrance will be closed and two-way access to campus will be provided via Kalmia Road, NW; • School Advance Signs and School Crossing Signs will be provided and installed at appropriate locations along the approaches to the school; • The geometric and signal phasing improvements for the intersection of 16th Street at Kalmia Road will be incorporated in the access plan for the campus, if permitted by the Department of Public Works;	periods; • Upon completion of proposed drive, access to the property will be counterclockwise with ingress via 17th Street, NW and egress via Kalmia Road, NW during peak morning arrival periods. During peak afternoon pick-up periods, access to the campus will be via Kalmia Road, NW with egress also via Kalmia Road, NW; • Maintaining a carpool program; • The Applicant will provide manual traffic control at each access point during weekday peak activity periods, as well as during major special events; • The Applicant will discourage the parents of its students from utilizing the neighborhoods streets to the south, (i.e., Juniper, Holly, and Jonquil) to access the site via 17th Street entrance; • School Advance Signs and School Crossing Signs will be provided and installed at appropriate locations along the approaches to the school; • Directional signs shall be posted at the “Y” intersection of 17th Street at Kalmia Road for clarity; • The geometric and signal phasing improvements for the intersection of 16th Street at Kalmia Road will be incorporated in the access plan for the campus, if permitted by the Department of Public Transportation; • The School will implement any remaining commitments outlined in the Traffic Management Plan submitted as Exhibit _____ in the record (attached as <u>Exhibit G</u> to this

Existing Condition	Proposed Condition
	statement).
6. The Applicant shall subdivided the Property located at premise addresses 1626, 1630 and 1636 Kalmia Road, NW, into three lots of record (collectively hereinafter referred to as the "Residential Lots") as shown on the plan prepared by Macris, Hendricks, and Glascock, PA, and marked as page J of Exhibit No. 12 in the record. The Applicant is permitted in this subdivision to deviate from the minimum lot area, lot frontage, side yard, rear yard and other area standards of the Zoning Regulations;	This condition has been satisfied and the 3 properties are not a part of the campus or this application.
7. The zoning of the Residential Lots shall be R-1-A. The Applicant shall attempt to sell the Residential Lots and buildings thereon, in order that they may be returned to a use consistent with the existing R-1-A Zone District. If the Applicant is unable to sell any or all of the Residential Lots, the Applicant may lease said Residential Lots for single-family residential use. There may be no use and/or sale of the Residential Lots unless, and until, the Applicant Records, among the Land Records of the District of Columbia, a deed restriction on the Residential Lots which restricts them to single family, or open space;	This condition has been satisfied and the 3 properties are not a part of the campus or this application.
8. The Applicant shall have the flexibility to allow a private elementary school, which is the potential purchaser of Lowell School's existing building at 4715 16th Street, NW to temporarily occupy the Kalmia Road campus during the 1998-1999 school year. This lessee shall comply with the conditions of this order including the Traffic Management Plan delineated in Condition no. 5;	Not applicable.
9. The Applicant shall establish a Community Relations Council to provide the neighborhoods with a mechanism to have its views considered and acted upon in connection with the activities at School. A majority of the	The Applicant shall continue to participate in the Community Relations Council to provide the neighborhoods with a mechanism to have its views considered and acted upon in connection with the activities at School. A

Existing Condition	Proposed Condition
Such notice and all successors in title to construct on the use of this property in accordance with this order or else amendment thereof by the Zoning Commission;	notice and all successors in title to construct on the use of this property in accordance with this order or else amendment thereof by the Zoning Commission;
17. The Office of Zoning shall not release the record of this case to the Zoning Regulations Division of DCRA until the Applicant has satisfied the conditions contained in Paragraph 15 herein;	The Office of Zoning shall not release the record of this case to the Zoning Regulations Division of DCRA until the Applicant has satisfied the conditions contained in Paragraph ____ herein;
18. The PUD approved by the Zoning Commission shall be valid for a period of two years from the effective date of this order. Within such time, an application must be filed for a building permit as specified in 11 DCMR 2409.1. Construction shall begin within three years of the effective date of this order.	The PUD approved by the Zoning Commission shall be valid for a period of two years from the effective date of this order. Within such time, an application must be filed for a building permit as specified in 11 DCMR 2409.1. Construction shall begin within three years of the effective date of this order. An application for the final building permit completing the work approved herein shall be filed within three years of the issuance of the certificate of occupancy for the Parkside building;
19. Pursuant to DC Code Section 1-2531 (1991), Section 267 of DC Law 2-38, the Human Rights Act of 1977, the Applicant is required to comply fully within the provisions of DC Law 2-38, as amended, codified at DC Code, Title 1, Chapter 25 (1991), and this order is conditioned upon full compliance with those provisions. Nothing in this order shall be understood to require the Zoning Regulations Division of DCRA to approve permits if the Applicant fails to comply with a provision of DC Law 2-38, as amended.	Pursuant to DC Code Section 1-2531 (1991), Section 267 of DC Law 2-38, the Human Rights Act of 1977, the Applicant is required to comply fully within the provisions of DC Law 2-38, as amended, codified at DC Code, Title 1, Chapter 25 (1991), and this order is conditioned upon full compliance with those provisions. Nothing in this order shall be understood to require the Zoning Regulations Division of DCRA to approve permits if the Applicant fails to comply with a provision of DC Law 2-38, as amended.

E. Flexibility

The PUD process was created to allow greater flexibility in planning and design than is possible under conventional zoning procedures. The PUD regulations specifically allow the

Zoning Commission to approve any zoning relief that would otherwise require the approval of the Board of Zoning Adjustment. Importantly, this project is consistent with the Zoning Regulations and does not require additional flexibility from the Commission.

F. Phasing

The first phase of development will include the addition of the 7th and 8th grades and the internal renovation of the existing Parkside building. The School anticipates beginning the improvements to Parkside² this Summer (2010) and incorporating 7th grade in the 2011-2012 School Year. The 8th grade will be added in the 2012-2013 School Year. The second phase of development will include the addition to the Parkside building as well as establishing the new driveway design for the proposed pick-up procedures. Finally, the third phase of development will be to raze the Fraser building, establish the parking deck, and construct the addition to the gymnasium.

III. Evaluation Standards

The project as proposed meets the standards of the PUD Regulations, Chapter 24 of the Zoning Regulations. Section 2403 sets forth the standards for evaluating a PUD application and an analysis of the standards is outlined below:

A. Public Benefits and Amenities of PUD

Section 2403.9 provides categories of public benefits and project amenities for review by the Zoning Commission. The objective of the PUD process is to encourage high-quality development that provides public benefits and project amenities by allowing applicants greater

² These renovations do not require any additions to Parkside and as such do not require Zoning Commission approval.

flexibility in planning and design than may be possible under conventional zoning procedures. The subject modification application will achieve the goals of the PUD process by providing high-quality institutional development at the subject site with significant public benefits to the neighborhood and the District as a whole.

1. Urban Design, Architecture and Site Planning: Section 2403.9(a) and (b) specifically include urban design, architecture and site planning as categories of public benefits and project amenities for a PUD. The School is proposing modest modifications to the existing Lowell campus; nevertheless, the design is the result of thoughtful planning. The Property has extreme grade changes and the proposed parking deck will take advantage of the differing grades to minimize its aesthetic effect. The parking deck will be below grade and hidden from view. The roof of the parking deck will be used as recreation space, thus maximizing the use of space on the Lowell campus. Additionally, the removal of Fraser Hall, which consists of 4 stories and approximately 39,200 square feet will significantly add to the air and the light of the campus and the community. The addition to the Parkside building is positioned away from the single-family houses that otherwise surround the campus. Again, the additions are an efficient use of space and are thoughtfully positioned on the Lowell campus.
2. Effective and Safe Vehicular and Pedestrian Access; Transportation Management: The School is proposing a traffic demand management plan, which is attached as Exhibit D and G. Existing PUD conditions already

regulate traffic operations on campus; however, in meeting with neighbors, the School has determined there are additional measures that it could undertake to further mitigate the effects from its operations. Specifically, the School will continue to evaluate and improve its transportation operations and strengthen its carpooling policy to improve efficiency of drop-off and pick-up procedures, minimize queuing on 17th Street, stop parents from parking on Kalmia Street and reduce vehicular demand. To that end, the School is proposing a new driveway to increase its on-site “stacking” capacity to minimize, if not eliminate, queuing from neighborhood streets. Further, the School is committing to establishing a busing program for its students in the Fall 2011. Finally, the School is extending its sidewalk network as shown on the attached plans to improve pedestrian safety.

3. Environmental Benefits: The campus includes a wide expanse of green space that includes a stream, mature trees, and lush landscaping. The natural setting of the campus complements Rock Creek Park, which is directly across 17th Street from the School. Although not seeking certification, the project will be designed to meet the Certified Level Requirements of LEED 2009 for Schools (LEED 3.0) and will exceed the Certified Level where practical. The proposed new construction will also be consistent with sustainable design and will incorporate a number of green features, including:

Parkside Building -

- Storm water management: Non-structural strategies, such as vegetated swales, will be used to manage runoff and allow it to naturally filter into the soil and vegetation. Pollutants are broken down by microorganisms in the soil and plants.
- Sustainable Roofing: A vegetative (Green) roof will be installed on the Library/Theater Addition. High-reflectivity roofing will be used on the existing building roof to lower heat gain from solar exposure.
- Exterior (Site Lighting): Dark Sky compliant fixtures will be used.
- Landscaping: Sturdy, low maintenance, native plants, which can tolerate the local climate without the need for irrigation, will be selected for planting areas.
- Innovative Water Use and Waste Technologies: Use super-efficient fixtures with low and dual flush capability in toilet rooms.
- High Efficiency HVAC System: A high efficiency, CFC-free (ozone depleting chemicals) HVAC system will be installed in the building.
- Recycling: The school will recycle paper, metals, and plastics used during the normal daily course of school.
- Sustainable Materials Choices: Use building materials with recycled content, FSC certified wood products, products that are produced regionally, and products that are produced from renewable sources, and those with low VOC content and low emitting characteristics.
- Interior Lighting Control: Energy efficient interior lighting will be designed to coordinate with natural light and provide multiple levels of lighting control so lower levels of artificial lighting can be used when day-lighting is strong. Occupancy sensors and automatic shut-off switching will also be provided.
- Day-lighting of Interior Spaces: Most spaces in the building have a visual connection with the exterior through the use of windows.
- Acoustic Performance: Classroom spaces will be designed to meet LEED for Schools acoustic performance standards.
- Alternative Transportation: The school utilizes extensive car-pooling and encourages the use of public transportation. A bicycle parking area will also be provided.
- Construction Waste Recycling: At least 50% of demolition and construction debris will be recycled.
- Re-use of existing building: The existing building will be re-used to the greatest practical extent to minimize waste.

- Construction Site Disturbance: The limits of construction sites will be limited to minimize disturbance to adjacent landscaped areas. Tree preservation will be a major objective.
- No Smoking: The school is a no-smoking campus.
- Windows: The building will be outfitted with new, energy efficient, operable windows.

Parking Deck and Athletic Center Addition

- Exterior (Site Lighting): Dark Sky compliant fixtures will be used.
- Innovative Water Use and Waste Technologies: Use super-efficient fixtures with low and dual flush capability in toilet rooms.
- High Efficiency HVAC System: A high efficiency, CFC-free (ozone depleting chemicals) HVAC system will be installed in the building.
- Synthetic Turf Field Roof: Instead of a concrete surface, the garage will have a synthetic turf roof system that will allow of the collection of rainwater to controlled dispersion into storm water system. This will mitigate the “heat island effect” common to paved parking areas.
- Interior Lighting Control: High-efficiency interior lighting will be designed to provide multiple levels of lighting control so lower levels lighting can be used during low occupancy time periods. Occupancy sensors and automatic shut-off switching will also be provided.
- Construction Waste Recycling: At least 50% of demolition and construction debris will be recycled.
- Construction Site Disturbance: The limits of construction sites will be limited to minimize disturbance to adjacent landscaped areas. Tree preservation will be a major objective.
- No Smoking: The school is a no-smoking campus.
- Sustainable Materials Choices: Use building materials with recycled content, FSC certified wood products, products that are produced regionally, and products that are produced from renewable sources, and those with low VOC content and low emitting characteristics.

The School is committed to promoting “green” construction, which was a major consideration when deciding to place a playing field on the roof of the parking deck. The playing field will minimize stormwater runoff by replacing what would otherwise be an impervious surface with pervious materials. The construction that is proposed as a part of this application has been thoughtfully designed to minimize its effect on the environment.

In fact, the additions have been designed to meet the certification standards for the LEED for Schools program.

B. Impacts on Surrounding Area and District Operations are Acceptable

The School has been operating at this site for over ten years without adverse effects on District operations. The instant application seeks a modest modification of the existing PUD and will not detrimentally affect District operations or services. The School also operates with its neighbors in mind and has established a means for neighbors to express their concerns to the School. In the past, neighbors have expressed concerns regarding the use athletic fields in the evening, traffic on Jonquil Street and Kalmia Street, and questions about the phasing of future improvements. The School has taken definitive steps to address neighbors' concerns and is committed to maintaining a positive relationship with the neighboring community. To that end, the School is proposing additional conditions to its use of the Property to demonstrate its commitment to its neighbors. The School will also continue its participation in the Community Relations Council, which provides a forum for the community to voice concerns and openly communicate with the School. Finally, the School has provided the community with a construction management plan (Exhibit H), demolition plan (Exhibit I), transportation management plan (Exhibits D and G), and a plan for the use of the recreation space (page 6) to alleviate any concerns the community may have on future operations at the School.

C. The Project is Not Inconsistent with the Comprehensive Plan

The modified PUD is not inconsistent with the Comprehensive Plan, but in fact furthers the policies and objectives of the Plan. Some of the purposes of the Comprehensive Plan are to guide private development in order to achieve District and community goals and to assist in

conserving, stabilizing and improving neighborhoods in the District. The proposed project is consistent with these objectives, and more, as noted below.

1. Compliance with Citywide Elements

a. Land Use: The School is an institutional use located in a residential neighborhood. Consistent with the land use elements outlined in the Comprehensive Plan, the School is conscious of its context. To that end, it takes numerous precautions to ensure that it does not have a detrimental effect on the adjacent neighborhood. The Property includes expansive swaths of green spaces and those buildings that do exist are located so as to minimize their effect on the neighborhood. The School has also been proactive in addressing any traffic issues that has arisen. In fact, it established a carpool that has been successful in connecting families that live near each other and it will continue to encourage families to carpool. The land use elements that the School has specifically considered in developing its operations as well as its campus are listed below.

- *Policy LU-2.1.5: Conservation of Single Family Neighborhoods*: Protect and conserve the District's stable, low density neighborhoods and ensure that their zoning reflects their established low density character. Carefully manage the development of vacant land and the alteration of existing structures in and adjacent to single family neighborhoods in order to protect low density character, preserve open space, and maintain neighborhood scale.
- *Policy LU-2.3.5: Institutional Uses*: Recognize the importance of institutional uses, such as private schools, child care facilities, and similar uses, to the economy, character, history, and future of the District of Columbia. Ensure that when such uses are permitted in residential neighborhoods, they are designed and operated in a manner that is sensitive to neighborhood issues and that maintains quality of life. Encourage institutions and I neighborhoods to work proactively to address issues such as traffic and parking, hours of operation, outside use of facilities, and facility expansion.
- *Policy LU-3.2.1: Transportation Impacts of Institutional Uses*: Support ongoing efforts by District institutions to mitigate their traffic and parking impacts by promoting

ridesharing, carpooling, public transportation, shuttle service and bicycling; providing on-site parking; and undertaking other transportation demand management measures.

- *Policy LU-3.2.3: Non-Profits, Private Schools, and Service Organizations:* Ensure that large non-profits, service organizations, private schools, seminaries, colleges and universities, and other institutional uses that occupy large sites within residential areas are planned, designed, and managed in a way that minimizes objectionable impacts on adjacent communities. The zoning regulations should ensure that the expansion of these uses is not permitted if the quality of life in adjacent residential areas is significantly adversely affected.

b. Transportation: The School has taken affirmative actions to encourage alternative forms of transportation. As noted above, the School has established a carpool program and encourages families to participate in the program. It supplies families with a map, which is also available online, that shows other Lowell families that live in the same neighborhood, facilitating the creation of carpools. The School also has bike racks to encourage its faculty and staff to bike to work and it is implementing a bus program starting in the 2011-2012 School Year. Perhaps most importantly, the School has incorporated lessons about conserving energy and being environmentally friendly into its curriculum. The School understands the importance of educating a younger generation about taking concrete steps now to help improve their future.

- *Policy T-2.3.1: Better Integration of Bicycle and Pedestrian Planning:* Integrate bicycle and pedestrian planning and safety considerations more fully into the planning and design of District roads, transit facilities, public buildings, and parks.
- *Policy T-3.1.1: Transportation Demand Management (TDM) Programs:* Provide, support, and promote programs and strategies aimed at reducing the number of car trips and miles driven (for work and non-work purposes) to increase the efficiency of the transportation system.

c. Environmental Protection: The School takes pride in its campus and the efforts it takes to create a green haven for its students. The Property is heavily landscaped with native plantings and many mature trees that the Applicant has preserved. In light of

the efforts the Applicant takes to preserve the natural setting of the campus, it is taking measures to ensure that the development is equally as thoughtful. The School will construct the new development to meet the standards for the LEED for Schools program. It is also taking creative approaches to its development -it is placing a playing field on the roof of its parking deck to minimize heat island effect and to support its stormwater management efforts. Listed below are specific District policies and actions with which the School is consistent.

- *Policy E-1.1.3: Landscaping:* Encourage the use of landscaping to beautify the city, enhance streets and public spaces, reduce stormwater runoff, and create a stronger sense of character and identity.
- *Action E-2.3.B: Expand Recycling Efforts in District Institutions:* Work with the DC Public Schools and Public Charter Schools to expand school recycling programs and activities. Encourage private schools, universities, colleges, hospitals, and other large institutional employers to do likewise.
- *Policy E-3.1.1: Maximizing Permeable Surfaces:* Encourage the use of permeable materials for parking lots, driveways, walkways, and other paved surfaces as a way to absorb stormwater and reduce urban runoff.
- *Policy E-3.1.2: Using Landscaping and Green Roofs to Reduce Runoff:* Promote an increase in tree planting and landscaping to reduce stormwater runoff, including the expanded use of green roofs in new construction and adaptive reuse, and the application of tree and landscaping standards for parking lots and other large paved surfaces.
- *Policy E-3.1.3: Green Engineering:* Promote green engineering practices for water and wastewater systems. These practices include design techniques, operational methods, and technology to reduce environmental damage and the toxicity of waste generated.
- *Policy E-3.2.1: Support for Green Building:* Encourage the use of green building methods in new construction and rehabilitation projects, and develop green building methods for operation and maintenance activities.

d. Educational Facilities: As mentioned previously, the School is an institutional use in the middle of a residential neighborhood. The School operates with its context in mind. The School's campus is extensively landscaped to complement Rock

Creek Park, which is located across 17th Street from the School. The well-landscaped campus is also valuable resource for the community because it provides an aesthetic oasis for neighboring residents. The School's campus incorporates high-quality design and landscaping to enhance the Property as well as the neighboring community. The School's actions are consistent with Policy 1.4.2 of the Comprehensive Plan:

- *Policy EDU-i.4.2: Promoting High-Quality Design:* Require that the renovation or reconstruction of school facilities use high architectural and landscape design standards that are sensitive to community context as well as academic and student safety needs.

2. Compliance with Rock Creek East Area Element

The School is located in the Rock Creek East Area Element. Rock Creek East is comprised largely of low-to moderate-density residential uses. Again, because the School is located in a residential neighborhood, it takes care to pursue improvements that comport with its context in the greater community. The School has maintained a low-density campus that highlights the architectural integrity of its buildings as well as the quality of its landscaping. These aesthetic resources add to the definition of the neighborhood, rather than detract from it.

The School is consistent with several policy points delineated in the Rock Creek East Area Element, such as:

- *Policy RCE-1.1.1: Conservation of Low Density Neighborhoods:* Maintain and conserve the attractive, stable neighborhoods of the Rock Creek East Planning Area. Any new development in the Planning Area should be attractively designed and should contribute to the community's positive physical identity.
- *Policy RCE-1.1.2: Design Compatibility:* Ensure that renovation, additions, and new construction in the area's low density neighborhoods respects the scale and densities of adjacent properties, avoids sharp contrasts in height and mass, and preserves park-like qualities such as dense tree cover and open space.

- *Policy RCE-1.1.12: Enforcement:* Mitigate traffic, parking, noise, and related safety problems that result from nonresidential uses through strict enforcement of zoning, parking, and other municipal regulations.

3. Compliance with Future Land Use Map

The Property is located in the institutional land use category of the Comprehensive Plan Future Land Use Map. This designation includes land and facilities occupied and used by I private schools, which is consistent with the Applicant's ongoing use of the Property.

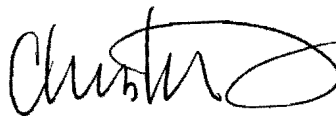
IV. Conclusion

For the foregoing reasons, the School submits that the modified PUD plan meets the standards of Chapter 24 of the Zoning Regulations; it is consistent with the purposes and intent of the Zoning Regulations and Map; it will enhance the health, welfare, safety and convenience of the citizens of the District of Columbia; it is not inconsistent with the Comprehensive Plan; it provides significant public benefits, and it advances important goals and policies of the District of Columbia. Accordingly, we respectfully request that the Zoning Commission schedule the application for a public hearing.

Respectfully submitted,



Phil T. Feola



Christine A. Roddy

June 11, 2010

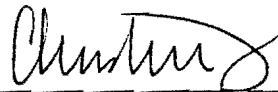
Certificate of Service

I hereby affirm that the foregoing document was sent to the following addresses on June 11, 2010, by hand delivery or first-class mail:

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