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MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Jennifer Steingasser, ^{JS} Deputy Director for Development Review and Historic Preservation

DATE: June 21, 2010

SUBJECT: Final Report for Zoning Commission Case No. 97-16A.
Lowell School Planned Unit Development Application for a Major Modification
1640- Kalmia Road, N.W. and 7775 17th Street N.W. Square 2745F, Lots 815 and 817.

I. OP RECOMMENDATION

The Office of Planning (OP) recommends that the Zoning Commission (the Commission) approve the requested application for modifications to the approved PUD, subject to the provision of additional information addressing concerns noted in Sections VI through VIII of this report.

Figure 1. Lowell School Site:



II. BACKGROUND

The Lowell School (the applicant), is located on an 8.75 acre campus in the Colonial Village neighborhood of Ward 4 in northwest Washington. The school is west of 16th Street, south of Kalmia Rd and north of Rock Creek Park & 17th Street, NW. In 1982, Z.C. Order 387 approved Gallaudet University's Planned Unit Development (PUD) request to establish a satellite campus on the site and established underlying R-1-A. After Gallaudet sold the property, the Lowell School relocated to the site pursuant to Z.C. Order 849 in Case No. 97-16 M.

The school enrolls 315 students in grades pre-school to 6, has a student cap of 400, and has filled its cap of 60 staff and faculty.

III. APPLICATION SUMMARY

The applicant has filed for major modifications to the approved PUD to:

- Add two new grades (7 and 8)
- Increase its staff from 60 to 100
- Improve its facilities through:
 - Selective demolition and new construction resulting in a net decrease in gross square footage;
 - Construction of a parking garage, and a net increase of parking spaces from 90 to 132; and
 - Reworking of its internal circulation system.

Since Setdown, the applicant has revised its proposal by:

- Changing the proposed construction plan from two phases to three phases;

ZONING COMMISSION
District of Columbia

CASE NO. 97-16A
EXHIBIT NO. 24



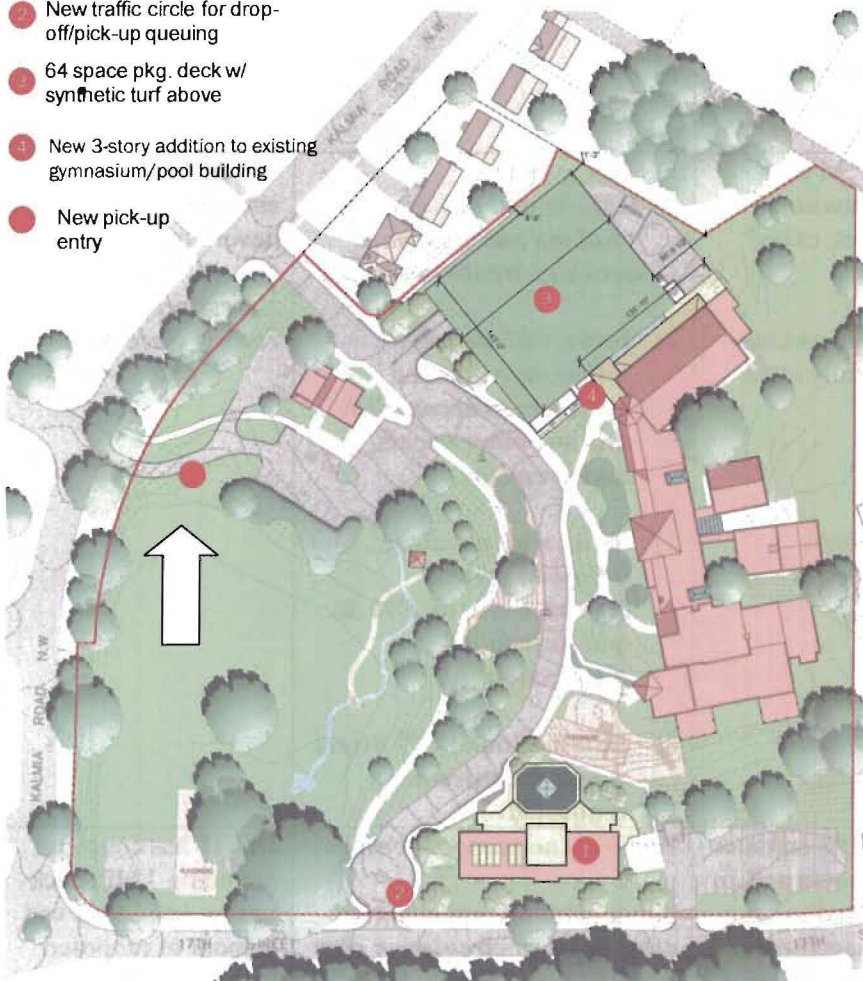
- Changing its proposed circulation and queuing system;
 - Marginally reducing the proposed increase in parking spaces;
 - Enhancing its Transportation Management Plan (TMP)
 - Committing to ongoing consultation with DDOT and the community regarding traffic, parking and other operations.
- Phase 1 (2011-13) would:
 - Increase student enrollment to 350;
 - Increase faculty and staff to 80;
 - Renovate the existing 6,150 GSF Parkside Building on 17th Street, and begin a middle school with 7th and 8th grades;
 - Start a 40-seat shuttle-bus service for students west of Rock Creek Park;
 - Maintain existing circulation and queuing pattern from 17th Street to Kalmia Road;
 - Increase the queued drop-off vehicles on 17th Street from 15 to 19 (projected);
 - Decrease the queued pick-up vehicles on 17th Street from 23 to 21 (projected).
 - Phase 2 (2013) would:
 - Construct a 3,950 GSF, green-roofed addition to the Parkside Building middle school;
 - Construct an additional entrance on Kalmia Road for evening pick-up;
 - Implement a new circulation system for morning drop-off and evening pick-up that would:
 - In the morning, maintain the Phase 1 level of queued drop-off vehicles on 17th Street (projected);
 - In the evening, temporarily close the 17th Street entrance, use Kalmia Rd as the entrance and exit point for pick-up of students, and stack more vehicles on the existing internal drive to eliminate off-site queuing of pick-up vehicles (projected).
 - Phase 3 (timing not specified) would:
 - Increase student enrollment to 400;
 - Increase faculty/staff to 100;
 - Demolish the existing 39,200 Fraser Building (circa 1964) in the northeastern corner of the campus;
 - Construct a 5,100 GSF addition to the existing gym
 - Construct a primarily underground 64-space parking deck with a synthetic, un-lit, non-regulation-size field on its roof, 12,495 GSF would count toward FAR;
 - Increase the overall parking from 90 to 132, including a 22-space reduction of surface parking and the addition of 64 spaces in the deck;
 - Expand shuttle-bus service from 40 seats to 80 seats.

The applicant plans to maintain its existing boundaries and continue to operate on a year-round basis. Between September and June, the school's sports facilities would continue to be used on weekends by youth organizations. ANC and other community meetings would continue to be held monthly, and private parties would continue to be held approximately once a month.

Fig. 2 Proposed Construction and Circulation.

(Post-Setdown changes *in italics*)

- 1 New Middle School: renovation/addition to Parkside
- 2 New traffic circle for drop-off/pick-up queuing
- 3 64 space pkg. deck w/ synthetic turf above
- 4 New 3-story addition to existing gymnasium/pool building
- 5 New pick-up entry



Now
315 students, pre-school-6 grade; 400 cap

Faculty/staff cap of 60

90 parking spaces

Issue: P.M. back-ups on 17th Street

Proposed
Add grades 7 & 8 (go to student cap)

Increase staff to 100

Demolish Fraser Hall (1964); replace w/ (mostly) underground garage w/ field atop

Increase parking from 90 to 132

Add 5-stop shuttle bus from west of Park

New circulation plan

-A.M. (#2) in 17th/out Kalmia

-P.M. (#5) in Kalmia; stack on both sides of drive, w/ turn-around at temporarily closed 17th St.; out Kalmia

The following table summarizes the previous orders' major stipulations and the applicant's current requests. Requested changes or additions are noted in **bold**. Changes proposed since the setdown are indicated in ***bold italics***. The complete list of existing and requested conditions is on pages 9 - 13 of the applicant's June 11, 2010 filing.

Table 1. PUD Modification Table

Site or PUD Condition	Currently Applicable	Requested/Proposed	Notes
Site Size	361,378 SF	Same	Significant slope up from west to northeast
Zoning	R-1-A	Same	
GSF	130,024	122,801	
FAR	--0.4 for R-1-A PUD. -Currently 0.36.	<i>0.34</i>	Decrease of .02 FAR
Lot Occupancy	-12.72%. Zone permits 40%	<i>15%</i>	
Height	40 feet	Same	
Student Enrollment	400 cap; 315 currently enrolled	Retain cap	Will reach 400 cap
Grades Permitted	Pre-School through 6	Pre-School through 8	Adds 2 grades w/in student cap

Site or PUD Condition	Currently Applicable	Requested/Proposed	Notes
Faculty/ Employee Cap	60	100	Adds 40 above cap
Parking Cap	60 spaces were noted in Order 849, which referred to parking spaces as shown on plans. Specific number not given in Order. 90 spaces are now on campus	Existing 90 plus 42	70 garage spaces added; 24 surface spaces removed. Net total = 132 spaces. (6 fewer spaces than in 12.07.09 application).
Access	-1) During A.M and P.M peak, one-way counter-clockwise, entered from 17th Street, exited from Kalmia Rd. 2) School to discourage parents from using Juniper, Holly and Jonquil Sts. 3) School to install school warning and crossing signs 4) School to close 17th Street entrance in off-peak hours.	1) A.M., same <i>-P.M., in and out via new Kalmia entrance and stacking/circulation loop</i> 2) Same, <i>with details to follow on enhanced measures to accomplish this and other access improvements.</i> 3) Same, <i>with details to follow on safety improvements at 17th St. and Kalmia Rd. intersection.</i> 4) Elimination of 17th Street closure requirement requested.	17th St. off-peak entrance closure was never implemented, <i>Access proposal revised since setdown.</i>
Traffic Control and Parking	Manual traffic control @ entrance and exit during peak hours and @ special events. Required to have a Transportation Management Plan (TMP). Requirements are described on page 8 of the Applicant's filing.	Had been no proposed change. Since setdown, applicant has proposed new <i>circulation plan removing p.m. traffic from 17th Street, staggering student hours, adding one to two 5-stop student shuttle bus, and reducing parking increase request from 48 to 42.</i> <i>Applicant and ANC are continuing discussions on additional measures to incorporate into formal agreements.</i>	DDOT has concerns, including TMP, back-ups on 17 th Street and amount of proposed parking. Will be filing comments with Commission.
Building Program	Original 1928 Marjorie Webster Junior College structures may be eligible for historic designation	1) <i>Retention of 1928 structures;</i> 2) 3,950 GSF addition to Parkside Building for middle school labs, studios, theater, library & common areas. 2) Demolition of non-historic	Fraser Hall demolition will be subject to DDOE asbestos abatement requirements.

Site or PUD Condition	Currently Applicable	Requested/Proposed	Notes
		Fraser Hall; replacement with below-grade garage, roof-top playing field & 5100 SF gym addition.	
Community Involvement	Establish Community Relations Council (CRC), chaired by community member and with majority of members being from community	Same as now.	<i>Applicant and ANC are working to draft voluntary, enforceable agreement prior to a Commission decision on case. (See Sec VI of this report).</i>
First Source/ MBOE	MOU with LBOC	Same as now.	<i>Details needed on provisions for new construction.</i> <i>Applicant will add proffer to apply to construction.</i>
Property Use Restrictions	No outside fundraising activities on property other than community-related activities at applicant's discretion, with prior notice to Community Relations Council.	Same as now, plus restrictions on interscholastic sports being played on synthetic turf across proposed garage; commitment not to put in field-lights, other than possible security lights	<i>List of proposed restrictions has been filed.</i>

When completed, the plans would result in a reduction in FAR from .36 to .34 (-7,305 SF); the removal of 22 surface parking spaces and a net increase of 42 spaces, all of which would be located underground; an increase in the student body from the current 315 to the currently permitted 400; an increase in faculty and staff from 60 to the requested 100; and the reconfiguration of the circulation system to address concerns about pick-up/drop-off queuing on public streets.

IV. ANALYSIS

OP's analysis is focused on the requested modifications rather than on the overall approved PUD – i.e., on the:

- Addition of 2 new grades within the approved 400-student cap;
- Addition of 40 faculty and staff beyond the approved cap of 60;
- Proposed circulation changes and the greater emphasis on Kalmia Road and internal stacking;
- Proposed net parking increase of 42;
- Demolition of Fraser Hall and the construction of the 64-space parking garage and 5,100 GSF gym additions.

Compliance With Chapter 24 Requirements

With the submission of its June 11, 2010 supplemental statement, the applicant has complied with all process-related requirements and has supplied information – other than that pertaining to First Source/CBE-- sufficient to comply with the requirements of Chapter 24.

A. The Requested Flexibility Would Not Compromise the Intent and Purpose of the Zoning Regulations.

The proposal is consistent with the permission granted for schools and institutional uses in the R-1-A zone. Its height, bulk, and lot occupancy would be within the limits established for a PUD in that zone. It would exceed its minimum parking requirements.

B. The PUD Modifications Would Not Be Inconsistent With Comprehensive Plan (underlined emphasis added)

Citywide Elements

- Land Use Policies:

The *Future Land Use Map* designates the property for institutional uses such as the existing school.

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 neighborhoods to work proactively to address issues such as traffic and parking, hours of operation, outside use of facilities, and facility expansion.

The low scale and materials of the proposed new construction would be sympathetic to the existing school buildings, and not introduce new elements into the neighborhood. The school has a limited number of school-related evening meetings: five in October; four in September and November; three in January, two in December and February – June; and none in July and August. The applicant has recently enhanced the car-pooling arrangements in its existing Transportation Management Plan and has proposed several measures to strengthen it. These are discussed further below.

Policy LU-3.2.3: Non-Profits, Private Schools, and Service Organizations states that it is important to “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”.

The school is planned and designed so that the scale of, location of, and access to its buildings minimizes objectionable impacts on the Colonial Village neighborhood. The ANC, which is generally supportive of the application, has expressed concern about potentially negative impacts from the applicant’s proposed parking increase and changes in circulation. The applicant’s efforts to mitigate potential transportation impacts are described below.

Policy LU-3.2.2: Corporate Citizenship. It is important to “*Support continued “corporate citizenship” among the city’s large institutions, including its colleges, universities, hospitals, private schools, and non-profits. Given the large land area occupied by these uses and their prominence in the community, the city’s institutions (along with the District itself) should be encouraged to be role models for smaller employers in efforts to improve the city’s physical environment. This should include a continued commitment to high quality architecture and design on local campuses, expanded use of “green building” methods and low impact development, and the adaptive reuse and preservation of historic buildings”.*

The campus is well maintained and open to the public for community meetings, selected celebrations, and organized and informal sporting events. The large hill and fields at the bottom maintain a sense of open space next to Rock Creek Park. Because the grounds are not fenced, the open landscape affords neighbors the opportunity for leisure-time use. Neither the proposed demolition of Fraser Hall nor the proposed new construction would change this relationship. The elevation of the proposed garage and

playing field that would replace Fraser would be primarily below ground and, with the exception of the field's perimeter fence, would always be below the elevation of adjacent houses' ground floor. The distance between the rear property line of those houses and the nearest visible Lowell building would increase from approximately 11 feet to approximately 175 feet. The garage/field would be screened with evergreen plantings

- Educational Facilities Policies:

Policy EDU-1.3.1: Private Schools states that is important to "recognize private schools as an important part of Washington's educational infrastructure". *Policy EDU-1.4.2: Promoting High-Quality Design* stresses the need to "use high architectural and landscape design standards that are sensitive to community context as well as academic and student safety needs". *Policy EDU-1.4.4: Eco-Friendly Design* notes that it is important to "Strongly support the use of green building, energy efficiency, and low-impact development methods in school construction and rehabilitation".

The addition of two grades would enable the Lowell School to create a middle school, which would parallel the grade structure of other public and private schools in the District, and help to retain Lowell's relevance to Washington's education infrastructure. The proposed building demolitions and the location and design of new construction would respect the rolling terrain, open landscape and dignified but informal architecture of the 1920's campus. The building density would continue to be farther from Rock Creek Park and would respect the traditional relationship between the school's buildings and the neighborhood's single family houses. As noted under "Environmental Policies", the construction would incorporate green roofs and other sustainability features.

- Transportation-Related Policies:

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".

The applicant's existing TMP includes a carpool program (which has been expanded since setdown), bike racks, and environment & energy classes designed to promote an awareness of the benefits of alternative modes of transportation

The applicant's traffic impact study (Tab D of the supplemental filing) indicates that all of the study area intersections operate at Level of Service (LOS) C or better, except for the 16th/Juniper Street intersection, which experiences LOS D service 2% of the time. These LOS's are considered acceptable for urban conditions.

The traffic study indicates that the roadway network would continue to operate at acceptable conditions after each Phase of the Lowell School's growth, including increases in regional background traffic. The traffic consultant had stated that with the combination of on-site roadway improvements, the underground garage and the designation of one staff member for traffic management issues, the capacity for accommodating vehicles temporarily on-site (e.g., drop-off and pick-up) would increase from 38 to 71. The school would also start to stagger arrival and dismissal times at the beginning of Phase 1 construction.

Since setdown, the school revised parts of its proposed circulation and TMP plans. While previously proposing to construct a service road parallel to 17th Street on which to "stack" cars that might back-up during student drop-off or pick-up times, it has modified this proposal by eliminating the proposed service road, and re-orienting the p.m. peak pick-up to a proposed new entrance on Kalmia Road and a

loop that would close the 17th Street entrance during the p.m. peak and stack cars on both sides of the existing campus drive.

Both DDOT and members of the community have reservations about transportation and parking impacts. They are summarized in sections VI and VIII of this report.

- Environmental Policies:

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.

LEED: The applicant has stated that the new construction would meet the standards of the LEED for Schools program; would include green roofs atop new construction; and would place a supplemental playing field on the garage roof to reduce the school's heat island effect and to retain more open land for storm-water management. OP has asked the applicant to explore converting some of the existing surface parking spaces into permeable spaces after construction of the garage is completed. Several of the existing spaces will be needed only for occasional use at that point. The applicant has stated it will provide additional information at a hearing about its plans to expand recycling, maximize permeable surfaces, and use of green engineering.

Asbestos Removal: Since setdown the applicant has noted that because Fraser Hall has asbestos on the interior and exterior, demolition would be governed by federal and District Department of the Environment regulations for asbestos abatement. The applicant's supplemental report includes a draft demolition plan for Fraser Hall that focuses heavily on asbestos mitigation and maintaining open and frequent communication with the community about the demolition. Any demolition plan for the Hall would be reviewed prior to and after the issuance of a demolition permit by the Department of Consumer and Regulatory Affairs (DCRA) and the Department of Health. Neighbors have expressed concern. Both the applicant and the community are working to clarify and, if necessary, to strengthen these measures.

Rock Creek East Elements

Policy RCE-1.1.1: Conservation of Low Density Neighborhoods states: "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 stresses how important it is to "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".

The proposed modification maintains the existing relationship between the campus and the neighborhood. There has been a school on this site since 1924, before the construction of other residences in this neighborhood. As Marjorie Webster junior college, the buildings were designed to appear as a large Spanish-Revival type estate at the top of a hill rolling down to the woods of Rock Creek Park. No building was more than 40 feet high. This appearance has been maintained by subsequent schools using the site, and these same relationships would be maintained under the proposed PUD modifications. Building additions would be lower than the buildings to which they would attach – less than 40 feet above grade. The addition to the three-story Parkside Building would be in the rear, not facing the community and would be only two-stories tall. The addition to the school's existing gymnasium would be patterned stucco with red tile roofs, would be shorter than the existing building, and would be more distant from the single family houses on Kalmia Road than the existing Fraser Hall. .

As Section 2207.2 of the Comprehensive Plan states, neighborhood residents noted during the Comprehensive Plan process that *"Land use planning for Rock Creek east should protect and enhance the stable neighborhoods for which the area is known. Residents at Comp Plan meetings described their neighborhoods as "park-like" due to their tree cover, low densities, and proximity to Rock Creek Park. An important part of what creates the park-like ambiance is the large federal and institutional properties in the community"*.

The requested modifications would retain and enhance the openness of the campus and its existing tree canopy and fields adjacent to Rock Creek Park, would help to maintain the neighborhoods existing "park-like" character. In so doing it would help to conserve the positive attributes of the existing low-density neighborhood.

V. REMAINING OP CONCERNS

Design: The existing site plan is generally defined by an arc of buildings atop a ridge that descends into a bowl adjacent to Rock Creek Park. OP has suggested to the applicant that minor changes to the angle of the proposed garage may help to reinforce the arc of the buildings on the ridge and improve the views of the main building.

Historic Preservation: Neither the campus nor any of its buildings have been declared historic. However, as this report was being prepared OP became aware of a potential historic preservation application for the property. Any impact that a future designation may have on the modifications the Commission is now reviewing could be considered in a future PUD modification request.

Permeable Surfaces: As noted above, OP has asked the applicant to provide information on removing or converting into permeable surfaces, some of the existing parking spaces that would not be needed on a daily bases after construction of the garage.

Construction Management: The applicant provided a draft construction management plan to OP. The monitoring and potential penalty provisions of the construction vehicle routing restrictions need to be strengthened. The applicant and the community are now working on an agreement to accomplish this.

First Source and Certified Business Enterprise Agreements: The applicant should submit a signed agreement governing these aspects of the construction proposed in the modification by the Commission's final action.

Phase 3: The applicant should provide a projected date for the initiation and completion of the demolition and construction projected for Phase 3, the complete filling out of the student and faculty/staff caps, and the expansion of the shuttle service.

Transportation: The applicant should commit to a specific minimum for the number of bicycle spaces, provide more details on the transit incentives to be provided to faculty and staff, and continue working with the community and DDOT on TDM, traffic calming and pedestrian and vehicular safety measures related to the access to the campus.

VI. COMMUNITY RESPONSE

ANC 4A voted on June 17, 2010 to recommend the Commission approve the applicant's requested PUD modifications as long as specific issues of concern to the community are satisfactorily addressed. The applicant and the ANC are working to complete a voluntary and enforceable agreement covering these issues prior to a Commission decision on the application. The parties' intentions are for the agreement to govern:

- Access & egress restrictions and enforcement, particularly on the narrower streets less able to handle school-related traffic;
- Signage and striping safety improvements to some existing intersections;

- Fraser Hall asbestos removal and building demolition;
- Noise-related limitations on the use of the proposed playing field atop the proposed garage
- Garage and playing field security.

VII. OTHER GOVERNMENT AGENCY RESPONSES

DDOT staff has met with the applicant several times and expressed concerns about existing queuing on public streets for student drop-off and pick-up; proposed transportation demand and transportation management plans (TDM and TMP); and the number of additional parking spaces as that amount relates to the proposed faculty and staff increases.

The applicant has taken some operational steps and modified some of its TDM and TMP proposals to respond DDOT's concerns, but has not satisfied all of them. The department expects to file comments with the Zoning Commission prior to the public hearing.

OP is not aware of any other agency comments.

VII. SUMMARY OF ISSUES THAT SHOULD BE ADDRESSED AT THE PUBLIC HEARING

- The status of a potential applicant/ANC voluntary and enforceable agreement concerning the community issues previously noted;
- Additional measures the applicant proposes to take by itself and/or in cooperation with DDOT to enhance the management of traffic to and from the School;
- A detailed construction management and enforcement plan, including estimated daily truck trips within the neighborhood and the streets on which those trips would be taken;
- First Source and CBE plans for the construction aspects of the proposals;
- Numbers and location of bicycle parking spaces.
- Estimated date for the start and completion of Phase 3.

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Stephen Cochran, AICP --project manager