

MEMORANDUM

TO: District of Columbia Board of Zoning Adjustment
FROM: Karen Thomas, Case Manager
JL Joel Lawson, Associate Director Development Review
DATE: June 12, 2019

SUBJECT: BZA Case 20047 – 3301 Lowell St NW (DGS Eaton Elementary) - **Special Exception** relief to permit renovation of Eaton Elementary school, including a new three-story multipurpose building and relocation of retaining walls on the campus.

I. OFFICE OF PLANNING RECOMMENDATION

The Office of Planning (OP) recommends **approval** of the following special exception relief pursuant to Subtitle X Chapter 9:

- Retaining Wall Height, Subtitle C § 1402.1, (4 feet maximum permitted; 4 ft + existing; up to 7.5 feet proposed);
- FAR, Subtitle C § 1610.2, pursuant to Subtitle C § 1604.2 (0.9 maximum permitted; 0.7 existing; 1.17 proposed);
- Direct Pedestrian Access from at least 2 public rights-of-way to rooftop recreation area (10 feet minimum width required; 7 feet, and 8 feet proposed).

The applicant requested flexibility as a condition to incorporate minor plan modifications to the exterior that may be recommended by HPRB, HPO and ANC3C to finalize the project.

OP has no objection to such flexibility, provided that no new areas of relief would be required.

II. LOCATION AND SITE DESCRIPTION

Address	3301 Lowell Street, N.W.
Applicant	Department of General Services (DGS – for Eaton Elementary)
Legal Description	Square 2088, Lots 0001, 800)
Ward, ANC	3/ANC 3C
Zone	R-1-B: Public education facilities are permitted as a matter-of-right.
Historic District	Cleveland Park Historic District.
Lot Characteristics	Square 4088 is comprised of two lots, which in combination forms a square lot with variable topography, rising from 34 th Street towards 33 rd Street to the east. The northeast corner is more than 15 feet above the grade at the 33 rd and Macomb Street intersection.

Existing Development	The school property is comprised of four main buildings, three of which are contributing structures to the historic district (Exhibit 30A1, Pg.5) The buildings primarily occupy the south portion of the square and the north campus area has a sports field, basketball courts and play areas. Retaining walls, steps and ramps accommodate grade changes within the site, as well as significant retaining walls at the north and east edges of the site.
Adjacent Properties	The campus occupies the square and there are no directly adjacent properties.
Surrounding Neighborhood Character	The neighborhood is primarily comprised of single-family, detached residential homes within the Cleveland Park Neighborhood and Historic District.

PROPOSAL

Eaton Elementary proposes to modernize its campus, which currently consists of three historic buildings. The original and oldest portion constructed in 1910 is located at the southwest portion of the square, and a similar facility constructed in 1922 is located east of that structure, with a connector/multipurpose room in the middle constructed in 1930, and a newer connecting corridor between the structures built in 1980. ([Exhibit 30A1](#) – Sheet 05)

The connecting structures of 1930 and 1980 would be razed upon approval by the Mayor’s Agent and replaced with a new three-story with basement building to accommodate an improved gymnasium, cafeteria and office spaces, as well as ADA access to the campus. This would add 24,822 sf of gross floor area, increasing the existing FAR from 0.7 to 1.17. In addition, new retaining walls would replace existing structures within and along the perimeter of the site.

The school has a current enrollment of 475 students and 70 full time staff. Future student enrollment is projected at 490 students after renovation is completed. As noted in the table above, relief would be required from the FAR, retaining walls and rooftop recreation access requirements.

III. ZONING REQUIREMENTS and RELIEF REQUESTED

Zone- R-1-B Public School Building Subtitle C	Regulation	Existing	Proposed	Relief
Height § 1602.1 (b)	60 ft. max.	56 ft. 9 ins	56 ft. 9 ins.	None Required
Lot Area § 1605.1	15,000 sf	66,150 sf.	66,150 sf	None Required
Lot Occupancy § 1603.4	60%	34%	46.3%	None Required
Floor Area Ratio § 1604.2	0.9 max.	0.7	1.17	REQUIRED
Retaining Wall Height § 1403	4 ft. max. (along street frontage)	> 4 ft variable	> 4 ft. (variable)	REQUIRED
Pedestrian Access § 1603.6	10 ft. min.	N/A.	6 ft; 7ft.; 8 ft	REQUIRED

IV. OFFICE OF PLANNING ANALYSIS

SPECIAL EXCEPTION pursuant to Subtitle X § 901.2

FAR C § 1610

i. *Is the proposal in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps?*

The intent and purpose of the regulation is to ensure that the permitted education use remains compatible with the single-family neighborhood and that potential impacts could be reasonably mitigated. The increased FAR would permit new classroom space and related facilities to accommodate up to 15 more students in an improved learning environment.

The increase should not have an adverse impact due to increased traffic to the school as most of the school's attendees originate within the defined school boundaries for Eaton Elementary prescribed by DCPS. The school is well connected by pedestrian sidewalks to Metrobus and Metrorail. The applicant's traffic study which was submitted to DDOT for analysis, concluded that ... "*the existing conditions of transportation modes in and around the school provide quality non-automotive options.*"

The school does not provide on-site parking but has dedicated spaces in public space along the site's periphery (excluding 34th Street) for employee parking and drop-off and pick-up. The [applicant's parking study](#) (page 4 and 5) stated :

- *The observed on-street supply options will adequately serve the project on a typical weekday; and*
- *At any time during a typical weekday, there are at least 604 spaces available within 1/3 mile or a 7-minute walk of the school. This includes at least 17 unrestricted spaces.*

The proposed expansion should not impact existing on-street parking supply, as the number of employees would not be increased, and students do not drive.

DDOT's report at Exhibit 31 of the record determined that the proposed actions will not have an adverse impact on the District's transportation network and has no objection to the approval of the application.

ii. *Would the proposal appear to tend to affect adversely, the use of neighboring property?*

OP does not anticipate that the FAR changes would adversely impact the use of neighboring property. The school occupies the entire square and changes to the building would mainly occur within the site's interior, where there should be no impact on light and air available to homes across Lowell Street or 34th Street.

The FAR should not have an adverse impact the use of neighboring property or the surrounding neighborhood through increase traffic, or on-street parking, based on DDOT's review.

RETAINING WALLS: C §1402

i. Conditions relating to the building, terrain, or surrounding area would to make full compliance unduly restrictive, prohibitively costly, or unreasonable.

The property currently has several retaining walls of varying heights around the site's perimeter, as well as the interior as shown on Sheet 10 of Exhibit 30A1. These walls have continuously supported the variable topography, including at the highest elevation at 33rd Place and Macomb Street. The intent of the modernization project in part is to provide adequate and level play areas, while replacing some of the retaining walls in kind, or recladding them to present consistency in materials for the walls (Exhibit 30A1 Sheets 10-14). New and replacement walls would be an improvement over the existing and would continue to provide support for the site's grades. Full compliance in this instance would be unduly restrictive or unreasonable due to the site's topography and would unduly limit necessary outdoor play area.

ii. Is the proposal in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps?

The intent of the regulations is to control the location of bulk of retaining walls in relation to adjacent lots within the low density residential districts. Thus, the proposal is in harmony with the Regulations, as the walls are located within the site and well removed from residential property.

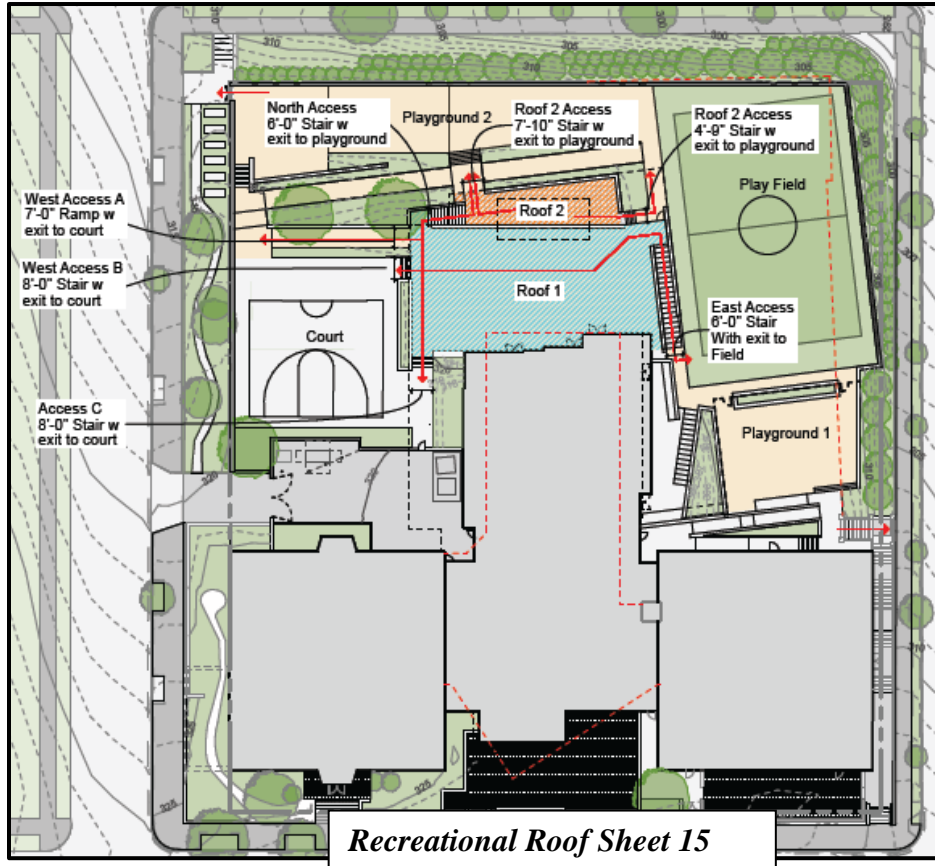
iii. Would the proposal appear to tend to affect adversely, the use of neighboring property?

The retaining walls would be landscaped where appropriate, as currently exists to minimize its appearance and height as viewed from residential homes across the street. The use of neighboring property should not be adversely affected.

PEDESTRIAN ACCESS C § 1603.6

The roof area of a public education building or structure shall be used only for open space, recreation areas, or other athletic and field equipment areas in lieu of similarly used space normally located at ground level provided direct pedestrian access not less than ten feet (10 ft.) in width from at least two (2) public rights-of-way shall be provided to each roof area used for these purposes.

As shown in Exhibit 30A1 -Sheet 15, two new recreation areas would be provided in areas identified as Roof 1, above the gymnasium and Roof 2, above the stage. There would be up to seven access points from to areas around the play areas, including access ramps and stairs at 8 feet, maximum and 4 feet minimum in width. The subject required access areas for relief would be 8 feet, 7 feet and 6 feet wide. These all exceed the egress widths for the roof's occupancy under DC Building code requirements.



i Is the proposal in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps?

The proposal is in harmony with the intent of the Zoning Regulations as adequate access relative to the design capacity of play areas would be provided according to DC Code regulations.

ii. Would the proposal appear to tend to affect adversely, the use of neighboring property?

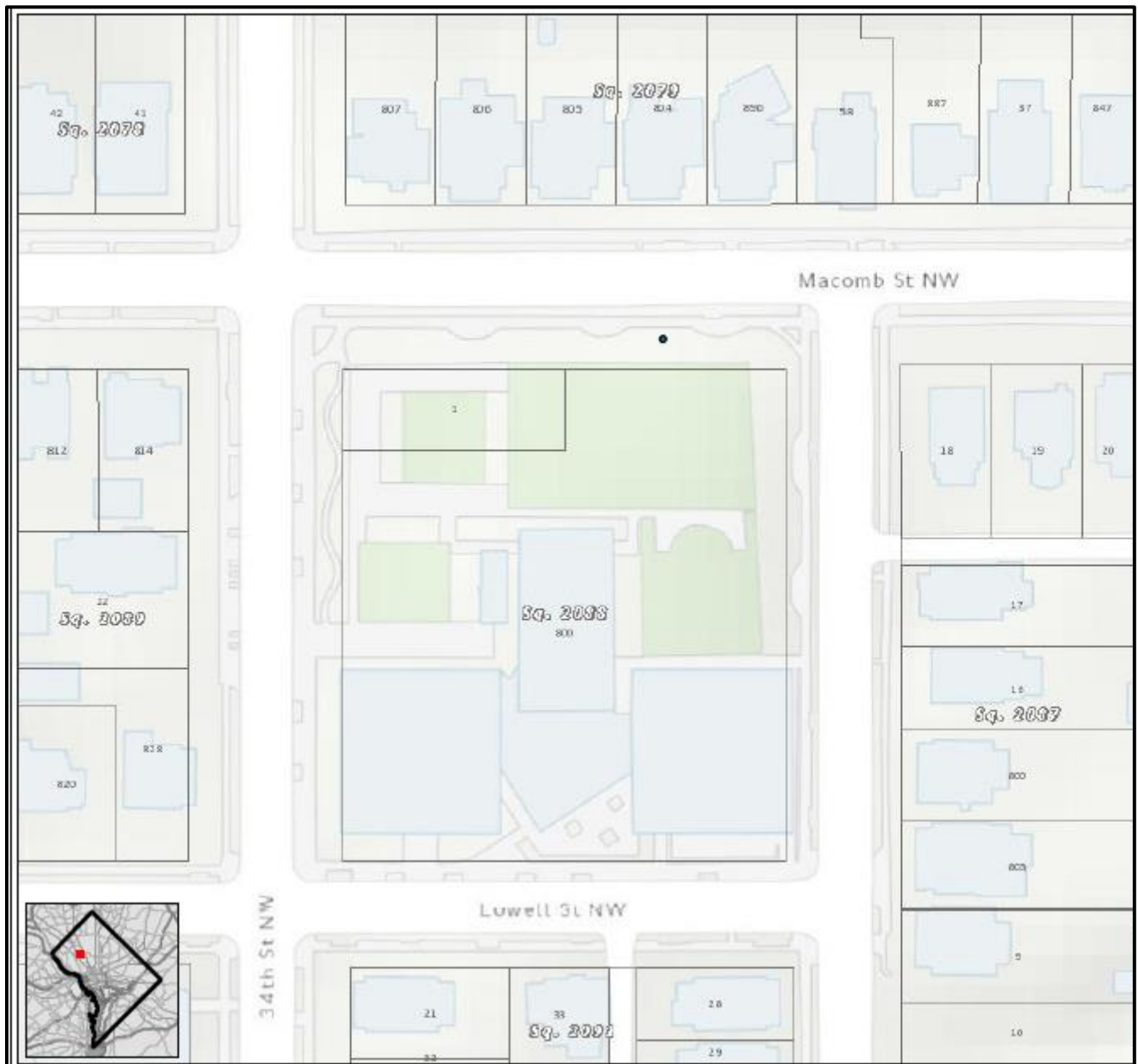
The use of neighboring property would not be adversely affected by the width of access stairs. The stairs would be located entirely within the school's property and would provide ingress and egress to improved public space pedestrian access amenities to 34th Street.

V. COMMENTS OF OTHER DISTRICT AGENCIES

DDOT's report is recorded as Exhibit #31. At the writing of this report other agency reports were not in the record.

VI. COMMUNITY COMMENTS TO DATE

An ANC 3C's report had not been added to the record at the writing of this report. The Applicant meets with the full ANC 3C on June 17, 2019.



LOCATION AND EXISTING SITE PLAN