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**Subject:** BZA Case #20472 OPPOSITION 200 Footer Testimony for the Record: Gianinno  
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## **BZA Case # 20472 OPPOSITION Written Testimony for the Record**

200 Footer: Alexandra Gianinno

4222 42nd Street, NW  
Washington, DC 20016

My name is Alexandra Gianinno. I have been a DC resident and taxpayer since 1997. Most importantly for this discussion, I have been a resident of 42nd Street, NW, since 2005. I am a 200 footer.

### **THE PROPOSAL BY TRS:**

The River School has proposed to purchase, relocate, and expand its school, currently located on MacArthur Boulevard in Palisades, to 4220 Nebraska Avenue, NW a 2.27 acre single-family zoned residential property in a residentially-zoned neighborhood. And they have included in their plan, but downplayed, a new unjustified ancillary National Center for Hearing Innovation (NCHI) which would provide professional training, research and services to the public and outside organizations to be added to the site and expanded over several years.

Most of us do not question the mission of the River School. I have many friends whose hearing children attended or are attending River School. Like so many of the private schools in DC, it is beloved by its students, families and alumni. What is objectionable, and the issue that many of the residents of Tenleytown and AU Park have with the River School proposal, is that the scope of their plan and the size of the proposed school and National Center for

Board of Zoning Adjustment  
District of Columbia  
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EXHIBIT NO.149

Hearing Innovation is simply too large, densely populated and industrial for such a small residential property in a residential area and, not discussed often enough in this dialogue, in an area with thousands of students and their families walking or biking through the residential streets to Janney, Deal and Wilson each day.

The ANC 3E voted 4-1 to oppose the River School proposal. I support the ANC and their decision. I hope that you deny the River School request for zoning exception by giving great weight to the ANC recommendation, and by giving great weight to the people who live in the community surrounding the site not the River School representatives who claim residency close to the property but per Nancy Mellon and other River School representatives, no current students live within 8 blocks of 4220 Nebraska Ave.

### **ARGUMENT AGAINST TRS ZONING EXCEPTION APPLICATION and SUPPORTING DOCUMENTATION**

I recognize that in the past, the BZA has granted zoning exceptions to several private schools wishing to relocate to residential neighborhoods on “historic” properties in DC. My argument today is that: #1, this property is too small for a school with 350 students and 100 faculty supporting infants-6th grade in DC; #2, this is not an historic property it is a 2.27 acre single family residentially zoned property; #3, None of the private schools in the area have added an industrial or commercial publicly accessed clinic, training or national research center that would generate revenue and significant traffic around their sites; #4 the plan would include demolishing **mature** greenery and moving **historic** trees all enjoyed by the community and per the Tree Canopy Plan and the Rock Creek West II Livability Study nature that should be retained, supported and protected, not destroyed.

If the River School purchases this property and then obtains the zoning exceptions, not only would the River School be adding 440 people and associated school-related traffic to the residential neighborhood, they would be adding a growing and evolving publicly accessed National Center for Hearing Innovation and its workers and visitors to the residentially zoned area. This is not a specialised center for students of the River school which would be the

norm for a local independent school. In fact, “...almost all private schools now have a learning center with learning specialists—ten, 15 years ago, there wasn’t a dedicated department with trained specialists there to support not only kids and families but also to work with faculty in their professional development,”

Washingtonian Magazine, “Private School Confidential: 25 Things Washington Parents Need to Know,” by Sherri Delphonse, Meaghan Hnna Davant, Kristen Hinman, Luke Mullins. October 18, 2018 [Access article link here.](#)

The “clinic” that would be located on the proposed campus at 4220 Nebraska Avenue, would not be an accessory use.

The River School mission statement posted on their site states: “The River School's inclusive program challenges each child to work collaboratively, to think critically, and to develop the confidence to take risks, embrace their curiosity, and find their voice.”[River School Community Handbook site](#)

This proposed new NCHI is an ancillary, currently unfunded, entity, which would be outside of the mission of the school, and would serve the public in its expansive proposed activities. In addition, the River School proposal includes NO parking for any visitors, outside organizations, or non-River researchers on the proposed site for the NCHI. The River School CTR does not address the significant size of the NCHI, nor the impacts that the NCHI would have on the actual population size of the campus, traffic and parking in the area.

## **ZONING:**

The 4220 Nebraska lot is located in the R-1-B zone, the purpose of which is to, “protect quiet residential areas now developed with detached dwellings and adjoining vacant areas likely to be developed for these purposes; and Stabilize the residential areas and promote a suitable environment for family life.

Based on the size and scope of the River School plan for the 4220 Nebraska property if they purchase it, the River School would fail to be in harmony with the general purpose and intent of zoning regulations and, in fact, **would adversely affect** the use of neighboring property in accordance with the zoning regulation and the zoning maps.

## **TRAFFIC IMPACTS:**

The River School CTR discusses existing traffic in the neighborhood

surrounding 4220 Nebraska Ave, NW, including the car trips related to several large development project-related traffic. Please see Exhibit B for a list of all development projects in the vicinity. However, much of the data used is invalid or vastly underestimates current and future conditions.

Data used in the River School CTR traffic counts is based on:

- Data gathered during COVID when schools and many offices were not on full pre-COVID schedules;
- Data gathered pre-COVID;
- Data collected before the GDS consolidation of their entire school to the Davenport Campus;
- one vacant building so existing use is underestimated;
- data from traffic studies from 2014;
- conservative assessments of traffic from local developers attempting to sell their projects to the neighborhood. For example, residence information for CIty Ridge and Upton Place include 1,450 residences and 250k SF of retail space, thus related trip counts are absurdly low. However using that data would add more than 1000 new trips in the AM peak and 2125 in the PM peak.

#### **COMMENTS ON THE CTR:**

1.

A new bike lane is set to be added to Nebraska from Tenley Circle to Ward Circle which cars, buses and delivery trucks from the 4220 location would need to cross through, twice at peak hours, to go into and out of the property. AU, DHS, Metro and private bus services will also have limited

lanes on Nebraska because of the new bike lane and will be pushed to the single available lane going south throughout the day.

2.

The 4220 Nebraska Ave entry/egress is situated close to a busy intersection with a 4-way light. All entry/egress from 4220 Nebraska Ave would not only cross a bike lane but also turn right off of the property to be forced to stop at a light immediately after exit from the property which would slow down anticipated pick up and drop off as well as bus embarking and disembarking on the property and all traffic on Nebraska Ave and feeder streets which would force cars to take evasive action onto local residential side streets to avoid the traffic.

3.

Several of the intersections near the 4220 Nebraska Avenue property have a DDOT rating of D-F and within the next five years will be at F or worse even without the addition of the River School.

4.

The CTR notes that the existing 42nd Street curb cut in the back of the 4220 Nebraska property would not be accessed by cars. However, the CTR does not include language that the curb cut would not be accessible to bicyclists or walkers. If the curb cut were not completely closed to all cars, bikes and walkers, the 42nd Street curb cut would become a defacto drop off and pick up point for River families wishing to avoid the Nebraska Avenue traffic.

42nd Street is a local street that is currently used by speeding WAZERs to avoid traffic on major arteries and GDS parents during peak hours. An entry and egress on 42nd would create a new choke point on a residential side street that is currently ripe with traffic and safety issues.

5.

The monitoring plan included in the CTR is weak and includes no community involvement and strong sanctions that the community would be able to impose upon the school. The River School must work with the community to develop a plan that has appropriately negotiated and

explicitly stated benchmarks and milestones similar to the neighborhood agreements between WIS and their [ANC](#) and [GDS](#) and our [ANC](#), that will be monitored and sanctioned by the community if they even want to consider a proposal of this size and scope. They have not worked with the community in this capacity.

It must be noted, however, that if the BZA approves this application for zoning exception **despite the fact** that the application is clearly inconsistent with the site's zoning **AND** the River school has failed to meet the standards that it would be in harmony with the general intent and purpose of zoning maps and regulations, and have no adverse impact, based on current experience, **neighbors are justifiably concerned that the ANC will not be able to enforce any community agreements and related ANC or city-enforced sanctions that might be developed.** We are all too aware of the daily dangerous and time consuming traffic, safety and congestion issues related to cars from the National Presbyterian School, Georgetown Day School, Sidwell Friends, DHS and AU. Neighbors do not have confidence that the ANC will enforce any sanctions on any school in the area once it has been approved by the BZA and relocates or expands into the area.

6.

In addition, in the public and recorded meeting in July and then again in September, 2021, Nancy Mellon, the Head of the River School, stated that the school does not have the funds to construct the school at this time and they must begin a massive fund-raising campaign that may take years. In the plans for the school and the neighboring area, the River School has pledged to fund several traffic remediation projects. If they do not raise enough funds, how will the ANC or the city impose sanctions on the River School related to projects they pledged to fund but cannot due to budget shortfalls? Once any school enters any neighborhood their impacts would be felt for years. This school proposes to purchase a residential property, put hundreds of people on this small residential property, and add a new ancillary large and expanding Center for Hearing Innovation to this property and they do not have the money for much of it at this time and cannot guarantee that they will raise all of the money for every aspect of

the project.

## **CONCLUSION:**

Traffic is bad in Tenleytown. It will get worse without the River School per the DDOT review of area intersections. The River School plan includes facts, figures and new non-school related structures, personnel and activities that have not been fully fleshed out. The school plans to add not only 440 people to the school each day but a NATIONAL center for hearing innovation, which would bring in an undisclosed number of people and cars to the property each day and the school has not included any details about growth of that center including number of visitors each day and related parking and traffic.

I ask that you will deny the River School request for Zoning exceptions related to the 4220 Nebraska Avenue, NW location on the grounds that the property is too small for the size and scope of the River School plan. It would have significant adverse affects on the neighboring community, zoning and, walkers, bikers and children, seniors and physically challenged people in the area. The project is objectionable because the data used in its traffic study is false, inaccurate or outdated. The community has 21 existing or planned, funded and approved development projects underway on or around major arteries that are impacting all of the residential areas.

When is it time to say enough development and special exceptions for new entities to push into this one square mile of DC until there is a comprehensive plan developed for the area including all relevant city government entities so that all of the needs for all residents of the city are supported, not simply the desires of a wealthy well connected private school wishing to move closer to the other private schools from one part of DC to another. Sometimes saying no is the right thing to do.

## **Tenleytown Construction, DDOT and Utility Projects as of 10/26/21**

### **Tenleytown Preservation Association**

Tenleytown and AU Park are thriving communities with numerous ongoing construction projects, vacant spaces, utility and DDOT projects that are currently and will significantly impact traffic, pedestrian safety, potential further overcrowding of local schools, and a multitude of safety issues for pedestrians in the short and long term. Clearly, many of these projects will also have significant benefits to the residents eventually, but the construction for many of these could last for years. In addition, with the issue of current school overcrowding and the overburdening of local roads built for far less traffic than we currently have in the neighborhood, what is the city doing to plan holistically to most effectively use the limited space we have left in the neighborhood?

### **Large Vacant Properties, Current or Planned Large Construction Projects and Major DDOT and Utility Projects in Tenleytown/AU Park**

1. City Ridge 3900 Wisconsin @ former Fannie Mae site
2. Upton Place 4000 Wisconsin @ corner of Upton and Wisconsin
3. Sidwell Friends School consolidation on the former Washington Home and Community Hospices Center @ Upton
4. 4615 Wisconsin and 4611 41st Street @ the Former Dancing Crab
5. 4620-4624 Wisconsin which begins demolition 7/21 with plans to close sidewalk for one year. Work includes demolition which is underway.

6. Tenleytown Public Library @ Wisconsin and Albemarle - build up
7. St. Anns @ Wisconsin and Yuma - portion of site
8. 4255 Western Avenue @ Lord and Taylor site for sale
9. 5300 Wisconsin Ave @ Mazza Gallery recently sold
10. Home Plate property @ parking lot behind Mazza Gallery and in front of Lord and Taylor
11. 4330 48th Street @ the former Superfresh site currently awaiting appeals court decision
12. 5151 Wisconsin Ave @ Fox News
13. 4100 Wisconsin Ave @ former WUSA9 on Upton and Wisconsin
14. 3920 Alton Place
15. Lisner Home @ 5425 Western Avenue, adding senior affordable house project
16. AU Law Dunblane house on Warren and 42nd
17. DDOT New bike lane Nebraska Avenue
18. DDOT New bike lane on Western Avenue
19. DDOT Installation of several new sidewalks
20. DDOT installation of protected sidewalk between Davenport and Fessendon

21.

DC PLUG PEPCO Infrastructure Improvement Projects-end stages of the projects

TPA: AG 10/25/2021

**Tenleytown Preservation Association**

**Schools, Child Care Centers, Institutions, Parks and Critical  
Infrastructure in Tenleytown and AU Park**

**Schools and Teaching Institutions**

1. Janney Elementary (public)
2. Deal Middle School (public)\*
3. Wilson High School (public)
4. St. Columba's Nursery School (private)
5. Georgetown Day School (private)
6. National Presbyterian School (private)
7. National Presbyterian School child care center, NPSCCC (private)

8. AU Law Campus Tenley Circle (private)
9. Broadcasters Child Development Center (private)
10. Communikids (private)
11. American University Main Campus (private)
12. Wesley Theological Seminary (private)
13. American University Child Care Center (private)
14. Methodist Church and School (private)
15. Washington School of Ballet Tenley Campus (private)
16. Seber Method Ballet Academy (private)
17. City POP! Dance Studio (private)
18. Horace Mann (public)
19. St. Albans Child Care Center (private)
20. Nazlymov Fencing Academy

\*Deal Middle School is located in Forest Hills but hundreds of Tenleytown and AU Park residents walk to Deal each day for school so Deal is included in this chart.

Institutions and Popular Parks/Playing Fields in Tenleytown/AU Park

1. Tenley Public Library (public)

2. Iona Senior Center (private)
3. Friendship Terrace/Seabury assisted living (private)
4. St. Ann's Church Tenley Circle
5. St. Columba's Episcopal Church
6. Greenberg Theatre
7. Tenley Friendship Park/Turtle Park (public)
8. Psychiatric Institute of Washington (private)
9. Fort Reno practice fields and park (public)
10. Fort Bayard practice field and playground (public)
11. Department of Homeland Security Nebraska Avenue Complex (NAC)
12. Embassy of Japan, Residence
13. Embassy of Sweden, Residence
14. Brazilian Army Commission (CEBW)
15. U.S. Post Office
16. Tenleytown/AU Park Metro Station

Schools In Northwest DC 10/2021 Facts							
School	Address	Neighborhood	Visible from Street	Historic Significance?	Number of Students	Number of Faculty and Staff Reported	Acreage
Beauvoir	3500 Woodley Road,NW	Cleveland Park	Yes	Yes	396 (pk-3)	66	57 acres (incl other schools and cathedral)
British International School	2001 Wisconsin Avenue, NW	Burleith	Yes	?	510 (2-18 years) with a cap of 745	57	3.147 acres
Edmund Burke	4101 Connecticut Avenue, NW	Van Ness	Yes	No	300(6-12)	70	60,000 square feet
Field School	2301 Foxhall Road, NW	Wesley Heights	Yes	Yes	380	63	10.5 acres
Georgetown Day School	4200 Davenport Street, NW	Tenleytown	Yes	No	1075 (k-12)	220	10 acres
Lab School	4759 Reservoir Road, NW	FoxhallVillage	Yes	?	350	200 faculty and staff	2 campus'
Lowell School	1640 Kalmia Road, NW	ColonialVillage	?	Yes	340 (k-8)	45 teachers	8 acres
Maret	3000 Cathedral Avenue NW	Cleveland Park	Yes	yes	650 (k-12)	108 teachers	10 acres
National Cathedral School	3612 Woodley Road, NW	Cleveland Park	Yes	Yes	597 (4-12)	70	57 acres(incl other schools and cathedral)
National Presbyterian School	4121 Nebraska Avenue, NW	AU Park	Yes	No	275 (pk-6)	52	12 acres
<i>River School</i>	<i>Proposed Location: 4220 Nebraska Avenue, NW</i>	<i>Tenleytown/Au Park</i>	<i>Proposal: Yes</i>	<i>No</i>	<i>Proposal includes 350</i>	<i>Proposal includes 90</i>	<i>Proposed Location includes 2.27 acres</i>
Sheridan School	4400 36th Street, NW	Cleveland Park	Yes	Yes on DC campus. In VA?	225	38 teachers	DC city block (2.5 acres). VA 130 acres
Sidwell Friends (Middle and Upper School)	3825 Wisconsin Avenue, NW	North Cleveland Park	Yes	Yes	350(middle) and 500(upper)	155 teachers and 112 administrative and support staff split between LowerMiddle&Upper	15 acres
Sidwell Friends	5100 Edgemoor	Bethesda	Yes	yes	295	155 teachers and 112 administrative and	NA

(Lower school bethesda)	Lane					support staff split between LowerMiddle&Upper	
St. Albans	3001 Wisconsin Avenue, NW	Cleveland Park	Yes	Yes	591 (4-12)	100	57 acres (incl other schools and cathedral)
St. Columbas Nursery School	4201 Albemarle Street NW	Tenleytown	Yes	Yes	up to 90	Yes	One city block (2.5 acres)
Washington International School (Elementary)	1690 36th Street, NW	Georgetown	Yes	No	450	90 full time and 14 part time split between lowermiddle&upper	One city block (2.5 acres)
Washington International School (Middle and Upper School)	Tregaron Campus - 3100 Macomb Street, NW	Cleveland Park	No	Yes	200(middle) 250(upper)	90 full time and 14 part time split between lowermiddle&upper	6 acres (with additional acreage surrounded by the protected Tregaron Conservancy and estate)
Whittle	3400 International Drive, NW	Van Ness	Yes	No	200 (going to 2500)	going to 400	13.7 acres
<b>Local Public Schools</b>							
Janney Elemenatary	4130 Albemarle Street, NW	Tenleytown	Yes	Yes	740 (pk-5)	53*	
Deal Middle School	3815 Fort Drive, NW	Tenleytown	Yes	Yes	1475	114*	
Eaton Elementary	3301 Lowell Street, NW	Cleveland Park	Yes	No?	476	30*	
Horace Mann Elementary	4430 Newark Street, NW	Au Park	Yes	No?	250	17*	
Hearst Elementary	3950 37th Street, NW	North Cleveland Park	Yes	No?	340	28*	
Wilson High School	3950 Chesapeake Street, NW	Tenleytown	Yes	?	1796	135*	6 acres
* some # additional teachers not included in these totals are funded out of parent donations and other non-DC budgeted							

funding sources							
<b>NW Schools with Comparable Student Age to River Proposal</b>							
Holy Trinity	1325 36th Street, NW	Georgetown (also campuses in Bowie and Glenn Dale MD)	Yes	?	345 (k-8)	38	
Blessed Sacrament	5841 Chevy Chase Parkway, NW	ChevyChase	Yes	Yes	515 (k-8)	43 (faculty not incl Staff)	
Our Lady of Victory	4755 Whitehaven Parkway, NW	Foxhall Village	Yes	No	220 (pk-8)	?	
St. Patricks	4700 Whitehaven Parkway NW	FoxhallVillage	Partial	No	480 (pk-8)	100	20acres
TPA AG: 10/26/21							