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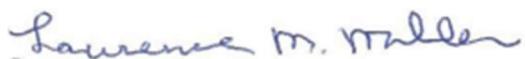
October 26, 2021

**Letter in Opposition to Case #20472: River School Application for Zoning Exceptions  
Request for acceptance of Opposition one day out of time**

To the Members of the Board of Zoning Adjustment:

I have today sent you by email a letter opposing the application by the River School for special exceptions in the above-referenced case. I had worked on that letter with the intention to finish it and send it to you yesterday. However, I had a Covid-19 booster shot on Sunday afternoon and ended up in bed with extreme fatigue and other symptoms all day Monday and this morning, unable to work. I respectfully request that you accept my opposition letter as in substantial compliance with timing requirements and consider it in your deliberations.

Respectfully submitted,



Lawrence M. Miller

To: dcoz@dc.gov  
bzasubmissions@dc.gov

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Washington, DC 20016**

October 26, 2021

**Letter in Opposition to Case #20472: River School Application for Zoning Exceptions**

To the Members of the Board of Zoning Adjustment:

I am writing in opposition to the application by the River School for special exceptions to relocate that school from MacArthur Boulevard to the residential property, zoned R-1-B, at 4220 Nebraska Avenue, NW, known as the Buchanan Estate. The Estate is at the intersection of Nebraska Avenue, Van Ness Street, and 42<sup>nd</sup> Street.

My wife and I have lived on Verplanck Place for 38 years. Our house is about 800 feet, a two-block walk, from the 42<sup>nd</sup> Street western edge of the Estate. We have never before opposed any development in the neighborhood. However, after review of all the available information, I have concluded that this proposal poses irremediable congestion and traffic problems because it is far too expansive and dense for the location and size of the property and is located at an unusually configured intersection that already poses serious safety issues.

The School's proposal would put a primary school and child development center, a clinic for the hearing-impaired, and a summer camp on a 2.27-acre residential property. The School proposes to serve 350, with 100 or so faculty and staff, and visitors to the proposed ancillary facilities. That total of over 450 daily users solely for school activities would far exceed matter-of-right parameters. The TRS proposal would produce a density of 0.61 Floor/Area Ratio. That proposed density would be an outlier for private schools in the District.

We value the many childcare and educational institutions in our immediate area, although each provides its own contribution to the established multimodal traffic at the complex intersection at issue. Those institutions include National Presbyterian School, with over 275 children in attendance in Nursery through Grade 6, located just across the street from the Estate at 4121 Nebraska Avenue, with school driveways on Van Ness Street about 165 feet from the Estate. The Broadcasters' Child Development Center, a pre-school facility for about 115 children, is located at the rear of 4200 Wisconsin Avenue, about 950 feet from the Estate. Throughout the day there is very substantial student pedestrian, bicycle, scooter, automobile, and dedicated bus traffic on Nebraska Avenue going to and from American University, with its extensive facilities starting just one-third of a mile from the Estate. Janney Elementary School, an overcrowded public neighborhood school with about 740 students, is about 1400 feet from the Estate. Janney parents and children walk through the neighborhood daily. Georgetown Day School (GDS), half a mile from the Estate, draws numerous cars through the neighborhood daily. The American University College of Law is also nearby. I am concerned about the additional traffic that yet another school, jammed onto a small lot and with many parents

driving to the site from Virginia and Maryland, would have on the area. That traffic would directly affect mobility and safety in the immediate area of the Estate and would inevitably drive some auto traffic onto nearby small neighborhood streets as drivers seek alternate routes to and from the school and follow directions from their navigation devices. The School's transportation study does not, in my observation, reflect actual traffic conditions during regular, non-pandemic, times, or provide convincing support for the proposition that the traffic generated would not be a serious problem.

Moreover, the application does not discuss the school's plan for a National Center for Hearing Innovation that was included in early documents provided to neighbors and that it highlights on its website, <https://riverschool.net/outreach/national-center-hearing-innovation>. That separate entity would occupy additional space with additional staff and visitors and does not appear to be within the scope of the requested exceptions.

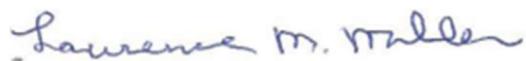
I have a personal perspective on private school siting issues, having served during the 1990s on the Board of Directors of Washington International School (WIS), including a period in which that school pursued a proposal for expansion of its Upper School on the Tregaron Estate, fronting Macomb Street. After protracted neighborhood controversy and extensive revisions to its original plans, WIS ended up with a limitation to 450 students on a campus of 6 wooded acres set amidst a 20.5-acre estate shared with a 14.5-acre nature conservancy. The River School proposal is for a much more crowded campus with little space to handle drop-off and pick-up traffic. Also, River School would serve a large population of infants and toddlers who are not likely candidates for safe busing.

The problem with the proposal is not the School as an institution. The problem is the poor fit of such a substantial institution with growth ambitions onto a residential lot in a neighborhood with many nearby educational institutions that generate traffic and pedestrian flow concentrated around normal school hours.

Because of such factors, our ANC3E, which has the most direct knowledge of the neighborhood and the site, has after extensive consideration and engagement with the River School resolved decisively to oppose the application. That opposition is based on the stated issues of Traffic Volume, Use of Local Streets for Queuing, Intersection Performance, Lack of Commitment to Alternative Transit Modes in TMP, and Consequences for Non-Compliance.

Considering all these factors and the many other objections lodged against the proposal, the BZA should deny the application.

Respectfully submitted,



Lawrence M. Miller

To: dcoz@dc.gov  
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