

October 26, 2021

District of Columbia
Board of Zoning Adjustment
441 4th Street NW
Suite 220S
Washington, DC 20001

RE: Case No. 20472
The River School for a Special Exception to Construct a Child
Development Center and Private School Campus in the R-1-B
Zone.

Dear Chairman Hill and Members of the Commission:

The River School serves a very special population in the District of Columbia and based on the numbers of students; it is a well-respected institution. But the purpose of this letter is not to address whether the River School is fulfilling its mission to educate its students, it is to comment on the relationship between the school and the surrounding neighborhood.

The matter-of-right school site is a building wedged between two adjacent apartment buildings and previously used as a NOAA Weather Forecast Site and the Middle School of St. Patrick's School. St. Patrick's purchased one of the adjacent apartment buildings which conveyed to the River School when the property was sold.

The beginnings of the school were a bit shaky as it was difficult to establish a drop-off and pick-up location. At one point much of this activity occurred in an alley when runs behind the homes on V Street but became unacceptable when garages were blocked, and staff was utilizing the entire street as its parking lot. Once the school was forced to move its parking and drop-off/pick-up operations from V Street, the school began to utilize MacArthur Boulevard.

At the same time River School pick-up and drop-off were removed from V Street, all day staff parking was eliminated through the implementation of RPP on V Street, but that meant teachers were forced to find alternative locations in the neighborhood. The new impacted streets included Potomac Avenue, W Street, V

Street, 49th Street and Ashby Street. With the exception of Ashby Street, which is not convenient due to distance, all these streets implemented RPP so residents could find parking near their homes.

A Metrobus Stop is in front of the River School. During drop-off and pick-up times that bus stop is difficult to access and buses must block the second lane of traffic because one lane of MacArthur Boulevard is blocked by school drop-off or pick-up operations.

This has not been an optimal situation for the neighborhood. Exhibit 94 from Tricia Duncan for the Palisades Citizens Association would have you believe there is no impact to the neighborhood when the flow of traffic on MacArthur Boulevard is blocked for afternoon pick-up. Parents begin lining up before dismissal and the queue line often blocks one lane of MacArthur Boulevard for several blocks. The queue line is often visible at the foot of Ashby Street which is several blocks from the school. Double parking on major streets is always a problem and is no different when trucks park to unload goods. This is an inconvenience the community has learned to live with, but that does not mean it is acceptable or a condition that should be transferred to the new school location.

There are also issues with parents parking on surrounding streets and dashing across MacArthur Boulevard to retrieve their children than wait in the queue line. I have personally witnessed some near misses.

Subtitle X, Chapter 9, Section 901- Special Exceptions - outlines the standards used to review applications. It is these standards which the Board must consider when granting a special exception and upon which conditions of approval should be based. The first standard is the most important [X-901.2(a)]. It states the granting of the special exception will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps. The R-1-B Zone is designated low-density residential. The Zoning Regulations did not apply for the current commercial property and thus the school is located as a matter-of-right on MacArthur Boulevard. Section 901.2(b) is the most germane standard in terms of the proposed location of the new school. It states *granting the application*, “[w]ill not tend to affect adversely, the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps.” The regulations conclude (c) by adding the enforcement language, “will meet such special conditions as may be specified in this title.”

Regulations addressing Campus Plans, School Plans and Medical Campus Plans are found at Subtitle X, Chapter 1. Here (Section 101.2) states, “The uses shall be located so that they are not likely to become objectionable to neighboring property because of noise, traffic, parking, number of students or other objectionable conditions. These standards serve as the foundation upon which the application is premised. The school must address each of these provisions and provide compelling evidence that it will not create objectionable conditions if approved.

The Board may want to impose conditions of approval to ensure the standards are met and may want to place a limit of five years on the preliminary approval to ensure the standards are being effectively implemented.

Thank you for your consideration of my comments and please accept them into the record although untimely filed.

Sincerely,

Alma H. Gates
4911 Ashby Street, NW
Washington, DC 20007