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**From:** Bardin, Sara (DCOZ)  
**Sent:** Friday, October 15, 2021 2:38 PM  
**To:** DCOZ - BZA Submissions (DCOZ)  
**Subject:** FW: Letter in Opposition to BZA Case 20472-The River School Application for Special Zoning Exception

Sara

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**Sent:** Friday, October 15, 2021 1:41 PM  
**To:** ATD DCOZ <[dcoz@dc.gov](mailto:dcoz@dc.gov)>  
**Subject:** Letter in Opposition to BZA Case 20472-The River School Application for Special Zoning Exception

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Dear Members of the Board of Zoning Adjustment,

After many months of hard work and careful deliberation, last night, the commissioners of ANC 3E voted 4-1 to oppose the River School plan to purchase, relocate, and significantly expand their school to a residential property at 4220 Nebraska Avenue, NW (BZA Case #20472). We are grateful to ANC 3E for their open-mindedness, thoughtful analysis, rigorous critiques, fairness and transparency in their decision-making process.

**Today, I am writing to voice my strong opposition to the River School request for zoning exception AND to correct erroneous arguments used by supporters of the school in their**

Board of Zoning Adjustment  
District of Columbia  
CASE NO.20472  
EXHIBIT NO.68

**letters to the BZA, DDOT and the ANC as well as in correspondence and meetings with the 200 footers and the broader community.**

I am a 200 footer, and my husband, three children and I reside at 4222 42nd Street, NW. I have lived at this residence since 2016. From 2005-2016, my family lived at 4414 42nd Street, NW. I have lived in DC since 1997, and my husband since 1992. We walk, bike, play, and due to COVID, work here, and appreciate all that the community has to offer, including much of the new development and the businesses, people, activities and opportunities they bring.

My children attended neighborhood schools including: Janney Elementary, Deal Middle, GDS, pre-k at St. Columba's, and attended day care at the National Presbyterian School Child Care Center. Similar to the avid supporters of River School, my family feels a deep connection to all of the school communities we are and have been a part of.

I would like to correct several of the false claims made, and misleading information provided, by the River School and its supporters so that they may gain BZA and others' approval to relocate their large school to a residential property in a residential neighborhood.

Size and Scope: Some of the pictures that River School architects have developed for the River School proposal may look nice, but they do not change the fact that the size and scope of the River School plan is simply too large for the site. Several architects, not affiliated with the school, have spoken out against the River School plan due to its sheer size, proximity to residences and major intersections and destruction of green space and heritage trees.

The fact is that the density of the River School proposal is far greater than allowed as a matter of right, and far too great for the property. While details of the river school plans are quite difficult to obtain, the plans call for roughly 60,000 square feet of development. The property is approximately 2.27 acres in size, meaning the proposal would yield a density of .61 FAR. In addition, the proposal is for a total population of approximately 450 people, including students, faculty and staff to the property each day just for the school. If the property were developed under matter of right parameters, this number would be far lower than 450. The River School plan's proposed density is greater than any comparable private school located in the District, except perhaps Edmund Burke. If you compare NPS or Washington International School for campus size; there is no valid comparison.

The Benefits of a New Private School in the Area: Many private schools located in and around Tenleytown and AU Park have had a presence in the community for many years; have shown support for local business and activities; and their expansion plans include or included benefits to the community including incentives to encourage local children to attend. The River School has no historic or current ties to AU Park or Tenleytown.

Adding an expensive private school to a neighborhood filled with or surrounded by some of the top public and private schools in DC does NOT increase school choice to a measurable extent nor provide economic benefits for the community just by simply existing.

Cultivating relationships and ties to a community are what enhance the benefits of a school to a community. Adding a new DC *public* school and finding a way to reduce overcrowding at the local

public schools, that many children in the neighborhood could walk or bike to school, *would* benefit the community.

The River School is already located in DC. The benefits of the River School switching locations on DC as a whole are a wash. And any benefits specific-to Tenleytown and AU Park, would be overshadowed by all of the negative impacts the school's influx of people, cars and safety concerns would bring.

Bullying and Scare Tactics: The River School does not currently own the property at 4220 Nebraska Ave. They are under contract.

The River School realtor and supporters of the school have attempted to scare many 200 footers, including elderly neighbors, into a fear of what or who might purchase and develop the 4220 Nebraska Avenue, NW property if not the River School. And if and when people speak out against the school's proposal based on issues of safety and traffic, the economically privileged parents of River School students cry foul and attempt to bully the opponents - even stealing yard signs off of an opponents' private yard in broad daylight and driving off with their large River School magnet prominently displayed on their rear fender.

Per many realtors and developers in the area who are not affiliated with the River School, the alternatives to the school would not be as invasive and dense as what the River School would like to build AND they would not add constant traffic and safety issues to the community.

Traffic Planning: The River School hired an independent traffic consultant to develop traffic plans. Despite the expertise of the firm, most of the data used in their study is invalid, inaccurate or outdated (ie. from 2014). Current traffic and safety issues in the surrounding area are an issue and adding ANY new entity to a residential area would put undo strain on local roadways and intersections in an area already on the brink of collapse. It would be a true disservice to the pedestrians, bikers, physically challenged and all residents of the community to add any more cars, buses and people to this area until all of the existing traffic and safety issues are addressed by DDOT and others.

Important Facts: Per the River School leadership, none of their current students live within 8 blocks of 4220 Nebraska Avenue, NW. And, the River School website states that 10-15% percent of students have *corrected* hearing impairment. [Click here for citation.](#)

The River School is a respected private school. It is not a school focused solely on children with special needs. It is a private school that offers a niche focus on communication skills by adding speech pathologists onsite as teachers. The speech pathologists at River benefit all students by teaching effective communication, a focus which is also very beneficial for children who have experienced hearing loss.

In reality, the River School is a major feeder school to GDS, NCS, St. Albans, Sidwell and other private schools within a two mile radius of the 4220 Nebraska Ave location.

More Than Just a School and Day Care Center: The River School's BZA application for zoning exception does not include any discussion of the National Center for Hearing Innovation (NCHI), as it is called on their school website, or the "clinic" as they call it in public discussions. Square footage

for the proposed “clinic” details were included in early documents provided to neighbors with a potential *square footage of approximately 9,300 or 14,000 square feet*. This is not the size nor the scope of typical activities for a private school to include in their learning center or clinic. There have been no additional details provided about the planned size and scope of this center on the property. Here is what we know,

Included in the River School Strategic Plan for 2020-2025:

“The River School will join with university, hospital and industry partners to develop a National Center for Hearing Innovation (NCHI) in Washington, DC. The goal is to improve access for all individuals with hearing loss to new hearing and listening technologies and to promote collaboration, clinical research and services, professional training, outreach and advocacy.

- Establish NCHI to better integrate the efforts of new and existing partners to improve treatment and outcomes for children and adults with hearing loss.
- Initiate collaborations that will provide the financial support needed to create NCHI and add value to The River School program through enhanced opportunities for research and development.
- Conduct a fundraising campaign to provide financial support for the establishment of NCHI.
- **Acquire a new facility to house NCHI and an expanded school, and build clinical capacity.”** [For citation link here.](#)

DDOT Needs to Fix What is Already Broken: The River School is not responsible for existing traffic and safety issues around 4220 Nebraska Ave. However, if the BZA grants the River School any zoning exceptions, that decision would negatively impact safety and traffic in the area at several chokepoints. Several intersections around 4220 Nebraska Ave, have or will have (within the next 5 years) a failing rating of F1 or F2. DDOT currently has no plans to mitigate the problems.

The River School population has more than 50 percent of its population between the ages of 0-3. Those children cannot easily be bused to school so no matter what creative transportation and traffic mitigation strategies they develop the negative impact of the school on traffic and safety in the community would be significant. No matter what solutions or mitigation River School proposes, they will not solve the problems that already exist and their presence would only make traffic and safety conditions worse.

Who will pay for everything that is needed or required? DDOT currently has no plan to fund mitigation of any of the current traffic and congestion issues around 4220 Nebraska.

DDOT has met with River School on multiple occasions to discuss what could be done with traffic around 4220 Nebraska Ave, but there are no concrete plans to fix or fund any of it. The River School has proposed a lot of mitigation solutions for traffic and safety issues they might cause, but there is no guarantee that any of these fixes will be implemented even if neighborhood agreements are developed.

In addition, and of vital importance, *River School does not currently have adequate funding to support this entire proposal*. Any promises or neighborhood concessions they make cannot be guaranteed as all of their funding is contingent upon fund raising.

Transparency and Neighborhood Input: Throughout the past year, the River School has not been transparent about the details of its project with the community.

There are many schools and development projects already approved, underway or recently completed in the AU Park and Tenleytown neighborhoods. And many of these projects have neighborhood agreements that were painstakingly worked out to address neighbor and community-wide concerns. Despite these neighborhood agreements, monitoring and enforcement of any of the community-mandated sanctions is almost impossible. Once a school or project zoning exception request is approved by you, the BZA, it is very hard for the community to force any entity to honor or abide by its agreements with the community.

Please **do not approve** the BZA Case #20472 application submitted by the River School for special zoning exceptions related to the residential property at 4220 Nebraska Avenue, NW.

Respectfully,  
Alexandra Gianinno