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11/7/2025

Office of Zoning and Administrative Hearings  
Stella B. Werner Council Office Building  
100 Maryland Avenue  
Room 200  
Rockville, MD 20850

**Subject: Supplement to Opposition to Proposed Amendment of Special Exception for Holton-Arms School (Case No. CBA-1174-E) and Refutation of Petitioner's Revised Statement of Justification (Exhibit 30, Sept. 12, 2025)**

Dear Hearing Examiner,

As residents of 8311 Burdette Road, we write to supplement our letter of April 14, 2025, in which we oppose Holton-Arms School's proposed major modification of its special exception (CBA-1174-E). 8311 Burdette Road is a uniquely situated property abutting the School along three boundaries totaling over 550 linear feet. Our residence is within mere steps of Field 1, bus parking, delivery zones, and the lower-school drop-off locations. We would bear a disproportionate burden due to the School's proposed changes.

Subsequent to our first letter, the School submitted a Revised Statement of Justification (SOJ) on September 12, 2025 (Exhibit 30). Simply put, that document misrepresents binding precedent, relies on traffic data irrelevant to noise, and fundamentally fails to acknowledge the existing nuisances that already violate §59-G-2.19(a)(1) of the prior Zoning Ordinance, which mandates that a special exception must not create a nuisance due to "traffic, number of students, noise, type of physical activity, or any other element."

While the School now claims it will "comply with the County noise ordinance" (Chapter 31B), this condition is and was already binding on all county residents and entities. In the same way that a smoke detector does not actually prevent fires, only allowing action to be taken after the fact, the noise ordinance does nothing to actually prevent noise. However, section 59-G-2.19(a)(1) of the prior Zoning Ordinance does allow for noise prevention by anticipating the result of the School's proposals. More students means more bus activity, parking lot activity, field, and drop-off activity. Recently, on Oct. 9<sup>th</sup> (see attached photos), the school held an evening interscholastic competition on Field 1 with auxiliary lighting. Field activities often make use of amplified announcements and air horn blasts.

Allowing outside groups on the School's fields will necessarily generate even more undesirable noise. Furthermore, the School's request for third-party use of its fields is an attempt to overturn the Board's binding 2002 decision, which explicitly banned outside group rentals, stating: 'Third-party rental of athletic fields is not an accessory use and would constitute a commercial enterprise incompatible with the residential zone' (Case No. CBA-1174-C). The SOJ claims this perspective "no

longer prevails today,” yet acknowledges these rentals are a marketing tool to “expose” potential students and drive enrollment demand. This admission confirms that the proposed activity is not an educational purpose per se, but rather a transparent marketing and commercial strategy that imposes intensified weekend and evening noise on abutting residents.

Finally, the impact of noise extends well beyond mere annoyance and can have serious health consequences. Noise is not defined solely by its decibel level—it also includes characteristics such as impulsiveness, tonal harshness, and unpredictability. A recent investigative report in *The Washington Post* (“[Pickleball noise is annoying. We’ve figured out why — and how to fix it. - Washington Post](#),” Sand & Tenjarla, Nov. 2, 2025), which synthesizes peer-reviewed research from Turku University and Harvard Medical School, directly supports our concerns. Drawing on findings from acousticians and cardiologists, the article confirms that noise generated by School activities and bus operations constitutes a nuisance with measurable physiological effects, even at moderate sound levels. The School’s proposed expansion would only intensify this harm. As the article explains, sounds like those produced by bus and delivery alarms, maintenance equipment, and field events have tangible health impacts:

“Even sounds less than 65 decibels with an impulsive... signature are enough to tire research subjects and increase cortisol levels.”

— Jenni Radun, Turku University

“Chronic noise exposure activates the amygdala, triggering the sympathetic nervous system and the hypothalamic-pituitary-adrenal axis, which keeps the body bathed in the stress hormone cortisol... [and] has been connected to a hefty list of troubles: diabetes, respiratory disease, worsening mental health, poor cancer outcomes and shorter lifespans.”

— Dr. Michael Osborne, Harvard Medical School

We respectfully urge OZAH to deny the proposed amendment and uphold the protections afforded by the existing special exception. The scientific and zoning record supports our position: the School's expansion would impose a disproportionate and harmful burden on adjacent residents, in direct conflict with established zoning standards and precedent.

Thank you for addressing our concerns.

Sincerely,

A handwritten signature in cursive script that reads "Eleanor Yano".

Eleanor Yano

A handwritten signature in cursive script that reads "John Harris".

John Harris



