

STATEMENT OF THE APPLICANT

I.

Nature of Relief Sought

This is the statement of St. Patrick's Episcopal Day School ("School") for a special exception to increase the number of students permitted at its private school located at 4700 Whitehaven Parkway, NW (Square 1372, Lot 817; Square 1374, Lots 838, 839 and 857)("Main Campus" or "Property"). The School is seeking to modify the cap imposed twenty-two years ago in Order No. 15374 which allowed an increase in the number of students from 390 to 440. The School now seeks an increase to no more than 485 students. The School does not propose an increase in the current faculty and staff cap of 105.

II.

Jurisdiction of the Board

The Board has jurisdiction to grant the relief requested pursuant to Section 3104 of the Zoning Regulations.

III.

The Applicant

St. Patrick's Episcopal Day School is a nursery, elementary and middle school operated under the auspices of St. Patrick's Episcopal Church. The School was founded in 1956 as a nursery school and expanded to the elementary school level approximately 10 years later. Continued growth led the Church to purchase the Whitehaven Campus from the Florence Crittenden Home, which was then approved for private school use by the Board of Zoning Adjustment in 1975 per BZA Order No. 11933 (11307).

BOARD OF ZONING ADJUSTMENT
District of Columbia

CASE NO. 18465

EXHIBIT NO. 4

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Today, St. Patrick's maintains three campuses: the Whitehaven Campus at 4700 Whitehaven Parkway, NW, for its Nursery through Grade 6 students, the MacArthur Campus at 4925 MacArthur Boulevard, NW, for its Grades 7 and 8 students, and a projected high school site on Foxhall Road. Construction of a new playing field on the Foxhall Campus was completed in the spring of 2012. St. Patrick's plans to add academic uses on the 9.2-acre Foxhall Campus in the future.

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IV. Description of Subject Property and Surrounding Area and Existing Zoning

The Whitehaven Campus, the subject of this application, is located on Whitehaven Parkway between MacArthur Boulevard and Foxhall Road. It is located to the east of The Lab School and Our Lady of Victory Church and School, to the west of The Field School, and directly across Whitehaven Parkway from the Mount Vernon Campus of The George Washington University. It is located amid a series of institutional uses, namely private schools, churches, and a university. Single-family homes are located further north and south of the Property.

The Property is located in the R-1-B Zone District, which is the predominant zoning classification of the area. A portion of the Property on the north side of Whitehaven Parkway is also located in the Diplomatic Overlay. The area northeast of the Property is located in the R-1-A Zone District of the Diplomatic Overlay.

V. Description of Project

The Applicant is proposing to increase the number of students for the Whitehaven Campus. The School is currently allowed a maximum of 440 students and the School would

like to increase this limit to 485 students. Imposed in 1990, the existing cap on student enrollment no longer reflects the demand for private education in the District, the interest in enrolling and remaining at St. Patrick's, or the capacity of the physical space and instructional staffing there. The proposed cap will give the School the flexibility that it needs to meet the educational needs of families in the metropolitan area who desire an exceptional, coeducational academic program in the Episcopal tradition for the nursery, elementary, and middle school years.

The School undertook a significant renovation and expansion of the physical school structure on the Whitehaven Campus in 1999, yet the School did not increase the student enrollment cap at that time, even though that work dramatically increased the instructional and related spaces that were available for the educational program. Rather, the School focused on ways to minimize the impact of the School on the neighborhood. In 2002, the School implemented an extremely successful carpooling effort to address the one lingering impact. Designed in collaboration with the School's traffic consultant and the District Department of Transportation, the Carpool Initiative continues to enable the School to manage its drop-off and pick-up procedures safely and effectively, with a significantly reduced impact on Whitehaven Parkway, Foxhall Road, and other nearby streets.

VI. Relief Requested

This application seeks special exception approval pursuant to Sections 205, 206 and 3104 of the Zoning Regulations.

Special Exception Relief

The standard for special exception relief requires establishing that the proposed project is

in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps, and that relief can be granted without adversely affecting neighboring properties. Specifically, the Regulations permit a private school in the R-1 Zone District provided that it satisfies the following: (1) it is located so that it is not likely to become objectionable to adjoining and nearby properties because of noise, traffic, number of students, or otherwise objectionable conditions, and (2) the site provides ample parking, but not less than the amount required by the Zoning Regulations.

- A. The Application is in Harmony with the General Purpose and Intent of the Zoning Regulations
1. The School is Located so as Not to Be Objectionable to Neighboring Properties

The School is located on Whitehaven Parkway, which is lined with institutional uses, such as The Lab School, Our Lady of Victory School, and the Mount Vernon Campus of The George Washington University. The Property was approved for use by St. Patrick's in 1975 per Order No. 11307. Over the last thirty-five years, St. Patrick's has worked hard to establish itself as a good neighbor to both its institutional and residential neighbors. The location of the campus on Whitehaven buffers the School from the neighboring residential communities to a large extent with respect to noise and visual impact. The School offers extensive landscaping in an effort to minimize any noise or visual impacts on neighboring properties. The School has effectuated a stringent transportation management plan over the years, which will be discussed in further detail below.

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a. Noise

Raising the existing cap on students at the Whitehaven Campus will not create an objectionable increase in the amount of noise on the Property. The children are indoors for a significant portion of the day, and there is a minimal amount of noise that is created by children while outdoors that can affect residential neighbors. The two playgrounds that are closest to or facing the residential areas to the south of the property – the Nursery School Playground and the Kindergarten Playground – will not see any appreciable increase in usage or population, as those programs have generally run at or near capacity. Staffing requirements articulated in the District of Columbia Department of Health Child Development Facility Regulations effectively establish maximum class sizes in our Nursery School. This application envisions increases in enrollment at the higher grade levels, which use the so-called Across-the-Street Playground, located on the north side of Whitehaven Parkway and bordered by the street, the School's gymnasium, and the property of The George Washington University. The School limits the number of classes, and therefore students, that use that playground at any one time. The one other area, in addition to the Nursery School Playground and the Kindergarten Playground, that faces any residential neighbors – the small playing field located above the gymnasium and facing toward Berkeley Terrace – will actually see a decrease in usage by physical education classes with the opening of the Foxhall Campus athletic field.

b. Traffic

The increase in students will not create any objectionable traffic conditions for neighboring property owners. The School is retaining a traffic consultant to provide the requisite data to support the fact it has minimal impact, but the School regularly receives accolades from

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the community and District agencies for the effectiveness of its Carpool Initiative. That program establishes an average vehicle occupancy (AVO) goal of 1.60 students at drop-off and pick-up times. As the School's annual reports to DDOT, Advisory Neighborhood Commission 3D, and the summer quarterly meetings with neighbors attest, the School has always exceeded the established AVO goal. In light of the extensive measures the School takes to reduce the vehicular trips to and from the School, it is able to keep queues during the drop-off and pick-up period to a minimum.

c. Number of Students

The Applicant seeks approval to allow an additional forty-five students to attend the Whitehaven Campus. The increase in students will not adversely affect neighboring property owners. As stated previously, the increase in students will not create any objectionable noise or traffic conditions. Further, the School has demonstrated that it will effectively deal with any traffic issues resulting from the increase in student enrollment. Its past practice has demonstrated that it has actually reduced trip generation while increasing enrollment – this is a practice St. Patrick's intends to continue well into the future. Also, as mentioned above, the school facilities are well equipped to absorb the increase in student enrollment, as they were expanded in 1999 and there was never a corresponding enrollment increase to take advantage of the additional space.

d. Otherwise Objectionable Conditions

The increase in student enrollment will not create any other objectionable conditions for neighboring property owners.

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2. The Applicant Will Provide Ample On-Site Parking

The School currently has a cap of 105 members of the faculty, staff, and administration on the Whitehaven Campus and is not proposing to increase this number, even with the proposed increase in the number of students. Entering the 2012-2013 school year, there are currently 98 members of the faculty, staff, and administration, with the intention of filling three existing vacancies in the near future. Therefore, the School will have 101 members of the faculty, staff, and administration during the 2012-2013 school year, well within its cap. The Zoning Regulations require one parking space for every four staff members associated with the Child Development Center (nursery) and two parking spaces for every three staff members associated with the School. This results in a requirement of 62 spaces which is satisfied by the 62 spaces in the garage.

B. Relief Can Be Granted Without Adversely Affecting the Use of the Neighboring Property in Accordance with the Zoning Regulations and Zoning Maps

As outlined above, the School is undertaking numerous precautions to ensure that neighboring property owners will not be adversely affected by an increase in the enrollment of students. The School continues to take affirmative steps to decrease its trip generation, and to minimize any noise that may be generated by the requested relief. These measures will diminish any possibility of adverse effects on neighbors as consistent with the Zoning Regulations and Zoning Maps.

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VII.
Exhibits

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| 1. | Exhibit A | Application Form |
| 2. | Exhibit B | Self Certification Form |
| 2. | Exhibit C | Surveyor's Plats |
| 3. | Exhibit D | Agent Authorization Form |
| 4. | Exhibit E | Statement |
| 5. | Exhibit F | Photographs |
| 6. | Exhibit G | Property Owner List |
| 7. | Exhibit H | Certificates of Occupancy |
| 8. | Exhibit I | Zoning Maps |
| 9. | Exhibit J | Previous BZA Orders |
| 10. | Exhibit K | Carpool report dated July 30, 2012 |

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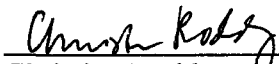
Conclusion

For the aforementioned reasons, the School requests that the Board approve this application as submitted.

Respectfully,



Allison Prince



Christine Roddy *AT*

Certificate of Service

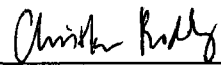
I hereby certify that the foregoing document was hand delivered or sent by first class mail on August 22, 2012 to the following:

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