

August 8, 2013

VIA HAND DELIVERY

Chairman Lloyd Jordan
D.C. Board of Zoning Adjustment
441 4th Street NW, Suite 210S
Washington, DC 20001

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Re: BZA Case No 18602 – Applicant's Pre-Hearing Submission

Dear Chairman Jordan and Members of the Board

Enclosed please find one original and 20 copies of the applicant's pre-hearing submission for the above-referenced case scheduled for a public hearing on September 10, 2013. The subject application requests special exception approval for a private school – the Washington Middle School for Girls – with 150 students and 20 faculty/staff.

Should you or your staff have any questions, please do not hesitate to contact me

Sincerely,



Cary R. Kadlecsek

Enclosures
DCDOCS\7081667.1

BOARD OF ZONING ADJUSTMENT
District of Columbia

CASE NO. 18602

EXHIBIT NO. 24

Board of Zoning Adjustment

CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2013, copies of the attached letter and attachment were delivered via messenger or U.S Mail to the following

Stephen Cochran
D.C Office of Planning
1100 4th Street SW, Suite E650
Washington, DC 20024

Jonathan Rogers
District Department of Transportation
55 M Street SE, Suite 400
Washington, DC 20003

ANC 8A
2100-D Martin Luther King Jr. Avenue SE
Washington, DC 20020


Cary Kadlecek

**BEFORE THE BOARD OF ZONING ADJUSTMENT
OF THE DISTRICT OF COLUMBIA**

Application of Archdiocese of Washington
ANC 8A

BZA Application No 18602
Hearing Date September 10, 2013

PRE-HEARING STATEMENT OF THE APPLICANT

This is the pre-hearing statement for the application of the Archdiocese of Washington ("**Applicant**") for a special exception to establish a private school and enrollment and faculty/staff caps at 1600 Morris Road, SE (Square 5817, Lot 803) ("**Property**") The Applicant is filing this application on behalf of the Washington Middle School for Girls ("**School**"), which plans to operate on a portion of the Property. The Property is located in the R-5-A Zone District.

I. NATURE OF RELIEF SOUGHT

The Applicant requests that the Board of Zoning Adjustment (the "**BZA**" or the "**Board**") approve a special exception pursuant to District of Columbia Zoning Regulations Section 206 (11 DCMR § 206) to establish a private school use Also pursuant to Section 206, the Applicant seeks to establish a student enrollment cap of 150 and a faculty/staff cap of 20

II. JURISDICTION OF THE BOARD

The Board has jurisdiction to grant the relief requested pursuant to Section 3104.1 of the Zoning Regulations (11 DCMR § 3104.1)

III. DESCRIPTION OF THE PROPERTY AND THE SCHOOL

The Property is located in the Anacostia/Randle Heights neighborhood of Ward 8 and contains approximately 590,825 square feet of land area The Property fronts on Morris Road to

the southwest and south. Close to Morris Road, the Property is improved with a church and accessory buildings, and surface parking with 150 spaces. The church offers daily services, and the accessory buildings are occasionally used for church-related activities such as bible study, church committee meetings, and social activities for the parish. One of the accessory buildings, the Panorama Room, is a social hall and is used for church social events approximately once per week in evenings or on weekends. Bible study and religious education occur in the same building that the School will occupy, but it is during evenings and on weekends. Religious services occur during the day.

The School plans to occupy one of the accessory buildings in the complex of buildings on the eastern side of the Property. The School will use the existing surface parking area along the south side of the Property for faculty/staff and visitors. The accessory building that the School will occupy was once used for a parochial school for approximately 200 students in grades 1 – 8. That school closed in approximately 2007, but the Property successfully accommodated a school once already.

The surrounding neighborhood is primarily moderate density residential in character with significant amounts of undeveloped open space. Directly across Morris Road are several moderate density garden apartment buildings and Moten Elementary School. Further to the west along Morris Road, but not across from the Property, are more garden apartments and row dwellings.

The proposed School building is generally buffered and separated from neighborhood residential buildings by a large distance. The proposed School classrooms are approximately 220 feet from the nearest residential building, which is across Morris Road, and the School's

parking area is approximately 100 feet from the same residential building. To the northwest, the Property is bordered by residential properties more than 800 feet away from the proposed School building. To the north and west, the Property is bordered by significant wooded parkland (Fort Stanton Park) that provides a large buffer between the proposed School building and residential properties. To the east of the Property are woodlands and recreational facilities for Fort Stanton Park. The majority of the Property is unimproved with open fields and woodlands that will buffer the School's outdoor recreation areas and the pick-up and drop-off area.

The Washington Middle School for Girls is a successful independent Catholic day school for girls in grades 4 – 8. The School provides tuition-free holistic education in a caring and safe environment for young girls who are living in the under-served neighborhoods in Washington and who are at risk of leaving school prematurely. In addition to its regular academic curriculum, the School's program includes academic support, an extended day for enrichment programs, summer activities, and counseling for students and their families. The School has a student body that is 100% African American, and 75% of them qualify for the Federal Lunch Program. In addition, 78% of the students are from single parent households.

The School has been in operation since 1998, when it served girls in grades five and six. It has since expanded to include grades four, seven, and eight. The School presently operates out of THEARC at 1901 Mississippi Avenue SE and the THEVIEW at 2863 Douglass Road SE. The School now plans to relocate students in grades four and five to the Property to expand its enrollment and be able to serve more students.

IV. PROPOSED PROJECT

The School will occupy and operate out of one of the accessory buildings already on the Property, and all cars for the School will park in dedicated spaces on the existing surface parking lot. Because the accessory building was previously used as a parochial school, it is well-suited to accommodate the School now. The School will make interior-only renovations to part of the existing building to modernize the facilities for their students, as shown on the plans in Exhibit A. The School will occupy approximately five classrooms in the existing school building, and it will use the existing outdoor space on the Property for student recreation. The school day will run from 7:00 am to 6:00 pm, Monday – Friday.

The School plans to begin operating 4th and 5th grades in the accessory building in August 2013 with a student population of 40 and a faculty/staff population of 7. The School plans to gradually grow to a maximum of 150 students and 20 faculty/staff in eight years by adding one grade every-other year.

V. THE SCHOOL SATISFIES THE STANDARD FOR SPECIAL EXCEPTION RELIEF UNDER SECTION 206

The Applicant is seeking a special exception under Section 206 of the Zoning Regulations for the establishment of a private school on the Property. The standards for such relief and the School's satisfaction of them are set forth below:

A. The School Shall be Located so that it is not likely to Become Objectionable to Adjoining and Nearby Property Because of Noise, Traffic, Number of Students, or Otherwise Objectionable Conditions

The School and its small number of students are not likely to create objectionable impacts because the School will be self-contained and well-managed. Because the School will be an

elementary/middle school, it will have few major events drawing many visitors that would have an impact on neighboring properties. It will not have any athletic events drawing other participants or observers, and other large daytime events will be very infrequent. School activities on the weekends will be rare and limited to ad hoc activities, such as an occasional club meeting or parent meeting. During recruitment season, there may be weekend open houses drawing limited numbers of visitors. The School otherwise will host approximately 12 evening events on campus per year. Parents and visitors attending these weekend and evening events will find adequate parking on the Property. Furthermore, the activities otherwise occurring on the Property as part of the church generally will not conflict with the School because they usually will take place at different times.

The School's operations will not create adverse traffic impacts on the surrounding community. Because of the School's hours, students will be arriving and departing before and after the morning and evening peak hours, respectively, for traffic. Otherwise, the School will not generate a significant amount of traffic. Based on experience, approximately one half of the students will arrive by public transportation or walking, and one half will arrive by automobile. Each morning and afternoon, there will be a crossing guard for the Morris Road crosswalk near 16th Street, and School staff will monitor and guide student drop-off and pick-up to minimize any potential for traffic becoming congested on Morris Road. The Property will provide ample on-site queuing space to eliminate back-ups on public streets. Cars will enter the Property from the eastern driveway on Morris Road and continue through the Property to exit to the west at a driveway on Morris Road near Evans Road. The School's one-way and monitored drop-off and pick-up procedure will efficiently unload and load children into and out of vehicles because it

will occur entirely on-site without any public street queuing and without any turning around or two-way traffic. The traffic circulation plan is shown on page G5-000 of Exhibit A.

Further, the amount of additional traffic generated by the faculty/staff will not be enough to create any adverse changes in the neighborhood. Approximately 2/3 of the full-time faculty and staff will drive to and from the Property, with the remainder taking public transit or walking. However, the driving faculty/staff will arrive well before the morning peak hour and will depart well after the evening peak hour. In terms of absolute numbers, the number of faculty/staff driving to the site will be approximately 14 when the School reaches peak capacity.

For those faculty/staff and students taking public transit, there is good access to the Property. The W2 and W3 Metro Bus lines run along Morris Road directly in front of the Property with stops within one block. On weekdays, these lines run approximately every 10-30 minutes, depending on the time of day. Also, the Anacostia Metro station is approximately 0.8 mile away (20 minute walk).

Similarly, any noise that the School produces will have a negligible – if any – effect on the community. The School will be well-insulated from neighboring properties because it will be separated by a great distance, and it will be surrounded by much open land and woodlands. No recreation or outdoor gathering space will be at the front of the Property on Morris Road, where residential properties are closest; all outdoor noise at the rear of the School's building will be buffered by forest or buildings. Furthermore, students will be outside only for recess two times per day and when going to and from the School. Thus, the small number of students outdoors at any one time will not be a significant source of noise, and the times when they will be outside will be very limited.

B The School will Provide Adequate Parking for Students, Faculty/Staff, and Visitors

Under Section 2101.1 of the Zoning Regulations, the required parking for the School is two (2) spaces for each three (3) teachers. Thus, at full capacity, the School will have a parking requirement of 14 spaces. Also, the church has 350 seats, so it has a parking requirement of 35 spaces (1 space for every 10 seats). The Property already provides 150 spaces, and the School will have exclusive use of 15 spaces, however, the owner, per the terms of the lease, agreed to provide more parking for the School as necessary. Thus, the 150 provided spaces will more than satisfy the church requirement, the School's requirement of 14, and the necessity for visitor spaces.

C The Approval of the School will be in Harmony with the General Purpose and Intent of the Zoning Regulations and will not tend to Affect Adversely, the use of Neighboring Property

Because the operation of the School at the Property will satisfy the standards for the establishment of a private school, the requested relief will be in harmony with the general purpose and intent of the Zoning Regulations and will not adversely affect neighboring property. As discussed above, the School will be uniquely located in an existing building that is far separated from any residential use, it will be mostly surrounded by woodlands that serve as a noise and sight buffer, it will provide on-site drop-off and pick-up to minimize any traffic impacts, and it will offer ample on-site parking to eliminate any neighborhood spillover.

VI. EXHIBITS

EXHIBIT A

Site Plan and Architectural Plans

VII. CONCLUSION

For all of the above reasons, the Applicant is entitled to the requested special exception and relief in this case.

Respectfully submitted,
GOULSTON & STORRS, PC

A handwritten signature in black ink, appearing to read "Paul Tummonds / CK".

Paul Tummonds

A handwritten signature in black ink, appearing to read "Cary Kadlec".

Cary Kadlec



WASHINGTON MODULAR SCHOOLS
FOR GIRLS
100 MORRIS RD SE
WASHINGTON DC 20003
202-637-1111

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1000 MORRIS RD SE
WASHINGTON, DC 20003

STAMP

PROJECT NUMBER
P10045.13

ISSUED

NO.	DESCRIPTION	DATE

3. PROJECT PRINT 06.12.13
1. PROJECT PRINT 06.03.13

FIRST FLOOR
PROPOSED
REFLECTED CEILING
PLAN

A1-201

REFLECTED CEILING PLAN NOTES

- C1: ALL EXISTING USABLE TILES TO BE MOVED TO NORTH. NEW TILES TO BE INSTALLED STARTING AT VISITOR'S ENTRANCE AT SOUTH.
- C2: NEW TILES TO BE INSTALLED AS REQUIRED.
- C3: PAINT EXISTING PLASTER CEILING. REFER TO FINISH SCHEDULE.
- C4: NEW 24" X 48" CEILING TILE.
- C5: REUSE EXISTING LIGHTS / CEILING FAN.

REFLECTED CEILING PLAN LEGEND

- AREA NOT IN CONTRACT (N.I.C.)
- ACT1: 12"x12" CEILING TILE
- ACT2: 24"x48" CEILING TILE
- GWB: CEILING
- OPEN TO DECK



1 FIRST FLOOR EXISTING REFLECTED CEILING PLAN
1/8" = 1'-0"



SYMBOLS		
NORTH ARROW		
COLUMN GRID		GRID LINE NUMBER
LEVEL HEAD		LEVEL NAME LEVEL ELEVATION
EXISTING SPOT ELEVATION		HEIGHT ABOVE SEA LEVEL UNO
NEW SPOT ELEVATION		HEIGHT ABOVE SEA LEVEL UNO
DRAWING TITLE		DRAWING NAME DRAWING SCALE DRAWING NUMBER
PLAN / DETAIL CALL- OUT		STATUS TAG VIEW NUMBER SHEET NUMBER
BUILDING ELEVATION		STATUS TAG VIEW NUMBER SHEET NUMBER
INTERIOR ELEVATION		STATUS TAG VIEW / SHEET NUMBER
BUILDING SECTION HEADER		STATUS TAG VIEW NUMBER SHEET NUMBER
INTERIOR SECTION /DETAIL HEADER		STATUS TAG VIEW NUMBER SHEET NUMBER
ROOM TAG		ROOM ROOM NUMBER SQUARE FOOTAGE
REVISION TAG		SEE SHEET TITLE BLOCK
SHEET KEYNOTE TAG		SEE SHEET KEYNOTES
WALL TAG		SEE PARTITION TYPE SHEET
WINDOW TAG		SEE WINDOW / CURTAIN WALL SCHEDULE
DOOR TAG		SEE DOOR / FRAME SCHEDULE
EQUIPMENT TAG		SEE EQUIPMENT SCHEDULE
PLUMBING / PLUMBING ACCESSORY TAG		SEE PLUMBING / PLUMBING ACCESSORY SCHEDULES
Ceiling HEIGHT TAG		CEILING HEIGHT
LIGHT FIXTURE TAG		SEE LIGHT FIXTURE SCHEDULE
FINISH TAG		WALL FINISH FLOOR FINISH BASE FINISH SEE FINISH SCHEDULE
SPECIALTY FINISH TAG		SEE FINISH SCHEDULE
FURNITURE TAG		SEE FURNITURE SCHEDULE
CENTERLINE		
ALIGN		
ALIGN - OPPOSITE FACES		
ALIGN - RIGHT ANGLE		
FINISH PATTERN DIRECTION		PATTERN DIRECTION

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1600 MORRIS RD SE
WASHINGTON, DC 20020

STAFF

PROJECT NUMBER
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2	PROCEP22 PART1	06.12
3	PROCEP22 PART1	06.28

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SITE PLAN

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25.000

G5-000

100



1 SITE PLAN
1" = 40' / 1"





VOA
100 17TH STREET, NW, SUITE 100
WASHINGTON, DC 20036
PH: 202.462.1000

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1600 MORRIS RD SE
WASHINGTON, DC 20020

RENOVATION AND UPGRADES

PROGRESS SET: JUNE 12TH, 2013

ARCHITECTURAL	
SHEET NAME	SHEET NUMBER
COVER SHEET	G0-000
STANDARDS ABBREVIATIONS	G1-002
STANDARD SYMBOLS	G1-003
GENERAL NOTES	G2-001
GENERAL NOTES	G2-002
GENERAL NOTES	G2-003
SITE PLAN	G5-000
DEMOLITION PLAN	A1-001
FIRST FLOOR PARTITION PLAN	A1-001
FIRST FLOOR EXISTING REFLECTED CEILING PLAN	A1-200
FIRST FLOOR PROPOSED REFLECTED CEILING PLAN	A1-201
MILLWORK DETAILS / ELEVATIONS	A5-001
MILLWORK DETAILS / RECEPTION DESK ELEVATIONS	A5-002
PARTITION TYPES / SCHEDULES	A7-001
DOOR AND HARDWARE SCHEDULE / DOOR TYPES AND DETAILS	A7-002

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NO.	DESCRIPTION	DATE

PROGRESS PRINT JUN 12 13
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COVER SHEET

VOA
 1111 17TH STREET, NW, SUITE 400
 WASHINGTON, DC 20036
 (202) 462-1017

WASHINGTON MIDDLE SCHOOL
FOR GIRLS
1000 PENNSYLVANIA AVE
WASHINGTON, DC 20004
202/556 1112

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1600 MORRIS HULSE
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STANDARD ABBREVIATIONS

G1-002