

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

Application of the Roman Catholic Archbishop of Washington
ANC 8A

BZA Application No.
Hearing Date:

APPLICATION STATEMENT OF THE APPLICANT

This is the application of Roman Catholic Archbishop of Washington ("**Applicant**") for a special exception to establish private school use and enrollment and faculty/staff caps for a private school 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 at the Property. The Property is located in the R-5-A Zone District. See an excerpt of the District of Columbia Zoning Map attached as Exhibit C.

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 Sections 206, the Applicant seeks to establish a student enrollment cap of 150 students and a faculty/staff cap 20 members.

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).

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BOARD OF ZONING ADJUSTMENT
District of Columbia

CASE NO. 18602

EXHIBIT NO. 3

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 Erie Street to the south. To the northwest, the Property is bordered by residential properties, and to the north and west, the Property is bordered by wooded parkland (Fort Stanton Park). Close to Morris Road and Erie Street, the Property is improved with an unoccupied church and accessory buildings, and surface parking with 150 spaces. Much of the Property is unimproved with open fields and woodlands.

The Washington Middle School for Girls is an independent Catholic day school for girls in grades 4 – 8. The School provides holistic education in a caring and safe environment for young girls who are living in the under-served neighborhoods in Washington, DC, who are at risk of leaving school prematurely. The School presently operates out of THEARC at 1901 Mississippi Avenue SE, but it plans to relocate to the Property to expand its student enrollment.

IV. PROPOSED PROJECT

The School will occupy and operate out of the church and accessory buildings already on the Property. The School will make interior renovations to the existing buildings to accommodate their students, as shown on the plans in Exhibit D. The School plans to begin operating at the site in the fall of 2013 with a student population of 40 and a faculty/staff population of 7. The School plans to eventually grow to a maximum of 150 students and 20 faculty/staff.

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**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 and the School's satisfaction of them are set forth below.

A. The Applicant will not Create Objectionable Impacts on Neighboring Properties

The number of students at the School is not likely to create objectionable impacts because it will be small and will be well managed. The school day will run from 7:00 am to 6:00 pm, so students generally will not be arriving and departing during the peak hours for traffic. Further, because the School is a middle school, it will have few major events drawing many visitors. It will not have any athletic events drawing other participants or observers, and other large daytime events will be very limited. The School otherwise will host approximately 12 evening events on campus per year, with small group meetings occurring periodically. Parents and visitors attending these events will find adequate parking on the Property.

The student and faculty/staff populations will not create adverse traffic impacts on the adjacent community. The School will not generate a significant amount of traffic and most of the evening trips will not coincide with evening peak rush hour, which minimizes its impact on the neighborhood. The School will employ an effective drop-off and pick-up procedure that efficiently moves children into and out of vehicles because it will occur entirely on-site without any street queuing. The amount of additional traffic generated by the additional students and faculty/staff will not be enough to create any adverse changes in the neighborhood.

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Similarly, any noise that the School produces will have a negligible effect on the neighbors. The School will be well-insulated from neighboring properties because it is surrounded by so much land and woodlands. No recreation or outdoor gathering space will be in the front, so all noise will be buffered by forest or buildings. Students will be outside only for recess 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.

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

Under Section 2101.1 of the Zoning Regulations the required parking for the School is two (2) spaces for each three (3) teachers. The Property already provides 150 spaces, which will more than satisfy the requirement of 14 spaces plus additional spaces for visitors.

VI. EXHIBITS

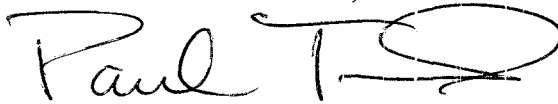
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|-----------|---|
| Exhibit A | Application Form, Self-Certification, Filing Fee Form, and Agent Authorization Letter |
| Exhibit B | Applicant's Statement |
| Exhibit C | Excerpt from D.C. Zoning Map |
| Exhibit D | Plans for Existing Buildings |
| Exhibit E | Photographs of Property |
| Exhibit F | List of Property Owners within Two Hundred Feet |

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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, P.C.



Paul Tummonds



Cary Kadlecek

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