

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

**APPLICATION OF
ST. JOHN’S COLLEGE HIGH SCHOOL**

**BZA APPLICATION NO. 18929
ANC 3G02**

STATEMENT OF THE APPLICANT

**I.
NATURE OF RELIEF SOUGHT**

This statement is submitted on behalf of St. John’s College High School (“St. John’s” or the “Applicant”), owner of property located at 2607 Military Road, N.W. (Lots 804-807 in Square 2308) (the “Site”) in support of its application to the Board of Zoning Adjustment pursuant to 11 DCMR §3104.1 for special exception relief under section 206 of the Zoning Regulations to allow a private school in the R-1-A District at the Site.

**II.
JURISDICTION**

The Board of Zoning Adjustment (the “Board”) has jurisdiction to grant the special exception requested herein pursuant to 11 DCMR § 3104.

**III.
EXHIBITS SUBMITTED IN SUPPORT OF THE APPLICATION**

- Exhibit A: A portion of the Zoning Map showing the Site.
- Exhibit B: Architectural plans and elevations showing the proposed additions.
- Exhibit C: Resolution in Support from ANC 3G.
- Exhibit D: Letter of Recommendation from the U.S. Commission of Fine Arts.
- Exhibit E: Outlines of Testimony.
- Exhibit F: Resume of Expert Witness.

IV. BACKGROUND

A. Description of the Site and Surrounding Area

Square 2308 is located in the northwest quadrant of the District and is bounded by McKinley Place and residential streets to the north, Oregon Avenue to the east, Military Road to the south, and 27th Street and Utah Avenue to the west. The land to the north, west, and southwest of the Site is residential, developed primarily with single family homes. To the east and south of the Site is Rock Creek Park. St. John's has been located in its current location at the Site since 1959.

As indicated on the Zoning Map, attached as Exhibit A, the Site is located within the R-1-A District and contains approximately 1,141,004 square feet of land area. Multiple classroom buildings are located on the Site, as well as a library, dining hall, gym and training rooms, tennis courts, playing fields, a stadium, and accessory parking lots. Vehicular entrances to the campus are located from 27th Street and Oregon Avenue.

B. Proposed Project

The project includes the renovation and expansion of a classroom wing and student center of the primary academic building (the "Academic Building") on the campus. The Academic Building is located in the southwest corner of the Site and presently occupies approximately 177,576 square feet of gross floor area. The modest expansion will add approximately 15,650 square feet to the building and will include (i) a 2,700 square foot covered student center walk, (ii) a 12,300 square foot classroom addition, and (iii) a 650 square foot boiler storage addition.

1. Student Center Walk

As shown on the architectural plans and elevations attached as Exhibit B (the “Plans”), the proposed student center walk will be located in the north courtyard of the Academic Building. The renovation will replace and expand the exterior concrete path with an enclosed walkway. In the current configuration, students are exposed to the elements when they travel between the classroom wing and the auditorium; enclosing the pathway will improve the current condition by providing a protected circulation route. The renovation also includes the conversion of the existing choir and band rooms, currently located in the lower level of the Academic Building adjacent to the proposed student walk, into expanded spaces for the campus ministry and the theater program.

2. Classroom Addition

As shown on the Plans, the classroom addition is located on the northernmost portion of the Academic Building’s classroom wing and will be set back approximately 57 feet from 27th Street to the west. The addition includes the renovation of the existing art studios and the construction of a new choir room, orchestra room, band room, and classrooms to support St. John’s music program. The existing patio will also be expanded and upgraded to improve its use and functionality.

3. Boiler Storage Room

The proposed boiler room storage addition will be located to the north of the existing boiler room, which is located to the north of the auditorium within the Academic Building. The expansion will provide new storage space for mechanical equipment and parts, and will match the existing boiler room’s height and exterior materials. Access to the existing electrical

transformer will be maintained and screened with new landscaping and a garden wall. The addition will not interfere with pedestrian circulation.

C. Relief Requested

In order to proceed with the proposed project, the Applicant requires special exception relief to allow the proposed additions to the existing private school pursuant to section 206 of the Zoning Regulations. Pursuant to section 206, use as a public school that does not meet the requirements of Chapter 4 of the Zoning Regulations or as a private school shall be permitted as a special exception in an R-1 District if approved by the Board under section 3104. As described below and as indicated in the Plans, the proposed project meets the standards set forth in section 206 and is consistent with the underlying purposes and intent of the Zoning Regulations and Zoning Map.

**V.
THE APPLICANT MEETS THE BURDEN
OF PROOF FOR SPECIAL EXCEPTION RELIEF**

A. Standard of Review

Relief granted through a special exception is presumed appropriate, reasonable, and compatible with other uses in the same zoning classification, provided the specific regulatory requirements for the requested relief are met. In reviewing an application for special exception relief, "[t]he Board's discretion ... is limited to a determination of whether the exception sought meets the requirements of the regulations." *First Baptist Church of Washington v. District of Columbia Bd. of Zoning Adjustment*, 423 A.2d 695, 701 (D.C. 1981) (quoting *Stewart v. District of Columbia Bd. of Zoning Adjustment*, 305 A.2d 516, 518 (D.C. 1973)). If the applicant meets its burden, the Board ordinarily must grant the application. *First Baptist Church of Washington v. District of Columbia Board of Zoning Adjustment*, 432 A.2d 695 (1981).

B. Special Exception per Section 206 to Allow a Private School in the R-1-A District

Section 206 of the Zoning Regulations authorizes the Board to allow a private school within the R-1-A District in accordance with the requirements of section 3104 for special exceptions, provided that the standards set forth in sections 206.2 and 206.3 are met. 11 DCMR § 206.1. As discussed below, these standards are satisfied in this case and the Board can therefore grant the requested relief.

1. *Section 206.2 – 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.*

As will be demonstrated more fully at the Board's public hearing on this application, the proposed additions will not result in any increase in noise, traffic, number of students, or other objectionable conditions. The proposed additions will occur completely within St. John's campus, sufficiently removed from all nearby residences and streets, and will be visible only from inside the campus. The proposed additions are intended to better accommodate the existing activities already occurring on the campus and to improve the educational experience for current and future students. All of the proposed renovations will match the height, massing, materials, and architectural design of the existing campus buildings. The renovations will allow St. John's to provide appropriate space for its music, art, and theater programs, as well as to provide a new space for the campus ministry. The renovations will also create a covered walkway for students to travel from their classes to the auditorium, and will provide additional storage space for mechanical equipment and parts.

2. *Section 206.3 – Ample parking space, but not less than that required in chapter 21 of this title, shall be provided to accommodate students, teachers, and visitors likely to come to the site by automobile.*

The existing school complies with the off-street parking requirements of section 2101.1 of the Zoning Regulations, and the proposed additions will not increase the number of parking spaces required under that section. The existing parking facilities on the Site will continue to adequately accommodate the students, teachers, and visitors who are likely to arrive at the Site by automobile.

VI.
COMMUNITY SUPPORT

The Applicant has the support of Advisory Neighborhood Commission (“ANC”) 3G, the ANC in which the Site is located. At its regularly scheduled, duly noticed public meeting on January 26, 2015, at which a quorum was present, ANC 3G voted unanimously to support the Application. A copy of the ANC’s resolution in support is attached as Exhibit C.

VII.
U.S. COMMISSION OF FINE ARTS

The Site is subject to the Shipstead-Luce Act due to its location adjacent to Rock Creek Park, and is therefore subject to review by the U.S. Commission of Fine Arts (“CFA”). *See* 40 U.S.C.A. § 8104(b). The Applicant presented the project to the CFA in November, 2014, and by letter dated November 21, 2014, the CFA recommended no objection to the concept of the three additions and associated site work (Exhibit D).

VIII.
WITNESS

- A. Jeff Mancabelli, President of St. John’s College High School
- B. Matthew Bell, Perkins Eastman, architect for the project

IX.
CONCLUSION

For the reasons stated above, the requested relief meets the applicable standards for special exception relief under the Zoning Regulations. Accordingly, the Applicant respectfully requests that the Board grant the application.

Respectfully submitted,

HOLLAND & KNIGHT, LLP

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