

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

**Application of St. John's College High School
2607 Military Road, N.W. (Lots 804-807 in Square 2308)**

PRELIMINARY STATEMENT OF COMPLIANCE WITH BURDEN OF PROOF

I. Background

St. John's College High School (the "Applicant") is seeking special exception relief from the Board of Zoning Adjustment ("BZA" or "Board") to permit the renovation and expansion of the gymnasium area located at 2607 Military Road, N.W. (Lots 804-807 in Square 2308) (the "Subject Property"). Square 2308 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, all in the northwest quadrant of Washington, D.C. The Subject Property is located within the R-1-A District and contains approximately 1,141,004 square feet of land area.

The proposed project includes a phased renovation of the existing gymnasium area and an expansion that will add approximately 56,233 square feet of gross floor area to the existing building. The gymnasium area presently contains approximately 44,095 square feet of gross floor area over two levels, comprised of the original Gallagher Gymnasium constructed in the late 1950s, and the more recent Roth Gymnasium addition constructed in the early 1990s. The proposed renovation and expansion will not result in an increase to the number of students, faculty, or staff. The number of existing parking facilities and spaces will not be affected, and will continue to adequately accommodate the students, teachers, and visitors who are likely to arrive at the Subject Property by automobile.

The project will be undertaken in three phases, as described below:

1. **Phase 1** will focus on upgrading the interiors of the existing gyms and support areas. Interior finishes, seating, the outdated HVAC system, and MEP infrastructure will be replaced, and the existing locker rooms on the west side of Gallagher Gym will be fully renovated.
2. **Phase 2** involves (i) a new one-story training center and locker room addition over the existing tennis courts on the west side of the gym area, with new spaces to provide appropriate gender separation and sufficient support space for all sports and student athletes; (ii) the renovation and expansion of the main lobby and support spaces to the south of the gym area; (iii) the renovation and two-story corner addition to the southeast corner of the Roth Gymnasium; and (iv) a one-story, east-west small addition located at the back (north) of the gym area to accommodate new mechanical and electrical equipment (see Sheet 13 of the architectural drawings included with the application).

The four existing tennis courts currently on the ground floor will be relocated to the roof of the new one-story addition on the west side of the gyms (see Sheet 15 of the architectural drawings). Furthermore, improved landscaping along the gym's west side addition will provide an additional green buffer between gym and 27th Street. Below the new addition, a portion of the below-grade level will be excavated to provide a new wrestling room and mechanical, utility, and support spaces (see Sheet 11 of the architectural drawings). None of the proposed new additions will be taller than the existing Gallagher Gymnasium roofline, with the exception of the renovated and expanded lobby, which will be approximately six feet above the Gallagher Gymnasium roofline but still well below the height of the existing main academic building.

3. **Phase 3** will focus on interior renovations to the lower level of the Roth Gymnasium, which is currently occupied by offices, strength and conditioning spaces, a multipurpose JROTC room, restrooms, outdated student lockers, and other support and mechanical spaces. Phase 3 will feature a new interior layout with repurposed and repositioned spaces to provide appropriate gender separation and sufficient space for all sports and student athletes.

The overall project will be a modern interpretation of the campus' existing architectural language. Brick and stone materials will match existing buildings on campus, while more contemporary materials such as metal and glass will allow natural light into the renovated gym area. The project improves the campus' overall sustainability and the well-being of users by incorporating extensive green roofs, using building materials with low-VOC and high-recycled content, replacing old HVAC and MEP systems with modern efficient equipment, providing better indoor air quality, and using energy-efficient lighting systems and fixtures throughout.

II. Relief Requested

In order to proceed with the proposed project, the Applicant requires special exception relief to allow an addition to an existing private school pursuant to section 206 of the Zoning Regulations. The architectural plans and elevations included in the application demonstrate that the proposed project is consistent with the underlying purposes and intent of the Zoning Regulations and Zoning Map.

The Subject Property is located adjacent to and west of Rock Creek Park and is therefore subject to the Shipstead-Luce Act ("Act"), which requires review by the U.S. Commission of Fine Arts ("CFA"). See 40 U.S.C.A. § 8104(b). Thus, this application is simultaneously being reviewed by the CFA.

The Applicant will file its prehearing statement with the Board no less than 14 days prior to the public hearing on this application. In the statement, and at the public hearing, the Applicant will provide testimony and evidence to meet its burden of proof to obtain the Board's approval of the requested special exception and variance relief. The following is a summary indicating how the Applicant will meet its burden of proof.

A. Burden of Proof

Relief granted through a special exception is presumed appropriate, reasonable, and compatible with other uses in the same zoning district, provided that the specific regulatory requirements for the requested relief are satisfied. In reviewing an application for special exception relief, “the 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 Board of Zoning Adjustment*, 432 A.2d 695, 701 (D.C. 1981) (quoting *Stewart v. District of Columbia Board of Zoning Adjustment*, 305 A.2d 516, 518 (D.C. 1973)). If an applicant meets its burden, the Board must ordinarily grant the application. *Id.*

B. Special Exception Per Section 206

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. 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 and will be sufficiently removed from all nearby residences and streets, including improved landscaping along 27th Street. The proposed additions are intended to better accommodate the existing activities already occurring on the campus, to provide appropriate gender separation and sufficient space for all sports and student athletes, and to improve the athletic experience and overall well-being for current and future students. All of the proposed renovations will be compatible with the height, massing, materials, and architectural design of the existing campus buildings, as described herein and shown on the attached plans.

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 Subject Property will continue to adequately accommodate the students, teachers, and visitors who are likely to arrive at the site by automobile.

III. Conclusion

The proposed special exception is in harmony with the general intent and purpose of the Zoning Regulations and Zoning Map and will not tend to adversely affect the use of neighboring property in accordance with the Zoning Regulations and Zoning Map. The Board should therefore grant the requested relief.