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March 1, 2000

OFFICE OF ZONING
DISTRICT OF COLUMBIA
'00 MAR -1 P2:42

BY HAND DELIVERY

Sheri Pruitt-Williams
Office of Zoning
441 4th Street, N.W.
Suite 210
Washington, D.C. 20001

Re: BZA Application No.16561
The Shrine of the Most Blessed Sacrament School
5831 Chevy Chase Parkway, N.W.

Dear Ms. Pruitt-Williams:

Enclosed please find an original and nine copies of the Pre-Hearing Statement for the above-mentioned application. If you have any questions regarding the application or this Pre-Hearing Statement, please feel free to call the undersigned at (202) 457-7854.

Very truly yours,

Paul A. Tummonds, Jr.

Enclosure

Cc: ANC 3G
Tom Gallagher

BZA Case No. 16561
Exhibit No. 25

Board of Zoning Adjustment
District of Columbia
CASE NO.16561
EXHIBIT NO.25A1

BEFORE THE BOARD OF ZONING ADJUSTMENT
OF THE DISTRICT OF COLUMBIA

Application of The Archdiocese of Washington on behalf of The Shrine of the Most Blessed Sacrament

BZA Application No. 16561
Public Hearing: March 15, 2000
ANC 3G

OFFICE OF ZONING
DISTRICT OF COLUMBIA
'00 MAR -1 P2:42

STATEMENT OF THE APPLICANT

I.
Nature of Relief Sought

This is a special exception application of The Archdiocese of Washington on behalf of The Shrine of the Most Blessed Sacrament ("Blessed Sacrament") for the construction of two infill additions and the renovation of a portion of the existing private school on the property located at 5831 Chevy Chase Parkway, N.W. (the "Subject Property"). The proposed additions and renovations to the school will provide space for classrooms and classroom related uses.

For the Board's information, ANC 3G unanimously supported this application at its public meeting on February 28, 2000.

II.
Description of Site and Existing and Proposed Use

The Subject Property is located on lots 821 and 822 in Square 1863 and has a street address of 5831 Chevy Chase Parkway, N.W. This property is located in the R-1-B zone and Ward 3 of the District of Columbia. The Subject Property is a through lot that fronts on Chevy Chase Parkway to the south, Quesada Street to the north and Western Avenue to the northwest. An apartment building owned by the Archdiocese is located immediately to the west of the Subject Property and single family homes are located to the east of the Subject Property across a sixteen foot public alley.

The Subject Property is presently improved with the Church of The Shrine of the Most Blessed Sacrament, a Parish House and Convent and a private school. These buildings are shown on the plat of the Subject Property attached as Exhibit B and form an interior courtyard. The main entrance to the existing school is located in this interior courtyard, however, the school can also be accessed from Chevy Chase Parkway. Roach Center, which is also used for school purposes, also fronts on Chevy Chase Parkway and is presently connected to the school building at the gymnasium level. To the northwest of the existing school building is the "convent building" that has been used by the school for years for library, classroom and art class uses as well as administrative and general storage uses.

The Archdiocese of Washington and The Shrine of the Most Blessed Sacrament have operated a private school on the Subject Property since approximately 1928. An addition to the school's first section was added in 1951. In 1963, the Board of Zoning Adjustment approved the construction of a one-story and basement addition to the school to house a multi-purpose and meeting room and storage space (See BZA Order No. 7412, attached as Exhibit D). Significantly, pursuant to BZA Order No. 7412, the school was permitted to have 1,015 students.

The proposed application requests the approval to make minor infill additions and renovations to the existing structures on the Subject Property. These infill additions and proposed renovations are shown on the plans for the project attached as Exhibit E. The infill additions will provide a second floor connection from the existing school building to Roach Center along Chevy Chase Parkway and will connect the existing school building to the convent building. The proposed renovations will permit use of the entire convent building for school purposes. As shown in the plans, the infill addition and renovated areas will be utilized for classroom uses,

administrative uses (including a nurses office) and storage space. Upon approval of this application, the student population will initially increase to 525 students from the existing approximately 500 students that presently attend the school. In order to anticipate possible future enrollment demand, Blessed Sacrament also is amenable to the BZA reducing the permitted enrollment from 1,015 students to 600 students.

III.
Board's Jurisdiction

This Board has jurisdiction pursuant to Section 3104.1 of the Zoning Regulations to grant the request for special exception relief.

IV.
Exhibits in Support of the Application

The Applicant submits the following exhibits in support of the Application:

Exhibit A	Portion of the Baist Atlas and Sanborn Map showing the Subject Property outlined in red.
Exhibit B	Building Plat of the Subject Property showing the existing and proposed structures on the Subject Property.
Exhibit C	A copy of the D.C. Zoning Map showing the subject property outlined in red and the surrounding area.
Exhibit D	Board of Zoning Adjustment Order No. 7412.
Exhibit E	Plans for the project.
Exhibit F	Photographs of the Subject Property.
Exhibit G	Testimony of representative of The Shrine of the Most Blessed Sacrament School.
Exhibit H	Testimony of Christoffer Graae, Kress/Cox Architects, Project Architects.

Exhibit I Testimony of Louis J. Slade, Gorove/Slade Associates, Traffic Consultant.

Exhibit J Traffic Operation Plan.

Exhibit K Construction Management Plan.

Exhibit L Resumes of Expert Witnesses.

V.
The Applicant is Entitled to Special Exception Relief Under the Zoning Regulations

As the Board is aware, uses that are allowed by special exception are deemed compatible with other uses permitted in that particular zoning classification provided certain requirements are met. In reviewing applications for a special exception under the Zoning Regulations, the Board's discretion is limited to determining whether the proposed exception satisfies the relevant zoning requirements. If the prerequisites of the Regulations are satisfied, the Board ordinarily must grant the application. See, e.g., Bakers' Local Union No. 118 v. D.C. Board of Zoning Adjustment, 437 A.2d 176, 178 (D.C. 1981). Granting special exception relief in this case is in harmony with the general purpose and intent of the Zoning Regulations and Map and will not adversely affect the use of nearby properties.

VI.
Section 206 - The Applicant Meets the Standards for Use as a Private School.

Section 206 of the Zoning Regulations provides that a private school shall be permitted in a R-1 Zone District if the Board of Zoning Adjustment finds that two requirements are met. First, the private school must not be objectionable to adjoining and nearby property because of noise, traffic, number of students, or otherwise objectionable conditions (11 DCMR 206.2). Second,

ample parking space, but not less than that required under Chapter 21 of the Zoning Regulations, must be provided to accommodate the students, teachers, and visitors likely to come to the site by automobile (11 DCMR 206.3).

A. Section 206.2 - The private school shall be located so that it is not likely to become objectionable to nearby property because of noise, traffic, number of students, or otherwise objectionable conditions.

(1) Blessed Sacrament will not create objectionable conditions due to the number of students attending and noise generated by the School.

As previously stated, Blessed Sacrament has operated a private school on the Subject Property since approximately 1928. At all times since its inception, the school has had a very strong and supportive relationship with its immediate neighbors and the surrounding community. In 1963 the BZA approved continued private school use on the Subject Property for a total student population of 1,015 students. The applicant is amenable to the Board reducing the student population to 600. The continued use of the Subject Property by Blessed Sacrament as a private school with a potential maximum student population of 600 students will not create an amount of noise that is objectionable to neighboring properties or the surrounding community.

(2) The traffic generated by the school will not create objectionable conditions in the area.

In consultation with staff members of the school, the traffic and transportation consulting firm of Gorove/Slade Associates, Inc. has prepared a Traffic Operation Plan, attached as Exhibit J, to address the existing and proposed impacts that the school's operations have on the traffic patterns in the area. In preparing the Traffic Operation Plan, studies of the existing traffic conditions within the immediate vicinity, the number of trips that are currently generated by the

school and the number of trips that can be expected with the student population, were made. In addition, a circulation plan has been developed to improve safety conditions and minimize any impact that the school has on the traffic patterns in the area.

Presently, students are dropped off for school in the morning by cars that come to the site via Quesada Street and the alley on the Subject Property or from both sides of Chevy Chase Parkway. The peak drop-off period occurs from 7:50 AM to 8:25 AM. In the afternoon, kindergarten students are picked-up in the alley and most students are picked-up from Chevy Chase Parkway. The peak pick-up period is from 3:00 PM to 3:10 PM. The present system of student drop-off and pick-up creates a less than an optimal traffic situation on Chevy Chase Parkway. However, the PM pick-up does not in any way impact PM peak hour traffic.

In order to address this situation, Blessed Sacrament has created a site access and circulation system to improve the flow of traffic in the area surrounding the school. This system will only allow morning drop-off of students in the alley and the westbound parking lane (or northern side) of Chevy Chase Parkway. This will allow the unimpeded two–way flow of AM traffic on Chevy Chase Parkway. Blessed Sacrament staff will be stationed on Quesada Street, Chevy Chase Parkway and the alley to make sure that parents follow the drop-off procedures.

In the afternoon, students will be picked-up in the alley and on Chevy Chase Parkway. Consistent with present practice, all students will wait in the gymnasium and will not be dismissed until their parent has arrived. Parents will be designated to pick-up their children in a specific "pick-up zone". Staff members will monitor the "pick-up zones" and will contact staff in the gymnasium, via walkie-talkie, that a student's parent has arrived. Staff members will also be stationed on Quesada Street, Chevy Chase Parkway and the alley to make sure that parents follow

these procedures. The proposed drop-off procedures have been developed to minimize vehicle/pedestrian conflicts and reduce the amount of time that a student must search for a parent's car and thus the amount of time that parent's cars will spend parked in the alley or Chevy Chase Parkway. Use of the alley in this fashion does not adversely affect any other property.

The implementation of the Traffic Operation Plan will improve the overall traffic flow of the vehicles that come to the Subject Property to pick-up and drop-off students. In addition, the Traffic Operation Plan will create a safer environment for the students and will improve the flow of traffic in the area. For these reasons, the continued use of the Subject Property as a private school by Blessed Sacrament will not create any objectionable traffic conditions in the area.

(3) The continued use of the Subject Property as a private school by Blessed Sacrament will not create any other objectionable conditions to neighboring properties.

In order to mitigate any adverse impacts that the construction activity on the Subject Property may have on the surrounding area and neighboring properties, Blessed Sacrament has established a Construction Management Plan, attached as Exhibit K. The Construction Management Plan establishes requirements for site management, cleanliness, work hours, subcontractors, worker parking, loading and truck traffic. More importantly, the Construction Management Plan creates a Project Oversight Committee that will monitor the construction process and be able to provide a forum for neighboring property owners to raise any concerns that they may have regarding construction activity on the Subject Property. The details of this plan have been worked out with ANC 3G and have been approved by the ANC. The continued use of the Subject Property by Blessed Sacrament will not create any other objectionable conditions to neighboring properties.

B. Ample parking spaces shall be provided to accommodate students, teachers and visitors.

Blessed Sacrament provides ample parking spaces in the interior courtyard of the Subject Property to accommodate the demand for parking from faculty/staff and visitors to the school, pursuant to the conclusion of Gorove/Slade Associates in their Traffic Operations Plan. (See Exhibit J). The Zoning Regulations require two parking spaces for every three staff members for an elementary school. Blessed Sacrament expects that there will be not more than 35 staff members on site at any time with the increased student enrollment. Therefore, the Zoning Regulations require 24 parking spaces on site. Blessed Sacrament utilizes the interior courtyard for parking and can accommodate approximately 70 cars when the interior courtyard area is used. However, the courtyard area is also used for playground purposes which effectively limits the number of parking spaces available on a daily basis to 30 spaces. Gorove/Slade Associates has determined that this is an appropriate number of parking spaces to accommodate the demand for parking spaces on-site.

VII.
Community Support

Representatives of Blessed Sacrament have had numerous discussions with the Single Member District Commissioner for ANC 3G regarding this project and made a presentation to all of the ANC Commissioners and members of the community at ANC 3G's February 28, 2000 public meeting. At this meeting, ANC 3G adopted a unanimous resolution supporting the application.

VIII.
Witnesses

A. Representative of The Shrine of the Most Blessed Sacrament School

B. Chris Graae, Kress/Cox Associates, Project Architect

C. Lou Slade, Gorove-Slade Associates, Traffic Consultant

IX.
Conclusion

A. Section 3104.1 - The Relief Sought is in Harmony with the General Purpose and Intent of the Regulations and Will Not Tend to Affect Adversely the Use of Neighboring Property.

As fully demonstrated above, this Application meets the criteria set forth in Section 206 for special exception approval and is, therefore, in harmony with the general purpose and intent of the Zoning Regulations. In light of the above, the requirements of Section 3104.1 are met in this case, and the Board should accordingly grant the requested relief.

Respectfully submitted,

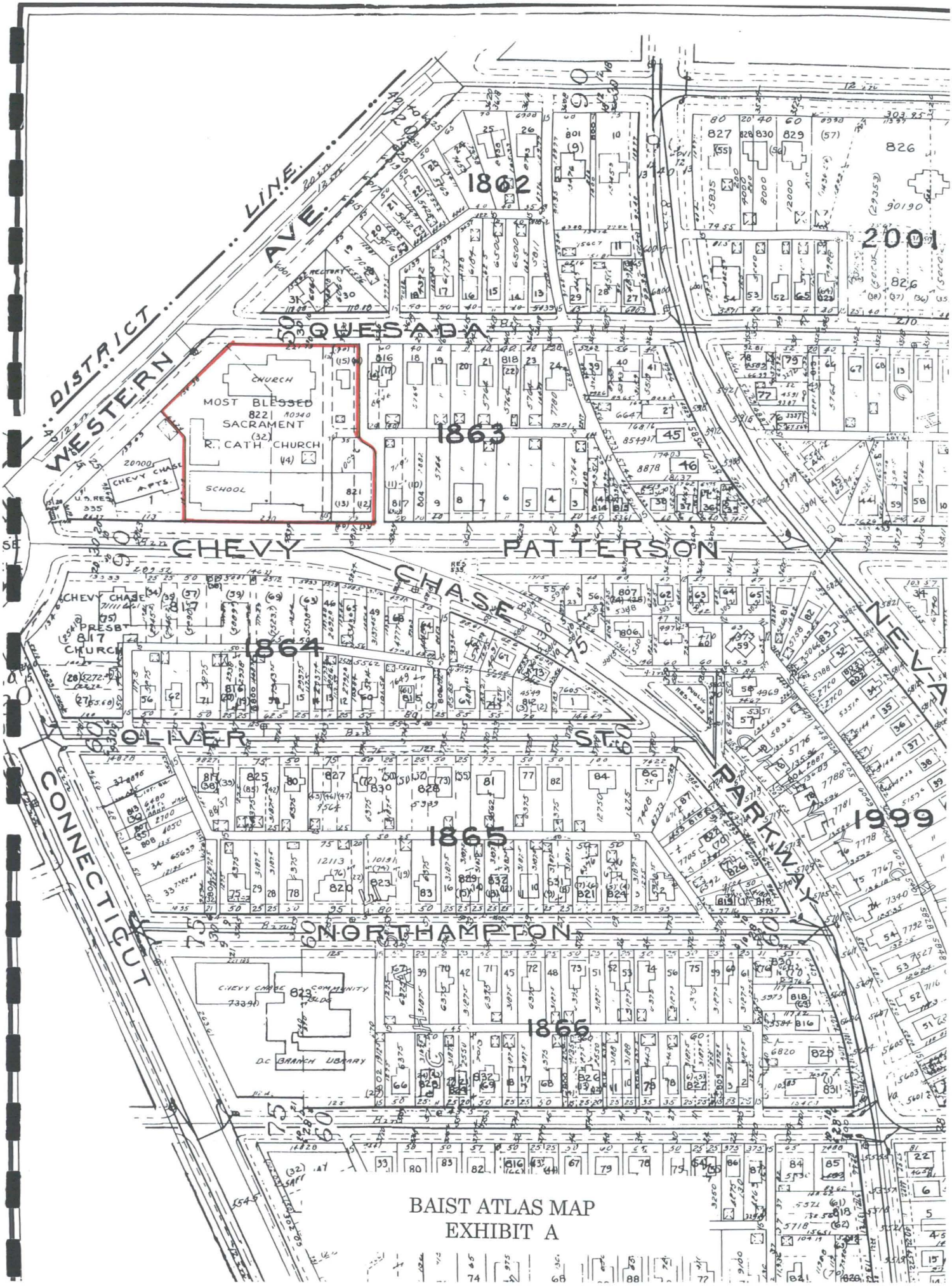
WILKES, ARTIS, HEDRICK & LANE
CHARTERED

By: _____
Norman M. Glasgow, Jr.

_____
Paul A. Tummonds, Jr.

Date: March 1, 2000





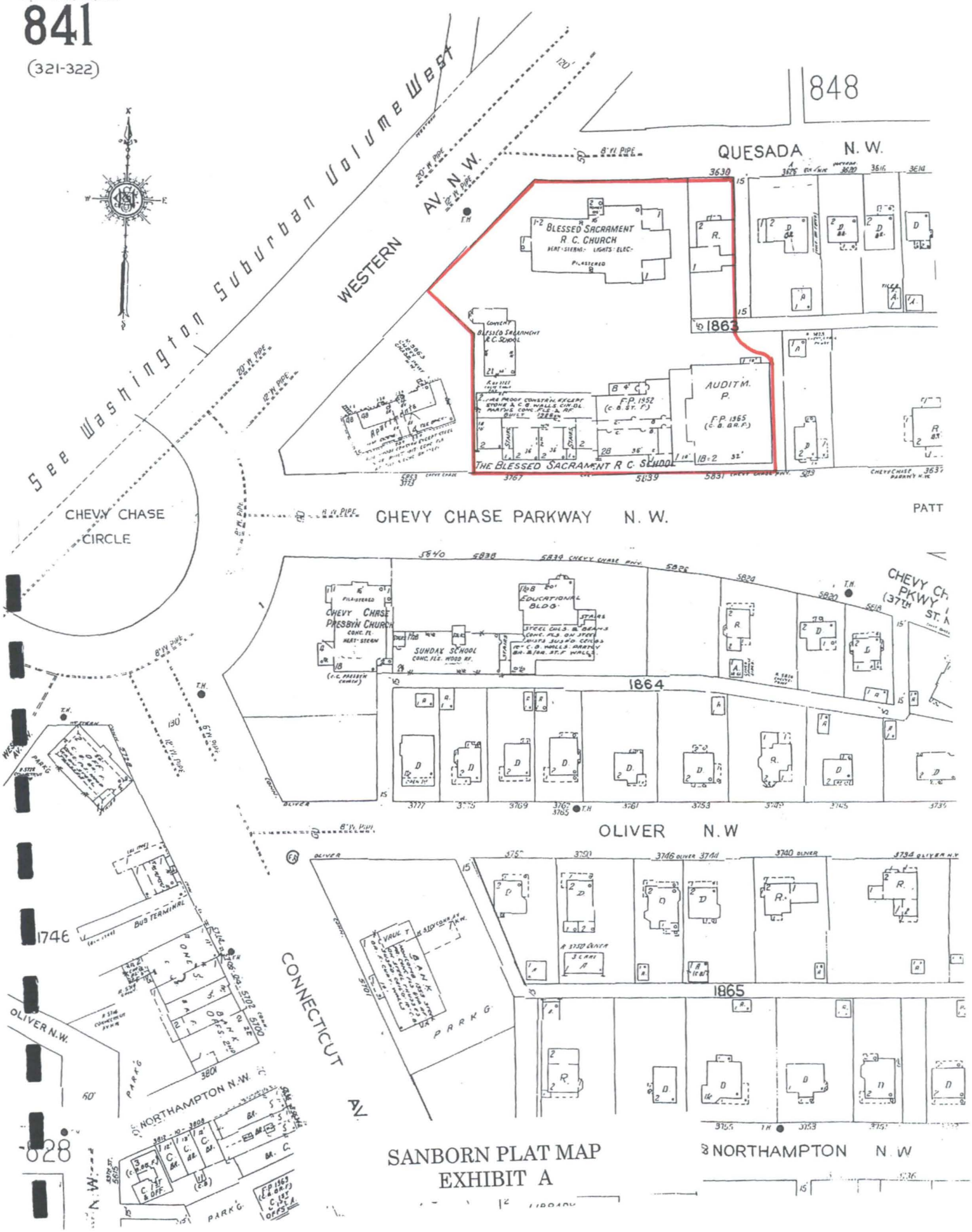
BAIST ATLAS MAP
EXHIBIT A

(3111)

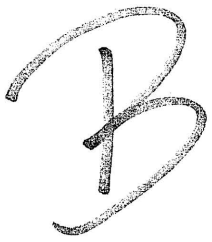
WASHINGTON, D.C., VOL. 8

841

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84
QUESADA
DISTRICT LINE
WESTERN AVE.
CHEVY CHASE CIRCLE
1863
872
PATTERSON
37TH
CHEVY CHASE
PATTERSON
HEVY CHASE CIRCLE
PARKWAY
CONNECTICUT
OLIVER
ST.
NORTHAMPTON
1865
1860
SANBORN TAX PLAT
EXHIBIT A
NORTHAMPTON



DISTRICT OF COLUMBIA GOVERNMENT
OFFICE OF THE SURVEYOR

Washington, D. C., ... 12-16 19 99

Plat for Building Permit of SQUARE 1863 LOT's 821 & 822

Scale: 1 inch = 40 feet Recorded in Book A&T page 3469 & 346-I

Receipt No. 75641

Furnished to WILKES, ARTIS, HEDRICK & LANE

Surveyor, D. C

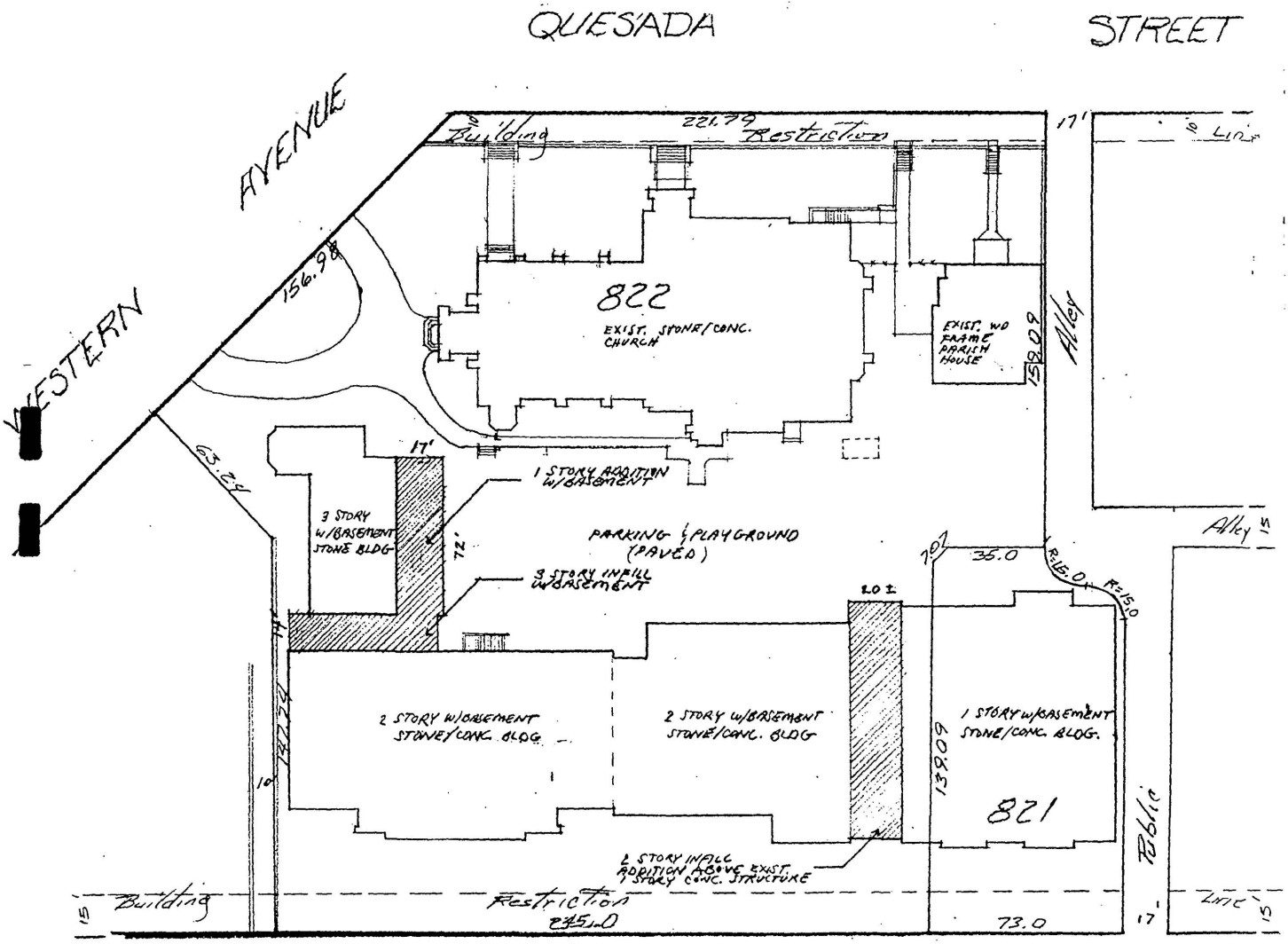
By: D.A.

I hereby certify that all existing improvements shown hereon, are completely dimensioned, and are correctly platted; that all proposed buildings or construction, or parts thereof, including covered porches, are correctly dimensioned and platted and agree with plans accompanying the application; that the foundation plan as shown hereon is drawn, and dimensioned accurately to the same scale as the property lines shown on this plat; and that by reason of the proposed improvements to be erected as shown hereon the size of any adjoining lot or premises is not decreased to an area less than is required by the Zoning Regulations for light and ventilation; and it is further certified and agreed that accessible parking area where required by the Zoning Regulations will be reserved in accordance with the Zoning Regulations, and that this area has been correctly drawn and dimensioned hereon. It is further agreed that the elevation of the accessible parking area with respect to the Highway Department approved curb or alley grade will not result in a rate of grade along centerline of driveway at any point on private property in excess of 20% for single-family dwellings or flats, or in excess of 12% at any point for other buildings. (The policy of the Highway Department permits a maximum driveway grade of 12% across the public parking and the private restricted property).

Date .....

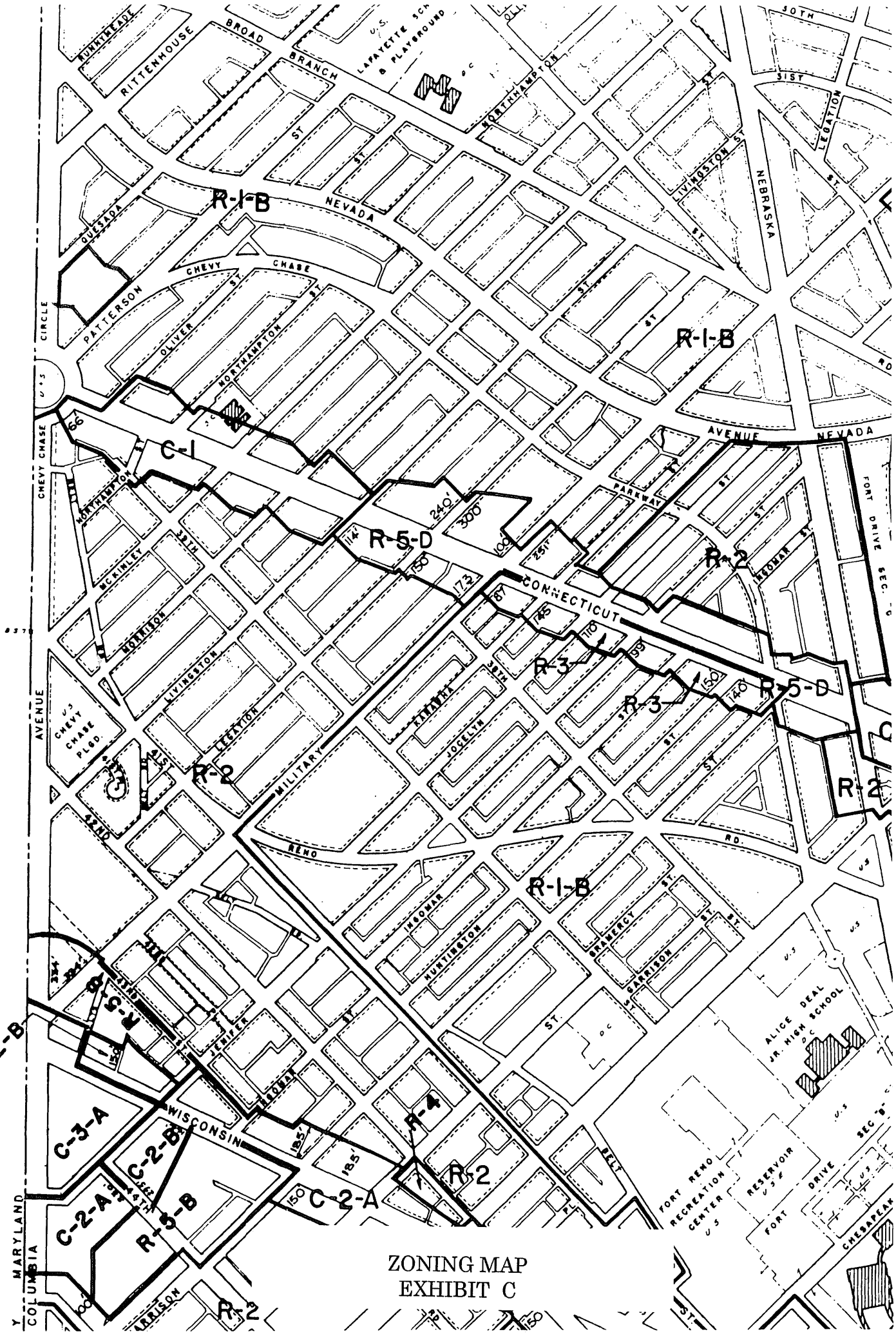
.....
(Signature of owner or his authorized agent)

NOTE: Data shown for Assessment and Taxation Lots or Parcels are in accordance with the records of the Department of Finance and Revenue, Assessment Administration, and do not necessarily agree with deed description.



BUILDING PLAT
EXHIBIT B




R-1-B
NEVADA
AVENUE
C-1
R-5-D
CONNECTICUT
R-2
R-3
R-4
C-2-B
C-3-A
C-2-A
R-5-B
WISCONSIN
MILITARY
RENO
CHEVY CHASE
PATTERSON
OLIVER
NORTHAMPTON
BROAD BRANCH
RITTENHOUSE
QUESADA
CIRCLE
MCKINLEY
HARRISON
LIVINGSTON
LEEDOM
JENNIFER
INGOMAR
HUNTINGTON
GRAMERCY
GARRISON
JOSELYN
KANSAS
LAFAYETTE SCH. & PLAYGROUND
ALICE DEAL JR. HIGH SCHOOL
FORT RENO RECREATION CENTER
RESERVOIR
FORT DRIVE
CHEVY CHASE PLGD.
MARYLAND AVENUE
NEBRASKA AVENUE
LEGATION ST.
LIVINGSTON ST.
NORTHAMPTON ST.
30TH ST.
31ST ST.
42ND ST.
39TH ST.
38TH ST.
37TH ST.
36TH ST.
35TH ST.
34TH ST.
33RD ST.
32ND ST.
31ST ST.
PARKWAY
INGOMAR ST.
RD.
66
240'
300'
114'
150
173
87
145
110
150
140
251'
185'
334'
ZONING MAP
EXHIBIT C