LAW OFFICES
GREENSTEIN DELORME & LUCHS, P. C.

WILLIAM H. HARRIS, JR.
RICHARD G. WISE
ABRAHAM J. GREENSTEIN
GILBERT E. DELORME
VINCENT MARK J. POLICY
RICHARD W. LUCHS
JUDITH R. GOLDMAN
JACQUES B. DEPUY
JEFFREY H. GELMAN
ALAN S. WEITZ
WILLIAM C. CASANO
STEPHEN H. ABRAHAM
LEWIS F. MORSE
JOHN PATRICK BROWN, JR.
LYLE M. BLANCHARD
ALFRED M. GOLDBERG
DONALD F. HOLMES, JR.
MIRIAM HELLEN JONES
SARAE T. LEUCKEL
ISABEL P. RUIZ DE GAMBOA*
JAMES D. SADOWSKI
*ADMITTED IN VA ONLY

1620 L STREET, N.W., SUITE 900
WASHINGTON, D.C. 20036-5605
TELEPHONE (202) 452-1400
FACSIMILE (202) 452-1410

OF COUNSEL
MARK J. ZWEIFLER
61 WEST 62ND STREET
7TH FLOOR - SUITE E
NEW YORK, NEW YORK 10023
(212) 664-1099
FACSIMILE (212) 586-1535

November 7, 2000

DISTRICT OF COLUMBIA
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BY MESSENGER

Ms. Sherri M. Pruitt
Secretary
Board of Zoning Adjustment
Suite 210
441 Fourth Street, N.W.
Washington, D.C. 20001

Re: B.Z.A. Application Number 16623: Washington International School

Dear Ms. Pruitt:

Enclosed is an original and eight (8) copies of the Applicant's Pre-Hearing Statement in support of Application Number 16623. Also enclosed are nine (9) copies of (a) photographs of the Annex that depict its size and other characteristics and its location in relationship to other buildings on the Washington International School's Tregaron campus and (b) a site plan depicting the location of the Annex.

Please call me should you have any questions regarding this submission. Thank you.

Sincerely,

Jacques B. DePuy/dmh

Jacques B. DePuy

Enclosures
cc: Office of Planning (Attn: Ms. Maxine Brown-Roberts)(w/encls.)(by mail)
ANC 3-C (Attn: Ruthanne Miller)(w/o encls.)(by mail)
Ms. Anne-Marie Pierce (w/o encls.)(by mail)

146700

BZA
Case No. 16623
Exhibit No. 22

Board of Zoning Adjustment
District of Columbia
CASE NO.16623
EXHIBIT NO.22

PRE-HEARING STATEMENT OF THE APPLICANT, THE WASHINGTON INTERNATIONAL SCHOOL, IN SUPPORT OF BOARD OF ZONING ADJUSTMENT APPLICATION NUMBER 16623 FOR A SPECIAL EXCEPTION TO ALLOW THE CONTINUED USE OF A MODULAR BUILDING AS AN "ANNEX" FOR CLASSROOMS ON A PERMANENT BASIS ON ITS TREGARON CAMPUS AT 3100 MACOMB STREET, N.W. (LOT 837, SQUARE 2084)

THIS PRE-HEARING STATEMENT is submitted on behalf of the Washington International School ("School", "WIS" or "Applicant") by its attorneys, Greenstein DeLorme & Luchs, P.C., by Jacques B. DePuy, Esquire, in support of Board of Zoning Adjustment Application No. 16623 to authorize the continued use of a modular building as an "Annex" for classrooms on a permanent basis on the Tregaron campus at 3100 Macomb Street, N.W. ("Tregaron campus").

I. Prior BZA Action Regarding Modular Building

In 1995, the School sought, and the Board of Zoning Adjustment ("Board") granted, the approval of an application to allow a modular building for classroom purposes on the Tregaron campus. [The modular building is commonly referred to as "the Annex."] The approval by the Board was limited to four (4) years. [See Order of the Board in Application Number 16054 submitted with the subject Application.] In 1995, at the time of the initial application for the temporary classroom building, the School was in the process of (i) selling a site used by the School for its Lower School ("Olive Street campus"), (ii) purchasing a new campus for the Lower School and (iii) planning for the development on the Tregaron campus of a new music and arts facility and gymnasium. WIS also needed to centralize classroom facilities on the Tregaron campus.

In 1999, the School sought, and the Board granted, the approval of an application to allow the continued use of the modular building for classroom use on the Tregaron Campus. The continued use of this structure was limited to the earlier of two (2) years or the completion of construction of the new arts and music facility and gymnasium. [See Order of the Board in Application Number 16468 also submitted with the subject Application.] The Board also approved the relocation of the modular building during the construction of the arts and music facility and gymnasium. In 1999, it was expected that the construction of the new music and arts facility and gymnasium would be completed by May, 2000. [In fact, because of construction delays, completion is not expected until December, 2000.]

II. Justification for Subject Application

In both 1995 and 1999, it was anticipated that the need for the use of the four (4) classrooms provided by the modular structure would cease upon the completion of the new music and arts facility and gymnasium. However, the School has recently been advised by accrediting authorities and an educational consultant that the new music and arts facility, together with its other existing buildings and facilities, will not satisfy the School's educational and space needs. Specifically, the visiting team of accrediting officials recommended that WIS (a) minimize the use of basement space in existing buildings for classroom use and (b) dedicate a certain amount of classroom space to specified subjects, particularly including languages, in order to create an environment reflecting the cultural aspects of the languages being taught in such facility. The educational consultant specifically recommended that the School retain the modular building and continue its use as classrooms in order to promote efficient use by WIS of all existing and new facilities.

In addition, WIS recently added a new course that is required by the International Baccalaureate Organization for the Middle Year Program. This course (i.e., design technology) requires special equipment and, therefore, a dedicated classroom. The addition of this classroom requirement, together with a shortfall of office space created by the demolition of the Farmhouse building and a shortfall of classroom space caused by the use of the Greenhouse building for admissions functions, has created the need for the classroom space provided by the modular building on an on-going basis.

III. Special Exception Relief

The School currently operates a private school under special exception authority granted by the Board in an Order dated July 21, 1978 in Application Number 12576. The authority to allow the initial installation and use of the modular structure for temporary classroom use was granted as a special exception. Similarly, the authority to make permanent the use of the modular structure as classrooms requires the approval of an application for a special exception.

IV. Subject Proposal

The subject application seeks to continue the use of a modular building for classrooms on a permanent basis. The location of the modular structure will not change. [As discussed above, the modular structure was moved to its current location upon commencement of construction of the new music and arts facility and gymnasium. Such a relocation was depicted on plans submitted to and approved by the BZA in Application Number 16468.] The modular building will continue to be used for four (4) classrooms.

No increase in the number of students or the number of faculty or staff members is sought by this application. No additional construction is required. There will be no change in the site plan for, or the use of, the Tregaron campus contemplated by this application.

The modular building, which is currently used for grades 6 through 8, will continue to be used by such grades. The number of students who are currently taught in the Annex at any one time (i.e., approximately 45 students) will remain unchanged. The size of the modular structure, approximately 1,500 square feet in area, will not change.

V. Description and Location of Site

The Washington International School's Tregaron campus is located on a six (6) acre portion of the historic Tregaron estate. The balance of the historic estate is currently undeveloped and is owned by a third party.

The School property is bordered to the north by Macomb Street, N.W., to the east by the balance of the Tregaron estate, to the south by Klingle and Woodley Roads, N.W. and to the west by private property. Uses surrounding the site include a property owned by the Republic of Taiwan to the immediate west, single family detached houses to the north located in the Cleveland Park neighborhood, the undeveloped portion of the Tregaron estate to the east and the residential neighborhood of Woodley Park to the south.

VI. The Use of the Modular Structure for Classrooms on a Permanent Basis is a Use Which is Compatible With, and Will Have No Adverse Impacts on, the Surrounding Neighborhood

The continued use of the modular structure for classroom use will be compatible with, and will have no adverse impacts on, the surrounding residential neighborhood. First and foremost, the modular building has been, and is, sited on the campus in such a location as to be completely invisible to the residential community. [Prior to its relocation, the modular building was located in an area that was not visible from the surrounding residential community during the spring, summer and fall (i.e., at all times that leaves were on the trees). In its current location, the modular structure is not visible at all during any season!] In addition, there are no lights on the modular building which shine on or cast any glare on nearby residential properties and no noise emanates from the building that could be heard by any surrounding residents. The Annex has been painted in order to be more compatible with surrounding buildings, particularly including the historic Dacha. Moreover, the School proposes to add landscaping around the Annex so as to blend it more effectively with all other buildings on the campus.

In addition, there will be no additional students, teachers or staff as the result of the continued use of the Annex for classrooms. There will be no increase in visitors to the site as a result of this proposal. Therefore, no additional traffic will be generated by this use.

Furthermore, no additional parking spaces will be necessary and no parking on neighborhood streets will occur.

VII. Summary

For the foregoing reasons, the Applicant submits that Application No. 16623, which seeks the continued use of a modular building for classrooms on a permanent basis, is in harmony with the general purpose and intent of the Zoning Regulations, will not affect adversely the use of neighboring property and should be granted by the Board of Zoning Adjustment.

Respectfully submitted,

GREENSTEIN DELORME & LUCHS, P.C.

By: Jacques B. DePuy

Jacques B. DePuy

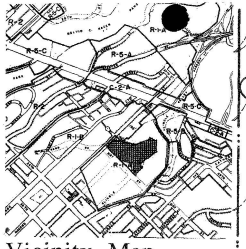
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Photographs of the Annex,
Washington International School









Vicinity Map

No Scale

Macomb Street, N.W.

Klingle Road

MANSION

ACADEMIC BUILDING

CARRIAGE HOUSE

GREENHOUSE

DACHA

COTTAGE

ANNEX

Playfield

Proposed Site Plan

Scale: 1"= 40'-0"

BGA

BOWIE · GRIDLEY ARCHITECTS, P.L.L.C.

1616 WISCONSIN AVE., N.W. SUITE 405
WASHINGTON, D.C. 20007
TEL. (202) 337-5868
FAX (202) 337-2626

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	CFA FILING	1/23
	BZA FILING	12/24
	HPRB FILING	11/25

Washington International School

Arts and Athletic Center

BGA No. 96001

PROPOSED SITE PLAN

DRW. BY

CHK. BY

SCALE

DATE 5/15/99