STATEMENT OF REASONS IN SUPPORT OF APPLICATION
FOR A SPECIAL EXCEPTION MODIFY THE ORDER IN BZA APPLICATION NO. 16177,
WHICH AUTHORIZED A PRIVATE SCHOOL IN A RESIDENTIAL
ZONE AT 1690 36TH STREET, N.W.; SQUARE 1304, LOT 14

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This Statement of Reasons is submitted on behalf of the applicant, The Washington International School (the "Applicant").

**The Property.** The subject property, 1690 36th Street, N.W., Square 1304, Lot 14 (the "Property"), occupies the entire square bounded by Reservoir Road on the south, 37th Street on the West, R Street on the north and 36th Street on the east The site contains 112,105.5 square feet.

**Current Use.** The Property is currently used as private school pursuant to the order in BZA Application No. 16177. The Board conditioned its approval of the special exception sought under BZA Application No. 16177 on, *inter alia*, (1) a total amount of staff members not to exceed 45; (2) a maximum of 475 students at the Property; and (3) hours of operation from 7:30 a.m. to 6:00 p.m., Monday through Friday. With regard to the number of students, WIS agreed to a series of enrollment caps limiting the number of students to no more than 375 in 1997, 400 students in 1998 and 475 students by the year 2000. (Exhibit 1.) WIS has abided by these limitations. Additionally, WIS is the only user of the Property.

**Proposed Use.** With regard to BZA Application No. 16177, WIS recently discovered that it inadvertently omitted from its staff calculations its librarian, part-time teacher assistants, after-School program personnel and custodial personnel. The additional staff were required because of faculty union requirements, parent requests and the increase in enrollment over that permitted at WIS's prior location. Since most of the issues raised at the time the application was considered by the BZA involved traffic issues related to the student population, little consideration had been given to the fact that the staff would have to slightly increase over time, despite the inaccurate counting then conducted, because of the fact that the BZA Order authorized increases in the student population. Consequently, WIS is seeking a modification of the Order in BZA Application No. 16177 so as to amend condition number 2 to allow a maximum staff of 64. For the reasons set forth herein, this modification can be granted without detriment to the neighborhood and without harming the purpose and intent of the zone plan.

**Zoning.** The Property is zoned R-3.

**Required Relief.** A special exception pursuant to Section 206.1 was granted in BZA Order No. 16177, thus authorizing a private school at the Property. A modification of BZA Order No. 16177 is now required to allow an increase in the number of staff at the Property.

**BZA**
**Case No.** 16890
**Exhibit No.** 5

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Board of Zoning Adjustment
District of Columbia
CASE NO. 16890
EXHIBIT NO.5

For the foregoing reasons, it is respectfully submitted that, upon receipt of all of the applicant's proof and all other support of record for the variances requested, such relief be granted.

Respectfully submitted,
ROBINS, KAPLAN, MILLER & CIRESI, LLP

By: _____
Richard B. Nettler

By: _____
Jeannine Rustad Zigner