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ADMITTED IN NEW YORK
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February 6, 2003

RECEIVED
D.C. OFFICE OF ZONING
2003 FEB 10 PM 4:27

BY FACSIMILE AND FIRST CLASS MAIL

Mr. Geoffrey H. Griffis
Chairman
Board of Zoning Adjustment
441 4th Street, N.W., Suite 210
Washington, D.C. 20001

Re: Application of Sheridan School; BZA No. 16977; Motion of Applicant for a Continuance of the Public Hearing Currently Scheduled for February 25, 2003 of Approximately Sixty (60) to Seventy-Five (75) Days

Dear Mr. Griffis and Members of the Board:

This firm represents the Applicant, The Sheridan School. This letter is to request that the Board grant a continuance of the public hearing, currently scheduled for February 25, 2003, for a period of approximately sixty (60) to seventy-five (75) days.

In support of this motion, the Applicant submits that this continuance is necessary to allow the Applicant to amend its application and, secondly and equally importantly, to permit the Applicant to work closely and cooperatively with its neighbors and ANC 3F to discuss the amendment and to resolve outstanding issues.

With respect to the amendment of the application, the Applicant intends to file an amendment of its application within the next few days that will (i) request additional zoning relief, in the form of a parking variance, and (ii) request Board approval of a "stacked" (tandem) parking arrangement currently used by the School in its parking lot on Alton Place, N.W. and approval of the School's summer educational program known as CASA. The Applicant believes that the

BZA
Case No. 16977
Exhibit No. 34

Board of Zoning Adjustment
District of Columbia
CASE NO. 16977
EXHIBIT NO. 34

continuance is necessary and appropriate in order to provide sufficient time for the School's neighbors and ANC 3F to review this amendment and to engage in meaningful dialogue regarding it. Adequate time to review this amendment should also be provided to the Office of Planning and other government agencies.

With respect to the second basis for the request for the continuance (i.e., the need to provide adequate time for the Applicant to work closely and cooperatively with its neighbors and ANC 3F to resolve outstanding issues), the School had been requested by several neighbors to provide a detailed landscaping plan and to undertake a traffic and transportation study prior to the BZA public hearing. Unfortunately, the landscaping plan has just been finalized and is under review by School officials and the traffic and transportation study has not been completed. The Applicant desires to complete the traffic study and make it, and the landscaping plan, available to its neighbors and ANC 3F so that there is ample time to discuss it and resolve outstanding issues prior to the BZA hearing. Insufficient time to accomplish this purpose exists prior to the scheduled hearing on February 25, 2003.

Please be advised that notice of this request was provided to ANC 3F and all owners within 200 feet of the School's property by a letter from Mr. C. Randall Plummer, Head of School, dated February 5, 2003. A copy of this letter is enclosed herewith.

For the foregoing reasons, we respectfully request the continuance be granted.

Sincerely,

GREENSTEIN DELORME & LUCHS, P.C.

By: _____
Jacques B. DePuy

By: _____
Lyle M. Blanchard

199635
Enclosure
cc: Ms. Cathy Wiss, Chairperson, ANC 3F
Mr. Carl Kessler, Commissioner, ANC 3F-01
Office of Planning (Attn: Mr. Steven Mordfin)
DDOT (Attn: Mr. Ken Laden)
Ms. Sherri Pruitt
Mr. Rick Nero
Mr. C. Randall Plummer
(All copies w/encl. by facsimile or email)

SHERIDAN SCHOOL

HEAD OF SCHOOL'S OFFICE

February 5, 2003

Ms. Cathy Wiss
Chair, ANC 3F
3810 Albemarle Street, N.W.
Washington, D.C. 20016

Mr. Carl Kessler
Commissioner, ANC 3F
3636 Alton Street, N.W.
Washington, D.C. 20008

All Neighbors of Sheridan School
who live within 200 feet of the School
[per enclosed list]

Re: BZA Application No. 16977; Motion for a Continuance in the Public Hearing scheduled for February 25, 2003

Dear Cathy, Carl and Sheridan's Neighbors:

As you know, the School's application to the Board of Zoning Adjustment is scheduled for a public hearing on February 25, 2003. This letter is to advise you that we have decided to seek a continuance (i.e., postponement) of the public hearing for the reasons set forth below. We hope that you will understand our reasons for our request and will support it.

Most importantly, the School has had insufficient time to complete two important tasks – a landscaping plan and a traffic study – both of which were requested by several of our neighbors. As a result, we have been unable to provide this information or discuss it with our neighbors. Thus, because the School desires to work closely and cooperatively with our neighbors and ANC 3F, we do not feel it is appropriate to proceed with the BZA public hearing until there has been adequate time to discuss the landscaping plan and the traffic study with our neighbors and other interested parties.

Secondly, with respect to parking, the School realized subsequent to the filing of its BZA application that we did not account for a modest amount of future growth in faculty and staff. Thus, although we believe the School is currently in compliance with parking requirements, the School anticipates that it may not be in compliance in approximately three years (i.e., 2006). For that reason, we will revise our BZA application to seek a modest variance from the on-site parking requirements. In addition, a question has been raised as to whether the School's current tandem (i.e., "stacked") parking arrangement in

its parking lot on Alton Place is permitted. The School will thus seek to clarify our application in order to obtain BZA approval of our current parking arrangement.

Finally, at the request of a neighbor, the School wrote to the Zoning Administrator, Mr. Robert Kelly, to obtain confirmation that its CASA summer program is in compliance with zoning regulations. We received a reply from Mr. Kelly dated December 30, 2002. Such letter states that, in Mr. Kelly's opinion, BZA approval is required if the School intends to offer "daily activities for over 100 students" in its summer program. As you may know, the CASA program currently serves 190 to 200 students on a daily basis during its peak summer period. For that reason, the School will clarify its application to seek BZA approval of daily activities for more than 100 students in the CASA summer program.

Please trust that it is a personal priority for me as well as for the faculty, staff, administrators and Board of Trustees of the Sheridan School to work closely and cooperatively with our neighbors in an attempt to resolve any concerns. If you have any questions or concerns about any of these matters, please contact my Assistant, Kirstin Morgan, at 202-362-7900, ext. 106, to arrange a phone appointment or personal meeting with me.

Sincerely,

C. Randall Plummer
Head of School

Enclosures: List of neighbors of Sheridan School who are listed on D.C. Government (Office of Tax and Revenue) records as owners of property within 200 feet of the School's property to whom this letter was mailed.

cc: Jacques B. DePuy, Esquire