

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

**4501 SOUTH DAKOTA AVENUE, NE
(SQUARE 3977, LOT 133)**

BZA CASE NO. 17552-A

**PREHEARING STATEMENT OF THE APPLICANT
PUBLIC HEARING DATE: OCTOBER 2, 2024**

**I.
NATURE OF RELIEF SOUGHT**

This Prehearing Statement is submitted on behalf of the Benedictine Foundation, in conjunction with the St. Anselm's Abbey School (the "Applicant" or "School"), in support of an application for a Modification of Significance to Board of Zoning Adjustment (the "Board" or "BZA") Order No. 17552, the most recent Order applicable to the School. The application seeks approval of the construction of an addition to an existing on-campus building which will include new library space, meeting rooms, offices, and a classroom. The School is located on the property known as 4501 South Dakota Avenue, NE (Lot 133 in Square 3977) (the "Property" or the "Campus"), and is zoned R-1B.

**II.
DISCUSSION**

There have been no material changes to the application since it was filed on June 10, 2024, and the Applicant's *Statement in Support* details the application's compliance with the applicable standards of review. See [Exhibit 3](#). As such, the Applicant believes that the application is complete as set forth in the record.

III. **COMMUNITY ENGAGEMENT**

The Property is located within the boundaries of Advisory Neighborhood Commission (“ANC”) 5A, and ANC 5B is an affected ANC because the Property is located on a street (i.e., Webster Street, NE) that serves as a boundary line between ANC 5A and ANC 5B. As required, the Applicant served a copy of the application upon both ANC 5A and ANC 5B.

The Applicant engaged with the community prior to submitting the application by contacting representatives of ANC 5A, the North Michigan Park Civic Association, the Michigan Park Civic Association, and the Queens Chapel Civic Association to discuss the application. On June 3, 2024, the Applicant attended a community meeting hosted by the Queens Chapel Civic Association. The Queens Chapel Civic Association indicated their support for the School and the application in a letter dated July 1, 2024, and in the record at [Exhibit 18](#).

In addition, on June 26, 2024, the Applicant attended a community meeting hosted by ANC 5A02 Commissioner Karlus Cozart — the Single Member District Representative for the Property — to present and answer questions about the application for the community. Immediately following that meeting, the Applicant formally presented the application to ANC 5A at its duly noticed and regularly-scheduled public meeting, during which ANC 5A voted unanimously to support the application.

Finally, the Applicant will present the application to the North Michigan Park Civic Association on September 4, 2024.

IV. **WITNESSES**

The Applicant has identified its anticipated witnesses. *See Written Summary of Witness Testimony*, [Exhibit 12](#). Additionally, the Applicant has provided the resume of each witness the

Applicant may qualify as an expert. *See Resume of Ed Foley, [Exhibit 10](#); see also Resume of Julianna von Zumbush, [Exhibit 11](#).* As such, each witness that the Applicant may call to testify has been identified.

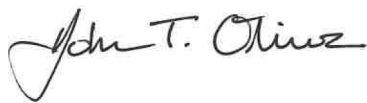
V.
CONCLUSION

For the reasons stated above and described elsewhere in the case record, the Applicant has demonstrated that the application complies with the applicable standards of review, and should therefore be approved.

Respectfully submitted,

HOLLAND & KNIGHT, LLP

By: 
Christine M. Shiker


John T. Oliver