

April 19, 2017

VIA IZIS

Chairman Fred Hill
D.C. Board of Zoning Adjustment
441 4th Street NW, Suite 200S
Washington, DC 20001

Re: BZA Case No. 18715A – Applicant’s Pre-Hearing Submission

Dear Chairman Hill and Members of the Board:

This letter serves as the Applicant’s pre-hearing submission in the above-referenced case scheduled for a public hearing on May 10, 2017. The applicant, Maret School, is requesting a special exception to continue the operation of a K-12 private school. No changes to the number of students and faculty/staff or the School’s operations are proposed. As described in the original application materials, the School proposes the elimination of the approval term and reporting requirement as well as a small change to a previously-approved expansion of one of the buildings. Otherwise, everything approved in 2014 in Order No. 18715 will remain the same.

I. Evaluation under Subtitle U § 203.1(I)

The satisfaction of the special exception standards under Subtitle X § 104 is set forth in the original application materials. In addition, the Office of Planning and the Office of the Attorney General recommend that special exception approval under Subtitle U § 203.1(I) may be applicable in addition to or instead of Subtitle X § 104. Therefore, out of an abundance of caution, the applicant requests that the Board also grant special exception approval for continued operation of the Maret School under Subtitle U § 203.1(I).

The evaluation standards under Subtitle U § 203.1(I) are nearly identical to Subtitle X § 104, so evaluation under this section is substantively no different. Accordingly, this application also satisfies the standards under Subtitle U § 203.1(I) as follows:

1. § 203.1(I)(1) – *Shall be located so that it is not likely to become objectionable to adjoining nearby property because of noise, traffic, number of students, or otherwise objectionable conditions.*

Maret School has existed at this location since 1952. Since that time, the School has been operating with minimal impact on the community, and it will continue to operate in that manner.

In particular, since the School's 2014 approval, it has operated without adverse impacts on the neighborhood. Because the School will not materially change any aspect of the last approval, including the number of students and faculty/staff, approval of this application will not create objectionable impacts on neighboring properties due to the number of students. Furthermore, the School will not change any of its operations from what was previously approved. Therefore, it will continue to operate without generating objectionable noise impacts to neighboring properties.

The proposed small additions on the South Activities Building will not create objectionable impacts on neighboring properties. The proposed south addition will be smaller than previously approved and it will be further away from adjacent properties. The mechanical equipment on its roof will be appropriately screened to mitigate potential visual and noise impacts. Similarly, the addition for the lobby will be so *de minimis* in size and secluded in location that it will not create any sort of noise or visual impacts on neighboring properties.

The primary issue in the prior approval was the potential transportation impacts from the increase in student enrollment and faculty/staff. The Board imposed conditions intended to mitigate transportation impacts, and the School is pleased to report that no adverse traffic impacts have occurred. The number of morning peak hour trips has remained below the BZA-imposed cap because of the School's aggressive TDM plan and other measures. The annual reports that the School submitted to DDOT show that the School has been successfully limiting the number of trips to below the cap that the BZA established and that the School has not adversely affected the transportation network surrounding the Property. The summary of the findings in the last three reports is included with the original application (Exhibit 10 in the record) and shows the success of the School's transportation operations. Therefore, since the School will continue to operate with the same TDM plan and with the same trip cap, the School's future operations will not have an objectionable impact on nearby properties due to traffic. Accordingly, the term of approval and the annual trip count reporting requirement are unnecessary.

2. § 203.1(1)(2) – *Ample parking space, but not less than required by this title, shall be provided to accommodate the students, teachers, and visitors likely to come to the site by automobile.*

The 135 parking spaces are unchanged since the approval in 2014 and will be unaffected by this application. This number of parking spaces exceeds the requirement and is sufficient to continue serving the students, faculty/staff, and visitors.

3. § 203.1(1)(3) – *After hearing all evidence, the BZA may require additional parking to that required by this title.*

The number of parking spaces adequately serve the School's needs without creating adverse parking impacts on the neighborhood. Since the number of students and faculty/staff as well as the School's operations will not change with this application, no additional parking is necessary.

II. Proffer of Expert

The applicant is proffering Christopher Kabatt of Wells and Associates as an expert in transportation planning and engineering. His resume is attached.

Should you or your staff have any questions, please do not hesitate to contact me.

Sincerely,

/s/ _____
Cary R. Kadlecek

Attachment