

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

Application of MIC9 Owner LLC
ANC 1C

Case No. 19689
Hearing Date: June 13, 2018

PRE-HEARING STATEMENT OF THE APPLICATION

This statement provides additional information in support of the Applicant’s request for special exception approval for (1) a 35-foot adjustment of the zone boundary line and (2) modifications to an existing private school campus plan, to facilitate the construction of a new 111-unit condominium building, additional space for Meridian International Center, and underground parking on the site of an existing surface parking lot at 2300 16th Street NW (“Project”).¹

The property that will contain the Project consists of Lots 806 and 808 in Square 2568 (“Property”). The Property is part of Meridian International Center’s campus, which also includes Lot 809 (“Campus”). The Campus is located in the Meridian Hill Historic District and it is improved with two historic landmarks, the Meridian House and the White-Meyer House. The Property is split-zoned, with the portion along 16th Street located in the RA-4 Zone District and the balance of the Property located in the RA-2 Zone District. Both zones permit a multifamily condominium building as a matter of right, with greater height and density permitted in the RA-4 Zone District. Both zones permit a private school with special exception approval; as discussed in the initial submission, Meridian has operated its Campus at the present location since 1960 pursuant to multiple approvals from the Board of Zoning Adjustment (“Board”).

¹ After further review, the Applicant has concluded that special exception approval for the proposed retaining wall height is not required because those provisions do not apply to the RA Zones.

I. Update on Community Outreach and Negotiations

As described in the initial application package, the Applicant and surrounding stakeholders have been engaged in discussions regarding the Project for over four years. Early discussions were centered around historic preservation review and focused largely on the building height, massing, and architectural design of the Project. As a result of these discussions, the Applicant scaled back the height and density of the Project and brought an entirely new architectural team on board to redesign the building to be more compatible with the character of the historic district. Ultimately, the Historic Preservation Review Board (“HPRB”) granted concept approval to the Project in June 2017. In doing so, HPRB also reviewed a version of the building with reduced height on 16th Street and concluded that the shorter building would not be compatible with the character of the historic district, which is marked by tall apartment buildings along 16th Street flanking Meridian Hill Park.

Since the filing of the BZA application in December, the Applicant has continued to engage with residents of neighboring properties (including ANC 1C, the Beekman Place condominium complex, the 1661 Crescent Place Co-op, the Meridian Crescent condominium, and homeowners on 17th Street) to reach a common understanding and resolution on issues and concerns regarding the Project. This dialogue has addressed not only the impacts of the proposed development but also issues regarding existing Meridian operations and concerns regarding the construction impacts associated with the Project. A “working group” of neighborhood stakeholders from all of the above properties has met nearly weekly over the past seven months, and the Applicant deferred the public hearing on three occasions to accommodate the significant and substantial progress that was being made by the working group. Through extensive dialogue and compromise, the Applicant and the working group have collectively

developed a series of memoranda of understanding (“MOUs”) that incorporate multiple operational agreements, improvements, and other concessions agreed to by the parties. The Applicant and members of the working group have nearly reached consensus on the proposed MOUs, and working group members who reside in 1661 Crescent Place, Meridian Crescent, and on 17th Street intend to bring the MOUs to their respective groups for review and signature in the coming weeks.²

The three MOUs reflect a common understanding of the mitigation measures and operational practices that will be put in place to ensure that the Project will not impose adverse or objectionable impacts on the surrounding neighborhood. All three MOUs call for the creation of a “Meridian Community Partnership,” formed by the members of the working group, which will meet regularly and work collaboratively to oversee the implementation and enforcement of the many commitments made by the Applicant.³ All three MOUs also include a system for fines and other measures to ensure compliance with their conditions. Copies of the current near-final draft MOUs are attached as Exhibits A, B, and C. For the Board’s convenience, below is a summary of the issues that are addressed in the MOUs.

- Condominium MOU (Exhibit A): loading, delivery, moving, and trash scheduling and truck routing; traffic control (including additional studies post-completion regarding a traffic signal at Belmont and traffic circulation on neighborhood streets); parking

² Unfortunately, Beekman Place’s association president sent a terse email to the working group the evening before the filing of this statement, stating that the association would not continue to negotiate regarding the MOUs. While disappointed, the Applicant nevertheless appreciates the significant time and effort given to the working group by Beekman Place residents and believes that the final MOUs and commitments therein will address many of the impacts and concerns identified specifically by Beekman Place residents.

³ Notwithstanding Beekman Place’s withdrawal from the MOU, the Applicant and the other community parties have agreed that Beekman Place representatives will nonetheless be afforded a role in the Meridian Community Partnership.

(including the availability of parking in the condominium garage to neighborhood residents); litter and maintenance; and rooftop use.

- Meridian Center MOU (Exhibit B): loading, deliveries, and trash scheduling and truck routing; limitations on the number of events and program attendees as well as operational details for the traffic, noise, and parking impacts of those events; and litter and maintenance.
- Construction MOU (Exhibit C): construction hours; construction staging; traffic circulation during construction (including traffic routing and other controls); parking during construction (including the provision of off-site parking to replace on-street parking temporarily lost due to construction activity and the provision of off-site parking to replace the Meridian parking temporarily displaced during construction); cleanliness, damage repair, and protection of landscaping;

Assuming the agreements are executed, the Applicant will provide final copies of the MOUs to the Board at the public hearing, and the Applicant will request that all provisions of the MOUs be incorporated as conditions of the Board's order.⁴

II. Overview of the Requested Relief

As described in the initial BZA application, the Project generally complies with the requirements of the Zoning Regulations. The proposed multifamily condominium building, at the height and bulk proposed, is permitted as a matter of right in the underlying zones. The Project complies with all applicable lot occupancy, yard, and court requirements, and it provides the required number of vehicle parking, bicycle parking, and loading spaces. However, special

⁴ To this end, all neighborhood residents, including those in Beekman Place, will benefit from many of the negotiated conditions and commitments set forth in the agreements.

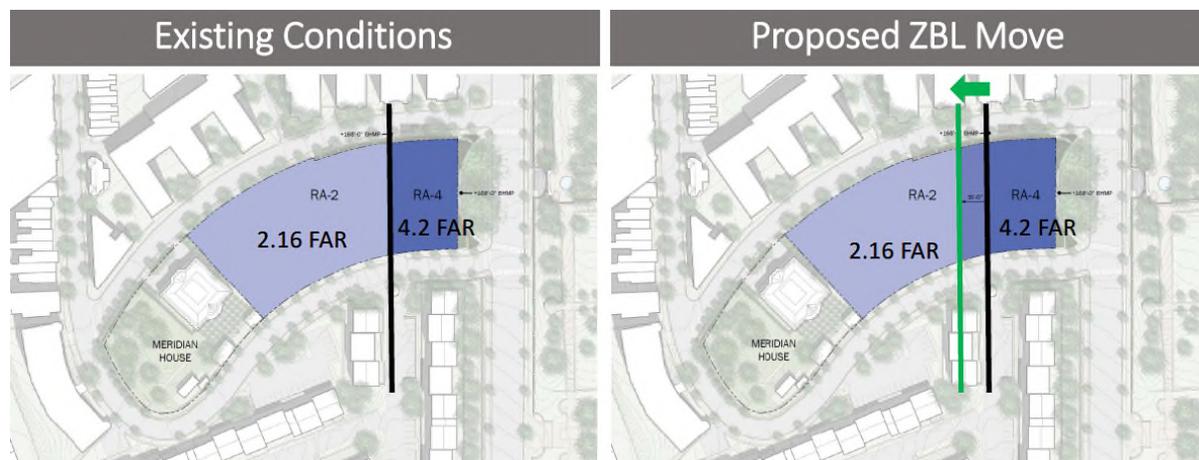
exception approval is required to permit: (1) the extension of the zone boundary line by 35 feet in order to reallocate density from the RA-2 Zone District to the RA-4 Zone District and (2) the modifications to the existing private school plan needed to accommodate the Project's new Meridian office and meeting space, replacement of its existing surface parking with an underground parking garage level, and relocation of its parking entrance from the one-way Crescent Place to the two-way Belmont Street.

III. Zone Boundary Line Extension

A. *The Zone Boundary Line Extension Will Not Have an Adverse Effect on the Character and Future Development of the Neighborhood*

Under the Zoning Regulations, the Board may approve the extension of the use, height, and bulk provisions of the less restrictive portion of a split-zoned lot into the more restrictive portion of that lot, provided that the extension does not exceed 35 feet and the extension will not have an adverse effect on the character and future development of the neighborhood. Here, the Applicant proposes to extend the RA-4 zoning 35 feet westward into the RA-2 portion of the Property in order to facilitate the allocation of density toward 16th Street and away from the landmarks and neighborhood.

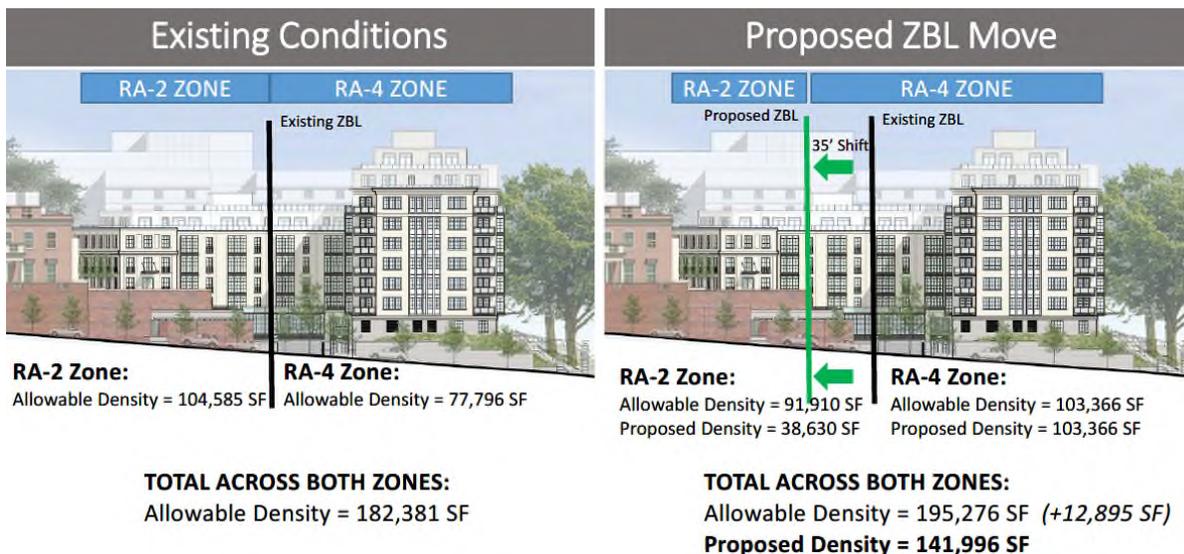
Figure 1: Zone Boundary Line Extension



As the Applicant explained in the initial filing, the proposed 35-foot adjustment will not impose adverse impacts on the character or future development of the neighborhood. HPRB has concluded that the proposed Project is compatible with the character of the historic landmarks on the site as well as the broader character of the Meridian Hill Historic District. In particular, HPRB found that the shifting of density away from the White-Meyer House (that is, the RA-2 portion of the Property) and toward 16th Street (that is, the RA-4 portion of the Property) was appropriate given the historic context of the site. HPRB also concluded that the massing of the Project was appropriate, including in particular the height of the Project along 16th Street.

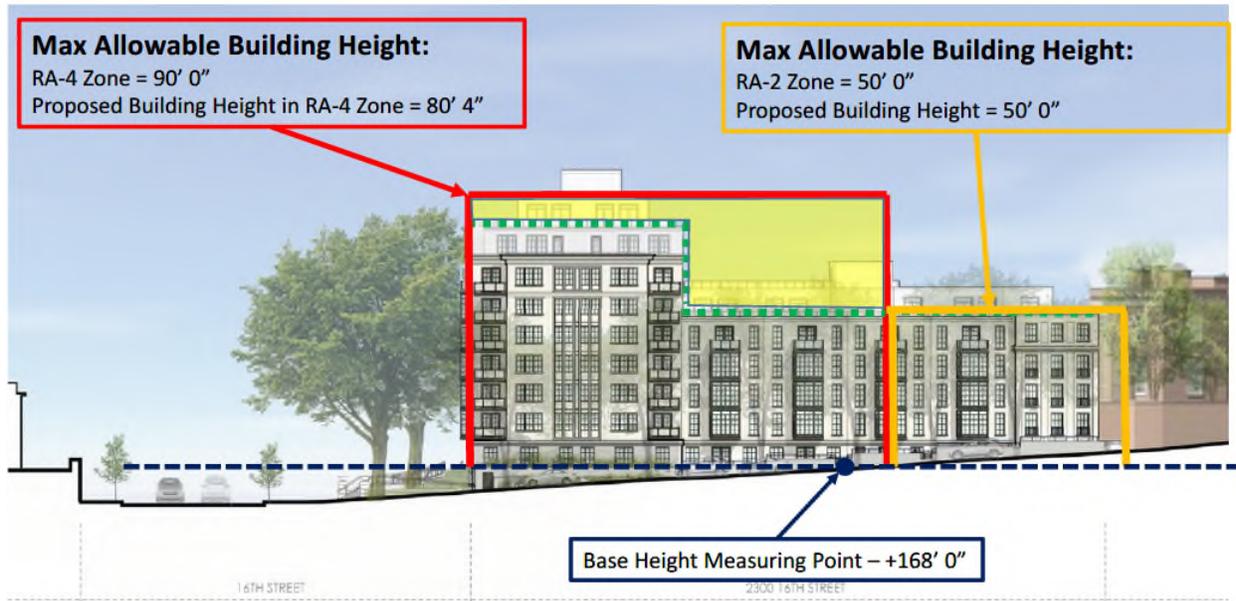
Furthermore, the extension of the zone boundary line does not result in additional height, density, or use within the transitional 35-foot area of the RA-2 portion of the Property. By moving the zone boundary line, the Applicant is able to construct an additional 12,895 square feet of density (that is, approximately one story) in the RA-4 portion of the Property, along 16th Street. This additional density is more than offset by over 50,000 square feet of density left unused on the RA-2 portion of the Property. Shifting the zone boundary line helps effectuate HPRB’s preference to concentrate density along 16th Street, away from the White-Meyer House.

Figure 2: Density Impact of Zone Boundary Line Extension



Moreover, as shown above, the portion of the Project that is within the zone boundary line extension remains within the 50-foot tall height limit that applies to the more restrictive RA-2 Zone. Indeed, the shorter 50-foot tall component of the Project extends well into the RA-4 portion of the Property, where a height of 90 feet would otherwise be allowed.

Figure 3: Height Impact of Zone Boundary Line Extension



As shown on the Massing Study attached as Exhibit D, the proposed massing with the special exception is actually less impactful than a matter-of-right development. The RA-2 portion of the site is large and generates ample density that could be used to create a 50-foot tall wing on the western portion of the building, close to the White-Meyer House and deeper in the neighborhood. Moreover, this massing would result in a shorter building along 16th Street, which HPRB specifically concluded was not compatible with the character of the historic district. Shadow studies comparing the matter-of-right and proposed design, attached as Exhibit E, further demonstrate that the proposed zone boundary line extension will not impose adverse impacts as compared to a matter-of-right development.

The zone boundary line extension will not have any adverse effect on future development in the neighborhood. The Property is a rare undeveloped parcel along the 16th Street corridor, and the surrounding properties are all generally improved, both along 16th Street and deeper into the neighborhood. Moreover, the proposed site massing represents exactly the type of thoughtful, contextual planning and design intended to balance infill development opportunities with surrounding neighborhood context.

B. The Zone Boundary Line Extension Is in Harmony With the General Purpose and Intent of the Zoning Regulations and Zoning Map

In addition to meeting the specific criteria of Subtitle A, the Regulations require that a special exception approval also meet the general criteria of Subtitle X: that the proposed project is in harmony with the general purpose and intent of the Zoning Regulations and Zoning Map and will not tend to adversely affect the use of neighboring properties. Here, the proposed zone boundary line extension is not being used to construct additional height or density in the transitional portion of the Property; rather, that portion of the Property remains consistent with the RA-2 Zone District's height and bulk limits. Indeed, following the completion of the Project, the Property as a whole (including both the RA-2 and RA-4 portions) will have a floor area ratio of 2.1, which is within the matter-of-right FAR for an inclusionary zoning development in the RA-2 Zone District. Therefore, the proposed special exception will not lead to any undue concentration of population or overcrowding.

What the zone boundary line extension does is allow the Applicant to shift some density from the western area of the Property, which is more sensitive to the positioning of density given the location of the historic landmark, to the eastern area of the Property, where density is preferred given its prominent location along 16th Street. This is wholly consistent with the intent and purpose of not only the provisions of Subtitle A regarding split-zoned lots but also the

overall framework for the RA Zones (which denote the RA-2 Zone as a “moderate density” zone and the RA-4 Zone as a “medium to high” density zone), because it shifts density out of the moderate density zone and into the high density zone. As a result, the special exception will further goals for adequate light and air by de-concentrating density within the core of the neighborhood as well as goals for the favorable distribution of land uses and efficient use of public infrastructure by focusing development on an infill site along the high-density 16th Street corridor.

C. The Zone Boundary Line Extension Will Not Tend to Adversely Affect the Use of Neighboring Property

Finally, the proposed zone boundary line extension will not tend to adversely affect the use of neighboring property. As detailed above, the extension does not adversely affect the character of the neighborhood, and it facilitates a massing that actually has less impact on neighboring property than a matter of right development would have. Importantly, the zone boundary line extension is not being used to facilitate any additional height or density beyond what the existing zoning already allows; put another way, a matter-of-right development could still contain the same building height, same number of units, same number of parking spaces, and other development features. Therefore, the zone boundary line extension does not in itself result in any new impacts as compared to a matter-of-right development, much less any adverse impacts; it simply allows for the reallocation of already-permitted density toward the higher density zone.

IV. Private School Plan Modification

As detailed in the initial application package, Meridian International Center is a premier nonprofit global leadership organization that offers experiential educational and cultural exchange programs aimed at strengthening global engagement and international cooperation. For nearly six decades, Meridian has operated its use on the Campus pursuant to a private school approval.⁵ Private schools are permitted in residential zones by special exception, provided that the use does not impose objectionable impacts due to noise, traffic, number of students, or other impacts. The current private school approval, which was last updated by the Board in 2003, includes a series of conditions intended to address the impacts of Meridian's operations.

A. The Proposed Modifications Will Further Meridian's Educational and Institutional Mission

The proposed Project will assist Meridian's ongoing mission in a number of ways. Most directly, it will provide Meridian with new modern office and meeting space that is equipped with state-of-the-art technology and audiovisual capabilities. The modernized office space will help to attract and retain high quality staff with a collaborative environment that fosters innovation. Similarly, the new meeting space will facilitate enhancements to Meridian's current programming with a more contemporary educational and learning environment. As importantly, the new space will be able to accommodate comfortably a typical Meridian speaker program in a single room (the room sizes in the current mansions limit the maximum number to 80 in one

⁵ The relevant orders of approval apply to the Meridian House lot (Lot 809) and the White-Meyer House lot (Lot 806) in Square 2568 as well as to Meridian's accessory parking on what is now Lot 86 in Square 2567. Lot 808 in Square 2568 (the parcel on which the bulk of the Project will be constructed) was not included in prior applications so it is not strictly subject to a private school order, though conditions of the most recent order of approval authorized its use for parking during construction on the primary employee parking lot and for event parking after the completion of the new employee parking garage. See BZA Order No. 17070 at FOF 6 and Condition 4.

room and 50 in an adjoining room). The Project will also allow for the existing surface parking on Lot 808 to be relocated into an underground garage with greater capacity than the current parking lot, which will increase the amount and convenience of Meridian's on-site event parking.

The proposed Project will also significantly enhance Meridian's long-term financial stability, including the continued maintenance of the Campus and its historic mansions. Through the sale of the development site, Meridian will create an endowment, the proceeds from which will generate investment earnings that support operations as well as capital expenses. The proceeds may also be used to provide flexibility in servicing or restructuring long-term debt. The new space in the Project will also further Meridian's long-term viability, as the modernized office, meeting, and parking space will help the organization to enhance and diversify its current programming and funding.

B. Overview of Proposed Modifications and Burden of Proof

In order to achieve these goals, the Applicant seeks to modify the existing private school approval to add approximately 9,266 square feet of new Meridian space within the Project. The Applicant also seeks to relocate Meridian's existing surface parking into an underground garage, with a driveway accessed from Belmont Street NW. Such modification is permitted provided that the use is not likely to become objectionable to adjoining and nearby properties because of noise, traffic, number of students, or other objectionable conditions. The analysis is limited to those aspects of the special exception that the Applicant seeks to modify.

In the initial application, the Applicant detailed how the private school modifications would not impose objectionable impacts due to noise, traffic, parking, and number of students. For the Board's convenience, the supporting evidence is summarized below, with a focus on each modification.

C. The New Meridian Space Is Not Likely To Become Objectionable Due to Noise, Number of Attendees and Guests, or Other Objectionable Conditions

As previously discussed, the proposed Project will not result in any increase in Meridian's day-to-day activity. Meridian's typical programs are held during the daytime and often have less than 50 participants per session, many of whom arrive by shuttle bus. Through its MOU, Meridian has committed to maintain existing levels for the total number of program participants and event guests on its Campus – a limit of 275 people at any one time. Meridian has also agreed to maintain existing levels for any event held on the Campus – 150 events per year, with a limit of 250 guests per event. Within these limits, Meridian has also committed to additional limitations on its overall operations, including limits on the number of evening events (55 per year, with a limit of 25 events that end after 9:30 PM), the number of weekend events (45 per year), and the number of events with more than 200 guests (limit of 10 per year).

The new meeting space in the Project is intended to serve as an alternative rather than an additional location for Meridian's programs and events, which means that the space will not result in additional numbers of program participants, event guests, and other visitors beyond existing levels and consistent with the limitations on the number of people and events set forth above. Moreover, many educational programs and events will continue to be held in the mansions, which means that impacts of these activities will be spread across the Campus rather than concentrated in one particular location. Finally, Meridian has agreed that it will not use the new Meridian space for weddings.

The Meridian MOU also contains extensive provisions that update, supplement, and enhance the existing agreements with the neighborhood regarding Meridian's operations. These provisions address the impacts related to Meridian programs and events held not only in the new Meridian space in the Project but also at other locations on the Campus. Conditions include

restrictions on times for delivery and trash activity, limitations on amplified music both outdoors (9 PM) and indoors (11 PM), expectations for behavior by event attendees and guests, rules for shuttle bus and valet operations to control the impact of pickup and dropoff activity, and litter and maintenance of the space surrounding the Campus. Adherence to these commitments will be implemented through Meridian personnel, including a loading coordinator, an event manager, and—for larger events—a traffic control coordinator. The MOU also includes detailed provisions to govern advance communication on events and reporting of complaints as well as a system of fines for violations of the MOU.

D. The New Parking Garage Is Not Likely to Become Objectionable Due to Parking or Other Objectionable Conditions

As previously discussed in the initial application and as supported by the Applicant's transportation studies (included as Exhibits 23 and 42 of the Record), the proposed Project will not have adverse traffic, parking, or other transportation impacts. The Project includes a new parking garage level dedicated to Meridian use with approximately 47-60 parking spaces (depending on whether valet operations are utilized). The garage will provide convenient, covered, and secured parking within the Project for Meridian's guests, visitors, and employees,⁶ with a greater number of spaces than the 30 spaces currently provided in the existing parking lot, which is unstriped and partially unpaved. Given that the number of program and event attendees will remain constant, the increase in parking should have a net positive impact on parking impacts. As with the current surface lot, Meridian will make its parking available to the parties

⁶ As noted previously, the primary parking facility for Meridian employees is another underground garage located beneath the Meridian-Crescent condominium building on 17th Street.

to the MOU on non-event evenings and weekends; to this end, the enclosed, striped, paved garage and increase in spaces will represent an improvement for the neighborhood as well.

The Project will also include a parking level dedicated to the condominium residents, which will provide approximately 72 parking spaces for approximately 111 units, which is nearly double the minimum parking requirement. The spaces will be adequate to accommodate parking demand from the building. Furthermore, the Applicant has agreed to provide the parties to the MOU with a right of first offer on any unsold spaces, which means that any unused parking spaces could help accommodate neighborhood parking demand.

E. The New Driveway Location Is Not Likely to Become Objectionable Due to Traffic, Congestion, Safety, or Other Objectionable Conditions

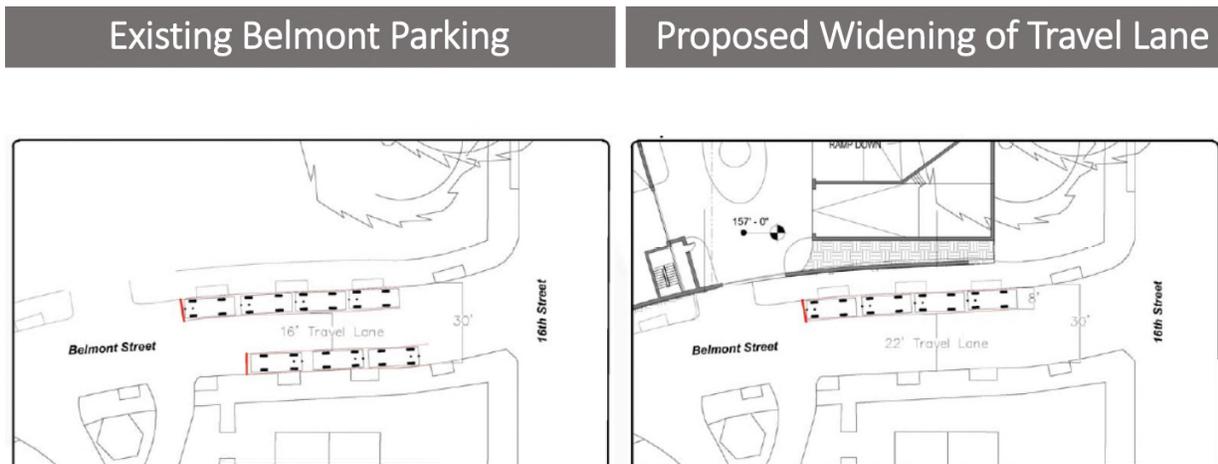
The relocation of the driveway entrance to the parking lot from Crescent Place to Belmont Street will not have adverse or objectionable impacts. The proposed driveway meets all relevant DDOT standards: it provides a single point of ingress and egress for all vehicular activity, it provides access to an off-street dropoff area for residents, visitors, and guests, and it facilitates “front-in, front-out” truck maneuvers. Furthermore, the proposed driveway is a more preferable location for parking and loading access given the unique combination of one-way and two-way roadways in the immediate neighborhood. As outlined below, the new location will represent an improvement for the neighborhood as a whole, and any impacts are capable of being mitigated by the provisions agreed to by the Applicant.

First, the proposed Project will facilitate the widening of the two-way portion of Belmont Street through the removal of three on-street parking spaces.⁷ The current roadway width is only

⁷ As set forth in the Applicant’s Supplemental Transportation Analysis dated February 23, 2018 (Exhibit 42A in the Record), parking was previously restricted on the north side of Belmont Street, opposite the Beekman Place driveway, in order to facilitate two-way traffic.

30 feet wide, which is too narrow to support two through lanes and two parking lanes, and does not meet DDOT’s minimum standard (which is 34 feet: two 10-foot travel lanes and two 7-foot parking lanes). Through the removal of one parking lane, the roadway will be reconfigured to provide two 11-foot wide travel lanes and one 8-foot wide parking lane, which will meet DDOT’s minimum requirements and better facilitate two-way traffic.

Figure 4: Widening of Belmont Street



Second, as shown on the Truck Routing and Traffic Circulation plans below, the location of the driveway on the two-way section of Belmont Street will facilitate getting larger trucks and shuttle buses to turn left out of the Project and proceed back out to 16th Street. This will eliminate the need for larger trucks and buses serving the Project to circulate through the neighborhood street network. (By contrast, a Crescent Place driveway would require all trucks to circulate through the neighborhood, since Belmont Street, 17th Street, and Crescent Place all operate one-way in a clockwise direction.) To ensure that such trucks do not cause unacceptable impacts at the intersection of Belmont and 16th Street, the Applicant has agreed to install signs directing trucks to only make right turns from Belmont Street onto 16th Street.

These restrictions were removed in the recent past, adding 4-5 additional street parking spaces.

Figure 5: Car and Truck Routing Plans

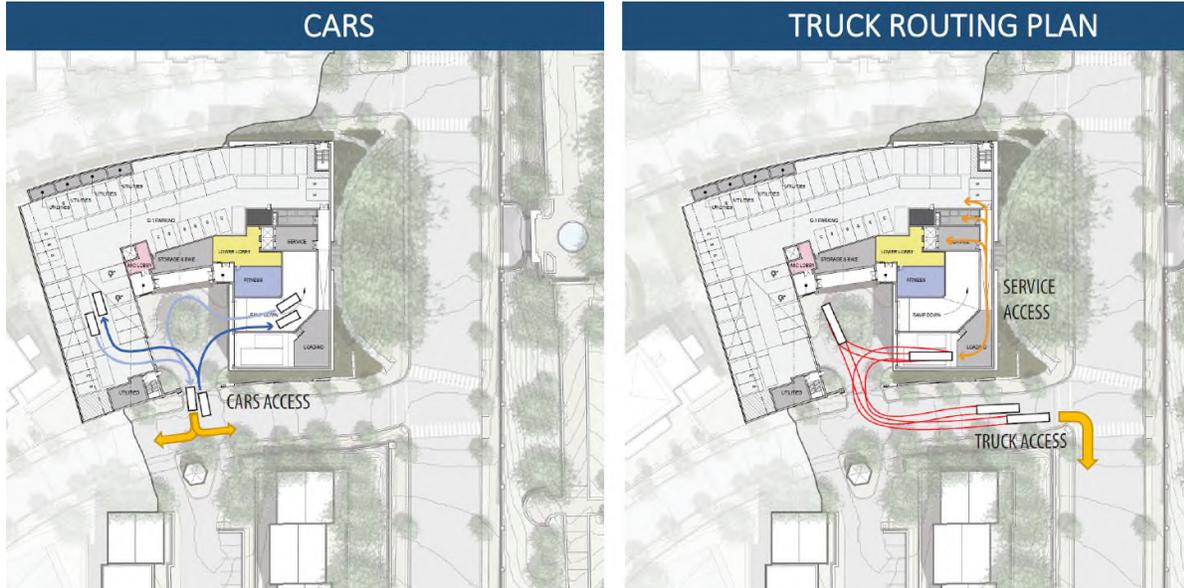
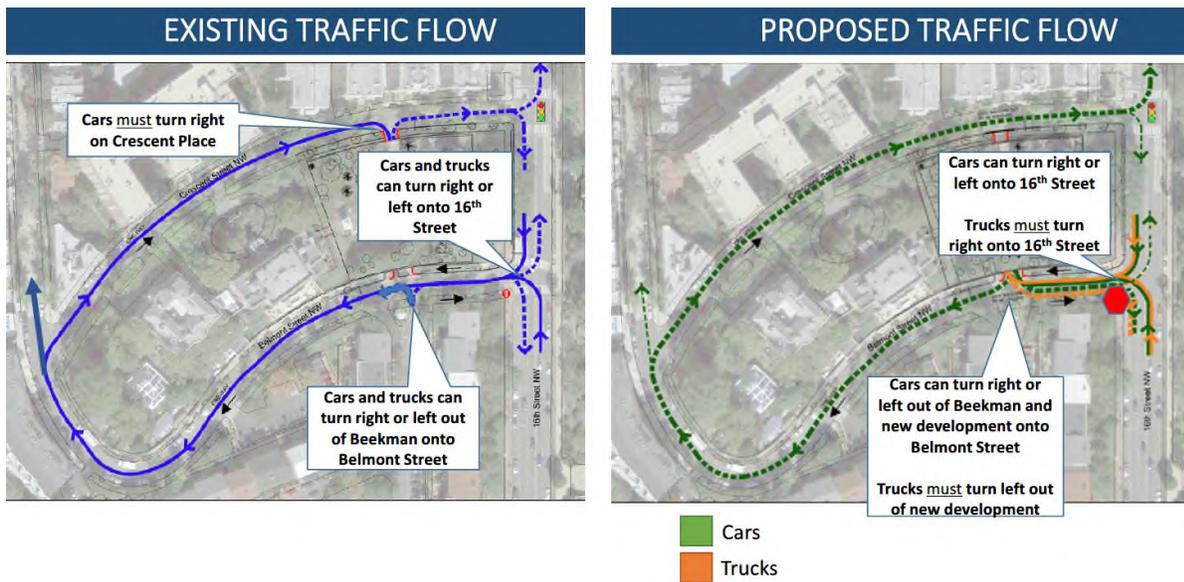


Figure 6: Traffic Circulation Patterns



Third, the location of the driveway on the two-way portion of Belmont Street will allow for departing vehicular traffic (other than larger trucks and shuttle buses) to disperse to multiple roadways. Cars may either turn left and head back out Belmont to 16th Street or turn right to proceed westward around the loop, and then either head north on 17th Street or east on Crescent

Place. By contrast, the current driveway location requires all departing traffic to use the intersection of Crescent Place and 16th Street.

Fourth, the Applicant's transportation study (Exhibit 23A in the Record) confirms that the limited additional traffic resulting from the Project will not impose any adverse impacts on any of the surrounding roadways or intersections due to traffic congestion, queuing, or safety. As part of the extensive dialogue with the community parties, the Applicant has proffered a series of improvements to the roadway network, many of which address existing conditions and concerns and will therefore represent an improvement over existing conditions and go well beyond the Applicant's obligation to mitigate objectionable impacts related to the private school modification. Specific improvements include:

- Belmont Street intersection: install signing and pavement markings to improve the visibility of pedestrians crossing Belmont Street; remove sidewalks across 16th Street; install "Do Not Block the Box" signing and pavement markings; install "No Left Turn from 7:00 AM to 9:30 AM and 4:00 to 6:30 PM" sign on Belmont Street.
- Belmont Street: install two-way traffic pavement markings along the two-way section of Belmont Street.
- 17th Street and Crescent Place intersection: install "No Trucks Over 7,000 lbs. Gross Vehicle Weight" signs to prohibit trucks traveling north on 17th Street.
- Crescent Place: install pavement markings approaching 16th Street identifying individual left and right turn lanes.
- Crescent Place intersection: install "Do Not Block the Box" signing and pavement markings.

In addition to the above improvements, the Applicant has also agreed to undertake a post-occupancy evaluation of the Project, focused on the Belmont and 16th Street intersection. The study will evaluate whether traffic volumes warrant a traffic signal, in which case the Applicant will request such a signal from DDOT and, if approved by DDOT, pay for the design and installation of the signal. Moreover, the Applicant has also agreed to request that DDOT install a signal detector at Belmont Street linked to the traffic signal at Crescent Place, which would help to create a gap in traffic on 16th Street to facilitate egress from Belmont Street. Finally, even if a signal is not warranted, the study will evaluate whether the Project has generated new trips at the intersection above the projected new trips in the Applicant's traffic study. If so, the Applicant will direct all vehicles exiting the driveway during the AM peak hour to turn right and proceed up to 17th Street or Crescent Place, rather than contribute additional trips at the Belmont and 16th Street intersection.

F. The Proposed Private School Modifications Are in Harmony With the General Purpose and Intent of the Zoning Regulations and Map

As with the zone boundary line special exception, the Regulations require that a private school special exception approval also meet the general criteria of Subtitle X: the proposed project is in harmony with the general purpose and intent of the Zoning Regulations and Zoning Map and will not tend to adversely affect the use of neighboring properties. Here, the proposed modifications will help Meridian to modernize and sustain its operations in furtherance of the Zoning Regulations, which specifically contemplate the presence of educational and institutional uses such as Meridian in residential zones and recognize the positive role such organizations play in promoting the general welfare. The proposed modifications will also decrease congestion and improve safety through improved traffic circulation patterns that disperse traffic throughout the neighborhood rather than concentrating it all on one intersection and better routing patterns that

eliminate the need for larger trucks and shuttle buses related to the Project to circulate through the neighborhood.

G. The Proposed Private School Modifications Will Not Tend to Adversely Affect the Use of Neighboring Property

Finally, the proposed private school modifications will not tend to adversely affect the use of neighboring property. As detailed above, the modifications will not impose objectionable conditions on the surrounding neighborhood due to noise, traffic, parking, number of people, or other conditions. Instead, the limited impacts of the Project—as well as existing conditions in the neighborhood—will be mitigated or otherwise improved through the extensive operational and design measures detailed above.

V. DESIGN CHANGES

Generally, the design of the proposed Project remains the same as submitted to the Board with the initial Application. However, the Applicant has made one modification to the design of the Project that is internal to the Campus. Under the submitted design, the lobby entrance to the Meridian space from within the Campus featured a door on the south side, exiting onto the new terrace and allowing ingress and egress from the White-Meyer House to the west. The Applicant proposes to locate the primary access point to the west of the lobby, facing White-Meyer. An additional set of doors will remain on the south side to provide access to the terrace. Revised elevations are attached as Exhibit F. The Applicant otherwise requests flexibility to modify the design based on comments and input from staff at the Historic Preservation Office as it proceeds through further historic preservation review during permitting.

VI. CONCLUSION

For all of the above reasons, the proposed Project merits special exception approval for the zone boundary line extension and the private school plan modifications. The Project meets the specific criteria for each special exception as well as the general standards for special exception approval.