

November 3, 2025

VIA IZIS

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

Re: **BZA Case No. 21389 – Saint Peter School - 422 3rd Street, SE**
Pre-Hearing Submission

Dear Chairman Hill and Members of the Board:

On August 29, 2025, Saint Peter School (“**Applicant**”) filed the above-referenced application for special exception and variance relief to permit the renovation and expansion of an existing private school located at 422 3rd Street, SE (Square 0793 Lot 0025) (“**Property**”). In advance of the December 3, 2025, public hearing on the subject application, the Applicant submits the enclosed supplemental information pursuant to Subtitle Y § 300.15.

I. Coordination with Advisory Neighborhood Commission 6B

Since submitting its initial application to the Board, the Applicant has continued to coordinate with neighbors, the community, and Advisory Neighborhood Commission (“ANC”) 6B. On October 15, 2025, ANC 6B voted to support the Applicant’s request. The Applicant is coordinating with ANC 6B to have the ANC’s resolution of support submitted to the case record in advance of the public hearing on the application.

II. Witnesses

The Applicant intends to present the following witnesses on its behalf at the public hearing:

- Karen Clay, Principal, Saint Peter School
- Sherry Rutherford, Principal, Rutherford
- Meagan Jancy, AIA, Principal, MTFA Design + Preservation
- Jami Milanovich, Principal, Wells + Associates
- Shane Dettman, Urban Planner, Goulston & Storrs

Outlines of witness testimony were submitted with the Applicant's initial statement, which are included in the case record at Exhibit 13. The Applicant intends to proffer Ms. Jancy as an expert in architecture and historic preservation, Ms. Milanovich as an expert in transportation planning, and Mr. Dettman as an expert in zoning and land use. Resumes for Ms. Jancy, Ms. Milanovich, and Mr. Dettman are attached as **Exhibit A**.

III. Conclusion

We look forward to presenting the Project to the Board at the December 3, 2025, public hearing. Please do not hesitate to contact the undersigned with any questions.

Respectfully Submitted,

/s/ Jeff Utz
Jeff Utz

Enclosure

Certificate of Service

The undersigned hereby certifies that copies of the foregoing prehearing statement and related exhibits were delivered by electronic mail to the following on November 3, 2025

Joel Lawson
Office of Planning
899 N. Capitol Street, NE, Suite 7100
Washington, DC 20024
joel.lawson@dc.gov

Erkin Ozberk
District Department of Transportation
55 M Street, SE, 4th Floor
Washington, DC 20003
Erkin.ozberk@dc.gov

ANC 6B
6b@anc.dc.gov

Tyler Wolanin, SMD 6B01
6b01@anc.dc.gov

/s/ Shane L. Dettman

Shane L. Dettman

EXHIBIT A

EXPERT WITNESS RESUMES

MEAGAN W. JANCY, AIA, LEED AP BD+C

PROJECT MANAGER, SUSTAINABILITY LEAD



ABOUT MEAGAN

Meagan brings over two decades of experience leading interdisciplinary design teams through complex projects that prioritize community impact, sustainability, and design excellence. As a Principal and project leader, she is known for her ability to guide teams through every phase of a project, from early visioning and stakeholder engagement to technical documentation and construction administration, with a balance of strategic foresight and hands-on detail.

With a strong foundation in both design and building systems integration, Meagan leads with clarity and purpose, ensuring that each project reflects the client's goals, exceeds performance expectations, and supports long-term resilience. As Project Manager and Sustainability Lead, she will oversee the full scope of design documentation and delivery, including coordination of consultants, quality control, technical detailing, and construction close-out, while fostering a collaborative process that empowers her team and engages the client at every step.

EDUCATION

Master of Architecture and
Bachelor of Science in Architecture
The Catholic University of America

LICENSE AND REGISTRATION

Registered Architect (RA)
DC / MD / VA

LEED Accredited Professional (AP)
Building Design and Construction
(BD+C)

PROFESSIONAL AFFILIATIONS



American Institute
of Architects (AIA), Member

AIA, VA Chapter, President

AIA, NOVA Chapter, Past President

US Green Building Council, Member

National Council of Architectural
Registration Board, Member

SPECIAL COMPETENCIES

Strong working relationship with Fairfax
County Public Schools building officials

K-12 Education Design

Sustainability Design, LEED and CHPS

Project Management

Programming

Quality Control

Code Analysis and Implementation

Technical Detailing

ADA and Accessibility

Renovation Logistics and Phasing

Consensus Building, Collaboration

Construction Contract Management

SAMPLING OF RELEVANT PROJECTS

Fairfax County Public Schools (FCPS)

Clermont Elementary School, Addition & Renovation	Alexandria, VA
Crestwood Elementary School, Addition & Renovation	Springfield, VA
Dranesville Elementary School, Addition & Renovation	Herndon, VA
Fox Mill Elementary School, Addition & Renovation	Herndon, VA
Hollin Meadows Elementary School, Addition & Renovation	Alexandria, VA
Langley High School, Addition & Renovation	McLean, VA
Beech Tree Elementary School, Addition & Renovation	Falls Church, VA

Arlington County Public Schools (APS)

Long-Range Renovation Study	Arlington, VA
Drew Elementary School, Addition & Renovation	Arlington, VA

Loudoun County Public Schools (LCPS)

High School Prototype Design	Loudoun County, VA
Middle School Prototype Design	Loudoun County, VA
Metro School, Prototype Design	Loudoun County, VA
Brambleton Middle School, New Construction	Ashburn, VA
Hartland Campus Master Plan, Study	Leesburg, VA
Lightridge High School, New Construction	Aldie, VA
Loudoun Advanced Technology Academy, Study	Leesburg, VA
Mercer Middle School, Addition	Aldie, VA
Willard Middle School, New Construction	Aldie, VA

Montgomery County Public Schools (MCPS)

Burnt Mills Elementary School, New Construction	Silver Spring, MD
Burtonsville Elementary School, New Construction	Burtonsville, MD
St. John Paul the Great Catholic High School, New Construction	Dumfries, VA
St. Peter School, Master Plan, Addition & Renovation	Washington, DC
The Sheridan School Master Plan, Renovation, & Addition	Washington, DC
Gallaudet University Merrill Learning Center, Renovation & Addition	Washington, DC
James Madison University, Spotswood Hall Modernization	Harrisonburg, VA

Jami L. Milanovich, P.E. Principal

Ms. Milanovich is a registered professional engineer with over 30 years of experience in a wide range of traffic and transportation projects including: traffic impact studies, corridor studies, parking analyses, traffic signal design, intersection improvement design, and signing and pavement marking design. Over the past 22 years, Ms. Milanovich has worked primarily in the District of Columbia on a multitude of mixed-use, residential, institutional, and office projects throughout the City. A sampling of her school-related projects is included below.

SCHOOLS AND DAYCARES

THE MARET SCHOOL, WASHINGTON, D.C.: Maret proposes to construct off-campus ball fields near the intersection of Nebraska and Utah Avenues in the Upper Chevy Chase neighborhood. A Special Exception was sought to permit a private school use in a residential zone and to allow parking within the front yard. In conjunction with the Special Exception application, Ms. Milanovich and her team prepared a Comprehensive Transportation Review (CTR) that evaluated the impact of the traffic generated by the ball fields on the surrounding roadway network. The CTR also included a parking study on the surrounding streets to determine the ability of the streets to accommodate potential overflow parking. Ms. Milanovich and her team also developed a Transportation Management Plan that identified strategies to reduce vehicular trips and an Operations Management Plan that identified protocols for promoting the safe and efficient flow of traffic to, from, and within the site.

Ms. Milanovich provided expert testimony before the Board of Zoning Adjustment (BZA). The BZA voted to approve the application in April 2022.

THE RIVER SCHOOL, WASHINGTON, D.C.: The River School proposes to relocate from its current location on MacArthur Boulevard to a new location at the intersection of Nebraska Avenue and Van Ness Street in the AU Park neighborhood of Washington, D.C. As part of the relocation, the River School proposes to expand its mission to include grades 4 through 6 in its curriculum. Ms. Milanovich and her team prepared a CTR that included an analysis of the traffic impact of the school on the surrounding roadway network and a detailed queuing analysis that demonstrated how the school's pick-up/drop-off operation would be accommodated on site without the use of public streets. The CTR also included a comprehensive Transportation Management Plan that included the following components: a Transportation Demand Management Plan, an Operations Management Plan, a Performance Monitoring Plan, and physical roadway improvements.



EDUCATION

Master of Engineering; The Pennsylvania State University (2000)
Bachelor of Science – Civil Engineering (With Distinction); The Pennsylvania State University (1995)

SPECIALTIES

Comprehensive Traffic Studies
Traffic Impact Studies
Parking Studies
Corridor Analyses
Loading Management Plans
Site Access Studies
Expert Testimony

PROFESSIONAL REGISTRATIONS

Registered Professional Engineer:
Washington, D.C.
Virginia
Maryland
Pennsylvania
West Virginia

PROFESSIONAL AFFILIATIONS

Institute of Transportation Engineers

Ms. Milanovich provided expert testimony before the Board of Zoning Adjustment (BZA). The BZA approved the application in November 2021.

SIDWELL FRIENDS SCHOOL, WASHINGTON, D.C.: Sidwell Friends School proposes to relocate its Lower School from its current location in Bethesda to its Upper/Middle School campus on Wisconsin Avenue in the Cleveland Park neighborhood of Washington, D.C. Ms. Milanovich and her team prepared a preliminary assessment of traffic operations to identify strategies to accommodate the Lower School traffic on the Wisconsin Avenue campus. Data was collected on both campuses to determine trip generation rates, pick-up/drop-off queues, and parking occupancy. W+A determined that the relocation of the Lower School would require improved pick-up/drop-off operations and proposed conceptual pick-up/drop-off area designs as well as more efficient procedures that would accommodate the increase in traffic.

Following the preliminary assessment, Ms. Milanovich met with several community working groups and neighbors to address their concerns related to traffic. A strong commitment to a robust Transportation Demand Management (TDM) plan and Monitoring Plan as well as relocating pick-up/drop-off operations for the Middle School from a public street to a location on campus helped Sidwell ultimately gain the active community's support.

A substantial Comprehensive Transportation Review (CTR) was also prepared for review by the District Department of Transportation (DDOT). The CTR included detailed assessments of multi-modal site access and circulation, the five pick-up/drop-off locations, existing and anticipated loading needs, intersection operation with the proposed TDM plan and Middle School pick-up/drop-off relocation, Wisconsin Avenue corridor operations, and transportation solutions proposed by the community to address existing traffic issues. W+A also conducted a mode split survey of parents and teachers to determine their travel characteristics.

Ms. Milanovich provided expert testimony before the Board of Zoning Adjustment (BZA). The BZA approved the Lower School relocation and subsequent student and staff cap increases in March 2016.

GEORGETOWN DAY SCHOOL, WASHINGTON, D.C.: Georgetown Day School consolidated its Lower, Middle, and High Schools on its Wisconsin Avenue campus in the Friendship Heights neighborhood of Washington, D.C. Ms. Milanovich and her team prepared a Comprehensive Transportation Review (CTR), which included a detailed assessment of a new driveway on River Road, a detailed evaluation of site access and circulation, including three proposed pick-up/drop-off locations, and intersection operation surrounding the campus.

Ms. Milanovich presented the results of the traffic study and the proposed transportation plan for the consolidated campus to various community groups. She also provided expert testimony before the Board of Zoning Adjustment (BZA). The BZA approved the campus consolidation in December 2017.

THE BRITISH SCHOOL OF WASHINGTON, WASHINGTON, DC: Ms. Milanovich worked with the British School to evaluate the school's current transportation operations and to project future traffic and parking demands for the school based on the school's proposed expansion plans. Ms. Milanovich and her team presented their findings to the school and provided recommendations to improve capacity in order to more efficiently process the school's drop-off/pick-up operation. Ms. Milanovich also prepared a

comprehensive transportation survey geared for students, parents, and faculty/staff. Using the results of the survey, Ms. Milanovich made recommendations to the school to reduce their vehicular demand.

SCHOOL FOR FRIENDS, WASHINGTON, D.C.: Ms. Milanovich oversaw the completion of a Transportation Assessment for School for Friends in the West End neighborhood of Washington, D.C. The study assessed the impacts of proposed student and faculty/staff cap increases on the surrounding road network as well as the pick-up/drop-off operations of the school. Parking occupancy counts, a mode split survey, and field observations were conducted to determine if the school's existing facilities could accommodate the additional parking demand associated with the cap increases. The Board of Zoning Adjustment approved the project in February 2015.

SHERIDAN SCHOOL, WASHINGTON, D.C.: Ms. Milanovich was responsible for the preparation of a transportation assessment of the Sheridan School in support of the school's renewal of their special exception approval. In conjunction with the special exception application, Sheridan sought a nominal increase in its enrollment cap from 226 to 230 students. The transportation assessment included an inventory of alternative transportation modes in the vicinity of the school, a description of the school's transportation operations, a summary of the school's Transportation Demand Management Plan, the anticipated increase in trip generation under the proposed student cap, and an assessment of vehicle queues on 36th Street during the AM drop-off period. The special exception application was approved by the Board of Zoning Adjustment in April 2014.

ST. PATRICK'S EPISCOPAL DAY SCHOOL, WASHINGTON, D.C.: Ms. Milanovich was responsible for the preparation of the traffic study prepared in conjunction with St. Patrick's Special Exception application, which requested an increase in enrollment from a cap of 440 students to a cap of 485 students at the school's Whitehaven Campus. As part of the traffic study, pedestrian and bicycle facilities on and around campus were evaluated. A detailed evaluation of the pick-up/drop-off area also was conducted. Ms. Milanovich provided expert witness testimony before the Board of Zoning Adjustment (BZA), which approved the project in December 2012.

ST. PATRICK'S MIDDLE/HIGH SCHOOL, WASHINGTON, DC: Ms. Milanovich was responsible for the preparation of the traffic study conducted in conjunction with St. Patrick's plans to develop a new 120-student middle school, 320-student high school, and 27 new single family homes at 1801 Foxhall Road. The purpose of the traffic study was to evaluate the impacts on the adjacent Colony Hill residential neighborhood. As part of the study, a Transportation Management Plan was developed and improvements on Foxhall Road were recommended. The project was approved by the BZA in November 2006.

SCHOOL WITHOUT WALLS, WASHINGTON, DC: Ms. Milanovich was responsible for the preparation of a traffic impact study for the proposed renovation of the School Without Walls, which included modernization and expansion of the existing building to accommodate an increase in enrollment of 100 students as well as a new residence hall for George Washington University on the existing parking lot for the School. Ms. Milanovich provided expert testimony before the Zoning Commission, which approved the project on December 11, 2006.

SHANE L. DETTMAN



EDUCATION

State Univ. of New York at Buffalo
M.U.P. – Urban Planning

State Univ. of New York at Buffalo
B.S. – Environmental Science

AREAS OF EXPERTISE

Comprehensive planning | zoning
and land use | environmental and
historic preservation analysis
and compliance

AFFILIATIONS

American Planning Association

Urban Land Institute

D.C. Building Industry Association

- Co-Lead, DC Agency Working Group, Office of Planning
- Co-Chair, IZ Plus / XL Working Group
- Exec. Committee Member, Comprehensive Plan Amendment Working Group

Lambda Alpha International Society,
Member

PROFESSIONAL BACKGROUND

Shane has over twenty years of public and private sector experience working in urban planning, land use, and zoning. He is currently an Urban Planner at Goulston & Storrs, P.C., Washington, DC office. Prior to entering the legal industry, Shane worked at the National Capital Planning Commission (NCPC), the federal government's central planning agency in the National Capital Region. Shane is a former NCPC representative, and vice chairperson, of the District of Columbia Board of Zoning Adjustment. He is currently an adjunct professor teaching land use controls and legal foundations of planning at the Georgetown University, School of Continuing Studies, Real Estate and Urban Planning program, and has been a guest lecturer on the topics of urban policy and community development at American University.

EXPERIENCE

Goulston & Storrs, P.C.
Urban Planner (Jul 2022 – Present)

Holland & Knight LLP
Director of Planning Services (Feb 2015 – Jun 2022)

Notable projects: Southwest Waterfront / The Wharf PUD, McMillan Reservoir PUD, Children's National Research and Innovation Center at Walter Reed zoning map and text amendment, Barry Farm zoning map and text amendment, Cotton Annex design review and federal interest review, Johns Hopkins Pennsylvania Avenue redevelopment federal interest review, Bridge District design review, Takoma Park Metrorail PUD.

National Capital Planning Commission (NCPC)
Director, Urban Design and Plan Review (Jun 2014 – Feb 2015)
Senior Urban Planner (May 2010 – Jun 2014)
Urban Planner (Dec 2001 – May 2010)

Notable projects: *Monumental Core Framework Plan; Comprehensive Plan for the National Capital*; Old Post Office Rehabilitation; Dwight D. Eisenhower Memorial, Martin Luther King, Jr. Memorial; Martin Luther King, Jr. Library Renovation.

District of Columbia Board of Zoning Adjustment
NCPC Representative / Vice Chairperson (Sept 2007 – Sept 2010)

Georgetown University, Real Estate and Urban Planning Program
Adjunct Professor (Jan 2021 – Present)