



January 23, 2026

VIA IZIS

Meridith H. Moldenhauer

Direct Phone 202-747-0763
Direct Fax 202-683-9389
mmoldenhauer@cozen.com

Zachary Bradley

Direct Phone 202-280-6451
Direct Fax 202-742-2531
zbradley@cozen.com

Carl H. Blake
Vice Chairperson
Board of Zoning Adjustment
441 4th Street NW, Suite 200S
Washington, D.C. 20010

Re: BZA Case No. 21400
Applicant's Supplemental Statement

Vice Chairperson Blake and Honorable Members of the Board:

This Supplemental Statement is submitted on behalf of the Aidan Montessori School (the "Applicant") to respond to recent letters of opposition filed into the record and to apprise the Board of recent communications between the Applicant and the Office of Planning ("OP"). The Applicant has also enclosed a Motion to Late File this supplemental material, which is included as **Tab A**. The hearing in this matter is scheduled for February 4, 2026, and pursuant to Subtitle Y § 300.15, all materials were required to be filed by the Applicant at least 30 days in advance, or by January 5, 2026. The Applicant respectfully submits that there is good cause for the Board to accept this late filing, as it will assist the Board by ensuring that it has the most current and complete record prior to the hearing as the supplemental materials address developments in the record that have occurred following the Applicant's submission deadline.

A. Communications With OP

On January 12, 2026, OP contacted Counsel for the Applicant requesting additional information to support the required showing that the asserted practical difficulties are the proximate cause of the zoning relief sought for the Project. The Applicant submits that the Project has two related but distinct goals: to modernize the building to better support the school's educational programming and to increase ADA-accessible space throughout the building, not just at the entrance, although that is a critical need. The new space on the first floor includes an ADA-accessible lobby and circulation area, which improves access into and through the building. Currently the only ADA-accessible entrance is around the side of the school building and directly through a classroom, creating an unwelcoming and disruptive condition that the proposed improvements are intended to correct. On the second floor, the project allows the school to add

and upgrade restrooms so that classrooms have access to ADA-compliant toilet facilities, which they do not have today. On the third floor, there are currently no classroom-serving toilets, and the project adds shared toilet facilities for the two classrooms on that level, including an ADA-accessible toilet. In addition to these ADA improvements, the project includes general modernization work across all levels of the building to update layouts, building systems, and functionality in support of the school's programming. Given the constrained site and the limitations imposed by the existing building footprint, providing required ADA-accessible services necessitates the reconfiguration of interior space and floor area in a manner that also supports the school's programmatic needs. From an economies-of-scale perspective, addressing both modernization and accessibility improvements through a single, coordinated project is more efficient, minimizes construction disruption, and allows the school to meet current and future needs without sacrificing existing instructional or programmatic space.

B. Recent Comment's Filed Into the Record

Since the Application was filed, additional written comments have been entered into the record. *See* Ex. 16, 19, 20, and 21. These submissions generally raise concerns regarding enrollment, alley safety and sightlines, sufficiency of playground area, and traffic generated during pick-up and drop-off operations. The Applicant values the comments submitted into the record and offers the following clarifications to ensure that the hearing remains focused on the relief requested.

Enrollment. Several comments reference enrollment levels and the 1995 agreement between the school and the ANC. The zoning history of the site provides relevant context. In 1963, the Board of Zoning Adjustment issued Order no. 7184, approving a special exception to permit a school and convent on the property with a maximum enrollment of up to 240 students. *See* Ex 6 at Tab B. In 1995, Aidan took over the property, continued operation as a school use pursuant to a 1994 letter from the Zoning Administrator confirming the use was consistent with the prior order. *See* Ex 6 at Tab B. In 1995, the school also entered into an agreement with the ANC that referenced a maximum enrollment of 180 students. *Id.* In 2005, the school initiated a BZA case seeking to reduce the maximum permitted enrollment but later withdrew that application. *See* BZA Case No. 17342. The school's current enrollment is 147 students. The Application does not seek approval for enrollment in excess of levels historically permitted for the site. In response to concerns raised in the written comments and to provide clarity going forward, the Applicant is willing, as part of this Application, to consent to a condition limiting enrollment to 180 students.

Alley Sightlines and Traffic. Other comments raise concerns regarding sightlines and safety at the alley exit onto 27th Street. The existing monumental stair currently creates a physical and visual obstruction at the alley mouth, where vehicular movements, pedestrian activity, and student circulation occur in close proximity. The Project proposes removal of this stair, which would restore clear sightlines for drivers exiting the alley, pedestrians traveling along 27th Street. Eliminating this obstruction would reduce potential conflicts among vehicles and pedestrians and materially improve safety conditions at the alley exit.

From a traffic management perspective, elimination of the stairs would streamline pick up and drop off operations by removing the need to move kids to climb up and down large steps. In

addition, other exterior improvements, including the sunken bleachers and the courtyard area outside the lobby, would expand on-site outdoor queuing space, allowing students to wait safely on the property and closer to the pick-up location. These changes are expected to improve operational efficiency while reducing congestion and conflicts in the public right-of-way.

Playground Area. Finally, the written comments also address the amount of available outdoor play space. The Project would result in a total of 4,336 square feet of usable play area, consisting of a 3,574-square-foot playground and a 762-square-foot Lower Plaza that will function as an extension of the playground. While this represents a net reduction of 144 square feet from the existing 4,480-square-foot playground, the overall play area remains substantial and would provide approximately 29.5 square feet of play space per student based on current enrollment. Additionally, in practice, students use the playground in staggered groups rather than simultaneously, such that the full enrollment is not present in the play area at any one time. The proposed configuration therefore provides adequate and functional outdoor play space for the school's operational needs.

The Applicant looks forward to presenting this Application to the Board of Zoning Adjustment on Feb 4, 2026. Thank you for your attention to this matter.

Sincerely,

COZEN O'CONNOR

A handwritten signature in blue ink, appearing to read 'M. Moldenhauer', written over a horizontal line.

Meridith Moldenhauer

A handwritten signature in blue ink, appearing to read 'Z. Bradley', written over a horizontal line.

Zachary Bradley

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of January, 2026 a copy of the foregoing cover letter with exhibits and motion was served, via electronic mail, on the following:

District of Columbia Office of Planning
1100 4th Street SW, Suite E650
Washington, DC 20024
planning@dc.gov

Advisory Neighborhood Commission 3C
Janell Pagats, SMD 3C03, Chairperson
Gawain Kripke, SMD 3C07, Treasurer
3C03@anc.dc.gov
3C07@anc.dc.gov



Zachary Bradley

Tab A



BEFORE THE ZONING COMMISSION OR
BOARD OF ZONING ADJUSTMENT FOR THE DISTRICT OF COLUMBIA



FORM 150 – MOTION FORM

THIS FORM IS FOR PARTIES ONLY. IF YOU ARE NOT A PARTY PLEASE FILE A
FORM 153 – REQUEST TO ACCEPT AN UNTIMELY FILING OR TO REOPEN THE RECORD.

Before completing this form, please review the instructions on the reverse side. Print or type all information unless otherwise indicated. All information must be completely filled out.

CASE NO.:

Motion of:

☐ Applicant

☐ Petitioner

☐ Appellant

☐ Party

☐ Intervenor

☐ Other _____

PLEASE TAKE NOTICE, that the undersigned will bring a motion to:

Points and Authorities:

On a separate sheet of 8 ½" x 11" paper, state each and every reason why the Zoning Commission (ZC) or Board of Zoning Adjustment (BZA) should grant your motion, including relevant references to the Zoning Regulations or Map and where appropriate a concise statement of material facts. If you are requesting the record be reopened, the document(s) that you are requesting the record to be reopened for must be submitted separately from this form. No substantive information should be included on this form (see instructions).

Consent:

Did movant obtain consent for the motion from all affected parties?

☐ Yes, consent was obtained by all parties

☐ Consent was obtained by some, but not all parties

☐ No attempt was made

☐ Despite diligent efforts consent could not be obtained

Further Explanation: _____

CERTIFICATE OF SERVICE

I hereby certify that on this

D

D

day of

Month

,

Y

Y

Y

Y

I served a copy of the foregoing Motion to each Applicant, Petitioner, Appellant, Party, and/or Intervenor, and the Office of Planning

in the above-referenced ZC or BZA case via:

☐ Mailed letter

☐ Hand delivery

☐ E-Mail

☐ Other _____

Signature:

Print Name:

Address:

Phone No.:

E-Mail: