

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

Application of Maret School
ANC 3C

STATEMENT OF THE APPLICANT

This is the application of Maret School ("**School**" or "**Applicant**") for a special exception to allow the continuation of an existing independent school operating at 3000 Cathedral Avenue NW (Square 2113, Lot 843) (the "**Property**"). The Property is included in the R-1-B and R-3 Zone Districts.

I. NATURE OF RELIEF SOUGHT

The Applicant requests that the Board of Zoning Adjustment (the "**BZA**" or the "**Board**") approve a special exception pursuant to Subtitle X § 104 of the Zoning Regulations (11-X DCMR § 104) for the continuation of a private K-12 school. The School requests approval without a term and without a reporting requirement as well as an approval for a small change to a previously-approved expansion of one of its buildings. All other aspects of the School and conditions will remain as previously approved.

II. JURISDICTION OF THE BOARD

The Board has jurisdiction to grant the relief requested pursuant to Subtitle X § 900.1 and Subtitle Y § 100.3 of the Zoning Regulations (11-X DCMR § 900.1 & 11-Y DCMR § 100.3).

III. DESCRIPTION OF THE PROPERTY AND SURROUNDING AREA

The Property is located in the Woodley Park neighborhood of Ward 3, at what was previously known as the Woodley Estate. The Maret School campus is situated on the south side of Cathedral Avenue but also has frontage on Garfield Street to the south. The campus contains approximately 7.9 acres of land area. The Swiss Confederation is to the east of the Property, and residential uses are to the west.

The Property is improved with the main house, Woodley, at its center, and accessory buildings and outdoor recreation/athletic areas are dispersed throughout the campus. The Woodley is the main building containing administrative offices. Academic buildings are located to the west of the Woodley building, and stables and an old cottage are located west of the academic buildings. Activities and athletic buildings, which also contain some classrooms, are located to the southeast of the Woodley building. Athletic fields are located south of the Woodley and academic buildings and west of the activities and athletic buildings. The north side of the campus contains mostly surface parking and green space.

The entire campus is listed as an individual landmark in the D.C. Inventory of Historic Sites. The main house (Woodley), cottage, and carriage house/stable are considered contributing buildings to the landmark.

The properties surrounding the Property are characterized primarily by residential uses and some institutional uses. Single-family houses are located to the north, west, and south of the Property. Row houses and apartment buildings are located further afar across 29th Street to the east toward Connecticut Avenue.

IV. SCHOOL BACKGROUND

Maret School was founded in 1911 by Louise Maret, a Swedish-born teacher educated in the United States, as a private, independent college preparatory school for girls. In 1952, Maret School relocated to its present site. Today, Maret educates students in kindergarten through 12th grades in a lower school, a middle school, and an upper school on its Woodley Park campus.

Maret School is well-known throughout the region for its rigorous academic program, innovative teaching methods, and high standards of excellence. The School emphasizes interdisciplinary approaches in education and stresses student independence, responsibility, and community service as integral components to the learning process. The low student to teacher ratio provides students with the individualized attention to pursue their goals and reach their fullest potential. Maret also believes that it is important to lead by example, which is one reason why Maret has become actively involved in multiple “green” programs, including the Green Flag Program, Environmental Spirit Week, the green film festival, sustainable dining, and sustainable facilities.

Maret also has taken steps to consider itself a District of Columbia school and attempts to reflect its community with regard to the diversity of its population. Its mission includes ensuring that a high percentage of its students and faculty are District residents, with a strong cultural, ethnic, and racial diversity to reflect the broader community. The School provides approximately \$1,800,000 in financial aid to District children. Approximately 62% of its current student families and 49% of its current faculty and staff are District residents. The School also takes a very active role in the community and participates in many activities to ensure that it is being a good neighbor.

V. HISTORY OF MARET SCHOOL'S APPROVALS

Maret School was first authorized to operate a private school at the Property in 1952 pursuant to BZA Order No. 2960. The maximum enrollment permitted for the School was 300 students. Maret returned to the Board in 1968 for authorization to construct a new arts and science building and to reserve the main house (Woodley) for library use and administrative offices. Enrollment was increased to 400 students, plus 35 teachers and 16 staff members, pursuant to BZA Order No. 9594. Phase H of the Arts and Science Building was approved in 1979 by Order No. 12821. BZA Order No. 14300 approved another classroom and gymnasium and an increase in enrollment to 500 students with a faculty/staff cap of 75. In 1991, Maret School secured approval for and constructed a school bus garage and equipment storage facility pursuant to BZA Order No. 15527. Then, pursuant to BZA Order No. 16313, Maret received approval to replace the lower school building and swimming pool with a new classroom facility, to construct multiple other additions, to reconfigure its parking areas, to increase enrollment to 600 students, and to increase the faculty and staff count to 125. Then, pursuant to BZA Order No. 17826A, the School received approval to increase its student enrollment cap to 635 and its faculty/staff cap to 129.

Finally, in 2014, pursuant to Order No. 18715 (a copy of which is attached), the BZA approved the expansion of student enrollment to 650 and faculty/staff count to 135. The BZA also approved the addition of new academic, administrative, and academic space to existing buildings. Following a request from DDOT, the BZA Order included several conditions pertaining to the mitigation of transportation impacts. In particular, the Order included a cap of 772 automobile trips in the morning peak hour, a robust transportation demand management (“TDM”) plan, and a requirement for an annual submission of a report to DDOT describing trip

and other transportation data. The Order also included an approval term of three years to assess whether the School is maintaining the number of trips within the cap. That approval expires on March 7, 2017.

VI. PROPOSED PROGRAM

Other than a modification to a previously-approved expansion of its athletic facilities, the School does not plan any changes to its population, facilities, or operations and will remain as approved in Order No. 18715. The School will maintain its student enrollment cap and its faculty/staff count approved in 2014. The School's transportation operations, including the TDM plan, also will remain as approved in 2014. Since the transportation operations are working as expected, the School proposes the removal of two of the previous conditions. Accordingly, the School proposes that the Board retain all of the conditions in Order No. 18715 *except* no. 1 (term of approval) and no. 3 (annual report to DDOT) and approve the School without a term and without an annual reporting requirement.

The proposed facilities modification is to the approved addition on the South Activities Building, as shown on the included plans. In Order No. 18715, the BZA approved a one-story addition containing approximately 3400 square feet to the southern side of the building to provide a new weight room and workout facilities for students.

The School now proposes a one-story addition to the South Activities Building in the same location as the prior approval but that is smaller and differently configured. The modified addition will contain approximately 2000 square feet and will have a smaller footprint to increase the separation from the south property line and the neighboring properties. The addition will contain team rooms and athletic storage. The roof of the addition will contain mechanical equipment with screening around the equipment.

The School also proposes a small one-story addition of approximately 480 square feet for a lobby on the west side of the same South Activities Building. This lobby addition will essentially be an infill of an open porch on the second floor of the building. The lobby will provide a larger entrance and gallery for the School's athletic center.

V. THE APPLICATION MEETS THE REQUIREMENTS FOR SPECIAL EXCEPTION RELIEF FOR A PRIVATE SCHOOL

A private school is permitted in the R-1-B and R-3 Zone Districts by special exception when the applicant demonstrates the following: (1) it is located so that it is not likely to become objectionable to adjoining and nearby properties because of noise, traffic, number of students, or otherwise objectionable conditions; and (2) it will not tend to affect adversely the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps.

A. The Applicant will not Create Objectionable Impacts on Neighboring Properties

Maret School has existed on the Property 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 latest 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.

Also, the small additions on the South Activities Building will not create objectionable impacts on neighboring properties. The 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 minimus* in size and secluded in location that it will not create any sort of noise or visual impact on neighboring properties.

The primary issue in the prior approval was the 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 mitigating the number of trips to below the limit 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 this application and shows the success of the School's transportation operations. Indeed empirical data is the best predictor of future conditions. 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.

B. The Proposed Expansion is Harmony with the General Purpose and Intent of the Zoning Regulations

The requested special exception relief for a private school can be granted without impairing the general purpose and intent of the Zoning Regulations and will not tend to

adversely affect neighboring properties. But for a small change, the School will maintain what the Board approved three years ago. In those three years (plus many more before that), the School operated without adversely affecting the neighborhood. The proposed addition will be modest and will not create adverse impacts. Accordingly, approval of the School without a term and without a reporting requirement will not cause objectionable conditions from noise, traffic, or number of students, so the requested special exception will satisfy the standards stated in the Zoning Regulations. Therefore, the proposed expansion of the School will be consistent with the general purpose and intent of the Zoning Regulations and Zoning Maps.

VII. LIST OF PUBLICLY AVAILABLE DOCUMENTS

1. Zoning Regulations and Zoning Map of the District of Columbia, available at dcoz.dc.gov.
2. Orders of the District of Columbia Zoning Commission and Board of Zoning Adjustment, available at dcoz.dc.gov.

VIII. CONCLUSION

For all of the above reasons, this application satisfies the standards for special exception relief in this case.

Respectfully submitted,
GOULSTON & STORRS, PC

_____/s/_____
Cary Kadlecek