

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

**APPLICATION OF
D.C. DEPARTMENT OF GENERAL SERVICES**

ANC 5B

STATEMENT OF THE APPLICANT

I. NATURE OF RELIEF SOUGHT

This statement is submitted on behalf of the Applicant, D.C. Department of General Services (the “Applicant”), as the implementing agency for D.C. Public Schools (“DCPS”) and owner of the property located at 1820 Monroe Street NE (Square 4203, Lot 1) (the “Property”), in support of its application for variance relief for multiple primary structures on one record lot (Subtitle C § 302.2) to construct a modular trailer “swing space” in the R-1B zone.

II. JURISDICTION OF THE BOARD

The Board of Zoning Adjustment (the “Board”) has jurisdiction to grant the variance relief requested herein pursuant to Subtitle X § 1000.1 of the Zoning Regulations.

III. BACKGROUND

A. The Property and the Surrounding Neighborhood

The Property is located in the R-1B Zone District and is a large rectangular lot of approximately 236,990 sq. ft. A copy of the Zoning Map is attached at **Tab A**. The Property is improved with the John Burroughs Elementary School building (the “School Building”), a D.C. public school, constructed in the 1920’s. The School Building is located on the western side of the Property. The eastern side of the Property is dedicated to a surface parking lot, a playground and open green space.¹ The Property occupies all of Square 4203 and is circumscribed by public

¹ The open green space is approximately 90,730 sq. ft. in land area.

rights-of-way: Monroe Street NE to the south, 20th Street NE to the east, Newton Street NE to the north and 18th Street NE to the west.

The Property is located in the Brookland neighborhood. The surrounding area is primarily improved with single-family residential homes. There is also a small swath of commercial uses to the west of the Property on 18th Street NE. The Property is not in an historic district, and the School Building is not a designated landmark. Nonetheless, the Applicant's team is working with the D.C. Historic Preservation Office ("HPO"), which has indicated that the School Building is intended to be historically designated in the near future.

B. Traffic Conditions and Mass Transit

The Property is well-served by Metrobus, with stops for Lines G8 and E2 directly abutting the Property. Additionally, the Brookland Metrorail Station is 0.8 miles to the west of the Property. There is a Capital Bikeshare station within a block of the Property as well.

C. The Project

The Applicant is conducting a renovation and modernization of the School Building that will include a new addition on the western side of the building.² In order to provide space for students during the renovation, the Applicant also proposes to construct a modular trailer "swing space" campus (the "Swing Space") on the eastern side of the Property. A copy of the architectural plan set is attached at **Tab B**. As described below, zoning relief is required in order to have multiple primary structures on one record lot in the R-1B zone.

The Swing Space consists of five modular trailers, one tensile structure (bubble) (multi-purpose space) and a concrete masonry structure for the electrical switchgear building that will have a total of 44,820 sq. ft. of gross floor area. Four of the five trailers will be dedicated to

² The school renovation will also include façade work, new playground space and other site improvements. However, no zoning relief is needed for the school renovation itself.

classrooms and support space and one trailer will be a kitchen. There will also be a canopy and walkway that is constructed to provide a path between each modular trailer. The Swing Space buildings will not disrupt the existing playground and parking lot located adjacent to the School Building's eastern façade. There will be approximate area of 10,770 sq. ft. along the northern lot line will remain open and usable green space and an enclosed fenced traffic garden.

The Swing Space and School Building will comply with all zoning standards in the R-1B zone. The buildings will have a total floor-area-ratio of 0.59 with up to 1.8 permitted for a school building. *See* Subtitle D § 4902.1. The Swing Space will have a maximum building height of 28 feet, with up to 60 ft. permitted for a school building.³ *See* Subtitle D § 4904.1. The total lot occupancy at the Property will be 44%, with up to 60% permitted. *See* Subtitle D § 4910.1. The Swing Space has a parking requirement of six spaces,⁴ which will be met in the 31-space parking lot at the Property. There are two loading berths in the parking lot, one of which will serve the Swing Space. The Swing Space will also provide 30 bicycle parking spaces, which meets the total requirement.⁵

IV. NATURE OF VARIANCE RELIEF SOUGHT AND STANDARD OF REVIEW

The Applicant is seeking area variance relief for multiple primary structures on a single record lot. Pursuant to Subtitle C § 302.2, each new primary building or structure must be erected

³ Modular Building E for the multi-purpose space is 28 feet. The trailers for classroom space and the kitchen are shorter. The School Building will have a maximum building height 36'7".

⁴ A public school use requires 0.25 spaces per 1,000 sq. ft. The Swing Space and School Building will have a total of 139,769 sq. ft., which would require 35 combined spaces (6 for the Swing Space, 29 for the School Building). However, the minimum parking requirement is reduced by 50% due to the Property's location with ¼ mile of the G8 Metrobus line, which is a Priority Corridor Network Route. This priority corridor reduction applies to a public school located within any zone. *See* Subtitle C § 702.2. As such, the total parking requirement is 18 spaces.

⁵ The requirement for the Swng Space is 22 short-term bicycle parking spaces and 6 long-term bicycle parking spaces. All bicycle parking spaces will be located outside the Swing Space. Under Subtitle C § 805.11, a public school is permitted to locate required long-term bicycle parking outside the building provided it meets all conditions.

on a separate record lot when located in an R, RF or RA zone. As a result of the Swing Space, there will be several primary buildings on the Property; therefore, area variance relief is needed.

Under D.C. Code § 6-641.07(g)(3) and 11 DCMR Subtitle X § 1000.1, the Board is authorized to grant variance relief where it finds that three conditions exist:

- (1) The Property is affected by exceptional size, shape or topography or other extraordinary or exceptional situation or condition;
- (2) The owner would encounter practical difficulties or undue hardship if the zoning regulations were strictly applied; and
- (3) The variance would not cause substantial detriment to the public good and would not substantially impair the intent, purpose and integrity of the zone plan as embodied in the Zoning Regulations and Map. 11 DCMR Subtitle X § 1001.1; *see also French v. Board of Zoning Adjustment*, 658 A.2d 1023, 1035 (1995); *see also Capitol Hill Restoration Society, Inc. v. Board of Zoning Adjustment*, 534 A.2d 939 (1987).

In assessing the variance test, the Board may apply a more flexible standard of review for a public service organization, “especially where the organization is seeking the zoning relief in order to meet a public need or serve the public interest.” *See Neighbors for Responsive Government v. D.C. Bd. of Zoning Adjustment*, 195 A.3d 35, 56 (D.C. 2018); *see also Monaco v. D.C. Bd. of Zoning Adjustment*, 407 A.2d 1091, 1097 (1979). The flexible standard of review can be applied regardless of whether the applicant seeks to expand an existing use or add a new use to the property in question. *See id.* at 59. As part of this reduced standard of review, the Board may more fully weigh the equities of an individual case, including the organization’s needs, in finding an exceptional situation or condition. *See id.* at 56; *see also Monaco* at 1098; *see also National Black Child Development Institute, Inc. v. D.C. Bd. of Zoning Adjustment*, 483 A.2d 687, 690 (1984).

V. THE APPLICANT MEETS THE STANDARD FOR VARIANCE RELIEF

A. The Property is Affected by an Exceptional Situation or Condition

The phrase “exceptional situation or condition” applies not only to the land, but also to the existence and configuration of a building on the land. *See Clerics of St. Viator, Inc. v. District of Columbia Bd. of Zoning Adjustment*, 320 A.2d 291, 294 (D.C. 1974). The unique or exceptional situation may arise from a confluence of factors which affect a single property. *Gilmartin v. D.C. Bd. Of Zoning Adjustment*, 579 A.2d 1164, 1168 (D.C. 1990).

Here, the Property faces the following exception situation and conditions:

1. Nature of Modular Construction

The Swing Space will consist of prefabricated modular trailers that function as interim swing space for students. Creating the Swing Space with multiple, separate trailers - as opposed to one larger structure - is necessary for several reasons:

- Allowing sufficient light and air into each classroom space
- Meeting DOEE stormwater requirements by providing green space between trailers
- Wood-frame construction type that limits maximum size of each trailer
- Separating each trailer by a minimum of 20 feet to avoid increased cost for fire and life safety compliance
- Transporting the prefabricated units on narrow public roads

2. Existing Site Layout

The open area where the Swing Space will be constructed is separated from the School Building by the parking lot and playground. To connect the Swing Space with the School Building would disrupt and require reductions to either the parking lot or the playground.

3. School Building Renovation and Layout

The School Building will be an active construction site while the Swing Space is being used. Upon completion of the renovation, the School Building will contain programming along the eastern side of the building where a structural connection to the Swing Space would be located.

4. Preservation of Historic Elements

Although the School Building is not a designated historic structure, the School Building was originally constructed over 100 years ago. HPO has indicated that the School Building could be historically designated in the near future. As such, the Applicant is working with HPO to ensure the historic facades are maintained to the greatest extent possible. Adding a structural connection to the Swing Space would disrupt this goal and negatively impact the façade.

5. Large Property

The Property is one of few large lots in the neighborhood where most lots are small residential lots. The Property's large size makes it appropriate for multiple primary structures.

B. The Applicant Will Face Practical Difficulty with Strict Zoning Compliance

An applicant experiences practical difficulties when compliance with the Zoning Regulations would be “unnecessarily burdensome.” *See Gilmartin v. District of Columbia Bd. of Zoning Adjustment*, 579 A.2d 1164, 1170 (D.C. 1990). Here, the Applicant faces practical difficulty with strict compliance of Subtitle C § 302.2 limiting each record lot to a single principal structure. These practical difficulties are present whether the Property remains a single lot or if the Property were to be subdivided to provide a separate lot for the Swing Space.

It is inefficient and unreasonable to construct the Swing Space as a single structure. One large structure would create more internal space with no access to natural light, which is not conducive to the learning environment. Likewise, one large structure would create challenges with meeting stormwater requirements and fire/life safety requirements. The smaller modular trailers

are also significantly easier to transport to the Property on the surrounding neighborhood roads. Therefore, even if the Applicant were to subdivide the Property and construct the Swing Space on its own record lot, multiple structures on the lot would still be needed.

Further, if the Property remains a single record lot, the Swing Space cannot reasonably be connected to the School Building. Constructing the Swing Space with a meaningful connection to the School Building would require alterations and a reduction in size to either the parking lot or the playground area. Further, the School Building will be undergoing a renovation and it is unnecessary to connect the Swing Space to an active construction site. Once the School Building renovation is completed, there will be programming along the eastern side of the building where the meaningful connection would be located. This is undesirable from a constructability perspective and would require additional work that impacts the School Building's exterior façade and internal floorplan. Finally, a structural connection would impact the historic value of the School Building's façade, which is likely to be designated in the near future.

C. The Variance Relief Will Not Cause Substantial Detriment to the Public Good or the Zoning Regulations and Maps

The variance relief will not cause substantial detriment to the public good or Zoning Regulations. The Property will remain compliant with the zoning standards in the R-1B zone. In particular, the School Building and Swing Space are well below the maximum permitted lot occupancy, building height and FAR. There will be approximately 10,000 sq. ft. of open field space, multiple play spaces, and gardens at the Property.

The Swing Space is a public school use that is permitted by-right in the R-1B zone. The Swing Space will not introduce a new use at the Property. Further, the Swing Space meets a public need in that it will minimize disruption for public school students during renovations. The alternative of sending students to schools in other neighborhoods is inconvenient and was not

preferred by many families. Ultimately, the Swing Space will help the Applicant and DCPS to achieve its goals of providing modernized facilities to improve educational outcomes for students and families.

VI. COMMUNITY OUTREACH

The Applicant and DCPS have discussed the Swing Space and the School Building renovation extensively with the community and Advisory Neighborhood Commission 5B (the “ANC”). The Applicant and DCPS have held or attended ten community meetings dating back to January 2024. Six of these meetings were held by DGS’ School Improvement Team (“SIT”), which is an advisory group that includes school staff, families and community members. The Applicant and DCPS also presented at the ANC’s public meeting in November 2024. There is another planned community meeting to be held on April 30, 2025.

The Applicant and DCPS will continue to engage the community and ANC in connection with the subject BZA application.

VII. SUMMARY OF WITNESS TESTIMONY

A representative of the Applicant, Patrick Moloney, will testify regarding the project and community outreach. Chris Ambridge, the project architect from Quinn Evans, will testify regarding architecture and project design. The Applicant reserves the right to add witnesses or expert witnesses as necessary

VIII. CONCLUSION

For the reasons stated above, the Project meets the applicable standards for variance relief under the Zoning Regulations. Accordingly, the Applicant respectfully requests the Board grant the application.

Respectfully Submitted,
COZEN O'CONNOR

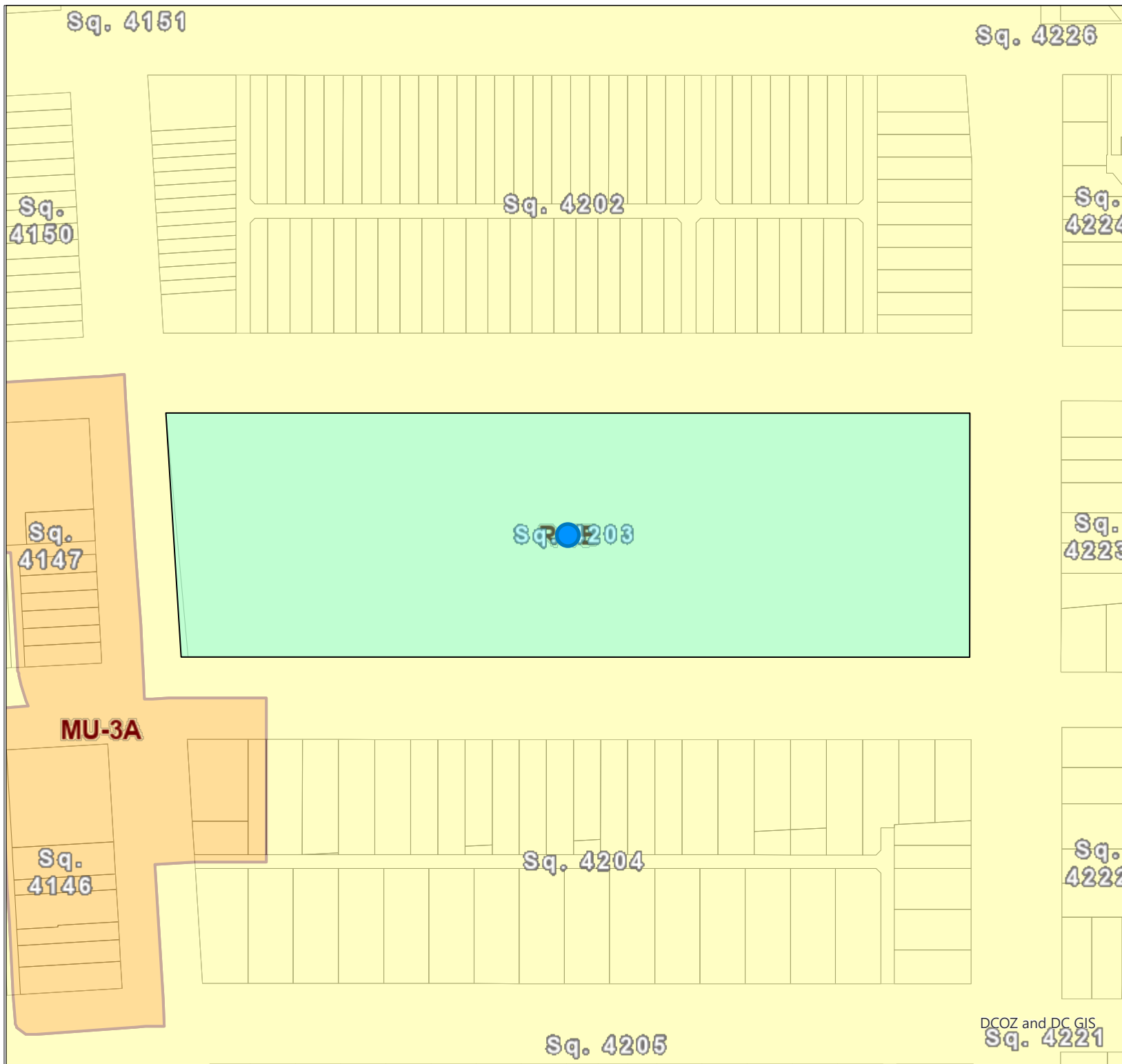
A handwritten signature in blue ink, appearing to read 'M. Moldenhauer', written over a horizontal line.

Meridith H. Moldenhauer

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

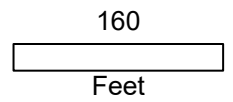
Eric DeBear

Tab A



DC Zoning Map

- Square
- Campus Plans
- PUDs
- Final
- Final
- Zone District
- Specific Zone Label
- Specific Zone
- Downtown Zone
- Mixed-Use Zone
- Mixed-Use Zone (IZ+)
- Mixed-Use Zone (IZ+ Exempt)
- Neighborhood Mixed-Use Zone
- Neighborhood Mixed-Use Zone (IZ+)
- Production, Distribution, and Repair Zone
- Residential Apartment Zone
- Residential Apartment Zone (IZ+)
- Residential Flat Zone
- Residential Zone
- Special Purpose Zone
- Special Purpose Zone (IZ+)
- Unzoned
- Zone District
- Downtown Zone
- Mixed-Use Zone
- Mixed-Use Zone (IZ+)
- Mixed-Use Zone (IZ+ Exempt)
- Neighborhood Mixed-Use
- Downtown Zone
- Mixed-Use
- Mixed-Use
- Mixed-Use Zone (IZ+)
- Neighborhood



Generated on maps.dcoz.dc.gov/zr16

Web Extract of the Official Zoning Map of the District of Columbia created on 4/21/2025.

Service provided by the DC Office of Zoning.

441 4th St NW Ste 200S
Washington, DC 20001

For reference only. To certify zoning on any property in order to satisfy a legal requirement, contact the Office of Zoning.

DCOZ and DC GIS
Sq. 4221

Tab B

JOHN BURROUGHS ELEMENTARY SCHOOL

BOARD OF ZONING ADJUSTMENT

APRIL 14, 2025



EXISTING CONDITIONS

Vicinity Map

- 1 Taft Junior High School
- 2 Basketball Courts
- 3 Tennis Courts
- 4 Basketball Courts
- 5 Taft Field Garden
- 6 Dwight Mosley Playground
- 7 Franciscan Monastery of the Holy Land in America
- 8 Franciscan Monastery Garden
- 9 Public Field
- 10 Woodridge Neighborhood Library



EXISTING CONDITIONS

Existing Aerial View Looking Southeast

Quinn Evans + Gilbane + WKM



EXISTING CONDITIONS
Site Context Photos

Quinn Evans + Gilbane + WKM



1 MONROE ST



2 MONROE ST



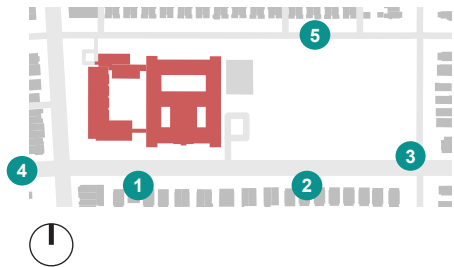
3 20TH ST



4 MONROE ST AND 18TH



5 NEWTON ST



EXISTING CONDITIONS
Historic Building Photos

Quinn Evans + Gilbane + WKM



1 WEST HISTORIC FACADE



2 SOUTH EAST FACADE FROM MONROE ST



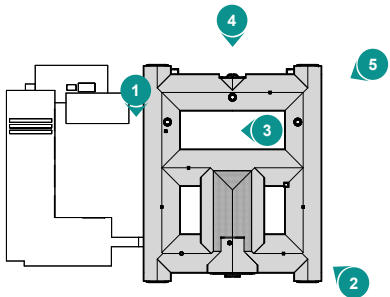
3 LARGE OPEN COURTYARD



4 NORTH ELEVATION FROM NEWTON ST



5 EAST FACADE FROM NEWTON ST, HERITAGE TREE, AND EXISTING PLAYGROUND



EXISTING CONDITIONS
Historic Building Photos

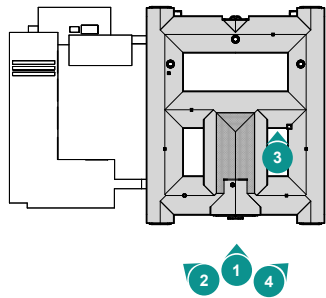
Quinn Evans + Gilbane + WKM



1 MONROE ST ENTRANCE.



2 MONROE ST LOOKING WEST



3 SMALL COURTYARD



4 MONROE ENTRANCE LOOKING EAST

EXISTING CONDITIONS
Addition Building Photos

Quinn Evans + Gilbane + WKM



1 NORTH FACADE OF 2013 ADDITION.



2 2013 ADDITION CONNECTOR FROM NEWTON ST.



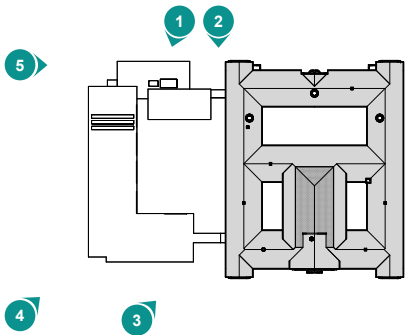
3 SOUTH FACADE OF 1959 ADDITION.



4 CORNER OF MONROE ST AND 18H ST NE, LOOKING AT 1959 ADDITION.



5 RAMP AND NEWTON ST ENTRANCE OF 2013 ADDITION.

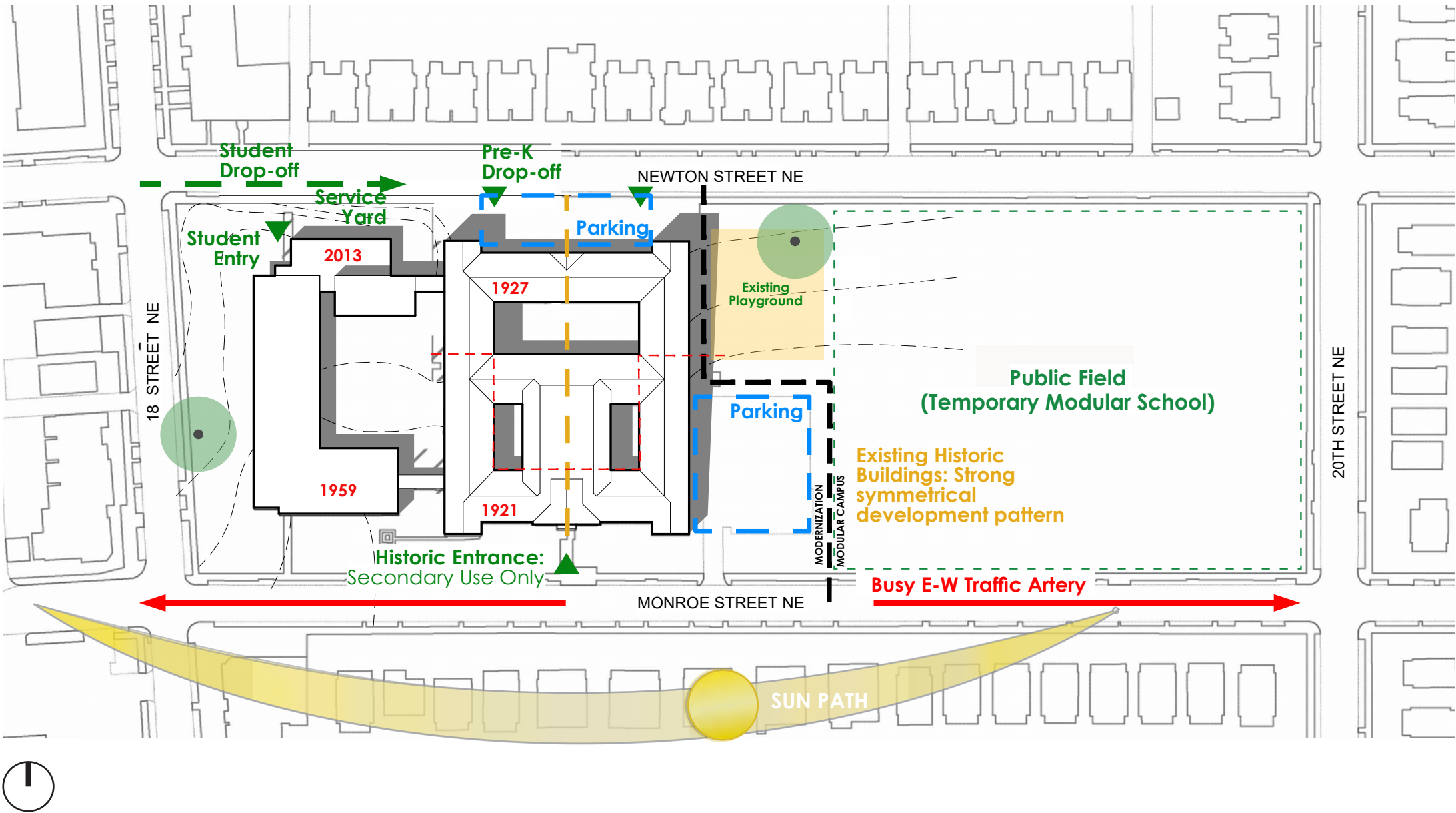


EXISTING CONDITIONS

Existing Site Plan

Quinn Evans + Gilbane + WKM

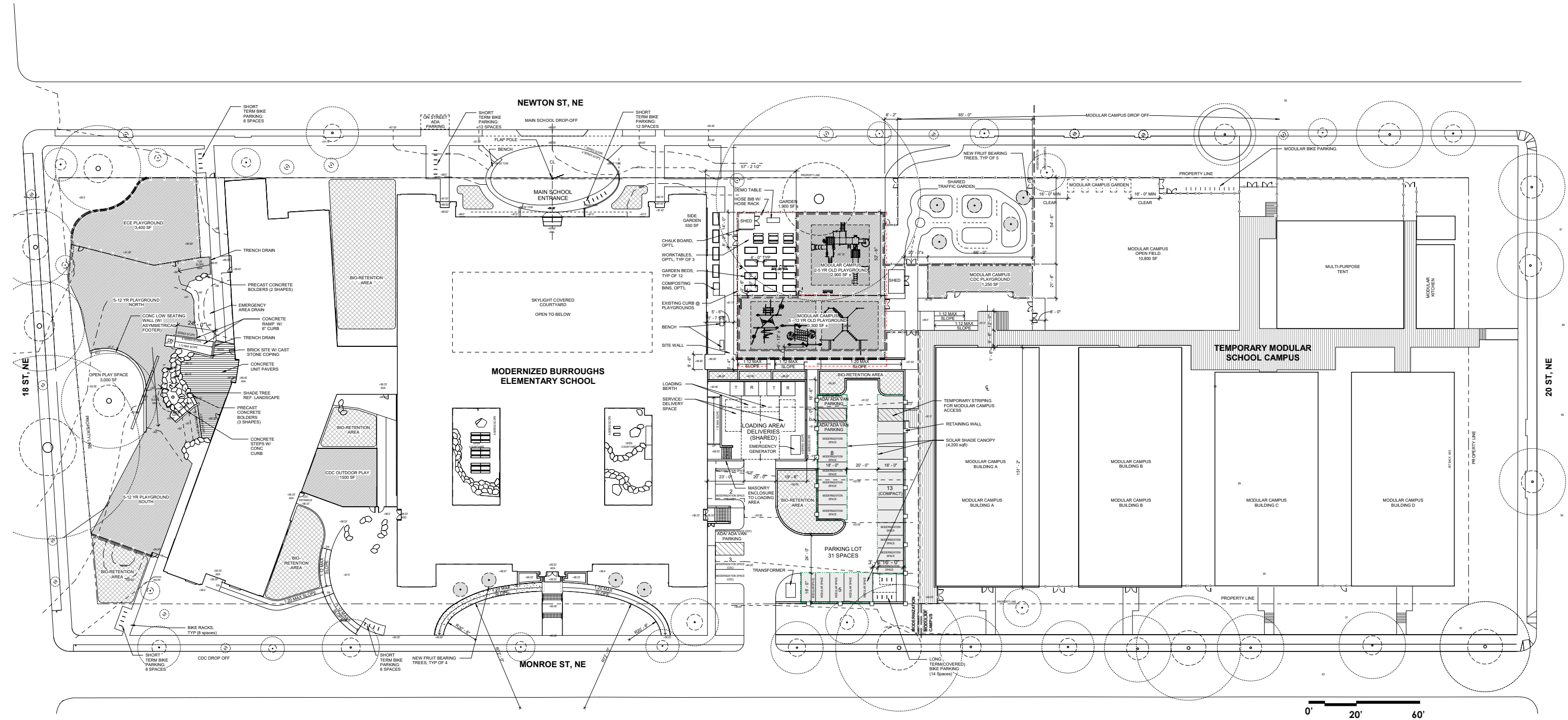
- **Historic school entrance safety issues:** Monroe St. is a major traffic through-fare. School currently uses multiple doorways on Newton St for arrival/pick-up to mitigate risk.
- **Newton Street Vehicle Issues:** Teacher Parking and Loading/ Trash along Newton St present safety and aesthetic issues.
- **2 heritage trees in close proximity to the building.** Critical Root Zones significantly impact areas of potential development on the west end of the site.
- **East Constraints:** Site improvements to the East side are limited by temporary Modular School (on play field).
- **Addition Accessibility and Planning Issues:** 1950's and 2013 Additions have ADA issues. Student Dining location (2013 addition) drives the problematic service yard location.
- **Under-utilized Courtyards:** Historic building courtyards are concrete covered yards. The smaller courtyards are not used by students.
- **Strong North-South symmetrical development pattern in Historic Building:** Main Entrance, Gymnasium, the courtyards and north bay window are all on a formal NS axis.



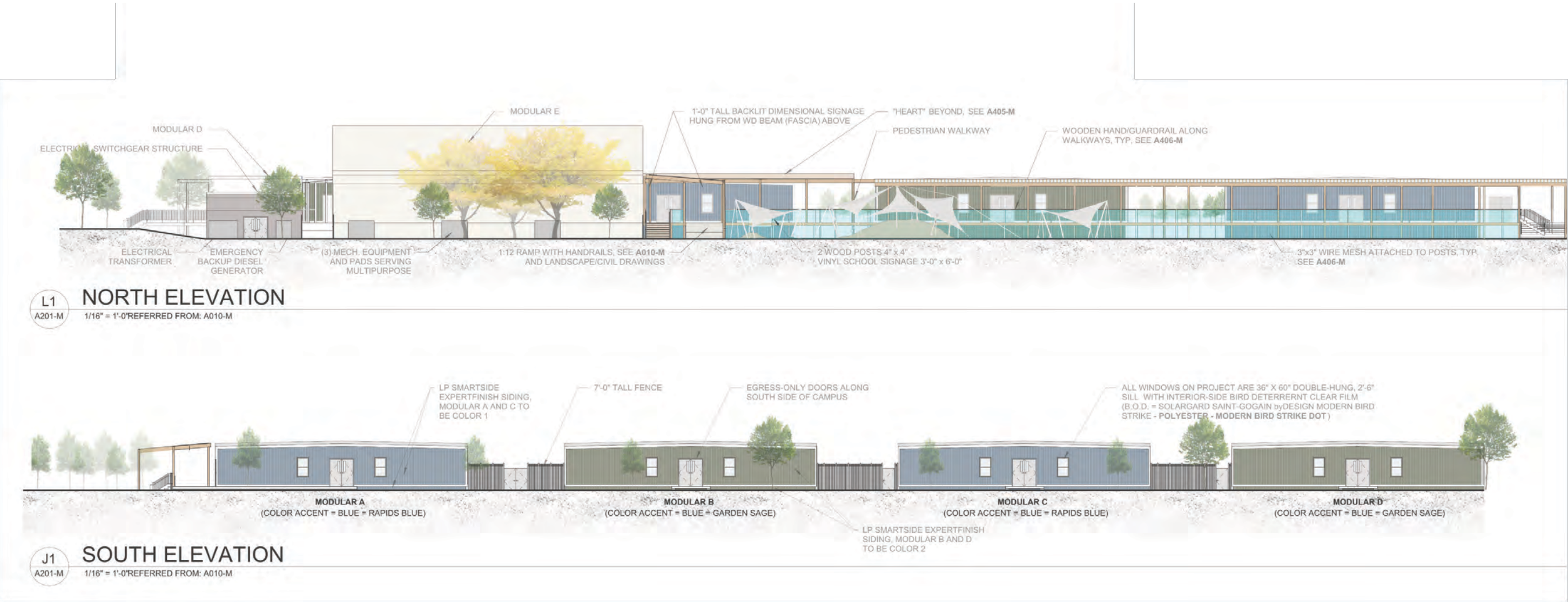
PROPOSED CONCEPT DESIGN

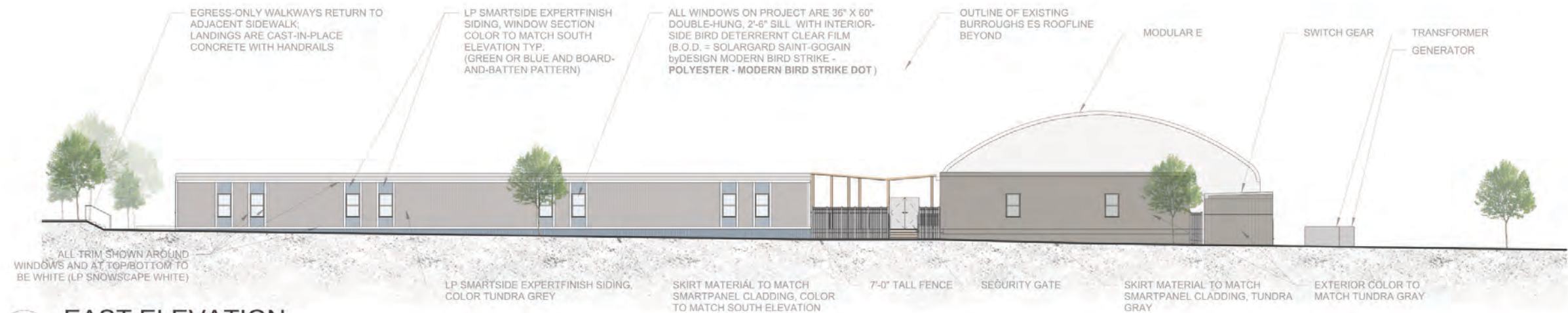
Site Plan (Modernization + Modular)

Quinn Evans + Gilbane + WKM

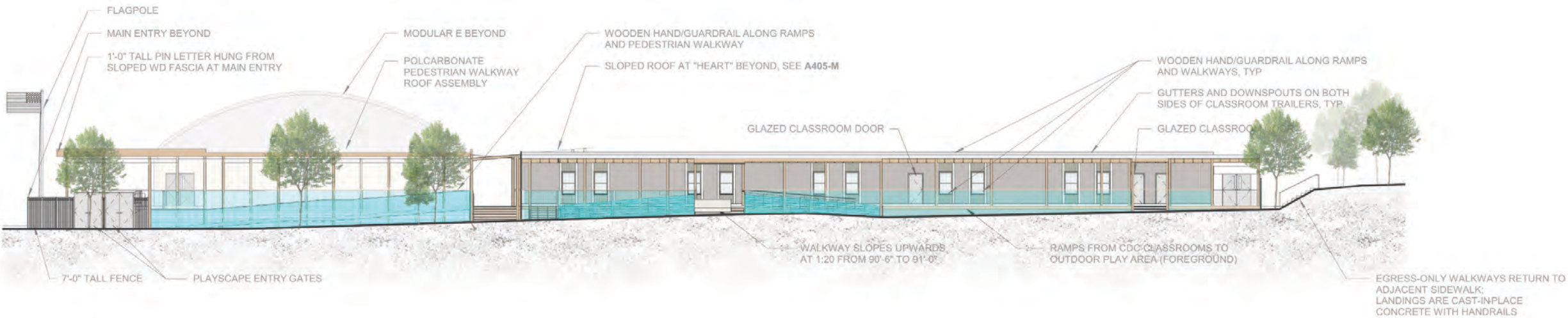


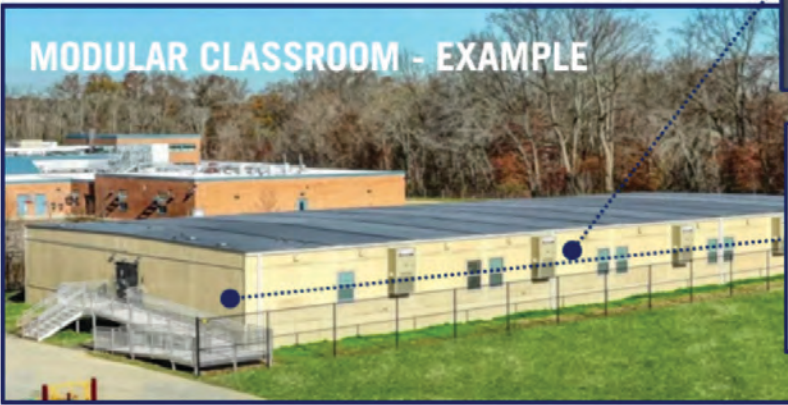
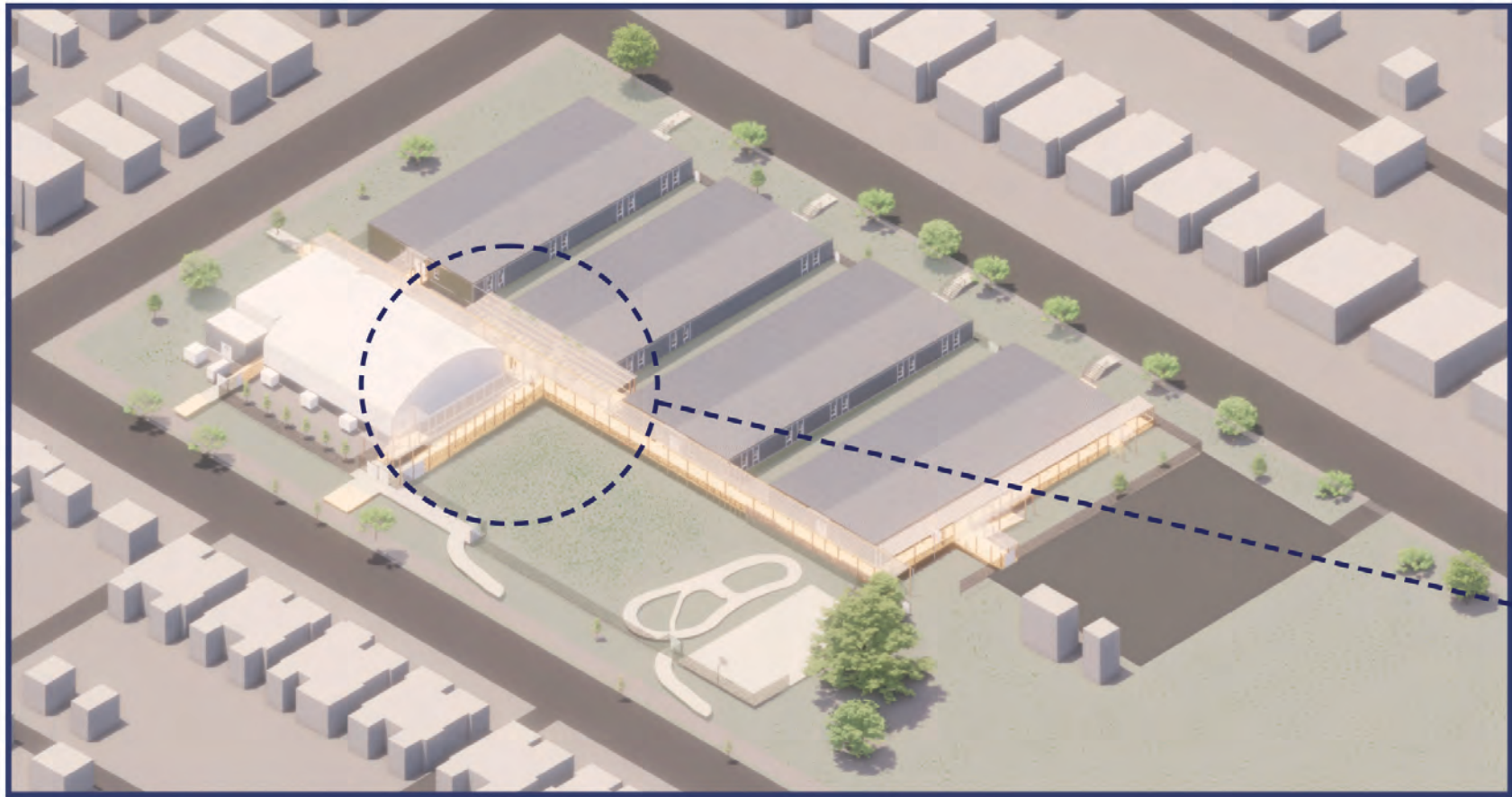
1 ARCHITECTURAL SITE PLAN



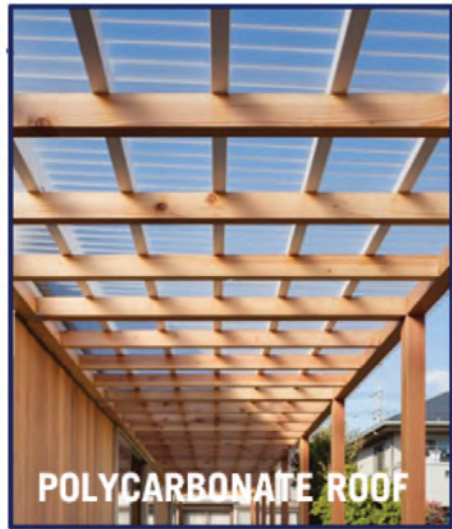


G1
A201-M
EAST ELEVATION
1/16" = 1'-0" REFERRED FROM: A010-M





MODULAR CLASSROOM - EXAMPLE



POLYCARBONATE ROOF



COLORED
POLYCARBONATE



COLORED
POLYCARBONATE

