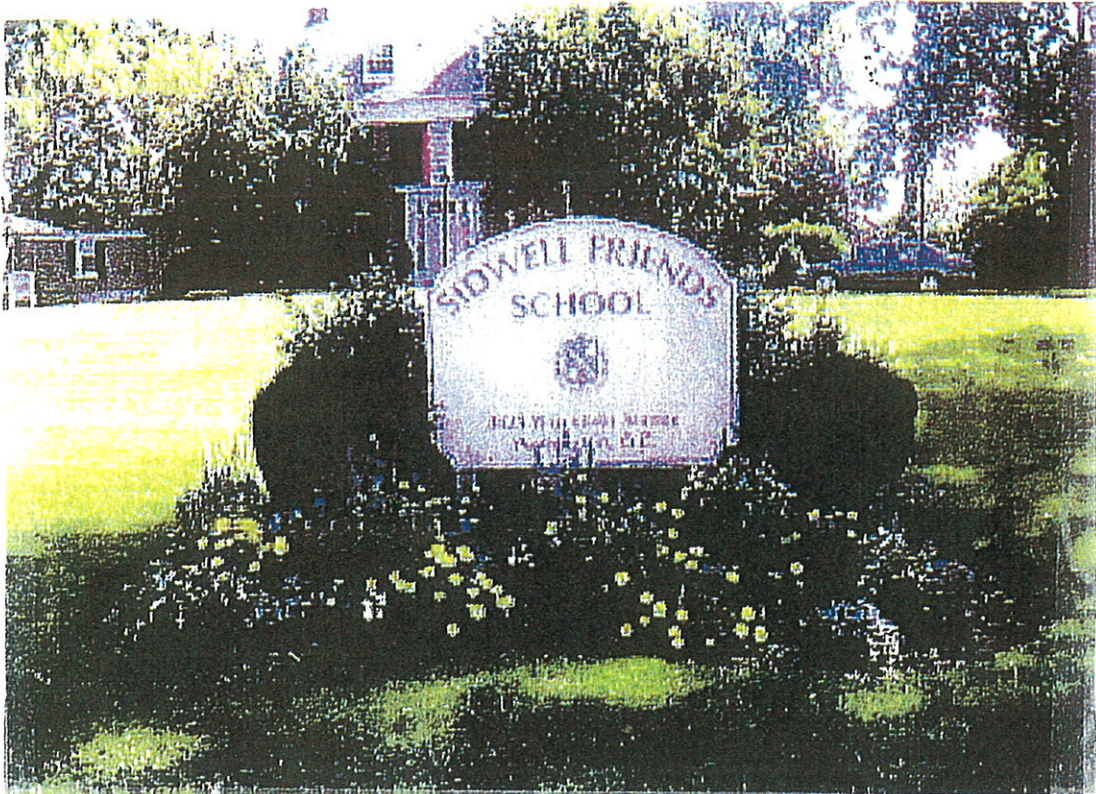


Sidwell
FRIENDS SCHOOL



**APPLICATION FOR
SPECIAL EXCEPTION
AND
VARIANCE**

October 15, 2015

Board of Zoning Adjustment
District of Columbia
CASE NO.17703A
EXHIBIT NO.6

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

Sidwell Friends School

**BZA Application No.
ANC 3F
October 15, 2015**

STATEMENT OF THE APPLICANT

I. INTRODUCTION

The Sidwell Friends School (“**School**”), in a continued effort to efficiently update and expand its facilities to support the needs of the students and faculty and to consolidate its Lower School onto its District of Columbia Campus, seeks to add to and modify its campus from the approval received from Board of Zoning Adjustment (“**BZA**”) in BZA Order No. 17703 in 2008. The School wishes to add to the existing campus an adjacent 5.7 acre parcel of land in order to relocate its Lower School from Bethesda, Maryland, its current location.

The Project will result in the School being able to operate its different units in a more efficient and coordinated manner. The Project involves the reuse of an existing building with an addition, to accommodate a new Lower School building, an addition of 25 parking spaces and approximately 3.7 acres of open space. It will increase the School’s campus from 15.4 acres to 21.1 acres and it proposes to increase the total population of students and faculty/staff to 1250 and 275 respectively.

Following the lead of the Middle School building, which received a “Platinum” certification — the highest recognized environmental certification standard — from the U.S. Green Building Council, the Project will utilize “green” architecture and sustainable design, expanding the already environmentally-friendly campus. Currently, there are three LEED Platinum buildings and one LEED Gold building on the Wisconsin Avenue Campus. Most of the perimeter of the Project Site will be unaffected by the Project except for aesthetic upgrades that

result from enhanced landscaping and architectural detailing, especially along Upton and 37th Streets.

II. NATURE OF RELIEF SOUGHT

The School requests that the BZA approve special exceptions to allow: (1) for an expansion of the existing private school campus in the R-1-B¹ Zone District pursuant to Section 206 of the Zoning Regulations; and (2) the addition of the Lower School to the campus. The existing school campus is located at 3825 Wisconsin Avenue, N.W. (Square 1825, Lot 816) as shown on Exhibit A. The special exception will permit the School to operate all of its divisions and its entire program on one campus. The proposed campus expansion is also shown on Exhibit A as well as plans for the Project.

In addition to the request for the special exceptions, the School also requests variance relief from the setback requirements of Section 400.9 of the Zoning Regulations which allows an institutional building in the residential zones to achieve a maximum building height of ninety (90) feet provided that it is set back from the property line at a 1:1 ratio. Here, because of the radical changes in grade from the proposed addition to the campus and the existing campus and because the existing Washington Home building (which will be renovated) is built to the Building Restriction Line, the proposed addition which connects the campus to the Washington Home building rises to a height of 54 feet. However, this addition, which is the proposed Campus Center, itself is removed from all lot lines significantly greater than the 1:1 requirement of Section 400.9.

¹ A small portion of the Campus is in the C-2-A Zone District based on Zoning Commission Order No. 530, dated September 30, 1988, page 11.

III. JURISDICTION OF THE BOARD

The Board has jurisdiction to grant the relief requested pursuant to Sections 3103.2 and 3104.1 of the Zoning Regulations.

IV. BACKGROUND

A. Sidwell Friends School

Sidwell Friends School was founded in 1883. The School is an independent, pre-kindergarten through twelfth grade, co-educational Quaker day school. It is a non-profit, tax-exempt institution incorporated in the District of Columbia and governed by an independent Board of Trustees, half of whom must be Quakers.

The School's Middle and Upper Schools are located on the Wisconsin Avenue campus, where it has operated since 1937. The School's Lower School (K - 5) is currently located in Bethesda, Maryland. Facilities on the existing fifteen-acre Wisconsin Avenue campus in the Tenleytown section of Northwest Washington include the Earl G. Harrison Jr. Upper School Building; the Middle School Building; Kogod Center for the Arts; Richard Walter Goldman Memorial Library; Zartman House (administration building); Sensner Building (storage and school store); a parking structure with a drop off lane and shops and offices for maintenance, security and information technology; Wannan Gymnasium; and athletic fields, tennis courts and a six-lane track.

For the 2015-2016 school year, there are 844 students on the Wisconsin Avenue Campus² and the School employs 187 employees at the Wisconsin Avenue campus. The Lower School, in Bethesda, for the 2015-2016 school year has 295 students and 50 faculty/staff. The School is a member of the Friends Council on Education and is accredited by both the Association of

² For the school year, the School will have 10 students studying in China in addition to those on Campus.

Independent Maryland Schools (“AIMS”) and the Middle States Association of Colleges and Schools.

B. Sidwell Friends School Mission

Sidwell Friends School is a community dedicated to educating and nurturing the mind, body and spirit of girls and boys in grades pre-kindergarten through twelve. Embracing the Quaker belief in the unique worth of each individual, the School seeks students of diverse cultural, racial, religious and economic backgrounds — students of ability and promise whose qualities of mind and heart indicate that they will thrive in an atmosphere of intellectual, creative and physical vitality intended to foster strength of character and concern for others. Diversity, Quaker values and academic excellence are the three pillars supporting a Sidwell Friends School education.

The School offers its students a challenging curriculum and a vigorous learning environment built on long-held standards of Quaker education. In keeping with the ideals of justice and peace, the School emphasizes personal integrity, respect for consensus and commitment to service. The School undertakes to develop in its students a combination of independent thinking and high personal expectation, complemented by openness to the ideas of others and a spirit of compassionate generosity. Above all else, the School seeks to nourish in all its students that genuine love of learning which will enrich them and animate their efforts to engage thoughtfully and responsibly with others throughout their lives.

The School is committed to remaining where it is — an urban school in the District of Columbia.

C. Previous Zoning Approvals

In the last 45 years, Sidwell Friends School has filed six applications with the BZA. In 1970, Sidwell Friends School was granted permission to erect a second and third story addition to the existing Middle School building (BZA Appeal No. 10460). On August 7, 1979, in BZA Application No. 12945, the School was allowed to construct a gymnasium, an art center and a maintenance building as additions to its campus and increase parking spaces from 110 to 145. On April 2, 1993, under Application No. 15769, the School added a classroom to a part of the Middle School building and increased its employee cap from 100 to 130. On August 16, 1996, under Application No. 16139, the School received permission to replace its Upper School library with an addition to the existing Upper School building, fully renovated that building and increased the student cap from 700 to 780 and the employee cap from 130 to 190.

On October 5, 2004, under Application No. 17149, the School was allowed to increase enrollment from 780 to 850 students while maintaining the faculty and staff at 190 employees. This order granted the renovation and expansion of the existing Zavitz Middle School, construction of a below-grade parking garage, expansion of athletic fields, the construction of a new gymnasium, construction of a new Quaker Meeting House, renovation of the existing Kenworthy Gymnasium for conversion to arts teaching space, partial renovation of the Kogod Arts Center, relocation of some and removal of other tennis courts, installation of new lighting, improved landscaping, and the application of environmentally “green” design. In BZA Application No. 17703, the School was permitted to modify the campus to relocate its gymnasium below its football field.

The Campus includes a parking structure, completed in May 2006, which provides on-campus spaces for employees, visitors and students, freeing up street spaces for residents and

other users. The parking structure includes a carpool lane which has reduced carpool volume on 37th Street and morning drop-off congestion on Wisconsin Avenue.

Transportation impacts on the neighborhood have been further reduced through the School's enhancement of shuttle bus service between its campuses and of financial incentives to employees and students for public transportation, as well as mechanisms to encourage and facilitate carpooling.

The Middle School building, which opened in September 2006, showcases state-of-the-art green design. It is the first building in Washington, D.C. and the first K-12 building in the world, to earn the highest level "Platinum" rating from the United States Green Building Council. It features dense and diverse native plantings in order to reduce water use and to help restore the native ecology. Storm water management is enhanced through a green roof, including organic garden plots shared with neighboring Phoebe Hearst Elementary School. The building treats and recycles grey water, reducing demand on municipal supplies by 93%, while energy efficient design features reduce energy use by 60%. The building has been featured in media outlets including CNN, the Washington Post, and in legislative briefings. Planned curriculum allows students around the world to learn about environmental design using real time and historical data on building performance accessible through the internet.

The Wisconsin Avenue campus currently has three buildings with a LEED Platinum certification and one other building which has achieved LEED Gold.

V. DESCRIPTION OF PROPERTY AND SURROUNDING AREA

The Campus is located in the R-1-B³ Zone District. The property which the School is acquiring for the proposed Project ("**Project Site**") is also in the R-1-B Zone District. An

³ A small portion of the existing Campus is in the C-2-A Zone District based on Zoning Commission Order No. 530, dated September 30, 1988, page 11.

excerpt from the Zoning Map is attached as Exhibit D. The Project Site is bounded by 37th Street, N.W. to the east; and Upton Street NW to the north. It is rectangular in shape and consists of approximately 248,318 square feet of land area or 5.7 acres. The Project Site is currently the site of The Washington Home and Hospices. If the application is approved, it will be added to the School's existing 15.4 acre campus, for a total campus of 21.1 acres.

The properties to the north of the campus include a commercial building occupied by the Federal National Mortgage Association, ("**Fannie Mae**"), the Friendship Station Post Office Building and a row of residential dwellings which front on Upton Street. To the east, across 37th Street, N.W., are the Phoebe Hearst Elementary School, the Hearst Recreation Center and playing fields. Across Quebec Street, N.W. to the south of the Campus, are three private residences and a commercial building occupied by the American Academy of Child and Adolescent Psychiatry. To the west, across Wisconsin Avenue, N.W., is the McLean Gardens condominium and the Fannie Mae National Headquarters office building.

Metrobus stops are located on the east and west sides of Wisconsin Avenue, N.W., directly in front of the school. The Tenleytown Metrorail station is four blocks from campus.

VI. PROPOSED PROJECT

As noted, the Sidwell Friends School is currently comprised of three school divisions on two campuses. With the proposed Project, the School will bring its three divisions together into a unified campus. In doing so, the Project will serve to bridge the topography of the new 5.7 acre of land, now occupied by The Washington Home, to the north with the existing School site creating a new campus center and expanded campus landscape. The Project will be a modern forward-looking renovation and addition incorporating Quaker principles and sustainable design to reinvigorate the campus for a new generation of students. The proposed Project includes the following components:

- Lower School. Renovation of, and an addition to, the existing the Washington Home building to accommodate the program of the Lower School currently located in Bethesda. The renovation will turn the first and second floors into the Lower School including classrooms, common areas, specialty rooms cafeteria, library and administrative offices. The third floor will used for administration, seminar rooms and a lecture hall for use by the Lower and Upper Schools. The existing mechanical wing will be incorporated into the design and a portion of the existing equipment will be reused. An existing one story addition to the Home building will be demolished and a new gym will be constructed in this area. The new gym will match the height of the existing building and will accommodate one regulation basketball/volleyball court requiring 25' vertical clearance.
- Campus Center. Construction of the Campus Center will connect the existing Campus and the Washington Home site. Spanning the current property line and elevation grade change, the new building will face the new central outdoor space and will also be accessible from all floors of the new Lower School building. The Campus Center will house a cafeteria, kitchen, faculty dining area, café space, a small recreation space/gymnasium, and maintenance and service spaces.
- Landscape. Landscape improvements will enhance existing and provide for new outdoor spaces on the current Campus. The existing constructed wetlands in front of the Middle School building will be extended westward. Additional green lawn space will be created abutting the Upper School and Kogod Arts Center Buildings.
- Circulation. Improvements to The Washington Home site will accommodate a new traffic pattern and, parking lot, Lower School play areas, and tennis courts. All curb cuts will remain in their existing locations. For morning drop-off and afternoon pick-up,

traffic will enter through the existing service entrance on 37th Street, NW, proceed through the site, and drop off at the existing roundabout at the entrance to the building. The curb cut and driveway on Upton Street will remain in use during off-peak times.

- Additional Circulation. Improvement of drop-off area at the current bus parking location will be created near the parking structure and new campus center. This drop-off area can be used by Upper, Middle, and Lower School students. This new area will build upon existing circulation patterns on the site and will not add significant additional traffic at the entries onto Wisconsin Avenue. Improved landscaping will make this area more aesthetically pleasing from the street and integrated into the rest of the Campus.
- Building Removal. Demolition of the Wannan and Fox Den buildings on the existing School campus will allow for a unified outdoor space at the center of the campus, and make room for a new Campus Center.
- Sustainability. “Green” architecture and sustainable design will be key components of all facets of the project as described in section VI-B. The school will seek a “Platinum LEED Certification” for the Washington Home renovation and new Campus Center – one of the highest recognized environmental certification standards.

VII. PLANNING AND ENVIRONMENTAL ANALYSIS

A. Planning

The Project is consistent with the District of Columbia’s Comprehensive Plan (“**Plan**”) which supports the continuing growth and stability of educational resources in the District. It is consistent with the Environmental, Transportation and Land Use Elements of the Plan. Further, the existing campus and the Project Site is designated as appropriate for “Institutional Use,” which includes schools, on the Comprehensive Plan’s Generalized Land Use Map.

The proposed Project brings clarity and a sense of openness to the campus. Land utilization is more efficient, while open space is consolidated and increased. Important space is maintained as greenery and buildings are being reused as opposed to new construction taking place. The public view of Zartman House, a historic landmark and the School's signature building, will be unaltered.

The Project is in general conformance with the requirements for the R-1-B Zone District. The lot occupancy will be 33.7 percent, well below the maximum lot occupancy of 40% in the R-1-B Zone District.

B. Environmental Analysis

The green strategies employed with the construction of the parking structure and the Middle School will be furthered and enhanced. These include: state-of-the-art systems and materials for the management and reuse of storm water; the minimization of pavement; the use of both green and reflective roofs to reduce solar heat gain and manage storm water runoff; the use of trees for shading and local plant species to minimize maintenance, water use and chemical inputs; the efficient use of water; the use of natural and mechanically assisted ventilation; an efficient building envelope and mechanical systems, including the potential use of a centralized cooling and heating plant; and efficient lighting systems with daylight optimization and controls. The reuse, rather than demolition and rebuilding, of the existing Washington Home building to reduce landfill use, construction materials, transportation and disruption to the neighborhood from construction; and the use of recycled, rapidly renewable and locally-manufactured materials. Enhanced daylighting and views will also be incorporated.

The vegetation strategy is an important facet of the sustainable design of the Project. It will unify the Campus through plantings and better define the edge of the Campus with a green boundary. Teaching gardens will connect the Campus to local ecology. Steep slopes and

transitional spaces will be planted with native species. Mature trees will be retained where possible and plantings will be integrated with stormwater strategies. Though the initial costs for such a “green” project are larger than they would otherwise be if the Project was conventionally constructed, Sidwell Friends is committed to making the property an environmentally friendly campus.

VIII. THE APPLICANT IS ENTITLED TO SPECIAL EXCEPTION RELIEF UNDER THE ZONING REGULATIONS

Uses that are allowed by special exception are deemed compatible with other uses permitted in that particular zoning classification provided certain requirements are met. In reviewing an application for a special exception under the Zoning Regulations, the BZA’s discretion is limited to determining whether the proposed exception satisfies the relevant zoning requirements. If the prerequisites of the Regulations are satisfied, the BZA ordinarily must grant the application. See, e.g., Bakers’ Local Union No. 118 v. District of Columbia Board of Zoning Adjustment, 437 A.2d 176, 178 (D.C. 1981).

As set forth in greater detail below, approval of special exception relief in this case is in harmony with the general purpose and intent of the Zoning Regulations and Map and will not adversely affect the use of nearby properties.

IX. THE APPLICANT MEETS THE STANDARDS FOR USE OF THE PROPERTY AS A PRIVATE SCHOOL

Section 206 of the Zoning Regulations provides that a private school is permitted in the R-1-B Zone District if the BZA finds that two requirements are met. First, the private school must not be objectionable to adjoining and nearby property because of noise, traffic, number of students or otherwise objectionable conditions (11 DCMR § 206.2). Second, ample parking, but not less than that required under Chapter 21 of the Zoning Regulations, must be provided to

accommodate the students, teachers and visitors likely to come to the site by automobile (11 DCMR § 206.3).

Through previous applications approved by the BZA, Sidwell Friends has demonstrated that its programs meet these standards. The proposed Project will not substantially change the School's impact on the surrounding neighborhood.

A. Noise

The School expects a reduction in noise levels emanating from the School due to this Project. Most of the construction is concentrated along the northern edge of the campus, adjacent to Upton Street. When completed, the new construction will act as a barrier to noise emanating from the School. Thus, the amount of noise generated by the School use of the campus, while already low, will likely be less when the Project is finished. The Project does not bring institutional use further into the residential neighborhood since the existing use of the Project Site is also institutional in nature and will not adversely affect the character of Tilden, 37th or Quebec Streets, N.W.

B. Traffic

Through the previous BZA approval, a vehicular management policy was instituted by the School to address neighborhood concerns. The parking structure has improved vehicular and pedestrian safety and traffic flow. In addition, it has helped create a more pedestrian-oriented campus, improved the campus aesthetics, and made parking on-street in the neighborhood unnecessary.

The transportation consulting firm of Wells and Associates has undertaken a traffic study of the area and has generated a preliminary traffic evaluation of the existing and future conditions for the School. A preliminary Transportation Assessment, including a Transportation Management Plan, dated September 11, 2015 (attached as Exhibit B) evaluated the ability of the

Lower School operations to be accommodated at the combined campus with the addition of the new property. The study concluded that the Lower School can be accommodated at the Wisconsin Avenue Campus. It makes a series of recommendations to ensure that the Lower School traffic operations could be accommodated, including the management of the Lower School pick-up/drop-off operation and implementation of some additional transportation demand management strategies, including a carpool matching program for parents. The study also reaffirmed that the parking and pick-up/drop-off operations of the Upper and Middle Schools generally can be accommodated within the allotted pick-up/drop-off zones (the Upper School within the garage and the Middle School along 37th Street). A more detailed comprehensive transportation review will be processed with the District Department of Transportation (DDOT) and a full study will be completed prior to the BZA hearing.

C. Number of Students and Faculty/Staff

Sidwell Friends is committed to small class sizes and a limited total enrollment. Pursuant to BZA Order No. 17703, the School is permitted to enroll a maximum of 850 students and employ 190 faculty and staff on its Wisconsin Avenue campus. Currently the School has, as of September 2015, a total of 844 students at the Wisconsin Avenue campus, thus meeting the BZA imposed limit.⁴ The School currently has 187 faculty/staff on its campus, below the BZA mandate of 190.

The current Lower School in Bethesda has a student population of 295 students and 50 faculty/staff. Consequently, when the divisions of the School are consolidated on the Wisconsin Avenue Campus, the student population will be 1,150 with 250 faculty/staff.

The School anticipates that combining all of its divisions on a single campus will allow its population to grow to 1250 students and 275 faculty/staff. With the addition of the 5.7 acre

⁴ There are an additional 10 students enrolled in the School who are studying in China.

Project Site to the Campus, there will be ample room for the additional facilities to accommodate 400 new students and 85 new faculty/staff.

D. Ample Parking

The underground parking garage, which was approved by BZA Order No. 17149, provides for a 307-space underground parking structure, fronting on Wisconsin Avenue, beneath an athletic field, results in a total of 328 existing, on-campus parking spaces. The creation of this parking has increased on-campus vehicular queuing space for student drop-off and pick-up and alleviated congestion on Wisconsin Avenue, N.W. and 37th Street, N.W., and creates a safer environment for students to exit, and enter, cars. By placing almost all campus parking under a playing field, the School addressed runoff from impermeable parking areas, typically a major source of groundwater pollution. The Project will create 25 additional parking spaces. Consequently, if approved, the Campus will have 353 parking spaces.

The School will provide 353 parking spaces when only a minimum of 263 spaces are required to satisfy Section 2101.1 of the Zoning Regulations. The current parking accommodations are sufficient for the present demand on the Property. Presently, according to the preliminary traffic evaluation, the peak morning occupancy utilizes a total of 156 spaces (or 51 percent of all spaces) were occupied on the campus. The peak afternoon occupancy utilizes 176 spaces (or 57 percent of all spaces). The School is committed to working closely with the community to continue to ameliorate any traffic and parking impact caused by the School.

X. VARIANCE RELIEF

A. Request

The Applicant is requesting variance relief from the setback restriction for an institutional building in the R-1-B Zone District for a portion of the addition to the proposed Lower School building in order for this portion of the building to accommodate the transition in topography

from the current campus to the Project Site. Section 400.9 of the Regulations permits an institutional building to have a maximum height of ninety feet provided that the building is setback from the property lines at 1:1 ratio. Here, the tallest portion of the project is 54 feet and this portion is more than 200 feet from all property lines. However, it is technically an addition to an existing building which is only 15' removed from the property line.

This request for relief is only applicable to a portion of the Project which is in the center of the campus, far removed from all property lines (see Plans in Exhibit A). The variance relief will allow a safe and uniform transition from the existing campus to the Project. It will utilize the new Campus Center (with its cafeteria) in a logical location to serve all three divisions of the School.

B. The Application Meets the Requirements for An Area Variance

An applicant requesting an area variance must prove that: (i) the property is affected by an exceptional or extraordinary situation or condition; (ii) that the strict application of the Zoning Regulations will result in a practical difficulty to the applicant; and (iii) that the granting of the variance will not cause substantial detriment to the public good or substantially impair the intent, purpose or integrity of the zone plan. *See Gilmartin v. D.C. Board of Zoning Adjustment*, 579 A.2d 1164, 1167 (D.C. 1990). As set forth below, the Applicant meets this test for the requested variance from the setback requirements for an institutional building under 11 DCMR 400.9.

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

The BZA may “weigh more fully the equities in an individual case.” *National Black Child Development Institute v. D.C. Board of Zoning Adjustment*, 483 A.2d 687, 690 (D.C. 1984). Further, it is not necessary that the uniqueness arise from a single situation or condition on the Property. Rather, it may arise from a “confluence of factors.” *Gilmartin*, 579 A.2d at 116. For example, in *French v. Board of Zoning Adjustment*, 658 A.2d 1023, 1035 (D.C. 1995),

the Court of Appeals upheld the granting of a variance from 11 DCMR § 217.1 based on the Board's findings that several circumstances existed which, when considered together, made the property unique including steeply sloping grade, the large size and physical configuration of the existing building, and its previous history. *Id.* Furthermore, it is not necessary that the Property be unreservedly unique. Rather, an applicant must prove that the property is affected by a condition that is unique to the property and not related to general conditions in the neighborhood. *Gilmartin*, 579 A.2d. at 1167.

Here, the primary factors that create an exceptional condition on the Property is the existence of significant topography and the existence of the Washington Home building whose configuration brings it to within 15 feet of the northern property line. Further, there is a 12-14 foot change in grade from the existing campus to the Project Site. In order to consolidate the difference divisions of the School, a central facility is logical and it is logically sited as shown on the Plans.

D. Strict Application of the Zoning Regulations Would Result in Practical Difficulty to the Applicants

To satisfy the second element for an area variance standard, the Applicant must demonstrate "practical difficulty." The D.C. Court of Appeals has established a two part test for determining whether an applicant has met its burden of proof of the practical difficulty element of the area variance test. The applicant must demonstrate that "compliance with the area restriction would be unnecessarily burdensome" and that the practical difficulty is "unique to the particular property." *Gilmartin v. District of Columbia Board of Zoning Adjustment*, 579 A.2d at 1170 (D.C. 1990). The Court of Appeals has held that the "nature and extent of the burden which will warrant an area variance is best left to the facts and circumstances of each particular case." *Id.* At 1171. The Court of Appeals provided "a wide range of factors" that the BZA may

consider in determining whether the practical difficulty standard has been satisfied. *Id.* At 1171, citing *Barbour v. D.C. Bd. of Zoning Adjustment*, 358 A.2d 326, 327 (D.C. 1976). See also, *Tyler v. D.C. Bd. of Zoning Adjustment*, 606 A.2d 1362, 1367 (D.C. 1992). The Court noted the following factors: “the severity of the variance(s) requested”; the weight of the burden of strict compliance”; and “the effect the proposed variance(s) would have on the overall zone plan.” *Id.* In addition to the factors listed above, the Court in *Gilmartin* stated that “increased expense and inconvenience to applicants for a variance are among the proper factors for BZA’s consideration.” *Id.* Thus, the Applicant must show that strict compliance with the regulations is practically difficult.

It would be unduly burdensome for the Applicant here to comply with the Zoning Regulations. Without the relief requested the existing Campus and the Project Site would remain “disconnected.” The grade change would necessitate elevators to accommodate the physically disadvantaged and would prohibit a seamless transition between the two properties. The Property, with the unique characteristics noted above, is not a typical property for the area and is therefore uniquely burdened. Based on the factors listed by the Court in *Gilmartin*, the Applicant has satisfied the practical difficulty standard of the area variance test.

E. Relief Can Be Granted Without Substantial Detriment to the Public Good and Without Impairing the Intent, Purpose, and Integrity of the Zone Plan

To satisfy the third element of an area variance, the Applicant must demonstrate that the requested variance relief will not result in substantial detriment to the public good, nor substantially impair the intent or integrity of the Zoning Regulations and Zoning Map. Indeed, the requested relief will have no such result. Instead, granting the requested variance relief advances the intent and goals of the Zone Plan for this area as defined in the District of Columbia Comprehensive Plan. The proposed Project will unify the Sidwell Friends Campus. The extra

height requested is over two hundred (200) feet from the closest property line and will not be visible from anywhere outside of the Campus.

The variance will have no impact of the immediate neighbors or the residents of the Project. The Campus Center will be on the interior of the site and therefore the neighbors will never see the condition. Therefore, the effect of any relief from strict application of the Zoning Regulations will not have negative consequences on the neighbors.

XI. COMMUNITY OUTREACH AND ITS IMPACT

The School has created a neighborhood web page, www.sidwell.edu/neighborhood/index.aspx, as well as the web page, www.sidwell.edu/about_sfs/one-campus/index.aspx for its development project and maintains this website to allow neighbors to access schedules and events of interest. As was the case with prior projects, the School's web page features a listserv for those who would like to be kept informed of new developments and a list of people to contact with construction related questions and concerns. Such discussions between the School and the community will continue throughout the Project and beyond.

In addition, the School is scheduled to present to ANC 3F, at a public meeting, on October 20, 2015, and will meet with the ANC 3C at its monthly meeting in November. The School has met with Springland Farm community organization three times. Together they have formed three subcommittees, one for design, one for traffic and one for construction management. The School and Springland Farm intend to continue the dialogue on these issues throughout the BZA process and the School's occupancy of the Project Site. The School will also sponsor a general public meeting later this fall to which all neighbors adjacent to the campus and ANC Commissioners will be invited, to review the Project. The School plans to continue its outreach to seek community input throughout the fall.

XII. EXHIBITS IN SUPPORT OF THE APPLICATION

The School will submit the following exhibits in support of the application:

<u>Exhibit A</u>	Proposed Campus Addition, Plans and Photos
<u>Exhibit B</u>	Preliminary Transportation Impact Study
<u>Exhibit C</u>	Zoning Map, showing the Property
<u>Exhibit D</u>	Property Owner's List
<u>Exhibit E</u>	Surveyor's Plat
<u>Exhibit F</u>	Agent Authorization Letter
<u>Exhibit G</u>	BZA Order No. 17703

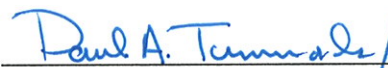
XIII. CONCLUSION

For the above reasons, this application meets the criteria set forth in Section 206 for special exception approval for a private school and meets the variance test for relief from the strict application of Section 400.9 and is therefore in harmony with the general purpose and intent of the Zoning Regulations and will not adversely affect neighboring property. The School respectfully requests the Board of Zoning Adjustment approve this application.

Respectfully submitted,



Phil T. Feola



Paul A. Tummonds

P.T.

October 14, 2015