

**BOARD OF APPEALS
FOR
MONTGOMERY COUNTY, MARYLAND**

In the Matter of the Petition of Holton-Arms School :

For a Major Modification of an Existing Private : Case No. CBA-1174-E

Educational Institution Special Exception :

**PETITIONER'S REVISED STATEMENT OF JUSTIFICATION AND
SUMMARY OF PROOF**

September 12, 2025

Petitioner, Holton-Arms School (“Holton-Arms”, “Holton”, or the “School”), hereby submits this Statement of Justification in support of its Major Modification Application to permit (1) an increase in its student enrollment cap from 670 to 870, (2) an increase in its summer camp registration cap from 665 to 970, (3) greater flexibility in third-party ancillary use of campus facilities and (4) incorporation of previous Board of Appeals administrative approval regarding Granger House (“Application”). The Holton-Arms campus, located at 7303 River Road, Bethesda, Maryland, 20817 (“Subject Property”), is classified in the R-200 and R-90 Zones. Pursuant to Section 7.7.1.B.1 and Section 7.7.1.B.3.c of the Montgomery County Zoning Ordinance, this Application will be reviewed under the standards and procedures of the zoning ordinance in effect prior to October 29, 2014 (the “2004 Zoning Ordinance”).

I. Introduction and General Description of Current Operations

Established in 1901, Holton-Arms is a private, nonsectarian school for girls. The School encourages young women in grades 3-12 to approach the world with a thirst for challenge, unflinching curiosity, and a sense of responsibility to use what they learn for the greatest good. A nationally-recognized school that prioritizes purposeful connections, Holton is a vibrant place

where both students and faculty are deeply engaged in the process of learning and bring tremendous spirit and passion to their work.

With a long legacy of excellence in educating girls, Holton provides students with time-tested and future-forward programming, preparing them for what the world needs next. The mission of the Holton-Arms School is to cultivate the unique potential of young women through the “education not only of the mind, but of the soul and spirit.” Founded by two visionary women, Holton-Arms continues to (1) cultivate a diverse, inclusive, and equitable school community, (2) tend to the health and wellbeing of its members and (3) build a global curriculum that responds to the learners in its classrooms and the world around us.

The School’s aspirations and current program offerings are rooted in Mrs. Holton’s founding vision: “My high hope is that they who enter through the ‘Open Door’ of Holton-Arms remember they felt, in the friendliness of a home, the urge to learn and the joy of overcoming obstacles as the way to happiness and the fullest life.” In this vibrant community committed to academic excellence, discovery, creativity, and joy, students are scholars, artists, and athletes who find their voices, take risks, learn from mistakes, pursue opportunities for leadership, and build lifelong friendships. The School motto, *Inveniam viam aut faciam* (I will find a way or make one), exemplifies this spirit of agency and empowerment.

During the 2023-2024 school year, the Board of Trustees, Head of School, and school community at large embarked on a process to identify the differentiators of Holton-Arms. The goal of this effort was to solidify an exciting vision of a compelling future for the School. As part of this process, the School leaders conducted multiple community surveys, gathered feedback from over 139 families and 291 individuals. As a result, the Board of Trustees also resolved to conduct a master planning process for the School to determine where and how campus facilities should be enhanced to position the School for future success consistent with its fundamental tenants.

Holton-Arms has existed at its present location at the Subject Property in Bethesda, Maryland since 1963. The School operates a Lower School (grades 3-6), Middle School (grades 7-8), and Upper School (grades 9-12). In addition to its academic programs, Holton-Arms also offers a variety of extracurricular activities, including athletics and visual performing arts programs that are essential components of the overall educational experience. Such programs are essential for the mission delivery of an education in “mind, soul, and spirit” as embodied in the School’s founding mission. A snapshot of the student body and teaching staff is as follows:

Students at a Glance

- Total Enrollment: 672 (in excess of current cap of 665 plus 5 if warranted)
- Students of Color: 48%
- Student to Teacher Ratio: 6:1
- Average Class Size: 15
- Average annual attrition 4.3%
- Students receiving financial aid: 21%
- 100% of Holton-Arms graduates are accepted to four-year institutions of higher education
- 100% of Middle School students and more than 80% of Upper School students participate in a sport
- Approximately 85% of Upper School students are enrolled in at least one Fine & Performing Arts class.
- Unique curricular opportunities including Global Education and the Humanities Scholars, Global Scholars, STEM Scholars and Community Engagement/Service Learning programs.

Faculty at a Glance

- Total Faculty and Staff: 225
- Total Faculty: 114
- 83% of faculty hold advanced degrees

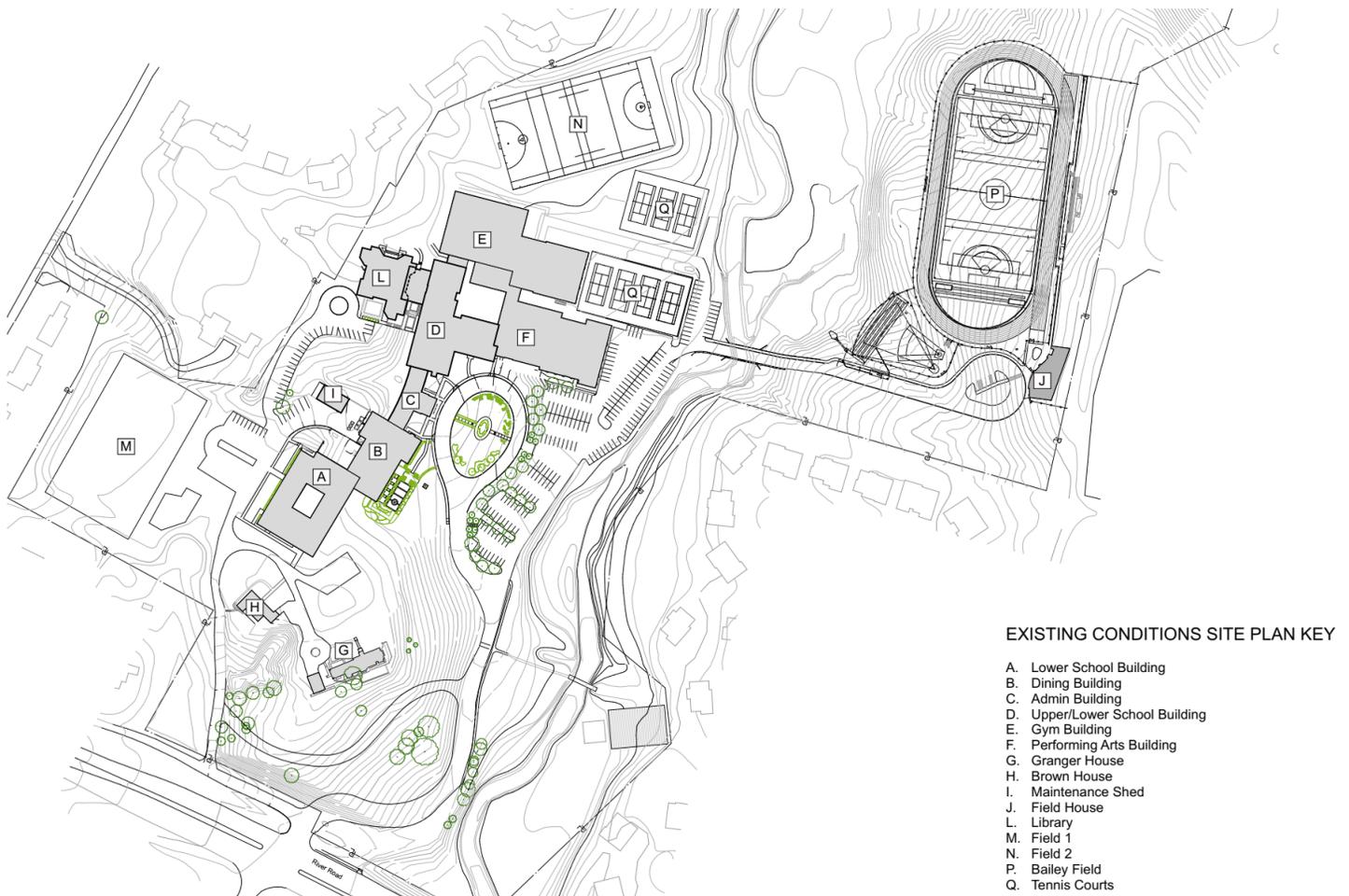
II. **Description of Property and Surrounding Area**

a. The Property

The Property is located on the northern side of River Road (MD Route 190) at its intersection with Royal Dominion Drive. It is east of River Road's intersection with Burdette Road and west of the River Road and Beech Tree Road intersection. The campus consists of an irregularly shaped Property of approximately 58.5 acres in size and is more specifically identified as Parcel Four, Burning Tree Valley Holton-Arms, as shown on Plat No. 24741 recorded among the Land Records of Montgomery County, Maryland on March 20, 2013.¹ The Property has about 770 feet of frontage on River Road and 110 feet of frontage along Burdette Road. At its northeastern extremity, the Property has frontage with Burning Tree Road at its intersection with Beech Tree Road. The topography includes forests, steep slopes that serve as significant buffers

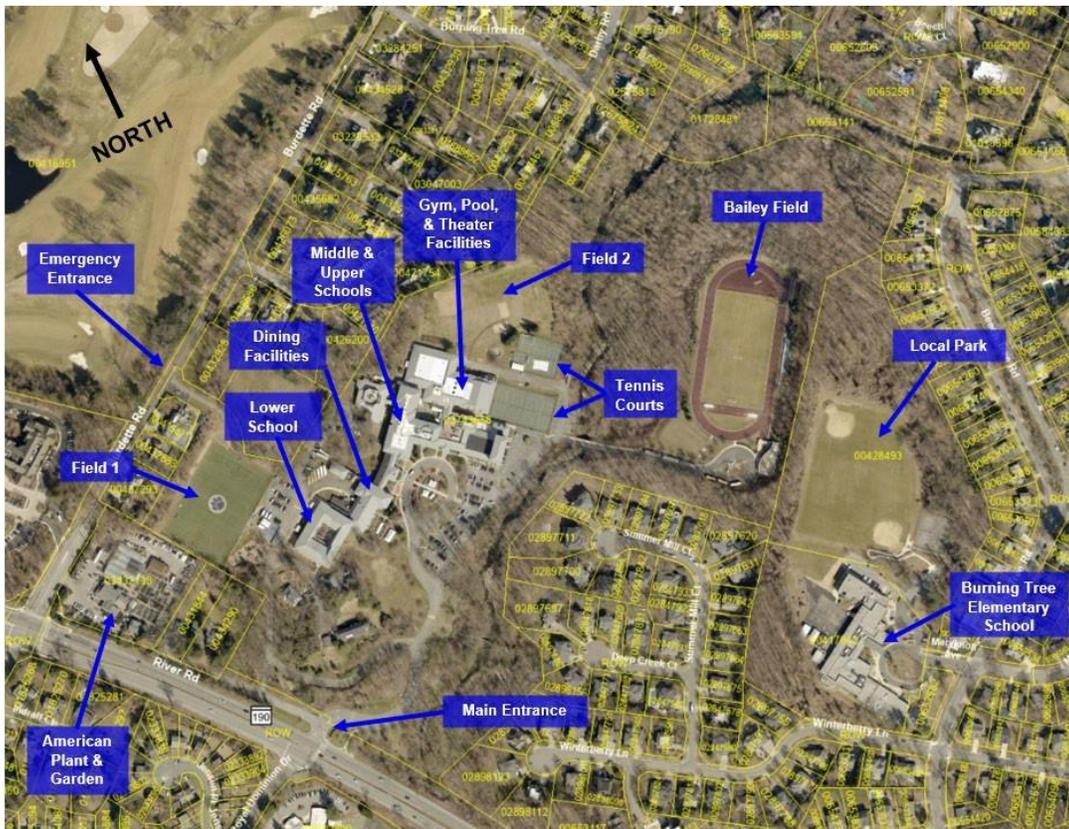
between the School uses and most of the surrounding neighborhood.

The Property is split zoned R-200 and R-90 and is within the 1990 Bethesda-Chevy Chase Master Plan area. The Property is improved with various buildings associated with the Special Exception, as well as 310 surface parking spaces. The total density on the Property is approximately 290,676 square feet and the majority of existing buildings date from 1963 to the early 2000s. Current facilities include, a Lower School; a Middle & Upper School; a dining facility; indoor program facilities, including an indoor competition-size swimming pool, a renovated double gymnasium and a theater; Bailey Field and an all-weather track; Fields 1 and 2; and outdoor tennis courts. An updated Existing Conditions Site Plan (excerpted below) that identifies the School's current facilities has been submitted for information purposes only as no new building construction or other site improvements are being proposed by the School in this Application.



Site Plan

Vehicular access to the Property is provided via one driveway along the Property's River Road frontage. There is a secondary access point off Burdette Drive, but it is restricted for use by emergency vehicles only. Pedestrian and bicycle access to the Property is provided via the sidewalk along River Road. The following Aerial Map, which is also submitted with the Application, helps to give a sense of the School and its surroundings.



¹ Holton-Arms also owns additional single-family properties along River Road, Burdette Road and Burdette Court that have not been incorporated into the Special Exception.

b. Surrounding Neighborhood

The surrounding neighborhood is bounded by Burning Tree Road to the north, Beech Tree Road to the east, River Road to the south and Burdette Road to the west. The neighborhood is predominantly single-family residential in character. Adjoining the School to the north are single-family homes in the R-200 Zone; to the east are single-family homes in the R-90 Zone and Burning

Tree local park owned by the Maryland-National Capital Park and Planning Commission; located nearby to the southeast is Burning Tree Elementary School; confronting the School to the south, across River Road, are single-family homes in the R-200 Zone and The Primary Day School; and adjoining the campus to the west are single-family homes in the R-200 Zone. Special exceptions in the area include Burning Tree Country Club (BA-2373), Fox Hill Residences assisted living facility (S-2504) and American Plant Garden Center retail nursery (S-824).

c. The Master Plan

The Property is subject to the guidance of the Bethesda-Chevy Chase Master Plan that was adopted in 1990 (the “Master Plan”). The Master Plan supports the existing R-90 and R-200 Zones for the Property. Private educational institutions are allowed by special exception in those zones. The Master Plan specifically addresses zoning at the Holton-Arms School, as well as other large land uses within the planning area. As to the School, the Master Plan recommends the same zoning to continue, and notes that it “[e]xpect[s] private school use to continue” (p. 36). The Master Plan acknowledges that occasionally a school seeks changes to its campus that would require special exception approval. The Master Plan notes that these “should be reviewed on a case-by-case basis to ensure compatibility with area residences and conformance with other Plan objectives.” (p. 31-32) Relevant Excerpts of the Master Plan are enclosed with the Application. Notably, the 1990 Master Plan recommends the continued use of the Property for a private school.

III. Prior Special Exception and Major Modification Approvals in re Case No. CBA-1174

Holton-Arms moved from its original location in downtown Washington, DC, at 2125 S Street, in 1963. The Montgomery County Board of Zoning Appeals first granted approval to operate a private school on the Property in Case No. CBA-1174. The Special Exception has since been modified from time to time to enhance and renovate the campus. On September 7, 2001, April 26, 2002, May 29, 2002, and March 23, 2004, the Montgomery County Board of Appeals (“Board”) approved modifications to the Special Exception that set many of the operational constraints that the Application seeks to change (see the attached Prior Special Exception Approvals). These approvals sought to resolve several elements of the then-applicable Special Exception contested by certain neighbors, including the confirmation that, except for emergency situations, only the River Road access may be utilized by the School. The opinions also embodied the perspective advocated by others at the time that third-party use of school facilities is not appropriate and did not constitute allowable “accessory uses.” This perspective, however, no

longer prevails today as evidenced by the County's interpretation/application of Section 59-G-2.19(b) of the 2004 Zoning Ordinance to modification requests that have been granted to other private schools in the County in the years since Holton-Arms' last major modification application in 2004.

a. Opinion Dated April 26, 2002

1. School arts programing, identified as the Center for the Arts, is limited as follows (Condition 3):
 - (a) No more than 20 non-Holton Family participants shall be on campus for this program at any one time and there shall be at least an equal number of Holton student participants
 - (b) At least 50% must be Holton families
 - (c) All non-Holton family participants shall arrive and depart during non-Peak Hours

2. Swimming activities by outside participants at the School are limited as follows (Condition 4):

The pool may be used for supervised swim programs operated by Curl Burke and The Capital Sea Devils for Holton Families and students of schools without pools that compete against Holton in swimming provided that such programs are conducted on a cost-sharing basis during non-peak hours, subject to the following conditions:

 - (a) No more than 40 swimmers at any one time.
 - (b) Weekdays: limited to one morning and one evening session. Morning session shall end before 7:30 am. Evening session shall not begin until after 5 p.m.
 - (c) A parent-driver who has a student enrolled in the early morning session may swim during that session provided that he is counted within the 40 swimmer limit.
 - (d) Include in its quarterly reports to the Board the names of schools attended by all the swimmers and a list of schools against which Holton will compete in swimming in that academic year.
 - (e) May accept compensation from Curl-Burke and the Capital Sea Devils in an amount no greater than the proportion of the maintenance and operating costs for the pool and related aquatic facilities directly related to such use.

b. Opinion Dated May 29, 2002

1. Limitation of new athletic field and track is as follows (Condition 6 and 8):
 - (a) For classes, school functions, practices, interscholastic competitions (35 per year),

conference championships (once per year and one match per weekday and 2 per weekend day)

(b) No use from 6/15-8/3, except for try outs and sports practices

(c) Seating limited to 200 seats

c. Opinion Dated March 23, 2004

1. Slight increase of the student enrollment cap from 645 to 665 with the possible addition of 5 more under certain circumstances (see Condition 6).
2. The summer camp registration cap was also increased to match the new student cap (see Condition 8).

IV. Proposed Modification Request

Holton-Arms seeks to amend the above conditions in Special Exception No. CBA-1174-D to increase its current student enrollment cap of 665 students plus 5 (if warranted) to 870 students (i.e. 29.8% increase) and to increase its summer camp registration cap from 670 campers to 970. The School also seeks to gain increased flexibility in how its campus facilities may be used by third parties, including surrounding neighbors and outside organizations. The current enrollment and campus use restrictions have been in place since 2002-2004 and the School has earnestly operated in compliance with Special Exception requirements, without seeking to change the operational limitations. Evolving conditions warrant the changes being sought in this Special Exception Modification. Finally, this application seeks to incorporate a change of use relative to the former head of school residence located on campus, also known as the Granger House, that was previously approved by the Board of Appeals administratively in 2023.

In-person education for children has become increasingly critical in 2024, with a significantly higher demand compared to twenty years ago. The Board of Trustees along with new Head of School, Penny B. Evins, are poised to solidify the School's future with the support and cooperation of its community partners. The growth objectives in the Special Exception Modification will accommodate School needs while respecting its residential neighbors. At the same time, the enrollment changes will set applicable growth limits that will guide the anticipated campus master planning process, discussed above, that the Board of Trustees is anxious to initiate. These enrollment numbers will also manage community expectations on potential School growth over the next several decades such that there is no need for neighbors to exert episodic focus,

resources and energy into piecemeal growth initiatives.

As noted in the Community Outreach section below, the School has already begun discussing the Special Exception Modification with its neighbors. To that end, the School reiterates its commitment to maintain only one school entrance (from River Road) and all parking within the campus.

a. Increase Student Enrollment to 870

The enrollment cap increase to 870 students will allow the Lower School program (grades 3-6) to accommodate up to 224 students, the Middle School (grades 7-8) to accommodate up to 238 students and the Upper School to accommodate up to 408 students. The focus of growth over the next five years will be in the Lower School with some ancillary growth in the Middle School. The School anticipates that the Lower School could grow by 98 students and the Middle School by 38 students over the next 3-5 years. Increasing enrollment and gaining operational flexibility is crucial to meet the growing market demand, stay competitive with schools that can adapt to market demands more effectively, and ensure the continued excellence of the Holton-Arms program.

The request to increase school-year enrollment is precipitated by a number of specific factors. First, there is a new and increased demand for our education model, which compels the School to consider how to accommodate the community demand for more capacity. This past year, the School experienced an unexpected enrollment surge above the current cap of 665 students for the 2024-25 academic year. The School's administrators made admissions decisions, as in prior years, based on yield and attrition information from the previous three years. The yield rate for the 2024-25 school year is 67%, which is the highest yield rate experienced by the School in the last ten years and includes yield rates of over 90% in grades 4, 7, and 8 – with the average yield over the last three years being 61%. Attrition rates remained low at 4.3%.

In response to the increased enrollment, Holton considered the optimal size of the student body in coordination with area wide roadway capacities that were studied in the attached Traffic Study, prepared by Gorove Slade Transportation Planners and Engineers. Based on this information, the School has determined that the optimal enrollment is 870 and that the School is currently capable of educating 200 additional students. The current campus has sufficient classroom space to accommodate the increased enrollment in the current educational facilities. The School has 73 variably-sized classrooms with a combined capacity of 1,262, along with five specialized spaces (two libraries, a lecture hall, one theater and a gymnasium) where classes are

regularly scheduled during the school year that add a capacity of 186. This total capacity of 1,448 in space used by the educational program is at a 46 percent space utilization rate with an enrollment of 670. According to the National Center for Education Statistics, an optimal utilization rate ranges from 75 to 90 percent. At enrollment of 870, the School's space utilization rate increases to 60 percent.

Second, under the current enrollment cap, the Lower School enrolls 143 students, resulting in unused classrooms and many classes with fewer than Holton's typical class sizes of 15-17 students and well below Holton's ideal Lower School division size. The ability to grow the Lower School, in particular, will allow Holton to support more students at younger ages, meet the increasing need for early childhood education, and establish a strong foundation to progress into Upper School years. The School has the staffing infrastructure and management for a larger Lower School and so adding Lower School students does not increase the personnel required at the same proportion as current staffing. Having the flexibility to increase the student body in the Lower and Middle Schools to meet demand will be the focus of enrollment growth and is essential for providing each child with access to a wide range of activities, including theater, dance, music, athletics, design technology and other extra-curricular activities, while also providing appropriate opportunities for social development and friendship with a broad and diverse group of peers, during this important development stage for learning from and with peers.

Third, independent school growth forecasts predict the long-term survival of mid-sized schools with enrollment of at least 800 students and the decline of schools with smaller enrollments. The fixed hard costs associated with facilities upkeep and competing for teacher talent are fast surpassing reasonable tuition expectations. Maximizing students within Holton's existing administrative structure will provide additional revenue to maintain facilities and enhance the current educational program.

Increasing enrollment and gaining operational flexibility is crucial to meet the growing market demand, stay competitive with schools that can adapt to market demands more effectively, and ensure the continued excellence of the Holton-Arms program.

The increased student enrollment can be accommodated within the surrounding roadway network, as evidenced by the revised LATR/Traffic Impact Study (TIS) that has been prepared in support of this Application. In addition to transportation demand management strategies to reduce peak hour trips, mitigation to address queuing, as detailed in the LATR/TIS, will be provided as follows:

- Optimized signal timings and offsets along the River Road (MD-190) Corridor
- River Road (MD-190) & Royal Dominion Drive intersection improvements
 - Intersection Improvements
 - Widen the northbound approach to install a 150’ northbound left turn lane
 - Extend the striping for the westbound right turn lane from 210’ to 500’
 - Traffic signal phasing modifications
 - Protected left turns for eastbound and westbound River Road
 - Re-servicing of the eastbound left-turn phase at River Road (MD 190) and Royal Dominion Drive in the AM peak hour.

The School currently has 279 paved parking spots, 21 gravel spaces, and 10 parallel spots along the track field road. These facilities currently accommodate sufficient parking for approximately 225 full- and part-time employees and 65-85 student parkers on any given day. According to Section 59-E-3.7 of the Prior Zoning Ordinance, the School must provide parking for each employee “plus additional facilities for all student parking.” Consistent with the enrollment plans discussed above, the School estimates that the number of additional faculty that may be needed to serve 870 students is 11, which would bring the total faculty/staff count to 236. To the extent necessary, student parking permits will be limited only to remaining available spaces. Moreover, in conjunction with this modification request, the School has developed a Transportation Management Plan (TMP) that includes, among other things, carpooling incentives for both students and staff that will significantly reduce the School’s overall parking demand.

b. Increase Summer Camp Registration to 970

Holton offers camps to children aged 4-14 years during the summer months after the academic year ends in early June and before the next academic year starts in early September. Holton’s summer programs are currently operated from 9am-3pm Mondays through Fridays. The School’s summer programs currently include a traditional summer camp with two, three-week sessions for students ages 4- 13 years that include crafts, arts, drama, dance, science, athletics, outdoor play and swimming (the “Creative Camp”), along with sports and discovery camps, with one to two week sessions, running just prior to the start of school and associated with the School’s

academic program in math, reading and literacy (the “Discovery Camp”). Holton also runs some sports programs before Creative Camp begins in the summer (the “Sports Camp”). Collectively the Creative Camp, the Discovery Camp and the Sports Camp are referred to as the “Summer Camp” program.

The School seeks to increase its Summer Camp enrollment from 670 to 970 students in response to community demand for more capacity. In accordance with the Special Exception, the Summer Camp gives enrollment priority to Holton-Arms students, children of Holton-Arms employees, returning campers and residents of the 20817 zip code before opening enrollment to others. Registration is full within one day and increasingly higher numbers of local students are not able to register. Demand has increased over the last four years in particular and it is difficult for parents to find summer camp and daycare options, especially in close proximity, for child care. The School would like to accommodate the demand from community members for the Summer Camp program.

Currently, the Discovery Camp is limited to Holton’s current students. When all camps were held virtually in the summer of 2020, Holton was able to open these camps to non-Holton students and found significant community interest for Middle and Upper School summer programs. The School would like to be able to run these camps on campus concurrently with the Creative Camp for older students both in and outside of the Holton community and add relevant programming in computer science, engineering, robotics, entrepreneurship and financial literacy, as well as other areas that are signatures of the School’s programming.

With increased Summer Camp enrollment, the School plans to implement staggered start and end times for the three summer programs to balance traffic on and off Holton’s campus. The Creative Camp program (ages 7-13) will maintain the 9:00 am start time with a 3:00 pm dismissal. Creative Camp kids programs (ages 4-7) will start at 9:30am with a 3:30pm dismissal. The Sports and Discovery Camp (ages 6-18) will operate both full- and half-day programming. Half-day programs will run 9:00 am-12pm, 9:30am-12pm and 12-4 pm and full day programs will run from 9:30 to 4pm.

These programs use different parts of the campus and the School will adjust its drop-off/pick-up access points so that cars will be moved off of River Road faster and directed to their programming locations, such as the Main Circle, Lower School, Learning Commons Circle, and Field House. We will utilize color coded carpool cards to help security easily recognize and direct cars.

The existing campus can accommodate the increased number of campers, with recommended mitigation strategies to improve overall operations along River Road. In addition to the facilities used during the school year that has surplus capacity to accommodate up to 1,448 students as outlined above, the summer program uses other internal specialized spaces such as dance studios, a second theater, and the pool to reach a total capacity of 1,628. The Sports Camp and other Summer Camp programs' outdoor activities make use of two of the School's three athletic fields and seven tennis courts for another possible 140 campers.

The current summer programs have no students of driving age. The current Summer Camp is staffed by 20 members of the leadership team and 202 counselors, of which 60 are junior counselors under the age of 16 and not eligible to drive. Parking is needed for 162 summer employees. The proposed 300 student increase to the summer program enrollment could result in an additional 61 employees of driving age for a total of 223 drivers needing parking. The number of year-round employees is approximately 80 and the majority of those personnel have the option to work remotely during the summer for up to 3 days per week so are not all on campus on any given day. All employees will be accommodated with current parking.

The increased summer camp enrollment can be accommodated within the surrounding roadway network, as evidenced by the revised LATR/TIS that has been prepared in support of this Application. In addition to transportation demand management strategies to reduce peak hour trips, mitigation to address queuing, as detailed in the LATR/TIS, will be provided as follows:

- Optimized signal timings and offsets along the River Road (MD-190) Corridor
- River Road (MD-190) & Royal Dominion Drive intersection improvements
 - Intersection Improvements
 - Widen the northbound approach to install a 150' northbound left turn lane
 - Extend the striping for the westbound right turn lane from 210' to 500'
 - Traffic signal phasing modifications
 - Protected left turns for eastbound and westbound River Road
 - Re-servicing of the eastbound left-turn phase at River Road (MD 190) and Royal Dominion Drive in the AM peak hour

The additional traffic associated with these increases may be accommodated on area roads

as discussed in the TIS. The lower summer traffic volumes, along with a 7-route camp busing program that will be increased to 9 routes as demand requires per the TMP, also allow for more campers without unduly burdening traffic. The Summer Camp program offers care before and after regular camp hours with the impact of staggering arrival times from 7:30-9am and dismissal times from 3-6pm. In order to further spread out summer program traffic in the afternoon, the School will vary the length and dismissal hours of the summer programs.

c. Third-Party Ancillary Use of Facilities

In addition to the enrollment caps associated with academic and camp programming, the Special Exception limits the School's ability to offer its facilities to third-party users. Currently, only the pool may be rented and it can only be rented to a small number of swimmers and predetermined operators who only have to pay for their proportionate share of the maintenance and operating costs associated with their use of the pool. No other facilities, including athletic fields, classrooms, theater, and tennis courts, may be rented and the number of non-School participants allowed to participate in School-sponsored programming is very limited. In this Application, the School seeks to eliminate the current rental prohibition for all facilities, subject to the following limitations:

- Rental of fields/tennis courts to youth programs or other independent school programs between the hours of 9-4 on weekends. This would allow up to 250 participants at any time. Fields may only be used 10 times per year for outside tournaments.
- Rental of fields/tennis courts to youth programs or other independent school programs from 5:30- 7:30 2 nights per week
- Rental of fields/tennis courts to youth programs or other independent school programs between the hours of 4-7 p.m. on summer weekdays
- Rental of indoor facilities, including classrooms, the swimming pool, basketball courts and performing arts spaces, outside of peak hour time periods

All rental opportunities will work around School use of the facilities, which is the priority. Rental numbers and contracts will be coordinated through a facilities manager to ensure that no more than 870 people, comprised of School students and outside visitors, may be on campus at any given time. The facilities manager is also responsible for ensuring that School parking is not

exceeded during non-School hours. Rental contracts will define the School's use expectations, prohibit parking within the neighborhood, and provide remedies for violations. The contracts will also require background checks and monitoring responsibilities of all outside staff using campus facilities.

One of the School's goals in renting facilities is to expose as many potential students to the campus as possible. Even though the School is currently experiencing high enrollment demand, Holton cannot rely on this trend in the future, particularly when competitor schools are much less restricted in their rental opportunities. To facilitate this exposure objective, the School anticipates renting to aligned schools, clubs and groups with preference given to girls' organizations. While the non-tuition revenue associated with these rentals is important, it is the introduction to Holton-Arms and its campus experience that is paramount to sustaining enrollment demand. School staff will be on hand to ensure that students, teachers and visitors may be safely and comfortably accommodated such that every visitor is left with a positive impression of the School.

In addition, there is a pressing County demand for available athletic spaces, particularly within the beltway where there is insufficient land and facilities for a growing number of athletic teams and clubs. By allowing the School's fields to be used sparingly for outside team activities, Holton may be a partner with the County and surrounding community in helping to ease a significant pressure point that frustrates healthy youth living nearby. Holton is also open to renting facilities to community members/groups or mission-aligned entities pro bono or at deeply discounted rates.

d. Incorporation of Previous Change of Use for Granger House Administratively Granted by Board of Appeals

The Board of Appeals administratively approved a change of use of the Granger House, which formerly served as the on campus residence of the head of school, to facilitate as an interim library and supplemental classroom location during construction of the Marriott Library/Learning Commons project. With the library project now complete, the School seeks to retain the Granger House as an auxiliary administrative office location for the long-term, as opposed to having to revert back to residential use. The Board's Opinion is excerpted below for ease of reference.

**BOARD OF APPEALS
for
MONTGOMERY COUNTY**

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**Case No. CBA-1174-D
PETITION OF THE HOLTON ARMS SCHOOL**

RESOLUTION TO MODIFY SPECIAL EXCEPTION
(Resolution Adopted July 26, 2023)
(Effective Date of Resolution: August 4, 2023)

The Board of Appeals has received a letter, dated July 18, 2023, from Soo Lee-Cho, Esquire, on behalf of The Holton Arms School. Ms. Lee-Cho requests an administrative modification of the School's special exception to allow "renovation and use of the former Head of School's on-campus residence, known as the Granger House." Ms. Lee-Cho states in her letters that "[t]he School seeks to renovate the first floor with classrooms and conference rooms as well as incorporate required ADA access improvements needed to be able to use the Granger House as a temporary library and associated staff office facility" while the School finishes the improvements to the Marriott Library and Learning Commons addition that were approved by the Board on June 8, 2022.

Ms. Lee-Cho's letter details the proposed changes to the Granger House, as follows:

... the 1st floor of the house will be converted into temporary business offices and two classrooms. The existing basement and 2nd floor will be unoccupied. The existing 1st floor full bathroom will be renovated into an ADA compliant bathroom. The interior stairs will be closed off to render the floors above and below not accessible. On the exterior, an ADA ramp will be built to allow for access to the front entrance. The existing range in the existing kitchen will be removed. The existing living, dining, and library will be converted to classroom and conference room spaces. A more detailed Site Plan (**Exhibit C**) and architectural floor plans (**Exhibit D**) are also provided in support of this modification request.

As noted above, she includes a Site Plan and architectural plans with her request.

Ms. Lee-Cho's letter states that because the Granger House was previously used as a residence for the Head of School, the proposed changes constitute a "change of use" for this building, which her letter states had "continued to be identified as 'residential' despite its location on a private educational institution site." Because of this, Ms. Lee-Cho's letter states that the Department of Permitting Service is requiring that the use and

occupancy of the Granger House "be revised to educational use, with ancillary business/office use." Her letter states that this change in the use of the Granger House will not result in any "increased occupancy on the school site" because the people in the Granger House will all have been "relocated from elsewhere on the School's campus, i.e., Marriott Library."

Ms. Lee-Cho states in her letter that the "requested renovation of the Granger House to provide limited and temporary Library space and associated staff office facilities while the Marriott Library renovation/Learning Commons addition...is completed, will not substantially change the nature, character or intensity of the School's special exception use, will not negatively impact traffic in any way, will not otherwise adversely affect the surrounding neighborhood." Thus she asserts that the requested modification can be granted administratively.

The subject property is Lot N-624, Parcel 2, and Part of Lots 6 and 7, Outlot A, Block B, Burning Tree Valley Subdivision, located at 7303 River Road in Bethesda, Maryland, in the R-90 and R-200 Zones.

The Board of Appeals considered the modification request at a Worksession held on July 26, 2023. Ms. Lee-Cho was present at the Worksession on behalf of the School, along with William Spack, AIA, of cox graae + spack architects. Ms. Lee-Cho explained that in seeking building permits for the previously granted modification involving the School's Marriott Library renovation and Learning Commons addition,¹ the School was informed by the County's Department of Permitting Services that the proposed relocation of library resources and staff to the School's Granger House would require a modification of the special exception because of the change in the use of the Granger House building (residential to educational). She stated that the Granger House was previously used as a residence by the Head of School. Ms. Lee-Cho stated that the incoming Head of School will reside elsewhere for the duration of the Marriott Library/Learning Commons construction, and that when that construction is completed and these renovated/new School facilities are operational, the Granger House will once again be used as a residence for the Head of School. Thus she noted that the requested modification is for interim use of the Granger House while the Marriott Library facility and Learning Commons space are under construction.

Mr. Spack stated that the entrance to the Granger House and its first floor bathroom were being made ADA-compliant. He stated that the School plans to block access to the upper level of the house. In response to a Board question, Mr. Spack stated that the footprint of the Granger House is not changing. He estimated that the Marriott Library/Learning Commons construction would take about a year.

Because Case No. CBA-1174-D was approved prior to October 30, 2014, under Section 59.7.7.1.B of the current Zoning Ordinance, this modification request must be reviewed under the standards and procedures in effect on October 29, 2014, unless the applicant elects otherwise. Section 59-G-1.3(c)(1) of the 2004 Zoning Ordinance provides:

¹ This construction was authorized by the Board's June 8, 2022, modification of this special exception.

If the proposed modification is such that the terms or conditions could be modified without substantially changing the nature, character or intensity of the use and without substantially changing the effect on traffic or on the immediate neighborhood, the board, without convening a public hearing to consider the proposed change, may modify the term or condition.

Based on the record before it, the Board finds that the proposed changes to the Granger House, as described herein and in Ms. Lee-Cho's letter, and as shown on the attachments to that letter, will not substantially change the nature, character, or intensity of the use or its effect on traffic or on the immediate neighborhood, and thus can be granted. The Board notes that the proposed renovations to the Granger House are modest in scope, and that the Granger House is interior to the School's campus. The Board further notes that the anticipated use of the Granger House for educational (and office) purposes is only for the duration of the Marriott Library/Learning Commons construction, that the anticipated use of the Granger House will be by persons who would already be on the School grounds but have been displaced by that construction, and that this use will therefore not increase the number of people who would otherwise be on campus. Finally, the Board finds that the proposed modification will have no effect on the other existing operations at the School.

On a motion by John H. Pentecost, Chair, seconded by Richard Melnick, Vice Chair, with Caryn Hines, Laura Seminario-Thornton, and Alan Sternstein in agreement:

BE IT RESOLVED by the Board of Appeals for Montgomery County, Maryland that the record in Case No. CBA-1174-D is re-opened to receive Soo Lee-Cho's July 18, 2023, letter, with attachments; and

BE IT FURTHER RESOLVED by the Board of Appeals for Montgomery County, Maryland that the request to modify the special exception is granted on the condition that this modification shall only be effective for such time as is necessary for the School to complete the construction on the Marriott Library and Learning Commons space and place the renovated Library and new Learning Commons space into service for the School; and

BE IT FURTHER RESOLVED by the Board of Appeals for Montgomery County, Maryland that all terms and conditions of the original special exception, together with any modifications granted by the Board of Appeals, remain in effect.


John H. Pentecost, Chair
Montgomery County Board of Appeals

Entered in the Opinion Book
of the Board of Appeals for
Montgomery County, Maryland

e. Consistency with Other Private Educational Institution Special Exceptions

The Board’ recent approvals (both for academics and for summer programs) allowing enrollment growth at Bullis School; Rochambeau, The French International School; and Landon School, along with the growth of other schools in the regional market clearly demonstrates that growing demand for increased independent school opportunities in Montgomery County is manageable. We note that such growth must be in coordination with the current 87-student-per-acre limitation set forth in Section 59- G-2.19(a)(4)(a)5 of the Prior Zoning Ordinance. Below is a chart showing the current enrollments for several Montgomery County and regional independent schools and how the enrollment is managed on a per acre basis.

School Name	Grades	Enrollment*	Land Area (Acres)**	Students Per Acre
Holton-Arms School	3-12	665	54.6	11.42
Landon School	3-12	705	69.73	10.11
Georgetown Preparatory School	9-12	506	90.30	5.60
Rochambeau The French International School	PK, K-12	1,233	14.33	86.04
Stone Ridge School of the Sacred Heart	PK, K-12	757	34.14	22.17
Bullis School	K-12	1,023	76.98	13.29
St. Andrew’s Episcopal School	PK, K-12	707	18.99	37.23
St. Albans	4-12	583	57.70	22.18
NCS	4-12	697		
Maret		650	7.91	82.17
Sidwell	PK-12	1,143	20.93	54.61
Madeira	9-12	341	376	0.91

GDS	pk-12	1,076	7.94	135.52
McLean	PK-12	464	20.61	22.51
Potomac (VA)	PK-12	1,066	90	11.84

*Enrollment data is from MoCo 360 article dated October 22, 2024 regarding Montgomery County Schools. Data concerning other schools is from their websites.

**Land area calculations are from available tax records.

The requested increase of the enrollment cap to 870 students places Holton at enrollment levels consistent with area independent schools, many of which have even higher enrollment caps than identified in the chart. For example, the chart notes Landon School’s enrollment at 705 even though its applicable special exception enrollment cap is 736. The chart also confirms that the requested cap at Holton will generate approximately 14.94 students per acre. This is well below the 87 student-per-acre limitation in the Prior Zoning Ordinance and is entirely consistent with the student densities of other independent schools in the area.

The Summer Camp enrollment and proposed facilities rentals are also consistent with flexibilities enjoyed by other independent schools in the County.

f. Summary of Special Exception Changes:

As a result, and as noted above, Petitioner seeks to amend the Special Exception to establish new limitations on the Special Exception as described below.

ISSUE	EXISTING APPROVAL	PROPOSED CHANGE
SCHOOL ENROLLMENT	(1) Limited to 665 (plus 5 if warranted)	870 students
SUMMER CAMP REGISTRATION	(1) Limited to 665 campers.	970 campers Priority registration over the public to 20817 residents

SWIMMING RENTAL	<p>May permit pool to be used for supervised swim programs operated by Curl Burke and The Capital Sea Devils for Holton Family and students of schools w/o pools that compete against Holton in swimming provided that such programs are conducted on a cost- sharing basis during non-peak hours, subject to the following conditions:</p> <p>(1) No > 40 swimmers at any one time.</p> <p>(2) Weekdays: limited to one morning and one evening session. Morning session shall end before 7:30 am. Evening session shall not begin until after 5 p.m.</p> <p>(3) A parent-driver who has a student enrolled in the early morning session may swim during that session provided that he is counted within the 40 swimmer limit.</p> <p>(4) Include in its quarterly reports to the Board the names of schools attended by all the swimmers and a list of schools against which Holton will compete in swimming in that academic year.</p> <p>(5) May accept compensation from Curl-Burke and the Capital Sea Devils in an amount no greater than the proportion of the maintenance and operating costs for the pool and related aquatic facilities directly related to such use.</p>	<p>Rent swimming facility for swim and dive training to respected youth programs and/or independent schools at market rates – subject to umbrella restrictions below</p> <p>Lift participant number restrictions</p> <p>Lift time restrictions – subject to below umbrella limitations</p>
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<p>“BAILEY FIELD” (formerly Track Field)</p>	<p>(1) For Holton classes, school functions, practices, interscholastic competitions (35 per year), conference championships (once per year and one match per weekday and 2 per weekend day) (2) No use from 6/15-8/3, except for try outs and Holton sports practices (3) Seating limited to 200 seats</p>	<p>Eliminate limit on number of interscholastic events for Holton</p> <p>Allow for rental of Bailey Field from 9-4 on weekends, 5:30 to 7:30 PM 2 nights per week, and from 4-7 PM on week nights in the summer, all of which are subject to:</p> <ul style="list-style-type: none"> -Rental to youth or independent school program -10 outside tournaments per year -umbrella limitations below
<p>CENTER FOR THE ARTS (now known as AUXILIARY PROGRAMS regarding Holton-run educational, artistic and athletic programing</p>	<p>(1) No >20 non-Holton Family participants shall be on campus for this program at any one time and there shall be an equal number of Holton student participants. (2) At least 50% must be Holton Family. (3) All non-Holton Family participants shall arrive and depart during non-Peak hours</p>	<p>Re-name to “Auxiliary Programming in Education, Arts and Athletics”</p> <p>Lift non-Holton Family restrictions, subject to their compliance with the below umbrella limitations</p>

<p>OTHER RENTAL</p>	<p>Need Board of Appeals approval</p>	<p>Allow for rentals of indoor facilities subject to umbrella restrictions</p> <p>Allow for rentals of outdoor facilities from 9-4 on weekends, 5:30 to 7:30 PM 2 nights per week, and from 4-7 PM in the summer, all of which are subject to:</p> <ul style="list-style-type: none"> -Rental to youth or independent school program -10 outside tournaments per year -umbrella limitations
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UMBRELLA LIMITATIONS:

- 870 student/participant limit on campus at all times during the Academic Year
- 970 camper limit on campus at all times during the summer camp season
- Arrival and departure outside of peak hours

HOLTON-ARMS' COMMITMENT:

- No parking in the neighborhood for campus events
- Noise Ordinance compliance
- No changes to current access prohibitions

Petitioner will comply with the requirements of Section G-2.19(b) of the Prior Zoning Ordinance and demonstrate that the above non-academic programming, in combination with other activities of the School, will not have an adverse effect on the surrounding neighborhood due to traffic, noise, lighting, or parking, or the intensity, frequency, or duration of activities. These elements are met primarily by the size and orientation of the campus, which accommodates significant room for campus circulation and a generous buffer between camp and neighboring residential activities.

The Traffic Study demonstrates that the area road system can accommodate 870 students and 970 campers, which incorporates attendance at all summer activities hosted by the School, in a given day with corridor-wide signal timings adjustments and improvements at the site driveway that improve the overall River Road corridor operations. The proposed existing campus network accommodates these increases in vehicle activity on the School Property.

V. Community Outreach

When it became apparent in July, 2024 that the School was overenrolled for the 2024-2025 academic year, Holton reached out to representatives of the Bradley Boulevard Citizens Association to alert them to the issue and that Holton planned to submit an application for potential changes to the Special Exception that would address the oversubscription and other related operational limitations. The School shared a list of proposed Special Exception changes with the representatives on August 26, 2024.

Later in the fall, the School sought feedback on several occasions from the Bradley Boulevard Citizens Association regarding the proposed Special Exception Modification; however, no feedback was provided. On November 13, 2024, the School hosted 27 immediate neighbors and other subscribers to the neighborhood listserv to discuss the proposed Special Exception changes and solicit feedback. At this event, the School obtained a list of addresses that will be used for ongoing communications as the Special Exception Modification progresses. Contact information for other interested parties will be added to the Application notice list as they engage with the School in the coming months. Most recently on September 9, 2025, the School hosted a Virtual Community Meeting Webinar at which the operational changes requested in this Application were again described and the mitigation measures detailed herein and in the revised LATR/TIS presented.

VI. Application Contents

In addition to this Statement in Support of Special Exception Modification Application, the Petitioner submits its filing fee, sign deposit, and the following materials in support of its Special Exception Modification Application:

- a. Application Form for Special Exception Modification
- b. List of Adjoining and Confronting Property Owners and Community Associations (with mailing labels)
- c. Certified Zoning Vicinity Map
- d. Tax Map

- e. Existing Conditions Site Plan
- f. Aerial Plan
- g. Bethesda-Chevy Chase Master Plan Excerpts
- h. Prior Special Exceptions Approvals
- i. LATR / Traffic Impact Study
- j. Transportation Management Plan

VII. Witnesses

The Petitioner anticipates presenting testimony from the following individuals at the hearing:

1. Penny Evins, and/or other representatives of the Petitioner, Holton-Arms, will provide an overview of the existing Holton-Arms operations, the existing Property conditions and improvements, and the need for the Special Exception Modification changes.

2. Katie Wagner of Gorove Slade, Transportation Planners and Engineers, will testify as an expert in the field of traffic engineering regarding the traffic impact from the proposed operations, the adequacy of roads and intersections, and how approval of the proposed Special Exception Modification will not have an adverse impact upon the local street network.

3. Marie Cox of Wells & Associates, Transportation Demand Management Specialist, will testify as an expert in the field of transportation demand management planning and assessment.

4. Patrick La Vay of Macris, Hendricks & Glascock, will testify as an expert in the field of Civil Engineering and Land Planning relative to the intersection mitigation improvements proposed to be constructed by the School as detailed in the LATR/TIS.

Petitioner may call additional witnesses in support of its Application and, if so, will supplement this filing accordingly.

VIII. Summary of Proof

At the hearing, the Petitioner will establish the following through its Application materials, testimony and other exhibits:

- 1. *That the private educational institution is a permissible Special Exception in the R-90 and R- 200 zones;*

A Private Educational Institution is permitted as a special exception in the R-90 and R-200 zones per 2004 Zoning Ordinance §59-C-1.31(D).

2. That the Special Exception Modification complies with the requirements of Prior Zoning Ordinance §59-G-2.19 as follows:

(a) Generally. A lot, tract or parcel of land may be allowed to be used for a private educational institution if the board finds that:

(1) the private educational institutional use will not constitute a nuisance because of traffic, number of students, noise, type of physical activity, or any other element which is incompatible with the environment and character of the surrounding neighborhood;

The Special Exception Modification will not constitute a nuisance because of traffic, number of students, noise, type of physical activity or any other element. The School has been in operation at this location since 1963. The Traffic Study demonstrates in great detail that the proposed changes may be accommodated within the area-wide road network. The requested modifications will result in activities that are well set back from adjoining uses. Bailey Field, in particular, is set back over 100 feet from the property line (see Opinion November 8, 2003 Board Opinion at page 15). There are no changes to the current 200-seating limitation and all outdoor activities will be during daylight hours.

(2) except for buildings and additions completed, or for which a building permit has been obtained before (date of adoption [April 2, 2002]), the private educational institution must be in a building architecturally compatible with other buildings in the surrounding neighborhood, and, if

the private educational institution will be located on a lot, tract, or parcel of land of 2 acres or less, in either an undeveloped area or an area substantially developed with single-family homes, the exterior architecture of the building must be similar to a single-family home design, and at least comparable to any existing homes in the immediate neighborhood;

No new buildings are being proposed as part of this Special Exception Modification.

(3) the private educational institution will not, in and of itself or in combination with other existing uses, affect adversely or change the present character or future development of the surrounding residential community; and

The Special Exception private education use has existed on the Property since 1963 and is

a part of the fabric of the surrounding residential community. The character of the Special Exception will remain substantially the same thereby not adversely affecting or changing the present character of the surrounding residential community.

(4) the private educational institution must conform with the following standards in addition to the general development standards as specified in Section G-1.23:

a. Density—The allowable number of pupils per acre permitted to occupy the premises at any one time must be specified by the Board considering the following factors:

1. Traffic patterns, including:

a) Impact of increased traffic on residential streets;

According to the Traffic Study, the increase in student enrollment during the school year and summer season will not have a detrimental impact on the adjacent transportation network as the additional trips can be accommodated as detailed in the revised LATR/TIS.

b) Proximity to arterial roads and major highways;

The Property has frontage on River Road which is a state roadway classified as a boulevard in the current amended version of the Master Plan of Highways and Transitway and was previously classified as a major highway in the 1990 Bethesda-Chevy Chase Master Plan. The State Highway Administration classifies River Road as a Principal Arterial/Secondary Highway.

c) Provision of measures for Transportation Demand Management as defined in Section 42A-21 of the Montgomery County Code;

A new/updated Transportation Management Plan (TMP) with TDM strategies has been prepared in support of this Application.

d) Adequacy of drop-off and pick-up areas for all programs and events, including on-site stacking space and traffic

control to effectively deter queues of waiting vehicles from spilling over onto adjacent streets; and

Current operations include the implementation of designated pick-up and drop-off areas that will create predictable behavior, reduce queuing, and reduce time spent on campus during the pick-up and drop-off periods.

2. Noise or type of physical activity;

Any noise caused by the private educational institution use is mostly mitigated by the ample setbacks of the use from all property lines, as well as adequate buffering. For the few adjacent residences that are located closer to School fields and tennis courts, the School is absolutely committed to its compliance with the applicable Noise Ordinance. The School further notes that all expanded activities will be limited to daylight hours and constrained by time and user limitations in the proposed Special Exception Modification.

3. Character, percentage, and density of existing development and zoning in the community;

As noted, the surrounding community is zoned R-90 and R-200 and contains moderate density residential uses, parkland, conservation areas, as well as other educational institutions. No new buildings are proposed with the Special Exception Modification.

4. Topography of the land to be used for the special exception; and

The campus topography varies in elevation with large flat areas spread throughout the campus to accommodate athletic fields and campus activities. There are some forested, steep slopes associated with the stream valley running along the east side of campus. The west and north side of the campus are also buffered from adjacent neighbors, in most cases, by ample setbacks and tree cover.

5. Density greater than 87 pupils per acre may be permitted only if the Board finds that (i) the program of instruction, special characteristics of students, or other circumstances justify reduced space and facility requirements; (ii) the additional density will not adversely affect adjacent properties; (iii) additional traffic generated by the additional density will not

adversely affect the surrounding streets.

An enrollment of much fewer than 87 students per acre is proposed. Given the above stated facts, the enrollment of 870 students (approximately 14.94 students per acre) and increased enrollment to 970 Summer Camp participants is appropriate. The proposed enrollment and students per acre are also compatible with independent schools in the County and broader region.

b. Buffer—All outdoor sports and recreation facilities must be located, landscaped or

otherwise buffered so that the activities associated with the facilities will not constitute an

intrusion into adjacent residential properties. The facility must be designed and sited to protect adjacent properties from noise, spill light, stray balls and other objectionable impacts by providing appropriate screening measures, such as sufficient setbacks, evergreen landscaping, solid fences and walls.

As discussed above, the existing location of athletic facilities are generally well setback from the property lines with notable slope and forest elements. Adequate buffers are also provided where athletic facilities may be visible to adjacent residential properties. In addition, the School is open to working with neighbors to address reasonable concerns about specific intrusions into their residential properties.

(b) If a Private Educational Institution operates or allows its facilities by lease or other arrangement to be used for: (i) tutoring and college entrance exam preparatory courses,

(ii) art education programs, (iii) artistic performances, (iv) indoor and outdoor recreation programs, or (v) summer day camps, the Board must find, in addition to the other required findings for the grant of a Private Education Institution special exception, that the activities in combination with other activities of the institution, will not have an adverse effect on the surrounding neighborhood due to traffic, noise, lighting, or parking, or the intensity,

frequency, or duration of activities. In evaluating traffic impacts on the community, the Board must take into consideration the total cumulative number of expected car trips generated by the regular academic program and the after school or summer programs, whether or not the traffic exceeds the capacity of the road. A transportation management plan that identifies measures for reducing demand for road capacity must be approved by the Board.

The Board may limit the number of participants and frequency of events authorized in this section.

(c) Programs Existing before April 22, 2002.

(1) Where previously approved by the Board, a private educational institution may continue the operation of (i) tutoring and college entrance exam preparatory courses, (ii) art education programs, (iii) artistic performances, (iv) indoor and outdoor recreation programs, or (v) summer day camps, whether such programs include students or non- students of the school, if the number of participants and frequency of events for programs authorized in 59-G-2.19(b) are established in the Board's approval.

(2) Where not previously approved by the Board, such programs may continue until April 22, 2004. Before April 22, 2004, the underlying special exception must be modified to operate such programs, whether such programs include students or non-students of the school. The Board may establish a limit on the number of participants and frequency of events for authorized programs.

With the Special Exception Opinion dated March 23, 2004, the Board has approved the continued operation of Holton-Arms' Summer Camp. The Board permitted 665 students during the academic year and 665 Summer Camp participants on campus at any given time. Holton-Arms now seeks to increase the number of students and Summer Camp participants permitted to 870 and 970, respectively. According to the Traffic Study, the increased number of students and campers, alone or cumulatively with the academic year program, will not

detrimentally affect the surrounding transportation network. The vehicle trips generated by the changes will not exceed the traffic capacity of the adjacent roadways and the proposed enrollment increases satisfy the County's motor vehicle adequacy test with mitigation measures as detailed in the revised LATR/TIS.

3. *That the proposed Special Exception Modification will be consistent with the General Plan, as well as the approved and adopted [1990] Master Plan;*

The Property is covered by the 1990 Bethesda-Chevy Chase Master Plan that affirms the existing R-90 and R-200 Zones and recognized that that the private school use may continue at the Property. In addition, the proposed Special Exception Modification is consistent with the applicable provisions of the 1990 Master Plan.

4. *That the proposed Special Exception Modification will be in harmony with the general character of the neighborhood considering population density, design, scale and bulk of proposed new structures, intensity and character of activity, traffic and parking conditions, and number of similar uses;*

The proposed Special Exception Modification will be in harmony with the general character of the neighborhood. As noted above, the neighborhood surrounding the Property is of a residential character, but also includes some school uses. Specifically, school uses in the vicinity of the Property are Burning Tree Elementary School and Primary Day School. The proposed Special Exception Modification will work well with the residential properties because no new buildings are proposed and all impacts may be absorbed within the existing campus environment.

5. *That the proposed Special Exception Modification will not be detrimental to the use, peaceful enjoyment, economic value or development of surrounding properties or the general neighborhood;*

The proposed Special Exception Modification will not be detrimental to the use, peaceful enjoyment, economic value or development of surrounding properties or the general neighborhood. The private educational institution use will continue to operate as it does

today, which includes ongoing respect for the surrounding residential community.

6. *That the proposed Special Exception Modification will cause no objectionable noise, vibrations, fumes, odors, dust, illumination, glare, or physical activity at the Property;*

The proposed Special Exception Modification will not cause objectionable noise, vibrations, fumes, odors, dust, illumination, glare, or physical activity at the Property. The increased enrollment opportunities and flexibility of campus operations will be fully contained within existing facilities. Outside activities will be limited to daylight hours and managed by restrictions on times and frequency of use. Existing buffers will continue to provide sufficient separation between school and residential uses. The School will adhere to the standards imposed by the applicable Noise Ordinance and identify a facilities manager to address neighbor concerns as they emerge.

7. *That the Special Exception Modification will not, when evaluated in conjunction with existing and approved Special Exceptions in the adjoining residential area, increase the number, intensity or scope of Special Exception uses sufficiently to affect the area adversely or alter the predominately residential nature of the area;*

The Special Exception Modification does not propose an increase in the number or scope of special exception uses in the area. As discussed above, any change to the intensity of Special Exception uses at the Property will be fully contained and managed within the Property.

8. *That the proposed Special Exception Modification will not adversely affect the health, safety, security, morals or general welfare of residents, visitors or workers in the area of the Property; and*

The proposed modifications to the existing Special Exception will not adversely affect the health, safety, security, morals or general welfare of residents, visitors or workers in the area

of the Property. The Special Exception has operated for many years without causing these effects and the proposed changes ensure that any outside visitors to the School will be properly vetted and maintained within the Property. In addition, the proposed road system mitigations will enhance traffic safety and emergency access to the site.

9. *That the Property will be served by adequate public services and facilities.*

The Property is served by adequate public facilities. According to the revised LATR/TIS with TMP inclusive of TDM Strategies, the proposed Special Exception Modification will not have a detrimental impact on the surrounding transportation network. Adequate water and sewer facilities will be available at the Property. The Property is designated water category W-1 and sewer category S-1. Adequate Fire and Rescue and Police services also serve the Property. The nearest fire station is approximately 1.1 miles away and the nearest police station is approximately 3.5 miles away.

IX. Estimated Time for Presentation

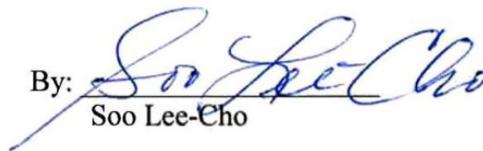
The Petitioner anticipates that the presentation of its Special Exception Modification request will take approximately five hours.

X. Conclusion

As demonstrated above, Holton has an immediate need to increase its academic and camp enrollment numbers and to obtain more flexibility in the use of campus facilities. The proposed modifications are required to address the current oversubscription of students this academic year and are critical for the long-term planning and viability of the School. The changes may be fully accommodated within the campus and within the existing road system while minimizing impacts to the surrounding neighborhood. To that end, the School is committed to working with its neighbors to quickly address concerns they may have as the changes are considered and implemented. For these reasons, Holton- Arms respectfully requests that the Board approve the requested modification of Special Exception so that Holton-Arms may continue to serve its students and summer camp participants effectively.

Sincerely yours,

BREGMAN, BERBERT, SCHWARTZ & GILDAY, LLC

By: 
Soo Lee-Cho