

**STATEMENT OF JUSTIFICATION
Christ Episcopal School**

Minor Modification of Special Exception

MODIFICATION REQUEST AND SUBJECT PROPERTY:

The Applicant, the Vestry of Prince George's Parish in Montgomery County, MD, on behalf of the Christ Episcopal School (CES), requests approval of a Minor Modification of the School's existing special exception to relocate from the 22 W. Jefferson Street Building ("Jefferson Building") and consolidate its operations in existing facilities within the main Church building and other property located at 109 and 119 ½ S. Washington Street.

The property is also home to the historic Christ Episcopal Church and parish offices located at 107 and 109 S. Washington Street. The subject property consists of a total of 1.94 acres of land in the R-90 Zone. No new building construction is proposed by this Modification. However, certain parking, landscaping and stormwater management improvements are proposed and will be implemented in conjunction with the 22 West Jefferson LLC's proposed residential project that will serve to also benefit the Church/School site.

The Jefferson Building was acquired by the Christ Episcopal Church/School back in 2004 in order to accommodate a phased growth/expansion of the School's program and student population that would eventually result in the conversion of the entire office building into private educational use. At the time, there were plans in place to aggressively expand the School's student enrollment to as many as 397 students. In December 2004, the Board of Appeals approved the School's use of the Jefferson Building to accommodate those expansion goals in Case No. SPX2004-00347. Growing the student population to that size, however, is no longer consistent with the School's current long-range Strategic Plan.

In 2021, the decision was made to refocus the School's programming on its core strengths such as smaller-class sizes as well as low student-to-teacher ratios and endeavor to 'right-size' the School's future growth model. Out of this strategic planning effort came the realization that the Jefferson Building no longer made sense as a long-term home for the School. Accordingly, this Minor Modification application is being filed to consolidate the School's operations within existing space already occupied by the School in the main Church building and other property located at 109 and 119 ½ S. Washington Street, and allow the reuse/redevelopment of the Jefferson Building and site for a new residential condominium community.

The Level 2 Site Plan application for the redevelopment/conversion of the Jefferson Building and site into a new residential condominium community will afford the Church/School an unique opportunity to maintain continued access to surface parking spaces needed to support its institutional uses. Consistent with a Parking Agreement and Cross Easement recorded in the Land Records of Montgomery County at

Book 64889, Page 143 and upon approval/implementation of 22 West Jefferson LLC's development proposal, the Church/School will have the right to use thirty-two (32) of the parking spaces located on the new development site *for so long as the Church continues to hold religious services* in the historic Church building. As such, approval of the new residential condominium community will not only add new and diverse housing stock located close to the many amenities of Rockville Town Square, it will do so in a manner that facilitates the long-term viability of the Christ Episcopal Church/School, one of the City's most valued historic institutions.

APPLICATION:

History/Background:

The Vestry of Prince George's Parish (Christ Episcopal Church) is the sponsoring entity for the Christ Episcopal School (CES) which was established in Rockville, Maryland in 1966. CES is a private co-educational institution that provides high academic standards with individual attention to the needs of students from pre-school to grade 8, in a caring, Christian environment. Although affiliated with the Church, an Episcopal parish established in 1726, CES is open to children of all denominations. The School is accredited by the Association of Independent Maryland Schools and the National Association of Independent Schools.

CES seeks to prepare talented girls and boys for the challenges of secondary education. Its program combines the challenge of a rigorous academic curriculum with the support and teachings of a caring, Christian community. Because class size is small, children are assured of individual attention from a faculty committed to the nurturing of every student. The small class size and individual attention by the teacher foster the complete development of a student's academic potential. The average class size is 13 students in K-8th grade, with an average student to full-time teacher ratio of 7 to 1. In an era when moral and spiritual values are avoided in most schools, CES focuses on giving each student the ethical standards and faith that are necessary for the proper maturation of the whole person, resulting in a student who is intellectually, morally and spiritually prepared for the opportunities and challenges of life. CES welcomes and respects students and families of all faiths, races and ethnic backgrounds, while maintaining an intentionally Episcopalian environment. All members of the School community attend chapel services, wear uniforms, adhere to a code of honor, and maintain high standards of conduct.

Existing Operations to be Maintained:

CES has determined that a total student population (Pre-K through 8th grade) of 180 students constitutes the "right size" for the School to achieve its mission and maintain both financial viability and high academic standards in the long-term. A student population of 180 students will be supported by a total of 30 staff members, including 14 full-time teachers, 6 part-time teachers (including 1 bus driver), 5 teachers' aides and 5 administrative personnel.

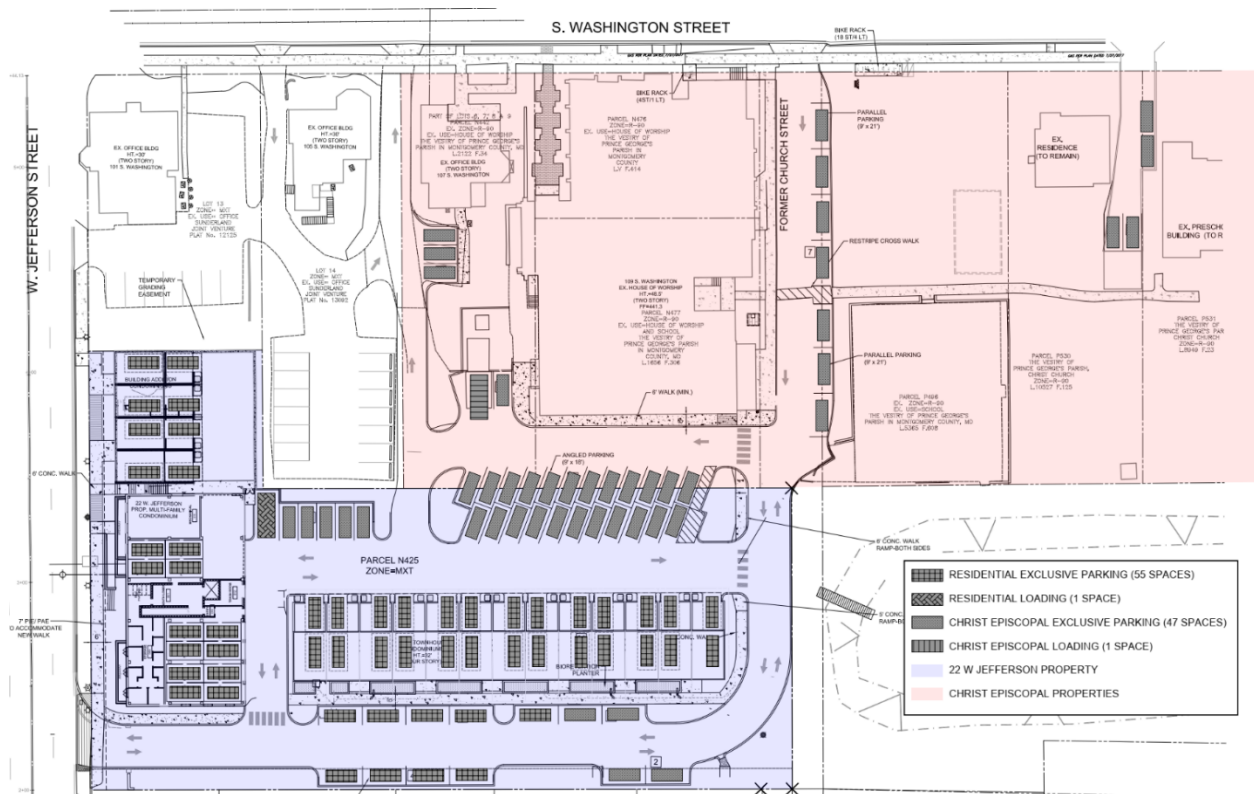
The School will continue to operate from 7:45AM until 3:15PM Monday – Friday, with an option for early arrival from 7:30AM and extended care until 6:00PM. Preschool students are dismissed at 11:45AM, but may stay for lunch until 1:00PM or for extended care until either 3:00PM or 6:00PM to

permit flexibility for working parents. All students arrive and depart by private vehicle, but arrival and departure times are staggered since some students participate in before or after-school care programs. The School sponsors occasional evening functions that end by 9:00PM. The Church periodically schedules evening use of the school facilities by community groups.

The preschool program will continue to be housed at 119 ½ South Washington Street, while the kindergarten through 8th grades will be accommodated in the main Church building. The School currently operates its programs during an academic year that extends from late August/early September to early June. In addition, the School offers 10 weeks of summer camp programs that extend from early June to mid-August.

Site Access/Circulation and Parking:

The site access/circulation for the Church/School will remain largely unchanged with its main access drive located along S. Washington Street. The site will maintain connectivity with the new residential condominium community in terms of vehicular/parking access and circulation as depicted in the Parking Exhibit below. The blue shading covers the 22 W. Jefferson property area, while the pink shading covers the Christ Episcopal Church/School site. A new private alley will facilitate safe/efficient site circulation for the new residential condominium community to/from its main access drive located along W. Jefferson Street.



The row of five (5) perpendicular spaces and twenty-three (23) angled spaces that straddle the two site areas in the middle of the above image are spaces that while mostly located on the 22 W. Jefferson property will be reserved for the Church/School’s use, allowing both sites to fully comply with the City’s minimum off-street parking requirements as detailed in the parking tabulations provided below; an additional four (4) parallel spaces are provided along the new private alley, for a total of thirty-two (32) surface parking spaces allocated for the Church/School’s use.

The Church/School’s required parking calculations reflected in the below table include a 30% reduction that is allowable by approval of the Board of Appeals under Section 25.16.02.g.4 of the Zoning Ordinance for sites that contain a church and affiliated private educational institution as in this case. As described above, the Church and School operations will not have overlapping peak hour parking requirements and as such the requested reduction will not adversely affect the site or adjacent area.

**TABLES FOR SPECIAL EXCEPTION APPLICATION – CHURCH/SCHOOL
DETAILED PARKING TABULATION – INSTITUTIONAL USES**

NAME	USE	GFA	EMPLOYEES	PARKING RATE	PARKING REQUIRED
Christ Episcopal Church	Place of Worship / Assembly (109 S. Washington)	11,973	N/A	1 per 300 SF	40
	Church Office (107 S. Washington)	1,800	N/A	1 per 300 SF	6
	Rectory (119 S. Washington)	1 du	N/A	2 per du	2
Christ Episcopal School	Educational Institution (109 S. Washington + 119 ½ S. Washington)	10,590	30	1 per 2 employees including teachers and administrators	15
Standard # of Spaces Required for Institutional Uses					63
30% Reduction Pursuant to Section 25.16.02.g.4 of Zoning Ordinance					[19]
Total Required for Institutional Uses					44
Total Provided on Church/School Property					15
Total Provided on 22 W. Jefferson Property					32

**TABLES FOR SITE PLAN APPLICATION – 22 W. JEFFERSON
DETAILED PARKING TABULATION - RESIDENTIAL CONDOMINIUM**

NAME	USE	# UNITS	PARKING RATE	PARKING REQUIRED
22 West Jefferson – Residential Condominium Project	Multi-Family Units	6	2 per du (tandem) (2 beds)	12
		6	1.5 per du (non-tandem) (2 beds)	9
	Townhouse Units	17	2 per du (tandem) (3 beds or more)	34
Total Required for Residential Uses				55
Total Provided on 22 W. Jefferson Property				87
Total Allocated for Residential Uses				55
Total Allocated for Adjoining Institutional Use Under Parking Agreement				32

-PROVIDED FOR INFORMATION PURPOSES ONLY

Stormwater Management:

Stormwater management for the development is proposed in accordance with the Stormwater Management Act of 2007, the revised 2000 Maryland Stormwater Design Manual (the Manual), the City of Rockville Code of Ordinances (Code), the City of Rockville Sediment Control and Stormwater Management Regulations (Regulations) and the City of Rockville Department of Public Works design policies and guidance to provide environmental site design (ESD) to the maximum extent practicable (MEP).

As discussed with DPW staff, the development area for stormwater management compliance purposes is 137,100 square feet (3.14 acres), i.e., inclusive of the Christ Episcopal Church/School properties, and consists of 89,800 square feet (2.06 acres) of existing impervious surface area (“SWM Site Area”). The existing impervious surface area is 65.4% of the SWM Site Area and includes institutional and commercial uses. As outlined in Code Chapter 19-IV.2.19.47, the Application is considered as redevelopment.

The required ESD treatment volume (ESD_v) for the SWM Site Area is 10,224 cubic feet with an associated Pe of 2.34”. With the program requirement to maintain the current level of parking, along with other site constraints such as existing and proposed utilities, the available locations for micro-scale practice locations are quite limited. The limited locations for facility siting encouraged the investigation of innovative practices. The proprietary system from Modular Wetlands System (MWS) was chosen to maintain the program requirements and provide at least the minimum allowable ESD_v treatment. The MWS system is approved for use as a stand-alone ESD practice by both MDE and MCDPS. This system uses a precast concrete structure with an integral biofiltration bed that relies on horizontal filtration to limit the required size of the filter bed and relies on off-line storage for the required volume. In addition, planter box micro-bioretenion facilities are proposed to treat the runoff from most of the townhouse roofs. These planter box micro-bioretenion facilities provide 1,556 cubic feet of storage with a treated Pe of 2.6”. There are no other locations on the project where ESD micro-scale practices can reasonably be provided. A monetary contribution to the City Stormwater Management Fund will be required for both the SWM Site Area covered by this Application and the right-of-way.

Forest Conservation:

As discussed with DPW staff, the development area for forest conservation compliance purposes is 137,100 square feet (3.14 acres), i.e., inclusive of the Christ Episcopal Church/School properties (“FCP Site Area”). The 3.14 acre FCP Site Area has a forest conservation requirement of 0.47 acres. This 0.47 acres is proposed to be met with 16,742 s.f. of on-site tree credit and 3,371 s.f. via fee-in-lieu. The 16,742 s.f. on-site forest conservation is met with a combination of 7,542 s.f. existing tree critical root zone credit and 9,200 s.f. of proposed tree credit. The minimum tree cover requirement of 20,564 s.f. is met with 9,142 s.f. credit from existing forest conservation and significant replacement trees, 11,200 s.f. of proposed large shade trees, and 400 s.f. of ornamental trees proposed for a total of 20,742 s.f. The replacement tree requirement of 54 trees will be met via 4 trees to be planted and 50 trees to be met with fee-in-lieu.

Compliance with Required Findings:

The subject Modification request constitutes a significant reduction in the intensity of the special exception use, in particular as it relates to the maximum student population that was previously approved for the Christ Episcopal School back in 2004. It will also retain access to the 22 W. Jefferson property for parking, and circulation, as well as benefit from stormwater management improvements being introduced by the new residential condominium project, thereby mitigating any potential adverse impacts that might be related to the School's ongoing operations, if any. Based on all the above and the accompanying application materials in support, the proposed Modification request satisfies all the required findings for Special Exception approval as required by the Zoning Ordinance as follows:

1. Section 25.15.01.a.2.(b) – Special Exception Findings:
 - a. Will not adversely affect health or safety of persons residing or working in the area;
 - b. Will not overburden existing and programmed public facilities as provided in Article 20 of Chapter 25 and as provided in the adopted Adequate Public Facilities Standards Manual;
 - c. Will not be detrimental to the use or development of adjacent properties or the neighborhood;
 - d. Will not change the character of the neighborhood in which the use is proposed considering services currently provided, population density, character, and number of similar uses; and
 - e. Will not constitute a nuisance because of noise, traffic, number of people, or type of physical activity.

Accordingly, based on all the above, we respectfully request approval of Christ Episcopal School's modification request as proposed.

Respectfully submitted,

BREGMAN, BERBERT, SCHWARTZ & GILDAY, LLC

By:


Soo Lee-Cho