

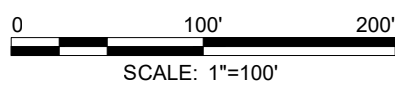
CONSULTANTS

6101 WILSON LANE  
BETHESDA, MD 20817

SHEET TITLE

## CS-100

SHEET 1 OF 15







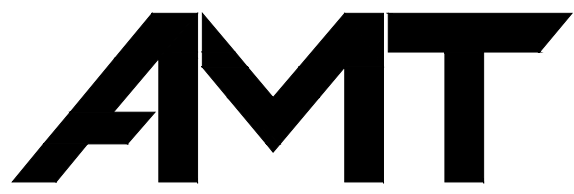
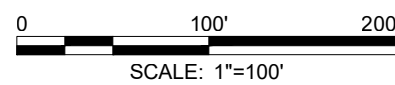
PHASING PLAN LEGEND

PHASE 0

370 PARKING SPACES

PHASE 0:

- FENCE & WELCOME CENTER: REPLACEMENT OF PERIMETER FENCE ALONG WILSON LANE AND A NEW SECURITY/WELCOME STATION AT THE WILSON LANE ENTRANCE TO CAMPUS.



A. MORTON THOMAS AND ASSOCIATES, INC.  
CONSULTING ENGINEERS  
800 KING FARM BOULEVARD, 4TH FLOOR  
ROCKVILLE, MD 20850  
PHONE (301) 881-2545 | FAX (301) 881-0814  
EMAIL: AMT1@AMTENGINEERING.COM

CONSULTANTS

LANDON SCHOOL

6101 WILSON LANE  
BETHESDA, MD 20817

MARK	DATE	DESCRIPTION
M-NCPPC	42021190E	420201370 (APPROVED 2020-08-04)
PROJECT NO:	42021029E	420201370 (APPROVED 2020-08-04)
	420024080	420201370 (APPROVED 2020-08-04)
	42007286E	420201370 (APPROVED 2020-08-04)
PROJECT NO:	17-0250.003	
DATE:	05/27/2021	
SCALE:	1"=30'	
DESIGNED BY:		
DRAWN BY:		
CHECKED BY:		
SHEET TITLE		

PHASING PLAN

PHASE 0

SHEET OF





PHASING PLAN LEGEND

PHASE 0  
PHASE 1

383 PARKING SPACES

PHASE 1:

- ARTS CENTER: RENOVATION OF THE CURRENT LOWER SCHOOL BUILDING INTO AN ARTS CENTER WITH SPACES BELOW USED FOR A MAINTENANCE FACILITY.
- LOWER SCHOOL: RENOVATION OF THE CURRENT MIDDLE SCHOOL BUILDING INTO A NEW LOWER SCHOOL.
- MIDDLE SCHOOL: RENOVATION OF THE CURRENT UPPER SCHOOL BUILDING INTO A NEW SHARED MIDDLE SCHOOL/UPPER SCHOOL BUILDING AND STUDENT COMMONS.
- THE QUAD: CREATION OF A NEW CAMPUS QUAD WITH PEDESTRIAN PATHS AND PLAY FIELDS SURROUNDED BY THE ACADEMIC BUILDINGS.
- UPPER SCHOOL: CONSTRUCTION OF A NEW UPPER SCHOOL TO SERVE AS THE GATEWAY TO THE ACADEMIC CAMPUS. THIS WILL RESULT IN THE RELOCATION AND RENOVATION OF ANDREWS HOUSE AND THE DEMOLITION OF TORREY HALL.



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CONSULTING ENGINEERS  
800 KING FARM BOULEVARD, 4TH FLOOR  
ROCKVILLE, MD 20850  
PHONE (301) 881-2545 | FAX (301) 881-0814  
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LANDON SCHOOL

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PROJECT NO:	42021029E	420201370 (APPROVED 2020-08-04)
	420024080	420024080 (APPROVED 2002-07-10)
	42007286E	42007286E (APPROVED 2007-11-12)
PROJECT NO:	17-0250.003	
DATE:	05/27/2021	
SCALE:	1"=30'	
DESIGNED BY:		
DRAWN BY:		
CHECKED BY:		
SHEET TITLE		

PHASING PLAN

PHASE 1

SHEET OF

0 100' 200'  
SCALE: 1"=30'





## PHASING PLAN LEGEND

PHASE 0

PHASE 1

PHASE2/BUILDOUT

388 PARKING SPACES

## PHASE 2/BUILDOUT:

- ACTIVITIES CENTER: CONVERSION OF THE C.W. LANSDALE HOUSE AND ASSOCIATED BARN INTO A NEW HUB OF ACTIVITY WITH THE FORMER BEING AN ALUMNI CENTER OR RELATED ADMINISTRATIVE SPACES AND THE LATTER SERVING AS SPACE TO SUPPORT TENNIS AND SWIMMING AND TO SERVE AS A LARGE GATHERING SPACE.
- AMPHITHEATER: GENERAL RENOVATION.
- MONDZAC PERFORMING ARTS CENTER: INTERIOR AND SYSTEMS RENOVATIONS.
- ATHLETIC EXPANSION: RENOVATION OF EXISTING ATHLETICS BUILDING AND EXPANSION TO INCLUDE AN INDOOR FIELD HOUSE.
- BASEBALL FIELDS: REGRADING NEAR MEADOWS FIELD AND ADDITIONAL BERM FOR SPECTATORS.
- FIELDS: EXPANSION AND UPGRADE OF GYM FIELD TO SERVE AS FULL SIZE TURF FIELD. RENOVATION OF FREED FIELD.
- GAME DAY PLAZA: A NEW PLAZA TO SUPPORT ATHLETIC ACTIVITIES ON GAME DAYS, SERVE AS A STAGING GROUND FOR OTHER OUTDOOR SCHOOL EVENTS, AND IMPROVE PEDESTRIAN SAFETY IN THE AREA.
- PERKINS DAY CARE: POTENTIAL RENOVATION AND CONVERSION OF PERKINS HOUSE TO DAY CARE FACILITIES FOR STAFF.
- TENNIS COURTS: RELOCATION OF THE TENNIS COURTS AND POOL TO CREATE A NEW OUTDOOR ATHLETIC COMPLEX/ TENNIS CLUB NEAR WHERE CURRENT POOL IS LOCATED. REALIGNMENT AND REPLACEMENT OF TURF ON PRINDLE FIELD AND GODDARD FIELD TO ACCOMMODATE THIS.

0 100' 200'

SCALE: 1"=100'

# AMT

A. MORTON THOMAS AND ASSOCIATES, INC.  
CONSULTING ENGINEERS  
800 KING FARM BOULEVARD, 4TH FLOOR  
ROCKVILLE, MD 20850  
PHONE (301) 881-2545 | FAX (301) 881-0814  
EMAIL: AMT1@AMTENGINEERING.COM

CONSULTANTS

## LANDON SCHOOL

6101 WILSON LANE  
BETHESDA, MD 20817

MARK	DATE	DESCRIPTION
M-NCPPC	42021180E	42021180E (APPROVED 2020-08-04)
PROJECT NO:	42021029E	42021029E (APPROVED 2020-09-28)
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	42007286E	42007286E (APPROVED 2007-11-12)
PROJECT NO:	17-0250.003	
DATE:	05/27/2021	
SCALE:	1"=30'	
DESIGNED BY:		
DRAWN BY:		
CHECKED BY:		
SHEET TITLE		

## PHASING PLAN

## PHASE2/BUILDOUT

SHEET OF



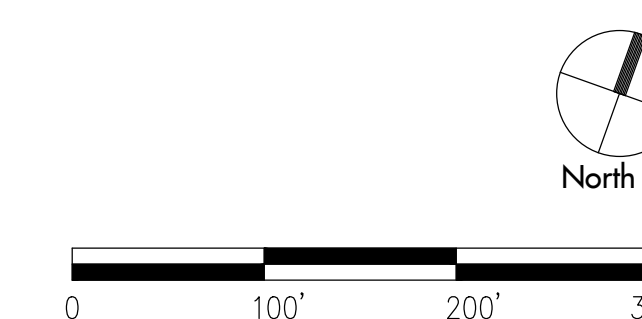
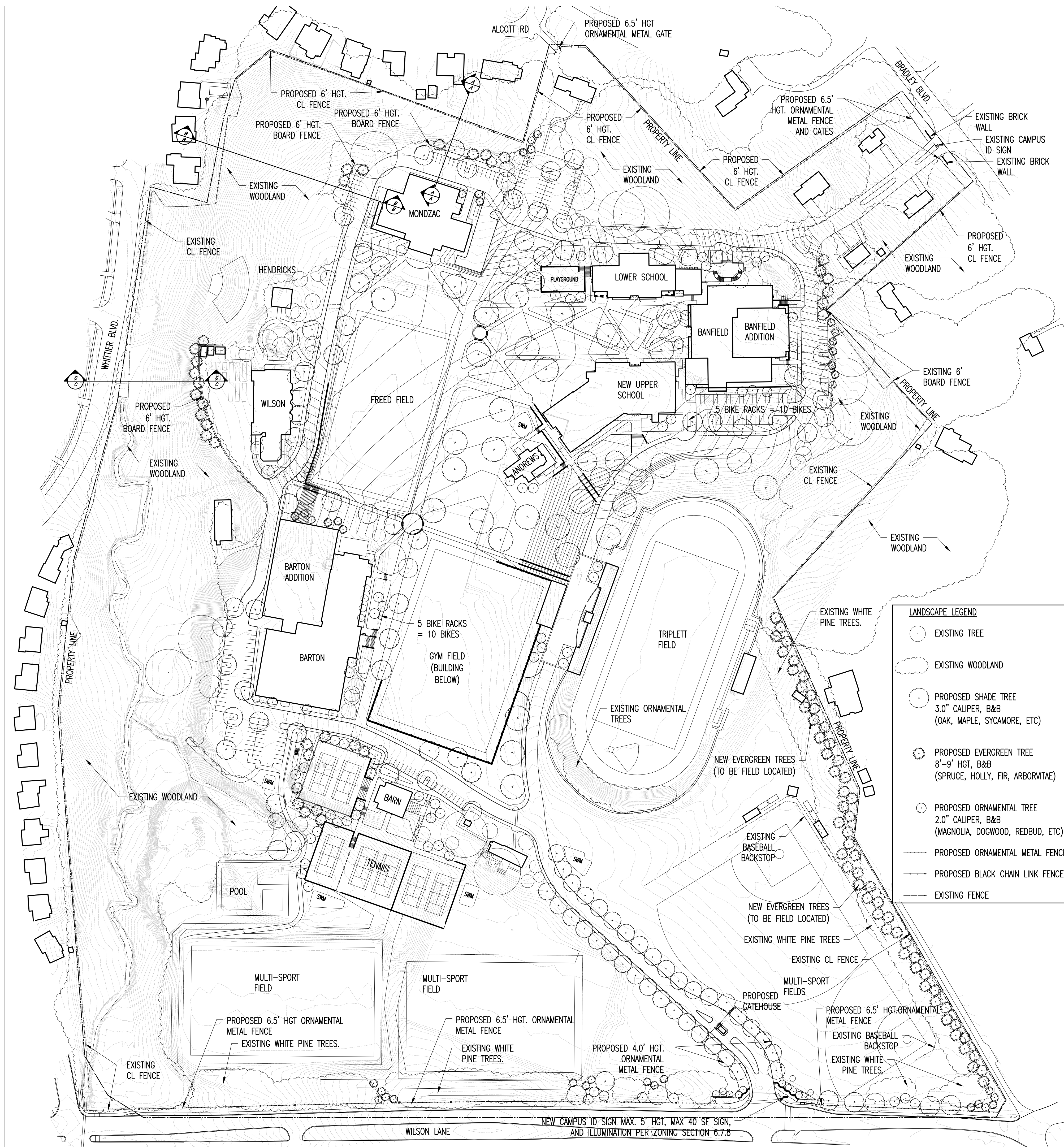
CONSULTANTS

3520 Quesada Street, NW  
Washington, DC 20015  
202.276.6522

6101 WILSON LANE  
BETHESDA, MD 20817

MARK	DATE	DESCRIPTION
M-NCPPC PROJECT NO: 420201370		
PROJECT NO:	17-0250.002	
SCALE:	1" = 100'	
DESIGNED BY:	BJS	
DRAWN BY:	MB	
CHECKED BY:	BJS	
SHEET TITLE		

# EXHIBIT





## CONSULTANTS

3520 Quesada Street, NW  
Washington, DC 20015  
202.276.6522

6101 WILSON LANE  
BETHESDA, MD 20817

SPECIAL EXCEPTION  
LANDSCAPE PLAN  
DETAIL

# EXHIBIT



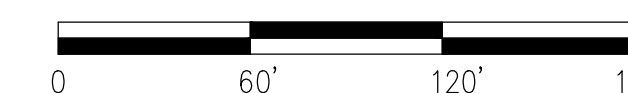
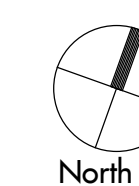
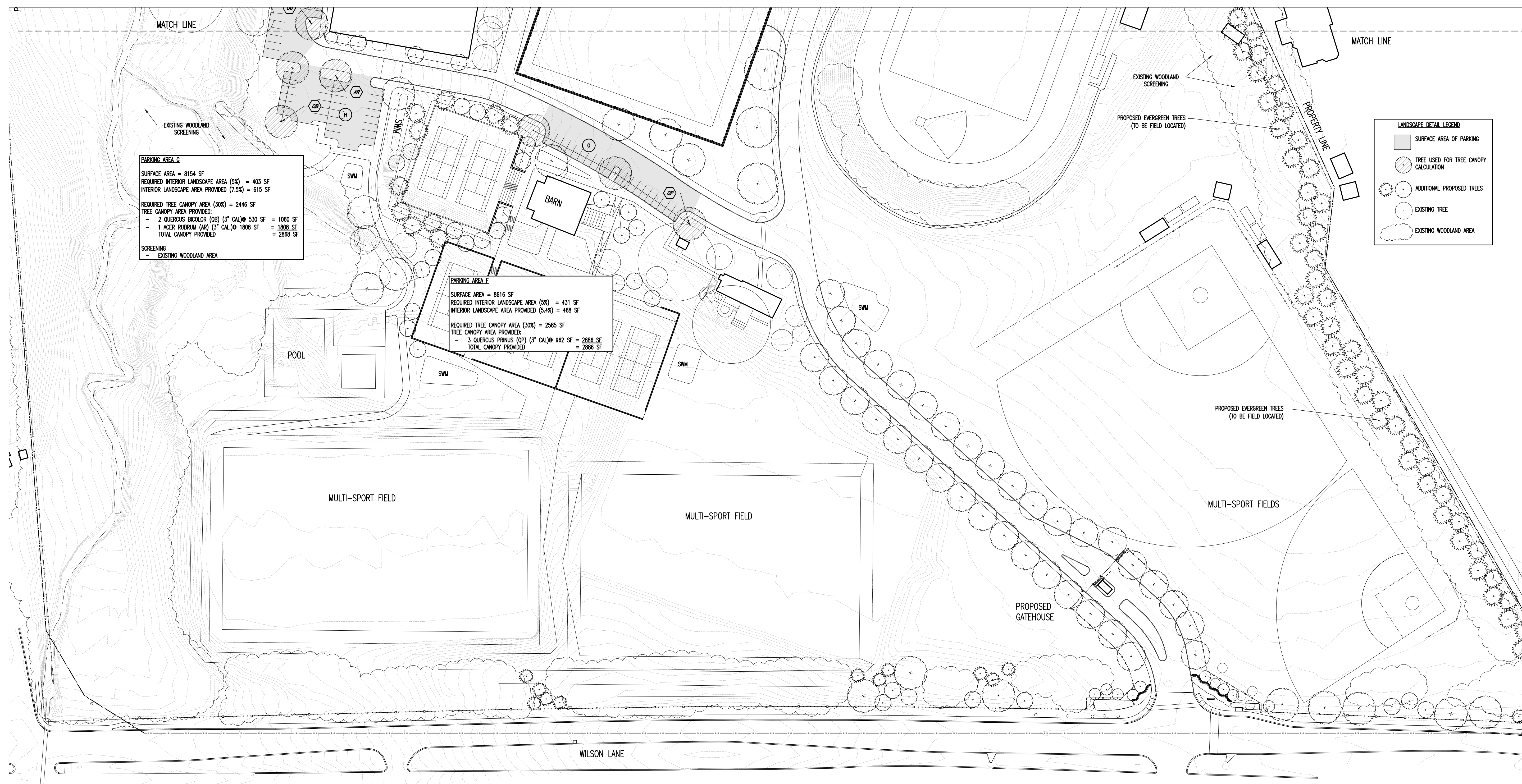
CONSULTANTS

3520 Quesada Street, NW  
Washington, DC 20015  
202.276.6522

6101 WILSON LANE  
BETHESDA, MD 20817

MARK	DATE	DESCRIPTION
M-NCPPC PROJECT NO: 420201370		
PROJECT NO:		17-0250.002
SCALE:		1" = 60'
DESIGNED BY:		BJS
DRAWN BY:		MB
CHECKED BY:		BJS
SHEET TITLE		

# EXHIBIT







A. MORTON THOMAS AND ASSOCIATES, INC.  
CONSULTING ENGINEERS  
800 KING FARM BOULEVARD, 4TH FLOOR  
ROCKVILLE, MD 20850  
PHONE (301) 881-2545 | FAX (301) 881-0814  
EMAIL: AMT1@AMTENGINEERING.COM

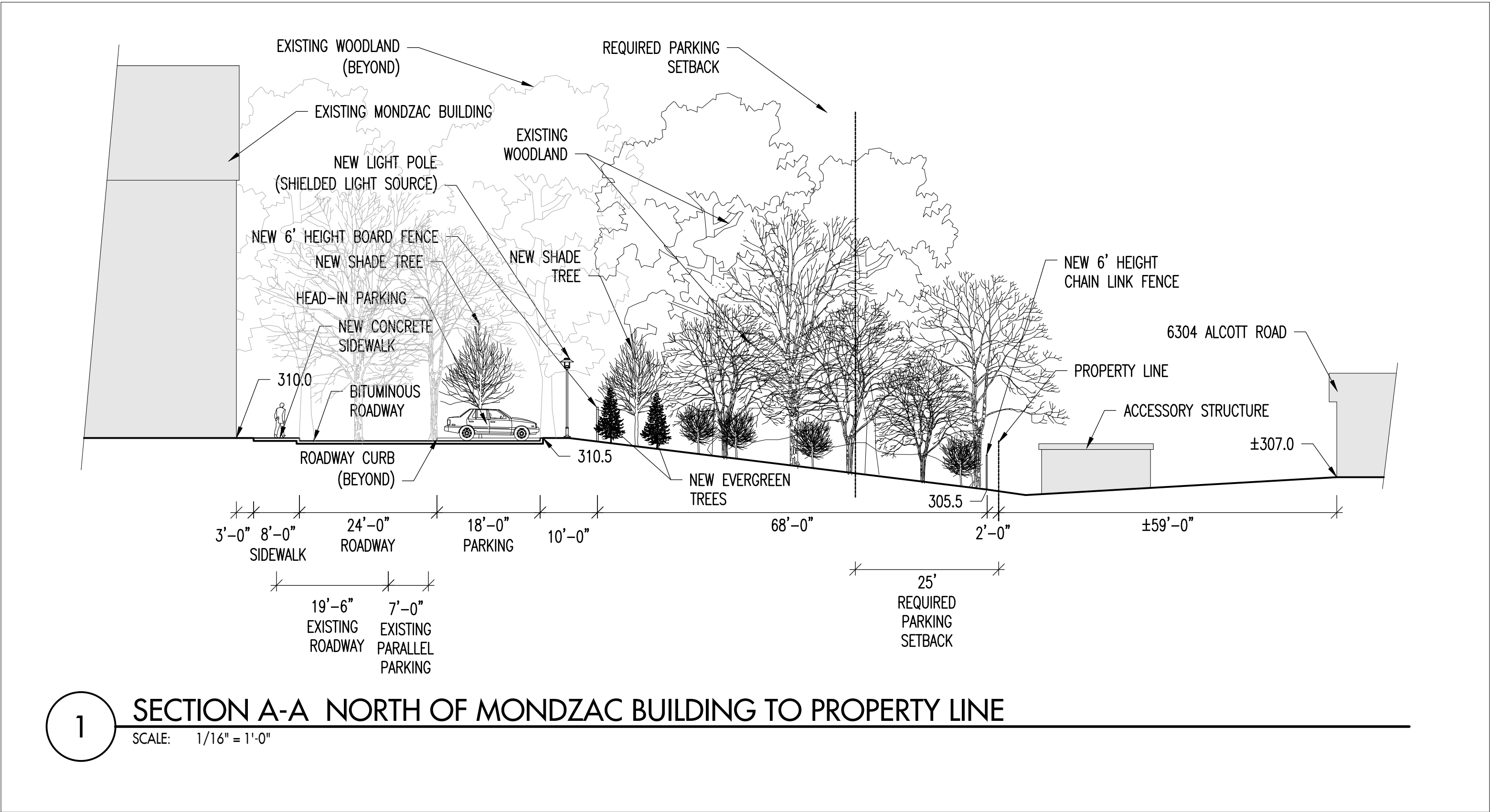
CONSULTANTS

**BRIAN J. STEPHENSON + CO. LLC**  
*Landscape Architecture*

3520 Quesada Street, NW  
Washington, DC 20015  
202.276.6522

LANDON SCHOOL

6101 WILSON LANE  
BETHESDA, MD 20817



EXISTING CONDITION NORTH OF MONDZAC BUILDING



EXISTING WOODLAND ON HILLSIDE NORTH OF MONCZAC BUILDING



EXISTING WOODLAND ON HILLSIDE NORTH OF MONDZAC BUILDING

	06.29.2021	Revisions and Updates
	03.23.2021	Revisions and Updates
	10.09.2020	Zoning Application Submission
MARK	DATE	DESCRIPTION
M-NCPPC PROJECT NO: 420201370		
PROJECT NO:		17-0250.002
SCALE:		1" = 16'
DESIGNED BY:		BJS
DRAWN BY:		MB
CHECKED BY:		BJS
SHEET TITLE		

SPECIAL EXCEPTION  
LANDSCAPE SECTIONS

EXHIBIT



CONSULTANTS

Landscape Architecture

3520 Quesada Street, NW  
Washington, DC 20015  
202.276.6522

6101 WILSON LANE  
BETHESDA, MD 20817

	06.29.2021	Revisions and Updates
	03.23.2021	Revisions and Updates
	10.09.2020	Zoning Application Submission
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M-NCPPC PROJECT NO: 420201370		
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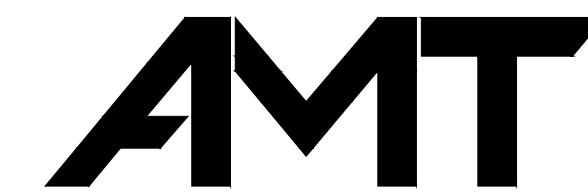
# EXHIBIT



SCALE: 1/16" = 1'-0"







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800 KING FARM BOULEVARD, 4TH FLOOR  
ROCKVILLE, MD 20850  
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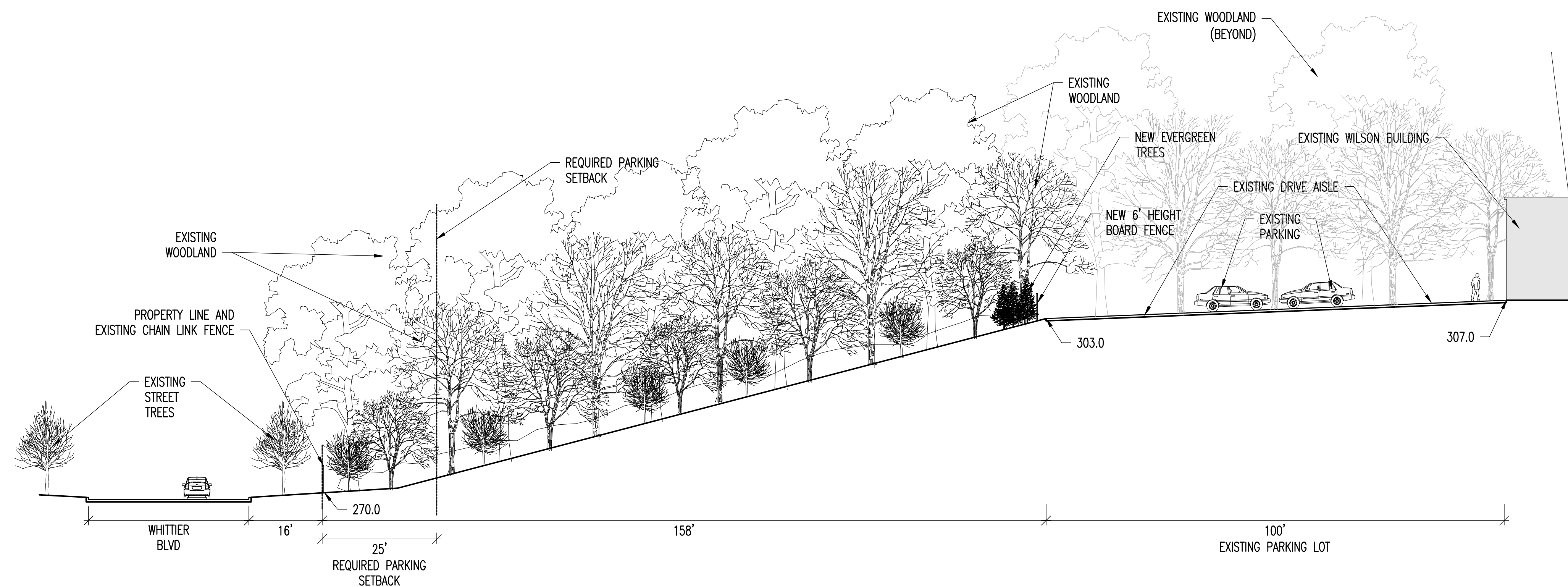
## CONSULTANTS

**BRIAN J. STEPHENSON + CO. LLC**  
*Landscape Architecture*

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## LANDON SCHOOL

6101 WILSON LANE  
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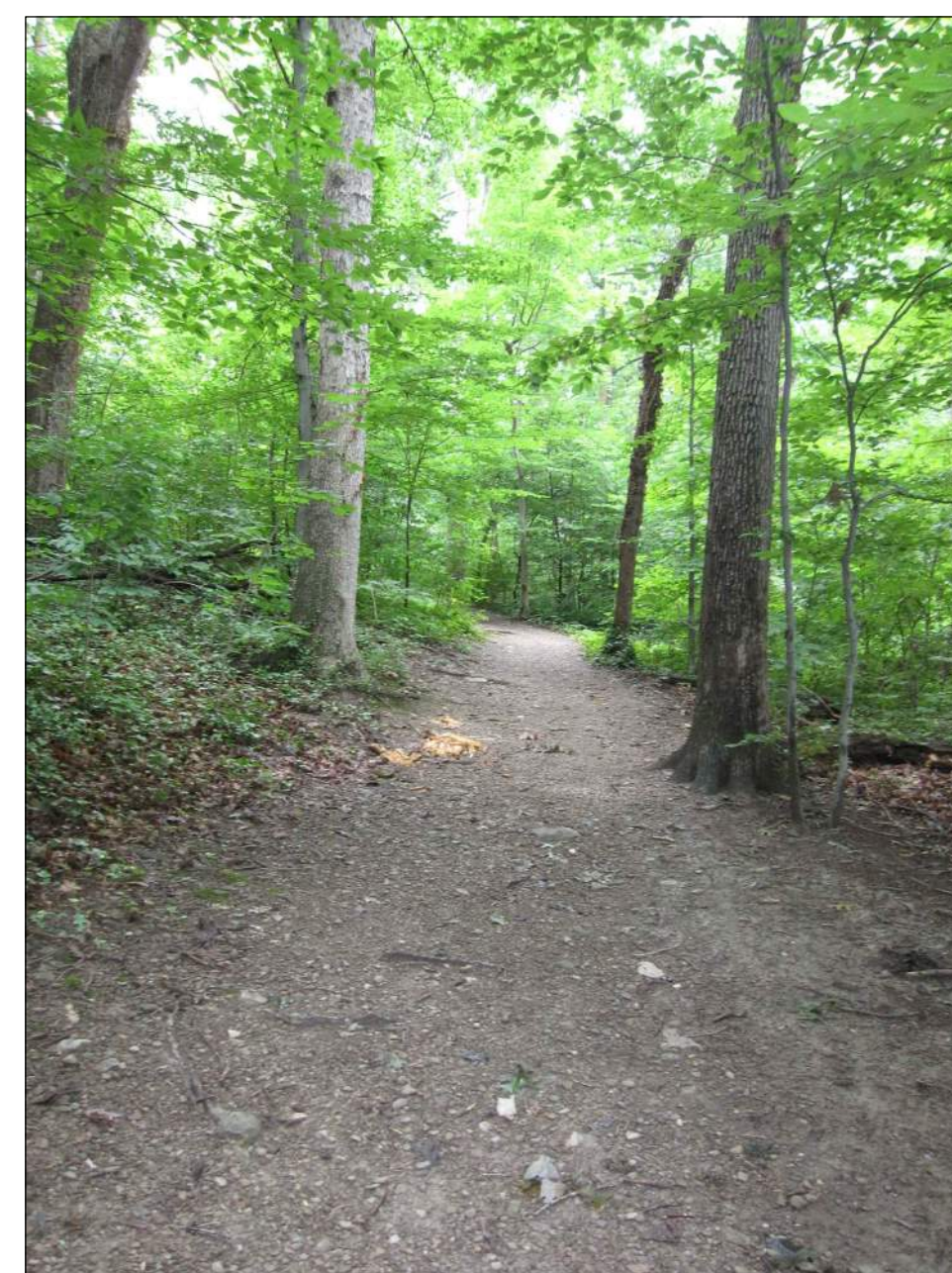
## 3

SECTION C-C WEST OF WILSON BUILDING TO WHITTIER BLVD

SCALE: 1/16" = 1'-0"



EXISTING CONDITION AT WILSON BUILDING - WEST SIDE



EXISTING WOODLAND ON HILLSIDE WEST OF WILSON BUILDING



EXISTING WOODLAND ON HILLSIDE WEST OF WILSON BUILDING

	06.29.2021	Revisions and Updates
	03.23.2021	Revisions and Updates
	10.09.2020	Zoning Application Submission

MARK	DATE	DESCRIPTION
M-NCPPC PROJECT NO: 420201370		
PROJECT NO:		17-0250.002
SCALE:		1" = 16'
DESIGNED BY:		BJS
DRAWN BY:		MB
CHECKED BY:		BJS
SHEET TITLE		

SPECIAL EXCEPTION  
LANDSCAPE SECTIONS

# EXHIBIT



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

In the Matter of the Petition of :  
The Landon School : Case Number S-686-C  
for a Special Exception Modification :  
to an existing Private Educational Institution :

**PETITIONER'S STATEMENT IN SUPPORT OF SPECIAL EXCEPTION MODIFICATION  
APPLICATION**

~~October 9,~~[June 11](#), 2020

Petitioner, the Landon School (“Petitioner” or “Landon”), the owner of the subject property and the operator of the subject Special Exception, hereby submits this Statement in Support of its Special Exception Modification Application (“Special Exception Modification”) to permit the implementation of Landon’s new master plan for its campus (“Campus Master Plan”) for the approved Special Exception for a Private Educational Institution (“Special Exception”) located at 6101 Wilson Lane, Bethesda, Maryland (“Property”). Pursuant to Section 7.7.1.B.1 and Section 7.7.1.B.3.c of the Montgomery County Zoning Ordinance, the Special Exception Modification will be reviewed under the standards and procedures of the zoning ordinance in effect prior to October 29, 2014 (the “Prior Zoning Ordinance”).

**I. Introduction and General Description of Current/Proposed Operations**

Established in 1929, Landon is a private, nonsectarian school for boys. Landon has existed at its present location at 6101 Wilson Lane, Bethesda, Maryland since 1936. Landon’s mission is to prepare its students not only for college, but also to be “accomplished, responsible and caring men whose actions are guided by the principles of perseverance, teamwork, honor and fair play.” Landon operates a lower school (grades 3-5), middle school (grades 6-8), and upper school (grades 9-12). The total current enrollment is approximately 680 students. In addition to its academic programs, Landon also offers a variety of extracurricular activities, including athletics and visual and performing arts programs that are essential components of the overall educational experience.

In addition to its scholastic program, Landon also hosts Landon Summer, a summer camp. Landon Summer offers a variety of programming to boys and girls from the larger community, ages 3½ to 17 over eleven one-week sessions. Programing includes academics, arts, technology and sports. The overall mission of Landon Summer is to “inspire boys and girls to build their confidence and explore their passions in a vibrant, nurturing camp environment that emphasizes community, discovery,

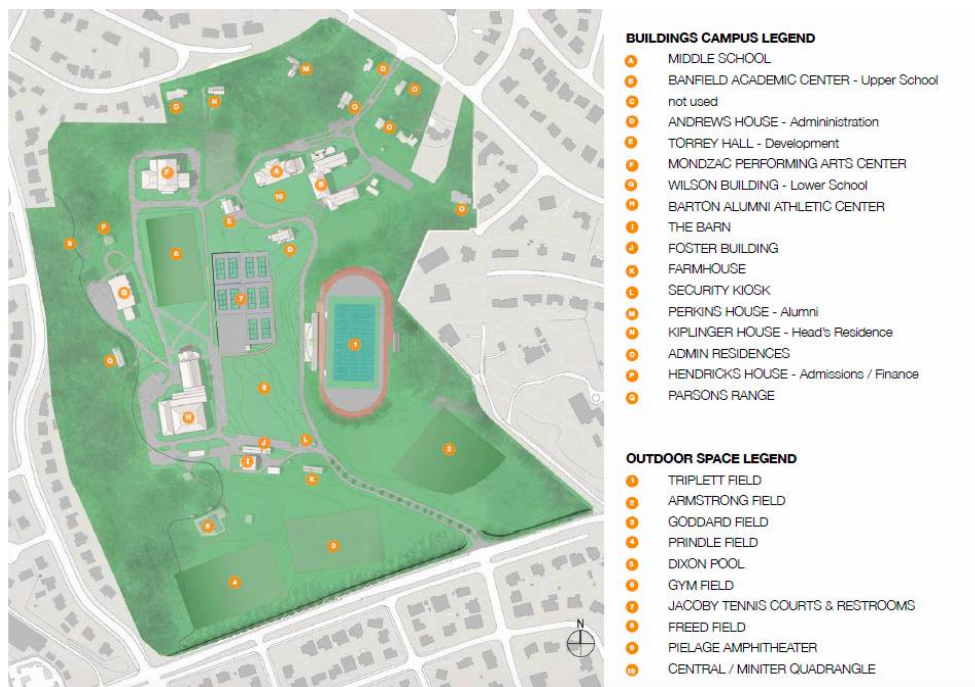


independence and fun.” In recent years, Landon Summer has grown in popularity with over 900 summer camp registrants during the more popular sessions.

## II. Description of Property and Surrounding Area

The Property is located on the northern side of Wilson Lane east of its intersection with Whittier Boulevard. It is approximately 69.73634 acres (3,037,715 square feet) in size and is more specifically identified as Parcel A, Landon School, as shown on Plat No. 21110 recorded among the Land Records of Montgomery County, Maryland on June 25, 1999.<sup>1</sup> The Property is zoned R-90. The easternmost portion of the Property is subject to a TDR-8.0 overlay zone for the potential increase in the maximum residential density, which Landon will not be pursuing. The Property is within the Bethesda-Chevy Chase Master Plan (“1990 Master Plan”) area.

As shown on the Existing Conditions Plan and Existing Conditions Photographs, the Property is improved with various buildings associated with the Special Exception, as well as ~~362~~370 surface parking spaces, and athletic facilities including several fields, an outdoor pool, tennis courts, and an athletic track. The total existing density on the Property is approximately 244,863 square feet. The existing buildings date from the mid-1800s to the 1990s. The locations and names of each of the buildings are depicted on the following image from the Landon Master Plan Summary Report:



Some of the buildings on the Property are historically significant. The C.W. Lansdale House (labeled as the Farmhouse and the Barn on the map above) was constructed in the mid-1800s. The

<sup>1</sup> Landon also owns additional single family home properties along Bradley Boulevard that have not been incorporated into the Special Exception.



Montgomery County Historic Preservation Commission (the “HPC”) designated the C.W. Lansdale House and surrounding land as an historic setting/viewshed in 1990. As of 2002, the C.W. Lansdale House along with the remainder of the Property, was deemed eligible for listing in the Maryland Inventory of Historic Places and the National Register of Historic Places. Collectively, the C.W. Lansdale House and the remainder of the campus are referred to as the eligible C.W. Lansdale House/Landon School historical district. According to the Historical Summary and Evaluation, prepared by Traceries, the contributing resources to the C.W. Lansdale House/Landon School historical district include the Andrews House, Athletic Center, Perkins House, Lower School (Wilson Building), Administration Building (Hendricks Building), Upper School (Banfield Academic Center), Torrey Hall, and the Frank Parsons Rifle Range. Each of these structures and its historical significance is explained in detail in the Historical Summary and Evaluation.

Landon voluntarily appeared before the HPC on April 28, 2021, as a courtesy to discuss the Special Exception Modification, even though the work items related to it are largely outside of the 11.77-acre historic viewshed/setting, over which the HPC has jurisdiction. In particular, Landon discussed the relocation of the Andrews House and demolition of Torrey Hall as key elements of the Campus Master Plan. The HPC appreciated hearing about the plan and were generally supportive of the proposed changes to the contributing resources per its letter to the Montgomery County Planning Board dated May 19, 2021. The HPC has recommended that Landon pursue some creative mitigation to highlight the history associated with these contributing resources and Landon has indicated its willingness to do so.

The balance of the site is open space with mature trees and other vegetation. Other natural physical characteristics of the Property are shown on the enclosed Natural Resource Inventory/Forest Stand Delineation (Approved NRI/FSD) map.

Vehicular access to the Property is currently provided via two driveways – one along the Property’s Wilson Lane frontage and the other along the Property’s Bradley Boulevard frontage. Pedestrian and bicycle access to the Property is provided via the sidewalk along Wilson Lane.

As discussed above and shown on the enclosed Certified Zoning Vicinity Map, the area surrounding the Property is zoned R-90. All confronting and abutting properties are improved with single-family detached houses. However, there are other educational institutions in the vicinity of the Property, including Thomas Pyle Middle School and Walt Whitman High School.

The Property is subject to the guidance of the Master Plan that was adopted in 1990. 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. The 1990 Master Plan accommodates, through zoning recommendations, the redevelopment of the Property into a moderate



density residential community, but the 1990 Master Plan does not otherwise recommend changing the existing Special Exception use. The 1990 Master Plan further recommends that the C.W. Lansdale House and its environmental setting be preserved in any future development of the Property. The 1990 Master Plan additionally supports enhancing Wilson Lane with improvements related to pedestrian safety, a bike path, and speed controls, which Petitioner understands have been implemented.

### **III. Prior Special Exception Approvals**

Landon has existed on the Property since 1936. In 1950, following the Property's rezoning, the Montgomery County Board of Zoning Appeals first granted approval to operate a private school on the Property (Case No. 927). The Special Exception has since been modified from time to time to enhance and renovate the campus (see the attached Prior Special Exception Approvals). In recent times, the Special Exception was modified in 2003 to allow for the construction of a new residence for the Head of the Upper School. Prior to that, in 2002, the Montgomery County Board of Appeals ("Board") approved a modification to the Special Exception to allow for: (1) construction of a new Lower School building; (2) addition of grades kindergarten through second; (3) renovation of the main athletic field and seating; (4) renovations to the amphitheater; (5) continuation of the existing summer camp program as an accessory use; and (6) revisions to the existing campus roadway system on the Property (the "2002 Modification"). The 2002 Modification capped the school's enrollment at 736 students during the academic year and 700 summer camp participants on site at any given time during the summer months.

Copies of the Prior Special Exception Approvals are included in this application and the following relevant conditions currently apply to the Special Exception use:

1. The Petitioner must keep the indoor rifle range building painted with good quality heavy paint so that the appearance of the cinder block may be as attractive as possible;
2. The Petitioner must implement the Transportation Management Plan;
3. The Petitioner shall continue the operation of the existing summer day camp, as an accessory use; and
4. The Petitioner must establish a neighborhood liaison committee, in which the People's Counsel shall serve ex-officio. The committee shall meet annually or more often if so requested by any of the existing neighborhood associations, or by the People's Counsel.

Petitioner is in compliance with all Special Exception conditions except that there is no longer a viable neighborhood liaison committee. Following the 2002 Modification, the neighborhood's heightened interest in school activities waned and the People's Counsel position was eliminated. As part of the Campus Master Plan process, the Head of School, Jim Neill, attempted to resurrect the committee by reaching out several times to all of the surrounding neighborhood associations registered in Park and



Planning's database; however, there were no responses to these overtures. As discussed in the Outreach section below, Petitioner has undertaken other outreach efforts to accomplish the notification objectives of the committee.

#### **IV. Request for Modifications to Special Exception Approval**

Petitioner respectfully seeks approval from the Board for modifications to the Property's Special Exception approval. Specifically, the Petitioner seeks approval of the Campus Master Plan changes discussed in the Landon Master Plan Summary Report, which are intended to modernize and enhance the Landon campus. In addition, Petitioner seeks to amend the Special Exception to clarify that the 11-week summer camp is a separate use that meets the requirements of Section G-2.19(b)) of the 2004 Zoning Ordinance. The camp is currently approved as an accessory use.

Generally, the goals of the Campus Master Plan are to enhance campus security, improve and augment academic spaces, improve the entrance and traffic safety, develop an identifiable campus core, upgrade athletic fields, implement green building and site design, and develop landscape replacement and maintenance strategies. Among the specific goals with regard to academic spaces, the Campus Master Plan seeks to move the Lower School into the current Middle School building, move the Middle School into a renovated Upper School building, improve the size and quality of academic space for the Upper School, and refresh and repurpose the Lower School space for other programmatic purposes. In conjunction with all of this, the plan will look to provide more meeting and large group gathering spaces for both academic and social purposes, as well as ~~increase~~increased natural light for all three divisions of the School. The Campus Master Plan also seeks to: 1) direct vehicular traffic away from pedestrians; 2) increase parking capacity; 3) consolidate administrative functions; 4) update library spaces and blend them more seamlessly with campus technology functions; 5) expand visual and performing art spaces; 6) improve the dining hall; 7) upgrade athletic facilities including the pool and tennis facilities; and 8) modify the current summer camp attendee cap.

Specifically, Petitioner requests that the Board allow the following modifications to occur across multiple phases, which comprise the Campus Master Plan:

Phase 0: (this is being pursued as a minor modification of the Special Exception to address immediate security concerns):

- *Fence & Welcome Center:* Replacement of perimeter fence along Wilson Lane and a new Security/welcome station at the Wilson Lane entrance to campus

Phase 1:

- *Arts Center:* Renovation of the current Lower School building into an arts center with spaces below used for a maintenance facility;



- *Lower School:* Renovation of the current Middle School Building into a new Lower School;
- *Middle School:* Renovation of the current Upper School Building into a new shared Middle School/Upper School Building and student commons;
- *The Quad:* Creation of a new campus quad with pedestrian paths and play fields surrounded by the academic buildings; and
- *Upper School:* Construction of a new Upper School to serve as the gateway to the academic campus. This will result in the relocation and renovation of Andrews House and the demolition of Torrey Hall.

#### Phase 2:

- *Activities Center:* Conversion of the C.W. Lansdale House and associated barn into a new hub of activity with the former being an Alumni Center or related administrative spaces and the latter serving as space to support tennis and swimming and to serve as a large gathering space;
- *Amphitheater:* General renovation;
- *Mondzac Performing Arts Center:* Interior and systems renovations;
- *Athletic Expansion:* Renovation of existing athletics building and expansion to include an indoor field house;
- *Baseball fields:* Regrading Near Meadows Field and additional berm for spectators;
- *Fields:* Expansion and upgrade of Gym field to serve as full size turf field. Renovation of Freed field;
- *Game Day Plaza:* A new plaza to support athletic activities on game days, serve as a staging ground for other outdoor school events, and improve pedestrian safety in the area;
- *Perkins Day Care:* Potential renovation and conversion of Perkins House to day care facilities for staff;
- *Tennis Courts:* Relocation of the tennis courts and pool to create a new outdoor athletic complex/ tennis club near where current pool is located. Realignment and replacement of turf on Prindle Field and Goddard Field to accommodate this; and
- ~~*Triplett Parking:* New parking to address the parking over flow that can occur on game days and other campus event days such as the Azalea Festival (an addition of 111 spaces for a new net total of 461 parking spaces).~~

Phases 0 to 1 changes are generally set forth on the Phase 1 Site Plan. Following the implementation of the Campus Master Plan, the total square footage of development on the Property will be 361,100 SF with a future anticipated enrollment of 707 students and a potential of 1,200 summer



camp registrants in the largest one-week sessions. While student enrollment will remain under the 736-student cap set by the 2002 Modification, the summer camp enrollment is planned to increase over the cap of 700 imposed by the 2002 Modification.

As a result, and as noted above, Petitioner also seeks to amend the Special Exception to clarify that the summer camp is a separate, and not an accessory, use at the school. To this end, Petitioner will comply with the requirements of Section G-2.19(b) of the 2004 Zoning Ordinance and demonstrate that the camp, 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 1,200 campers, which incorporates attendance at all summer activities hosted by the school, in a given day without any mitigation. The proposed campus network improvements will easily address any increases in vehicle activity on the school Property. The Petitioner also submits a transportation management plan for the camp that identifies measures for reducing the volume of traffic coming to the Property, manages the flow of traffic at the two entrances to the Property, and ensures appropriate queueing/circulation within the Property.

The camp activities will be conducted in small groups of no more than ~~2025~~ campers disbursed throughout indoor and outdoor areas of the campus. ~~No~~Camp counselors will be instructed to maintain outdoor group activities ~~occur within 50~~at least 10 yards ~~off~~from neighboring residential properties. On rare occasions, larger segments of the camp population will gather together for non-emergency camp activities, but such gatherings will be held within indoor spaces or interior portions of the campus. As a result, any increased noise or intensity of activities will be fully absorbed within the campus without impacting any residential neighbors. The duration of the camp will be the same as it has been for at least the last 10 years: 9:00 am to 4:00 pm on weekdays for approximately eleven weeks in the summer. Because campers will be coming to the Property via buses and parent drop-offs, there is no discernible camp parking demand. No camp-related lighting changes are needed or proposed. For all of the above reasons, the proposed camp will not have an adverse effect on the surrounding neighborhood.



Architecture: The primary goal of the Campus Master Plan’s architectural approach is to achieve “appropriateness” through a methodology that draws its inspiration from the existing campus context. The design proposed for renovation / rehabilitation, as well as for new structures and infill, respects the existing architecture by maintaining the rhythm of façades, materials, massing, scale and color. The general architectural expression is one of collaboration with the intent of the original designers without mimicking them. Rather, the architecture is intended to be “of its time” in order to create an expression that “belongs”, blending seamlessly into the campus environment, not only maintaining the context, but also enhancing it. Therefore, and as shown on the Architectural Elevations included with the Special Exception Modification, the overall architecture of the buildings will convey a more modern campus feel while blending with the historic and other older structures on the Property.

Historical Resources: Notably, the C.W. Lansdale House and associated barn are proposed to be converted to an Alumni Center and a Tennis/Swimming support facility. These retrofits will not involve any modifications to the exterior architecture of either structure. Thus, the Special Exception Modification preserves this important County-designated historical resource while repurposing it for the benefit of Landon’s students and alumni. The key visual connection between the C.W. Lansdale House and Wilson Lane will be retained through the retention of athletic fields in the southern portion of the Property.

Almost all the buildings that are contributing resources to the eligible C.W. Lansdale House/Landon School historical district will remain intact and in their present locations with the implementation of the Campus Master Plan. However, Andrews House will be relocated close to its current spot, and Torrey Hall will be demolished, along with a low rise concrete block building next to the barn. Notably, unlike the C.W. Lansdale House, neither the Andrews House nor Torrey Hall have been designated as historical resources by the HPC, and the concrete block building appears to have no historic significance. Relocation of Andrews House, per the Historical Summary and Evaluation prepared by Tracerics, and as discussed with the HPC on April 28, 2021, will not be a potential adverse impact because the building will remain intact and in its same general location on the campus. Regarding the demolition of Torrey Hall, Tracerics explains that it has been modified over the years and said modifications have “altered the structure and diminished its integrity.” Tracerics concludes that the demolition of Torrey Hall, while a potential adverse effect, is acceptable because: 1) its removal would create a stronger visual relationship between the Upper School and Lower School – more in line with the original architect’s vision; and 2) it is not a significant contributing resource due to modifications and its status as an ancillary building to the



Andrews House. The HPC agreed that the demolition of Torrey Hall is more consistent with the original historic vision for the campus.

Operational Characteristics: Following the implementation of the Campus Master Plan, the Private Educational Institution use will continue to operate in a substantially similar manner as it does today. Landon will continue to provide educational, athletic and extracurricular opportunities to approximately 707 students during the school year. The hours of operation will, with minor exceptions, be from 7:30 am to 6:20 pm during the week and the only weekend activities will be occasional school games, practices and field rentals. Faculty and staff will continue to be comprised of 190 persons.

Landon also will continue to offer varied programming to summer camp participants up to 1,200 campers registered in any given session. The duration of the camp will be the same as it has been for at least the last 10 years: 9:00 am to 4:00 pm on weekdays for approximately eleven weeks in the summer. The maximum number of staff persons that would be needed to operate the largest camp sessions is 250.

As discussed in the enclosed Traffic Study, the implementation of the Campus Master Plan will not have a detrimental impact on the surrounding transportation network based on the following:

- The proposed enrollment of 707 students will generate fewer trips than what was analyzed as part of Special Exception Case No. S-686-C in 2002 (736 students).
- The surrounding roadway network can accommodate the proposed enrollment cap of 1,200 summer campers based on a preliminary analysis using 2016 MDSHA traffic volume data.
- The School's Summer Camp operations will be analyzed following Montgomery County's Planning Department guidelines, and potential impacts will be mitigated as part of the proposed study.

Access and Circulation: Except as noted above, vehicular and pedestrian access to the Property will remain the same. Internal circulation will be enhanced for greater efficiency and pedestrian safety. Specifically, after the implementation of the Campus Master Plan, there will be sidewalks throughout the campus that currently do not exist and a new quad with pedestrian pathways to allow pedestrians to traverse the campus without interaction with vehicles. Additionally, the Campus Master Plan will implement improved and more clearly designated pick-up and drop-off areas.

Parking: Under existing conditions, ~~362~~370 surface parking spaces are provided across the campus. For special events, including athletics, additional parking is provided by allowing vehicles to park on ~~the~~



certain athletic fields. Under the proposed Phase 2 build out, parking will be increased from ~~362~~370 to ~~461~~388 spaces, with a combination of surface and structured facilities. The proposed supply, along with occasional field parking, will meet the practical demand of a typical school day, provide overflow parking for special events, and will meet Zoning Requirements. The Phase 1 parking plan reallocates existing parking among current and proposed surface lots that are conveniently located near proposed activity centers. Under Phase 1, parking will be increased from ~~362~~370 to ~~376~~383 spaces.

We note that the Campus Master Plan contemplated additional parking in the area of the football stadium (Triplett Field) to address the parking over-flow that can occur on game days and other campus event days such as the Azalea Festival. Landon has determined that the overflow needs may continue to be addressed by using field parking for special events. As such, Landon will not pursue the Triplett Field parking identified in Phase 2 of the Campus Master Plan.

Loading and Trash Collection: The current back of house services for the campus are conducted primarily from the Barn Building, where most loading and unloading activities including trash collection take place. From there, staff shuttle materials and trash back and forth among other campus structures. Food service deliveries are made to the cafeteria in the Mondzac Performing Arts Building along with some building materials for set design. Upon the implementation of the Campus Master Plan, the back of house services at the Barn Building will be relocated to the Wilson Building on the northwestern portion of the campus. This new loading zone has been identified on the Site Plan (as revised). The relocation was made because the Wilson Building is in an interior location that can be shielded effectively from the rest of the campus. Delivery services to the Mondzac Performing Arts Building will continue. Additional screening has been included in the Special Exception Modification for both loading areas to shield delivery activities from other campus activities.

Environmental Features: As noted, the Campus Master Plan will implement green building and environmental site features. The proposed development will preserve the existing environmental elements on the campus by focusing most changes within developed areas and avoiding sensitive environmental features, particularly the forested areas and stream valley running down the west side of the campus. The building design anticipates incorporating proven sustainable initiatives such as energy efficiency, water conservation, sound waste management principals, healthy indoor air quality, natural lighting and natural ventilation among others. This approach will extend to the site where the design will incorporate stormwater mitigation including green roofs, maximized preservation of the natural habitat, native plantings, micro-bioretenment areas as well as the potential for rainwater harvesting.



Landscaping: Changes to the landscaping on the Property are detailed on the Landscape Plan included with this Special Exception Modification. Notable features of the Plan are as follows:

- Maintenance of existing campus perimeter woodlands and screening landscape, with new infill planting in gaps of the perimeter landscape.
- Addition of new trees within the campus to maintain and enhance the existing campus landscape character of shade trees, lawns, and casual walkways.
- New shade and screening tree planting at roadways and parking areas.
- New campus security fencing at gaps in the existing perimeter fencing.
- Maintenance of campus athletic fields and outside courts sized for regulation play of high school varsity sports.
- Maintenance of existing plants at the C.W. Lansdale House and maintenance of views of the C. W. Lansdale House and Barn area from Wilson Lane.

Lighting: The lighting design will include new ornamental campus light fixtures for roadways and walkways. The ornamental light fixtures will have cut-off style LED luminaires (3000K) and be dark sky compliant. The luminaires will be mounted on 12-foot high poles spaced at approximately 70 foot intervals. As shown on the Lighting and Photometric Plan, the selected fixtures and quantities are placed to provide safe egress paths from the buildings and a safe parking areas at an average minimum illumination of 1.0 FC and with light coverages that meet applicable County site lighting requirements (0.5 footcandles or less at the lot line).

## **V. Community Outreach**

The Petitioner is committed to working with the surrounding community and other interested parties ~~on~~concerning the Project. The Petitioner already has conducted outreach efforts and will continue to do so as the Project moves forward. In particular, Landon's Head of School, Jim Neill, has met individually with eight adjoining neighbors who have previously expressed interest in campus operations. The Head of School also attempted to convene the neighborhood liaison committee by reaching out several times to all of the surrounding neighborhood associations registered in Park and Planning's database; however, there were no responses to these overtures. Petitioner then researched available websites to identify leaders of both established and ad hoc neighborhood associations. This effort resulted in a virtual meeting with representatives of the Kenwood Park neighborhood group (Foroud Arsanjani) and of Burning Tree Village neighborhood group (Anne & Robert Coe).



Following these efforts, members of the Woodhaven neighborhood, located to the north of the campus off of Whittier Boulevard, reached out to Landon, via Planning Staff, inquiring about the Special Exception Modification. Landon convened a virtual meeting with Woodhaven residents on May 27, 2021, to discuss the Project, its phasing, and the Special Exception process. Neighborhood representatives have since articulated concerns about operational and noise impacts associated with the location of campus activities any closer to the residential properties. In response, Landon conducted a noise study and is poised to meet with neighborhood representatives to discuss their concerns.

All neighborhood discussions have been positive and all attendees have expressed support for the Campus Master Planning efforts.

## **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:

1. Application Form for Special Exception Modification
2. Expert Witness Resumes
3. List of Adjoining and Confronting Property Owners and Community Associations (with mailing labels)
4. Plat No. 21110
5. Certified Zoning Vicinity Map
6. Tax Map
7. Bethesda-Chevy Chase Master Plan Excerpts
8. Existing Conditions Photographs
9. Approved NRI/FSD
10. Forest Conservation Exemption
11. Existing Conditions Plan
12. Description of Proposed Operational Features
13. Site Plan and Landscape Plan
14. Architectural Elevations and Floor Plans
15. Project Rendering
16. Lighting and Photometric Plan and Lighting Information
17. Stormwater Management Concept Plan and DPS approval
18. Stormwater Management Calculations



19. Fire Access Plan
20. Prior Special Exceptions Approvals
21. Traffic Study
22. Historical Summary and Evaluation
23. Landon Master Plan Summary Report
24. Phase 1 Site Plan

## **VII. Witnesses**

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

1. Jim Neill, and/or other representatives of the Petitioner, Landon, will provide an overview of the existing Landon operations, the existing Property conditions and improvements, and the need for the proposed renovation and expansion of the existing building and other modifications to the Special Exception.
  2. Aaron Smith, and/or other representatives of A. Morton Thomas and Associates will testify regarding the civil engineering, site development, site utilities, land use, planning, zoning, environmental conditions, forest conservation, stormwater management, landscaping and landscape architecture associated with the proposed Special Exception Modification.
  3. Katie Wagner and/or Erwin Andres of Gorove Slade, 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.
  4. Bill Spack, and/or other representatives of Cox Graae + Spack architects will testify as to the architectural elements of the proposed Campus Master Plan and proposed lighting.
- Petitioner may call additional witnesses in support of its application and, if so, will supplement this filing accordingly.

## **VIII. Expected 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 zone;*  
A Private Educational Institution is permitted as a special exception in the R-90 zone per Prior 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 be a nuisance because of the location of the proposed changes or physical activity associated with it. Following the implementation of the Campus Master Plan, the private educational institutional use will continue to operate in substantially the same manner as it does today.

*(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;*

As discussed in detail above, the proposed renovation of existing buildings and new construction proposed in the Campus Master Plan has been carefully designed to be architecturally compatible with the surrounding area. Further, the Property is nearly 70 acres in size and the buildings that comprise the Special Exception are well setback from the property lines. As such, to the extent that any architecture proposed is perceived as incompatible with the surrounding neighborhood, this is mitigated by substantial setbacks and screening.

*(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 1936 and is a part of the fabric of the surrounding residential community. After implementation of the Campus Master Plan, 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 implementation of the Campus Master Plan will not have a detrimental impact on the adjacent transportation network as trip generation under the proposed enrollment will not exceed the approved enrollment or trip generation cap. Furthermore, the School's new operations and impacts of the increased summer camp enrollment will be analyzed following Montgomery County's guidelines and mitigation measures will be included as needed to address potential impacts.

*b) Proximity to arterial roads and major highways;*

The Property has frontage on both Bradley Boulevard and Wilson Lane. Both roads are designated as arterial.

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

Per the 2002 Modification, Landon has implement a Transportation Mitigation Plan and continues to take measure to reduce the number of cars traveling to and from the Property each day. A Transportation Mitigation Plan for proposed new camp operations is being submitted with this Special Exception Modification.

*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*

The Campus Master Plan includes 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 mitigated by the ample setbacks of the use from all property lines, as well as adequate buffering.

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

As noted, the surrounding community is zoned R-90 and contains moderate density residential uses, as well as other educational institutions.

*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 west side of campus. The center of campus generally sits at a higher elevation than the surrounding properties and contains a drainage divide that runs from north to south through its center. Consequently, stormwater runoff from the campus generally drains to the east to a shallow stream or to the west to the existing stream valley and ultimately drains to the north and west towards Bulls Run and then Cabin John Creek.

The grading associated with the proposed development will focus on the existing developed areas of campus and will not alter the existing natural drainage divide running through the center of campus. Minor grading improvements are proposed to accommodate the new development while providing ADA-compliant access and improved drainage to new stormwater management facilities.

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 fewer than 87 students per acre is proposed. Given the above stated facts, the continued enrollment of fewer than 736 students (approximately 10.5 students per acre) and increased enrollment to 1,200 summer camp participants is appropriate.

- 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 shown on the Site Plan the existing and proposed locations of athletic facilities are well setback from the property lines. Further, as shown on the Landscape Plan adequate buffers will be provided where athletic facilities may be visible to adjacent 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 2002 Modification, the Board has approved the continued operation of Landon's summer camp. The Board permitted 700 summer camp participants on campus at any given time. Landon now seeks to increase the number of summer camp participants permitted from 700 to 1,200 registrants.<sup>2</sup> According to the Traffic Study, the increased number of summer camp participants, alone or cumulatively with the academic year program, will not detrimentally affect the surrounding transportation network. The vehicle trips generated by the summer camp will not exceed the traffic capacity of the adjacent roadways. Further, the Transportation Management Plan will reduce the demand for road capacity generated by both the academic year program and the summer camp.

<sup>2</sup> The change from campers on site to registrants will facilitate better record keeping and monitoring of Petitioner's adherence to any camp cap imposed by the Board.



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 proposed Special Exception Modification is consistent with the applicable provisions of the 1990 Master Plan in that it maintains the current Special Exception use. The Campus Master Plan's new design features strive for continued compatibility with the surrounding residential neighborhood. The buildings and athletic facilities that make up the private educational institution use are set back a minimum of 110 feet from the surrounding residential properties and buffered by swaths of trees where the Property directly abuts single family homes.

Additionally, the Campus Master Plan retains and protects the C.W. Lansdale House and its environmental setting as recommended by the 1990 Master Plan. While the structures associated with this historic resource, the farmhouse and the barn, will be repurposed as discussed above, the exterior appearance of these structures and their environmental setting will remain undisturbed. As noted in the Historical Summary and Evaluation, the Campus Master Plan retains and preserves the farmhouse, barn, and surrounding grounds. It further notes that the key visual connection between the C.W. Lansdale House and Wilson Lane will be retained through the continued placement of athletic fields in the southern portion of the Property.

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 include Thomas Pyle Middle School and Walt Whitman High School. In keeping with the generally residential character of the neighborhood, the Special Exception Modification proposes modifications to the existing campus within the general area in which the existing buildings are already located. Notably, the area of the Property in which the existing and proposed buildings are located is separated from the abutting and confronting residential uses by a minimum 110-foot setback and screened by trees. The Special Exception Modification is not anticipated to have a detrimental impact on traffic or cause parking issues in the surrounding residential neighborhood. ~~In fact, the Special Exception Modification proposes to increase the amount of on-campus parking to accommodate athletic and other special events. Further,~~ ~~per~~ Per the Traffic Study, even with the increased number of summer camp participants proposed, the use will not have a detrimental impact on the transportation network.



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, following the implementation of the Campus Master Plan. As noted, if anything, implementation of the Campus Master Plan will be beneficial to the peaceful enjoyment, economic value or development of surrounding properties. ~~In particular, the Campus Master Plan increases parking on the Property to avoid overflow parking in the neighborhood on game days or other large campus events. It will also~~ In particular, it will implement designated pick-up and drop-off locations on campus thereby creating predictable behavior, reducing queuing, and reducing time spent on campus during the pick-up and drop-off periods. ~~Furthermore, the~~The buildings that comprise the private educational institution use will also remain at a significant setback from the property lines. Additionally, as noted in the Traffic Study, even with the increased summer camp participation, the private educational institution use will not have a detrimental impact on adjacent roadways.

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. As previously outlined, the site lighting is strategically placed to meet both safety and egress requirements, as well as respecting the County requirements for cut-off of lighting at the lot lines. No lighting of outdoor athletic facilities is proposed.

The buildings associated with the Special Exception are set back significantly from adjacent properties (a minimum of 110 feet) and screened by mature trees. Thus, any noise and physical activity on the Property associated with the Special Exception will not be noticeable to the neighborhood. No vibrations, fumes, odors or dust are anticipated.

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 any new special exception uses. It only proposes the enhancement of the campus through the implementation of the Campus Master Plan.



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. After implementation of the Campus Master Plan, Petitioner intends to provide substantially the same programming as it does today both during the school year and the summer.

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

The Property is served by adequate public facilities. According to the Traffic Study, the Project 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 2.2 miles away and the nearest police station is approximately 1.9 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**

For the foregoing reasons, Landon respectfully requests that the Board approve the requested modification of Special Exception so that Landon may continue to its students and summer camp participants effectively.

Respectfully submitted,  
Lerch, Early & Brewer, Chtd.

By: \_\_\_\_\_

Patrick O'Neil  
Attorney for Petitioner  
7600 Wisconsin Avenue Suite 700  
Bethesda, Maryland 20814  
Phone: (301) 657-0738



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