

THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

Item No. Date: 7.15. 2021

The Landon School - Special Exception Amendment No. S-686-D



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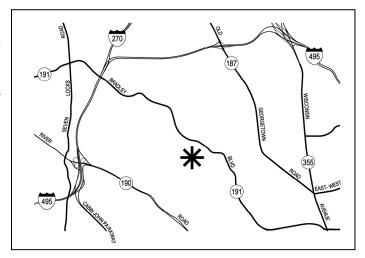
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Description Completed: 7.2.2021

- Request: Special Exception Amendment to increase the previously approved maximum summer camp enrollment from 700 to 1,200 campers and make changes to the structures and vehicular circulation per the Applicant's Landon School Campus Master Plan
- Located at 6101 Wilson Lane, Bethesda; 69.74 acres (3,037,715 square feet) of tract area zoned R-90/TDR 8.0 in the 1990 Bethesda Chevy Chase Master Plan
- Petitioner: Landon School Corporation
- Acceptance Date: November 23, 2020
- Review Basis: 59-G-2.19 of the Zoning Ordinance in effect on October 29, 2014
- Hearing Examiner Public Hearing Date: August 2, 2021



Summary

- Staff recommends APPROVAL of the proposed Special Exception Amendment subject to the conditions contained in this Staff Report.
- The Landon School was established in 1936 and has been operating under a special exception for a Private School since 1950. The original approval has been modified several times over the years to enhance and renovate the campus.
- This Amendment seeks approval to renovate several existing buildings on campus; construct a new upper school, campus quad and new outdoor athletic complex/tennis club; relocate the Andrews House, tennis courts and pool; demolish Torrey Hall; install new parking facilities; and reconfigure the internal roadway network and circulation patterns to improve safety for all travel modes. Combined, the proposed changes implement the Landon School's vision of the School's Campus Master Plan.
- This Amendment would also expand the previously approved enrollment cap for the summer camp from 700 to 1,200 campers and 250 total staff.
- The School is located within the C.W. Lansdale House/Landon School Historical District and the Application has been reviewed by the Historic Preservation Commission, which provided comments at their regularly scheduled meeting on April 28, 2021.
- Staff received correspondence raising a concern about potential new access to the Site. This concern is summarized and addressed in the staff report, and included in Attachment I.

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SECTION 1: RECOMMENDATION AND CONDITIONS

Special Exception Amendment S-686-D

Staff recommends approval of Special Exception Amendment S-686-D, which seeks to renovate and construct new academic, athletic facilities, and parking throughout the Site and to increase the previously approved maximum summer camp enrollment from 700 to 1,200 campers and 250 staff on 69.74 acres of land zoned R-90/TDR 8.0, and subject to the following conditions of approval, which replace and supersede all previous conditions of approval:

- 1. The Private Educational Institutional special exception use is granted to the Landon School ("School" or the "Applicant") and does not run with the land.
- 2. The Private Educational Institution is limited to the following:
 - a. A maximum total gross floor area of 361,100 square feet;
 - b. A maximum enrollment during the academic school year of 736 students and 190 staff (including teachers, administrators, janitorial staff, etc.).
 - c. A maximum enrollment during the summer camp (11 weeks, June-August) of 1,200 campers and 250 staff (including counselors, administrators, janitorial staff, etc.).
- 3. Hours of operation for the Subject Special Exception Amendment for the Landon School will be limited as follows (summer camp addressed in Condition No. 17):
 - a. Academic Schools days, including before-school and after-school care, Monday through Friday from 7:30 AM to 6:20 PM.
 - b. Special events, on weekends or outside peak travel hours on weekdays (6:30 AM 9:30 AM and 4:00 PM 7:00 PM) include but are not limited to:
 - i. Athletic events
 - ii. Theatrical Performances
 - iii. Parent-teacher Conferences
 - iv. Homecoming (traditionally in October)
 - v. Holiday Market (traditionally in December)
 - vi. Azalea Festival (traditionally in May)
 - vii. Graduation (traditionally in May)
- 4. The Applicant must dedicate along Wilson Lane (MD 188), in a form acceptable to the Maryland State Highway Administration, the necessary right-of-way to provide a width of 40 feet of dedicated right-of-way between the property line and right-of-way centerline in support of the master-planned right-of-way of 80 feet, total.
- 5. Prior to any above-ground building permit for Phase I improvements the Applicant will be required to install a concrete pad for the eastbound bus stop located on the Site frontage on Bradley Boulevard to meet Americans with Disabilities Act (ADA) accessibility design guidelines (8-foot by 5-foot concrete pad).
- 6. During the school year (September June), entry from Bradley Boulevard during the morning drop-off period (7:30 AM 8:10 AM) for parents or guardians will be restricted, and all parents and guardians will enter the Site from Wilson Lane. Staff, deliveries and other authorized vehicles will be permitted entry from Bradley Boulevard during this period by the vehicular security gate equipped with a readable sensor to allow registered vehicles access.

- 7. No vehicles may gueue on the adjacent public streets while accessing the Site at any time.
- 8. The Landon School will continue to implement the previously approved Transportation Management Plan during the academic school year (S-686-C, 2002).
- 9. The Landon School shall keep the indoor rifle range building maintained in a state of good repair (both structurally and aesthetically) such that the appearance of the cinder block may be made as attractive as possible.

10. Parking:

- a. The Applicant must provide a minimum of 301 and not to exceed 386 total vehicle parking spaces on-site at full build-out:
 - i. One parking space for each employee (includes teachers, administrators, janitorial staff, etc.).
 - ii. 0.25 parking spaces for all students in grades 9-12 or aged 16 and older.
- b. All on-site parking facilities must be set back at least 25 feet from the rear property line and at least 16 feet from any side property line.
- c. The Applicant must provide at least 20 short-term bicycle parking spaces on-site in compliance with the Montgomery County Bicycle Parking Design Guidelines.

11. Landscaping and Screening

Site landscaping and perimeter screening must be provided in accordance with the Special Exception Landscape Plan.

12. Lighting

- a. All new onsite exterior area lighting must be in accordance with the latest IESNA outdoor lighting recommendations (Model Lighting Ordinance-MLO: June 15, 2011, or as superseded).
- b. All new onsite down-lights must have full cut-off or BUG-equivalent fixtures.
- c. Deflectors will be installed on all new fixtures to prevent excess illumination and glare.
- d. Illumination levels generated from on-site lighting must not exceed 0.1 footcandles (fc) at the lot line, excluding areas impacted by street lights within the right-of-way.
- 13. The Applicant must comply with all tree-protection and tree-save measures shown on the approved Tree Save Plan for each phase of the Landon School Campus Master Plan (site plan). Tree-save measures not specified on the Tree Save Plan may be required by the M-NCPPC Forest Conservation Inspection Staff. A Tree Save Plan Submission will be required for all future land disturbing activities.
- 14. Prior to any demolition, clearing, grading or construction for this development Application, the Applicant must submit a five-year Maintenance and Management Agreement ("MMA") in a form approved by the M-NCPPC Office of General Counsel. The MMA is required for all forest clearing areas as shown on the Tree Save Plan. The MMA includes invasive species management control measures. All proposed measures should be chosen with consideration of the proximity to nearby streams and other environmentally sensitive areas. The use of herbicides should be avoided where possible.
- 15. The Applicant must schedule the required site inspections by M-NCPPC Forest Conservation Inspection Staff per Section 22A.00.01.10 of the Forest Conservation Regulations.

16. The Applicant must comply with the Montgomery County Department of Permitting Services requirements for stormwater management prior to the release of Sediment and Erosion Control permits.

17. Summer Camp

- a. The Summer Camp is limited to a maximum registration of 1,200 campers and 250 staff during any of the sessions during the 11-week operational period between June and August.
- b. Campers and staff may be on-site from 7:45 AM to 6:10 PM weekdays, including before-and after-camp care, with the main camp operating from 9:00 AM to 4:00 PM.
- c. No outdoor group activities for groups of more 25 during the summer camp sessions will occur within 30 feet of Site's property line.
- d. Noise associated with outdoor play will be limited to daytime hours during the week and will not begin prior to 8:00 AM.
- e. The Landon School will implement the new, distinct Summer Camp Transportation Management Plan (TMP) during the 11-week sessions between June and August. Important elements of Summer Camp TMP include:
 - The Landon School will appoint a Transportation Coordinator responsible for coordinating and managing carpools and private bus routes and for the purpose of reducing motor vehicle trips to and from the Site.
 - ii. The Landon School will operate at least 4 private neighborhood/regional bus routes to reduce vehicle trips to and from the Site.
 - iii. The Landon School will continue to commission off-duty police officers at the Wilson Lane and Bradley Boulevard entrances to assist with egress transportation operations.
 - iv. The Landon School's events scheduler will ensure that activities on campus are organized so that they avoid traffic movements during peak travel periods (6:30 AM 9:30 AM, 4:00 PM-7:00 PM).
 - v. The Landon School Summer Camp staff will be instructed to commute to and from the Site outside of the morning drop-off peak hour (7:15 -8:15 AM) and the afternoon pick-up peak hour (4:30 PM 5:30 PM).
- 18. The Planning Board has reviewed and accepts the recommendations of the Montgomery County Department of Transportation (MCDOT), in their letters dated January 25, 2021 and April 14, 2021 and hereby incorporates them as conditions of approval, except conditions 1,2,4, and 10 of the April 14, 2021 letter pertaining to right-of-way dedications and undergrounding utilities on along the Site frontages. The Applicant must comply with each of the recommendations as set forth in the letters, which MCDOT may amend if the amendments do not conflict with other conditions of Special Exception Amendment approval.
- 19. The Planning Board has reviewed and accepts the recommendations of the Maryland Department of Transportation State Highway Administration (MDOT SHA), in its letter dated May 14, 2021 and hereby incorporates them as conditions of approval. The Applicant must comply with each of the recommendations as set forth in the letter, which MDOT SHA may amend if the amendments do not conflict with other conditions of Special Exception Amendment approval.
- 20. The Planning Board has reviewed and accepts the recommendations of the Montgomery County Department of Permitting Services (MCDPS), Fire Department Access and Water Supply Section in its letter dated June 8, 2021, and hereby incorporates them as conditions of approval. The Applicant must comply with each of the recommendations as set forth in the letter, which MCDPS may amend if the amendments do not conflict with other conditions of Special Exception Amendment approval.

21. "Prior to submission of the demolition permit for the Torrey House, the applicant shall submit to the Historic Preservation Office a mitigation plan that incorporates educational opportunities with historic preservation efforts. This could be a multidisciplinary approach involving students with varying background and interests and supervision from educators and experienced professionals and should incorporate at least one of the suggestions offered by the Historic Preservation Commission in their May 19, 2021 letter to the Planning Board. The Historic Preservation Office will comment on the proposed plans within 10 business days of submission. Final copies of any deliverables, including but not limited to documentation, oral histories, or student projects should be offered to the Historic Preservation Office to be filed with the property records for the Master Plan Historic Site."

SECTION 2: SITE DESCRIPTION AND VICINITY

Subject Property

The subject site ("Subject Property" or "Property") is located just south of Bradley Boulevard at 6101 Wilson Lane (MD 191). The Property, recorded as Parcel A (Plat No. 21110, dated 1999¹), consists of 69.74 acres (3,037,715 square feet). The Property has approximately 1,673 feet of frontage on Wilson Lane, 215 feet on Bradley Boulevard, 680 feet on Whittier Boulevard, 595 feet on Merrick Road, and 200 feet on Poe Road. The Property is surrounded by residentially zoned and developed properties along its northern, western, and eastern property lines. Other land uses in the area include Thomas W. Pyle Middle School on Wilson Lane and Hillmead Neighborhood Park on Bradley Boulevard. The Property is within the area encompassed by the 1990 Bethesda – Chevy Chase Master Plan (Master Plan).

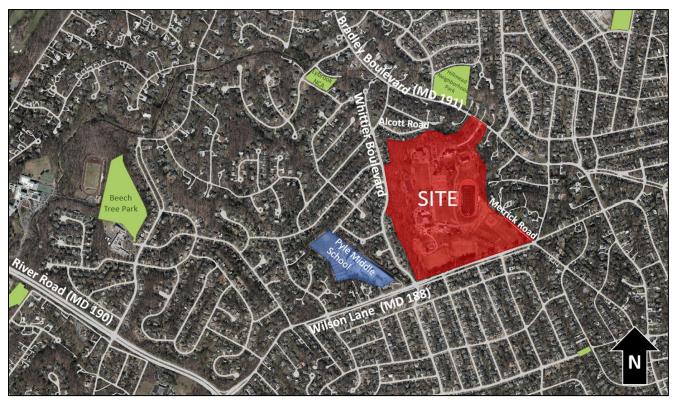


Figure 1 – Vicinity Map

Site Analysis

The Property is zoned R-90 and 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 the Applicant will not be pursuing at this time. The Property is improved with several academic and auxiliary buildings associated with the existing Special Exception as well as 370 existing parking spaces² and athletic facilities including several fields, an outdoor pool, tennis courts, and an athletic track. The total existing building floor area on the Property is approximately 244,863 square feet. The existing buildings date from the mid-1880's to the 1990's.

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

² After full-build out, only 22 existing spaces will remain in their original configuration.

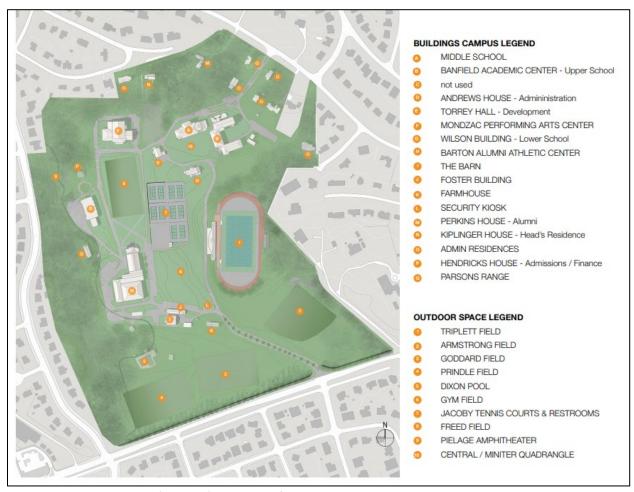


Figure 2 - Campus Map (Existing), page 13 of the Landon School Campus Master Plan Summary Report

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 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 their historical significance are explained in detail in the Historical Summary and Evaluation (Attachment G).

The Site is currently accessed via two driveway entrances: one on Wilson Lane and one on Bradley Boulevard. Both will remain in the future condition proposed by the Subject Application. To improve safety and circulation efficiency on campus, modifications to the internal roadways and pedestrian pathways are proposed.

The campus topography reflects rolling terrain with steep slopes along the west side of the Property where an intermittent stream is located. The main use areas of the campus are on the ridge in the center of the Site. To the east and west are woodland reserves that contain the stream valley and wooded slopes that provide screening of

the campus to the surrounding residential neighborhoods. This wooded perimeter extends on the north of the Site where the campus residences are located. The main views of the campus from the outside are from Wilson Lane, with open views to the historical farm and open, green athletic fields. The campus buildings are located in the center of the Site and set into the landscape area characterized by tall shade trees in the academic campus core and open fields and lawns in the athletic core.



Figure 3 – Site Aerial³

A simplified Natural Resources Inventory/Forest Stand Delineation (NRI/FSD) was approved for the Subject Property on September 28, 2020 (420201370). The Subject Property is located within the Cabin John watershed, a Use I-P watershed⁴. There are no known rare, threatened, or endangered species on-site. There are no 100-

³ The Site boundary, shown in red, does not include the adjacent residential properties owned by the Landon School.

⁴ Use I-P: WATER CONTACT RECREATION & PROTECTION OF AQUATIC LIFE, AND PUBLIC WATER SUPPLY Waters that are suitable for: water contact sports: play and leisure time activities where the human body may come in direct contact with the surface water; fishing; the growth and propagation of fish (other than trout); other aquatic life, and wildlife; agricultural water supply, industrial water supply, and use as a public water supply.

year floodplains or wetlands on-site. Aside from the forest and numerous mature trees, there are no other environmentally sensitive resources associated with the Site. The mature trees on-site are generally sized at 24-inches in diameter-at-breast-height (DBH) or greater, including a 60-inch Silver Maple located near the alumni center, interior to the Site. None of the 36 specimen trees on-site are county champion trees as verified in March 2018 by The Montgomery County Forestry Board Register of Champion Trees and there are no state champion trees on or near the Site. Soils are classified generally as 2UB, an urban soil which is typically well drained, not highly erodible, and is limited to minor slopes of 0-8%.

Previous Approvals

The Landon school has existed since 1929 and has been located on the Subject Site 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 nearly two dozen times to enhance and renovate the campus. Due to the nature of the Special Exception use type under the County's regulatory process, every permit for renovation, demolition, and new construction requires approval of an amendment to the previous special exception by the Board of Appeals. Each of the prior approvals for the Subject Site is listed in chronological order and summarized below. Consolidated documentation for each of the cases is provided in Attachment A:

- 1. Case No, 927, June 2, 1950: approval to continue as a school
- 2. Case No. 118, October 19, 1953: approval for construction of the headmaster's house
- 3. Case No. 211, August 16, 1953: approval for construction of the rifle range
- 4. Case No. 540, July 16, 1957: approval for construction of a new wing of the gymnasium
- 5. Case No. 1118 September 5, 1961: approval construction of the third floor and new wing on the middle school
- 6. Case No. S-398, May 14, 1975: approval for construction of an additional classroom wing to Banfield building
- 7. Case No. S-398 July 19, 1978: approval for construction of a greenhouse
- 8. Case No. S-686, May 2, 1979: approval for construction of an addition to the gymnasium
- 9. Case No. S-686-A, August 26, 1986: approval for construction of the activities building
- 10. Case No. S-686, May 29, 1991: approval to install a canopy over the gymnasium steps
- 11. Case No. S-686, June 30, 1992: approval for construction of the Torrey Hall exit stairs
- 12. Case No., April 7, 1993: approval for construction of the stair enclosure of exterior stairs on Banfield Academic Center
- 13. Case No. S-398, March 4, 1996: approval to replace the outdoor swimming pool
- 14. Case No. S-398, February 20, 1998: approval to install a roofed storage shed
- 15. Case No. S, February 250, 1998: approval to install a new security booth
- 16. Case No. S-398, July 26, 1999: approval for construction of the new Middle School
- 17. Case No. S-398, August 27, 2002: approval for installation of a new security kiosk
- 18. Case No. 686-C, November 18, 2002 ("2002 Modification"): approval for construction of the Lower School, addition to the Grade kindergarten through second, renovation of athletic field, renovation of the Amphitheater, continuation of the summer camp, revisions to the campus roadway system
- 19. Case No. S-686-C, January 16, 2003: approval for construction of the Crittenberger House
- 20. Case No. S-686-C, May 10, 2007: approval for expansion of the gymnasium
- 21. Case No. S-686-C, June 15, 2009: installation of two baseball dugouts
- 22. Case No. S-686-C, May 20, 2010: approval for a permit to erect a seasonal tennis bubble and small restrooms next to the athletic field
- 23. Case No. S-686-C, January 6, 2011: approval to relocate small restrooms approved for installation in 2010

Neighborhood Description and Surrounding Uses

The defined neighborhood is developed primarily with single-family detached residential dwellings to the east, south, and west in the R-90 zone and with single-family detached residential buildings, zoned R-60, to the northeast, opposite the Site on Bradley Boulevard. Beyond the neighborhood boundary to the northwest are single-family residential buildings zoned R-200.

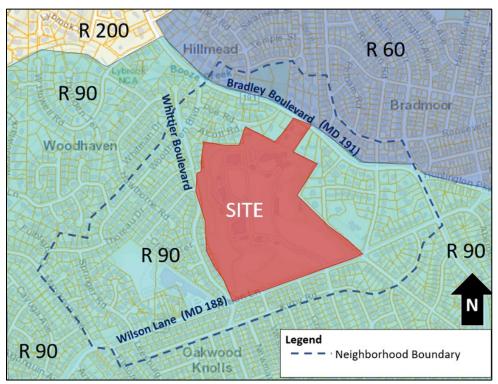


Figure 4 – Zoning Map with Defined Neighborhood

The Property is unique when compared to the surrounding residential uses for its size, shape, and dense vegetation bordering elevations above the adjacent properties.

There are four known existing special exception uses within the neighborhood. These uses are listed below in Table 1 and shown in Figure 5 for context.

Table 1: Existing Special Exceptions and Conditional Uses within the Defined Neighborhood						
Map ID	Case Number	Use	Location			
1	S1957	Accessory Apartment	7902 Springer Road			
2	S2796	Accessory Apartment	8312 Woodhaven Boulevard			
3	S2738	Accessory Apartment	8605 Long Acre Court			
4	S1283	Home Occupation (Dress Maker)	6304 Wilson Lane			

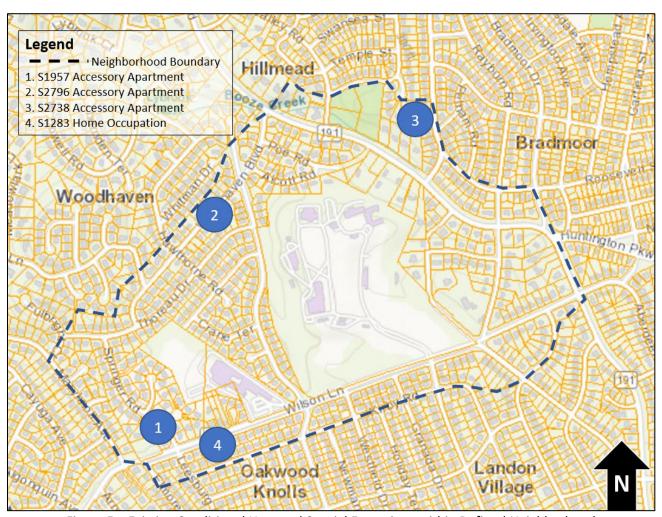


Figure 5 – Existing Conditional Uses and Special Exceptions within Defined Neighborhood

SECTION 3: PROJECT DESCRIPTION

The Landon School in greater Bethesda, is a private, nonsectarian school for boys. The school has existed at its present location at 6101 Wilson Lane, Bethesda Maryland since 1936. The campus operates as follows:

- The Lower School, serving, grades 3-5;
- The Middle School, serving grades 6-8;
- The Upper School, serving grades 9-12

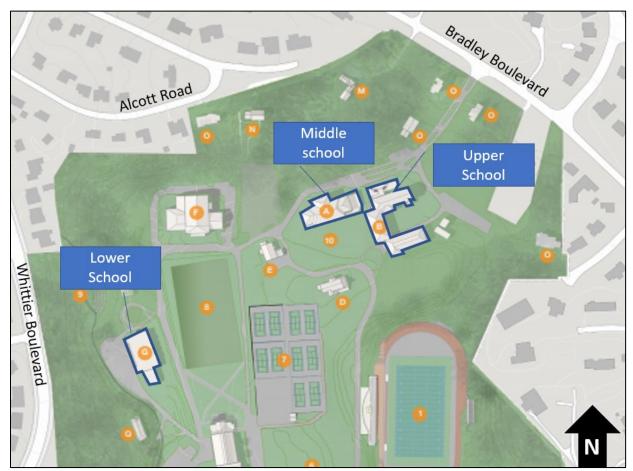


Figure 6 - Lower, Middle and Upper Schools

The total enrollment during the academic school year is 680 students with an approved cap of 736 students during the academic school year. The Landon School also offers a co-ed summer camp for students ages 3 ½ to 17, over 11 one-week sessions between the months of June and August.

Proposal

The Landon School seeks approval to increase the cap on enrollment in the Summer Camp from 700 to 1,200 total students with 250 staff maximum in a single session over the 11-week operational period between June and August.

Additionally, the Landon School requests approval for its long-term plans to upgrade various buildings and student facilities on the Site. The School has maintained a long-term Campus Master Plan since at least the 1970s and it has been updated periodically since. As all modifications to the campus including renovations, new construction,

and demolition must be reviewed and approved as an amendment to the approved Special Exception by the Board of Appeals, it can be helpful to the school and the greater community to submit a consolidated Application covering all of the planned changes within the greater context of the entire Site, rather than submitting piecemeal Applications over several years.

Therefore, the Subject Application proposes to modify Special Exception S-686-D, to gain approval to increase the existing cap on the School's summer camp enrollment from 700 to 1,200 participants and to achieve the School's Campus Master Plan, as summarized in the *Landon Master Plan Summary Report* (Attachment F) and shown on Figure 7. Additional details on these two proposals are included below.

Increased Enrollment Cap for Summer Camp

The Landon School has provided a summer camp on the Site since the 1940's. The Summer Camp is open to boys and girls, whether or not they attend the Landon School during the academic school year. The School is approved to provide a summer camp over 11-weeks between June and August for a maximum of 700 students ages 3 ½ to 17. Due to increased demand on the program⁵, the Applicant seeks to increase the cap on summer camp participation from 700 campers to 1,200. The core hours of operation will continue to be from 9:00 AM to 4:00 PM on weekdays, and the three session options (morning session, afternoon session, all day session) are not proposed to change. As conditioned, campers may be on-site from 7:45 AM to 6:10 PM, including before- and after-camp care. No additional lighting on-site is needed or proposed in conjunction with expanded summer camp enrollment. The school's private busing program also operates over the summer with four routes providing transportation to students from nearby neighborhoods and northwest Washington, D.C. and the School has committed to increasing the number of routes if needed. Buses will continue to arrive on campus at 9:00 AM and depart at 4:00 PM.

As the proposed increase in campers for the summer camp is beyond what was previously analyzed and approved for transportation impacts (a maximum of 736 students during the school year), the Applicant was required to conduct a transportation impact study (TIS). The TIS was reviewed by Planning Staff, the Montgomery County Department of Transportation and the Maryland Department of Transportation State Highway Administration and all determined that there is adequate capacity on the regional transportation network to accommodate the proposed increase in trips. A Summer Camp Transportation Management Plan (Summer Camp TMP), specific to the summer camp and separate from the School's current TMP, was submitted to identify measures for reducing the volume of traffic coming to the Property, to manage the flow of traffic at the two entrances to the Site, and to ensure appropriate queueing/circulation within the Site.

As conditioned, the Landon School summer camp will be limited to a cap of 1,200 campers registered to any of the sessions over 11 weeks of the year and a maximum of 250 staff persons and will be subject to a new, summercamp specific Summer Camp Transportation Management Plan (Summer Camp TMP), to be approved by the Hearing Examiner. Should the Applicant seek to increase this summer camp enrollment cap again, an amendment to the Special Exception would be required, along with an updated TIS and an amended Summer Camp TMP subject to review and approval by the Hearing Examiner.

Landon School Campus Master Plan⁶

The purpose of the current Landon School Campus Master Plan update is to modernize and enhance the Landon School campus. At full build-out, the operations of the school itself will remain the same as they do today. The

⁵ The Applicant has indicated that the summer camp enrollment has exceeded the enrollment cap of 700 campers within the last five years. The Landon School has since stopped operating beyond the enrollment cap and seeks to remedy non-compliant enrollment increases with this Application, which includes a study of the transportation impacts of the proposed increase.

⁶ The Landon School Campus Master Plan is developed by the School, for the School's purposes. This is not a document created for or reviewed by the Planning Department or any other government regulatory agency.

academic year enrollment will not exceed the approved cap of 736 students. The hours of operation during the academic school year (both educational instruction time and after school care) are in compliance with the previous Special Exception approvals and are not proposed to change as part of this Application. Additionally, the busing program complies with the previously approved Transportation Management Plan, and no changes are proposed in conjunction with the Subject Application.

Generally, the goals of the School's Campus Master Plan are to enhance campus security, improve and augment academic spaces, develop an identifiable campus core, upgrade athletic fields, implement green building and site design, develop landscape replacement and maintenance strategies, and to improve the entrance and traffic safety campus-wide. Among the specific goals, the Landon School 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, increase the size and improve the 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 Landon School Campus Mater Plan seeks to provide more meeting and larger group gathering spaces for both academic and social purposes, as well as increase natural light for all three divisions of the School. The specific proposed changes to the campus are listed below, sorted by phase. The resulting vision of the Landon School Campus Master Plan is included in Figures 7, 8, and 9.

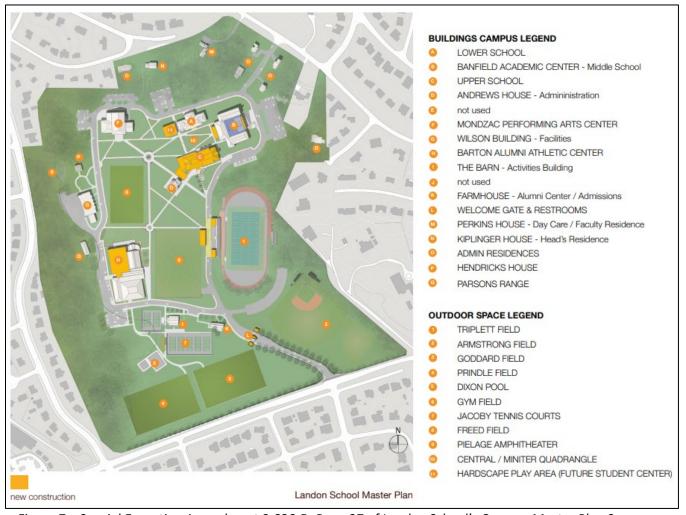


Figure 7 – Special Exception Amendment S-686-D, Page 37 of Landon School's Campus Master Plan Summary Report

Phase 0⁷:

• Fence & Welcome Center: Replacement of perimeter chain-link fence along Wilson Lane and replace the existing Security/welcome station with a new one, approximately 200 feet south (closer to the entrance) at the Wilson Lane entrance to campus.

Phase I:

- 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.

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 provide day care facilities for staff; and
- 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.

⁷ Phase 0 does not require Planning Board review, as it fits the criteria for a minor amendment to the Special Exception and therefore this is not included in the Application. Approval of this phase by the Board of Appeals is on a parallel review track to this Application. The goals of the phase are included in the Staff Report for context.

Following the implementation of the Landon School Campus Master Plan, the total square footage of development on the Property will increase from 244,863 square feet to 361,100 square feet with a future anticipated enrollment of 707 students, which is under the enrollment cap of 736 students.



Figure 8: Structures to be demolished, relocated, and renovated as envisioned by the Campus Master Plan

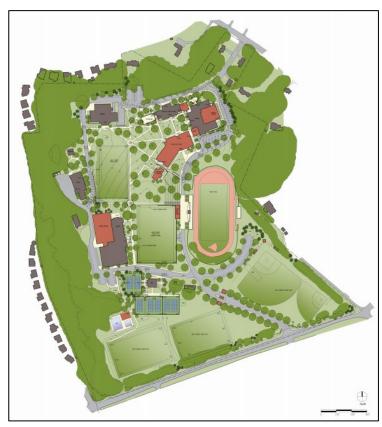


Figure 9: Rendered site plan Showing Full Build-out as envisioned by Campus Master Plan

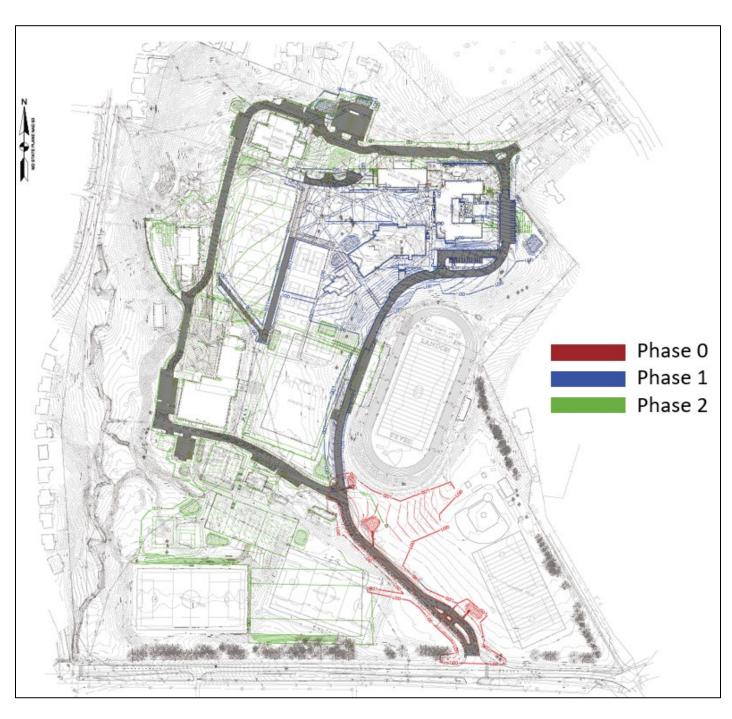


Figure 10: Proposed Phasing of the Landon School Campus Master Plan (site plan)

Buildings and Campus 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, as shown in Figures 11-15 below, 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.



Figure 11: Innovation Center South and Southeast Elevations

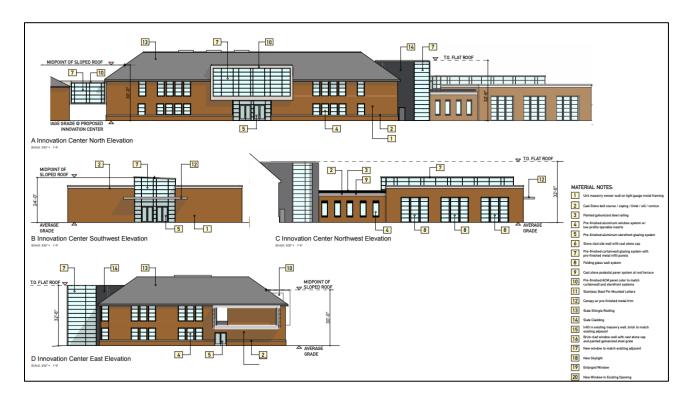


Figure 12: Innovation Center North, Northwest, Southwest, and East Elevations



Figure 13: BAC West and South Elevations

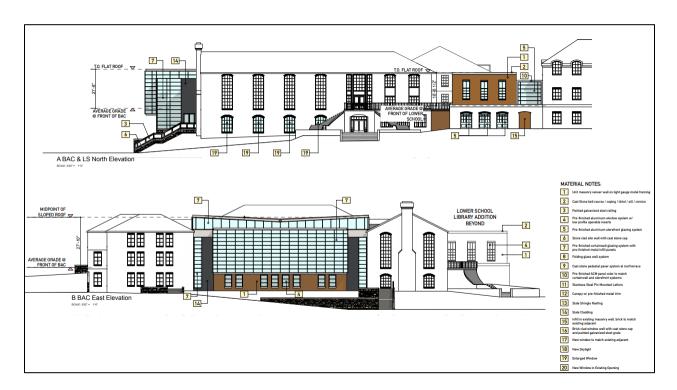


Figure 14: BAC North and East Elevations and LS North Elevation

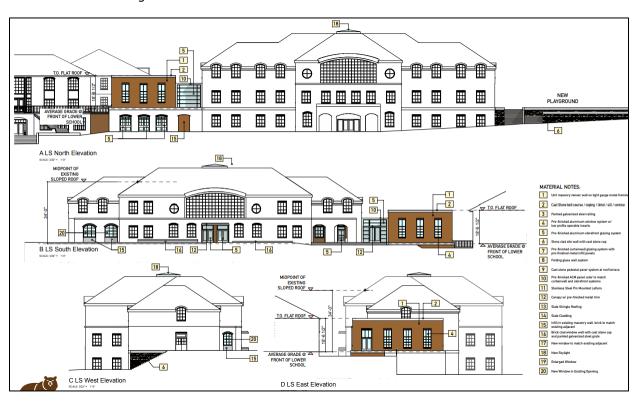


Figure 15: LS North, East, South, and West Elevations

Access, Circulation, and Parking

All access to the Site is provided from two existing, full-movement driveways. The main entrance is located on Wilson Lane (MD 188) and the secondary entrance is on Bradley Boulevard (MD 191). Both roadways are classified as Arterials by the 2018 *Master Plan of Highways and Transitways* and are owned and maintained by the Maryland Department of Transportation State Highway Administration (MDOT SHA). Pedestrians access the Site is provided by the existing sidewalks on Wilson Lane which connect to the larger sidewalk network along Whittier Boulevard to the west and Aberdeen Road to the east.

The Site also has frontage along Whittier Boulevard, a Primary Residential Roadway, owned and maintained by the Montgomery County Department of Transportation (MCDOT) and Merrick and Poe Roads, both lower-tier residential roadways. No vehicular access is provided from these roads. Pedestrian access exists on these frontages in the form of informal trails leading to nearby residential areas. These informal pathways will be limited and/or eliminated and a designated sidewalk running along the Wilson Lane entrance within the campus will be constructed to provide safe, designated pedestrian access to the Site.

Internal circulation will be enhanced for greater efficiency and pedestrian safety. Specifically, after the implementation of the School's Campus Master Plan, there will be sidewalks throughout the campus that currently do not exist, connecting to a new quad with pedestrian pathways to allow pedestrians to traverse the campus without potential conflicts with vehicles. Additionally, the School's Campus Master Plan, when implemented, will provide designated pick-up and drop-off areas. A summary of existing pick-up and drop-off operations and how they are proposed to be improved is included below.

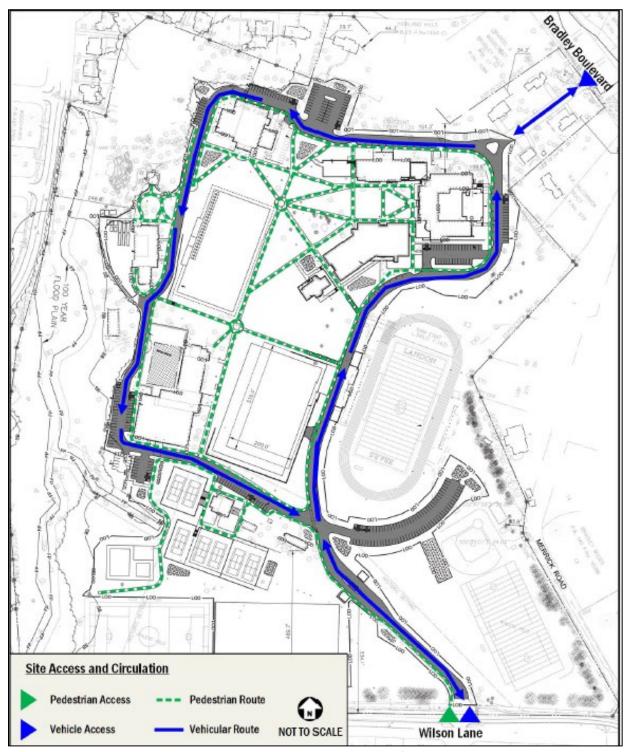
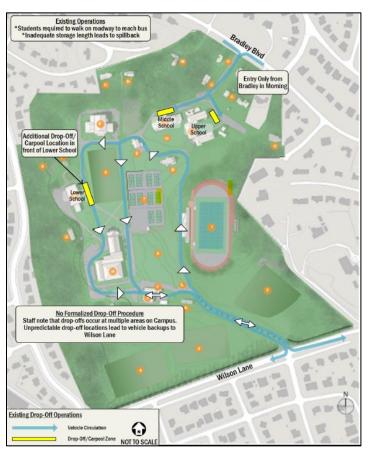


Figure 16: Proposed Site Circulation at Full Build-out of the Campus Master Plan

Current On-site Circulation

Under existing conditions, the Landon School maintains three general locations for pick-up and drop-off in front of each of the three Divisions of the School, and two general locations for pick-up, one in front of the Athletic Center and one in front of the Lower School. Vehicles may enter from Wilson Lane or Bradley Boulevard, with the main driveway circulation running in a counterclockwise direction. There is an existing carpool system that organizes parents into groups of carpools to lessen single student occupancy vehicles. Parents register their car tag numbers at the beginning of the year. Two traffic control personnel are present at both entrances during morning arrival and afternoon dismissal to regulate traffic control and enforce turn restrictions.

Morning drop-off for the Lower, Middle, and Upper schools occurs between 7:30 and 8:15 AM. Peak arrival occurs between 7:45 and 8:00 AM. Existing drop-off operations are shown in Figure 17. Drop-off operations are currently informal, with parents dropping off children at multiple locations outside of each of the three Divisions of the School. As shown in Figure 17, all vehicles exit the campus on Wilson Lane only during drop-off operations.



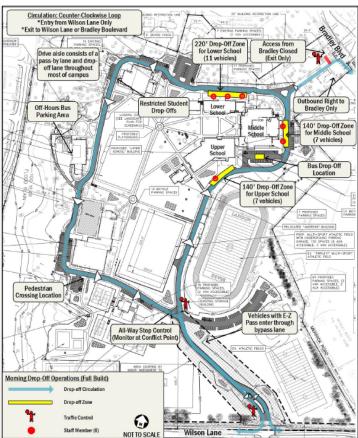


Figure 17: Morning Drop-off, Existing conditions

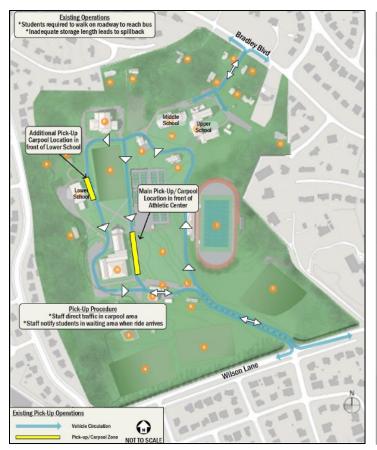
Figure 18: Morning Drop-off, Proposed Full Build-out

For the pick-up operations, parents begin to arrive on campus shortly before the 3:40 PM dismissals for the Lower and Middle Schools⁸. Students wait in a secure indoor location and are notified when their vehicle arrives. Motorists can currently access the Site from either the Wilson Lane or Bradley Boulevard entrances. Motorists are also permitted to exit from either driveway.

⁸ Upper School students are required to participate in mandatory athletics which begins at 3:30 PM and ends at 6:00 PM. Parents picking up junior varsity athletes will pick up their children at the designated pick-up area in front of the Upper School. Parents picking up varsity student athletes will do so at the appropriate athletic facility.

Proposed Circulation

One of the goals of the Campus Master Plan is to relocate all educational buildings within a ring road, thereby significantly reducing potential pedestrian/vehicle conflicts. Pedestrian paths are designed to allow students to walk from any of the school buildings to most of the athletic fields without vehicular conflict or by crossing at well-defined crosswalks. The significant circulation improvements are largely accomplished in the Interim Phase 1 period, with some additional internal pedestrian pathways to be built in Phase 2 (full build-out). One significant improvement achieved in the interim Phase 1 is a widened drive aisle to allow for a bypass lane for pick-up and drop-off operations. Additionally, six staff persons (monitors) are proposed to assist with morning drop-off, and 11 staff persons with afternoon pick-up. Two traffic control officers, one at each driveway, will continue assist with traffic control and enforcement during both school-peak travel periods as they do today.



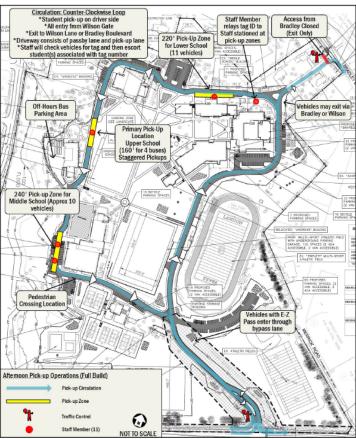


Figure 19: Afternoon Pick-up, Existing conditions

Figure 20: Afternoon Pick-up, Proposed Full Build-out

The circulation for proposed drop-off and pick-up activities has been designed to ensure an efficient and predictable operation, with no queues spilling outside of the school campus. The operations take advantage of the interim Phase 1 and Campus Master Plan's goals of placing all academic buildings inside of the roadways and moving vehicle circulation to the outer ring. As a result, there are fewer pedestrian-vehicle interactions.

Under both the interim Phase 1 and full build-out of the Campus Master Plan, the counterclockwise circulation plan will be maintained, with inbound access available only from Wilson Lane⁹. Vehicles will be permitted to exit the campus via the existing driveways on Wilson Lane or Bradley Boulevard. Outbound movements on Bradley

⁹ This applies to the Academic School Year only. As studied in the transportation impact study, the adjacent roadway network can support inbound access from both driveway entrances during the summer camp sessions, as occurs today.

Boulevard are right-out only, and this will be enforced by a stationed traffic control staff person. Under this circulation, there will be minimal conflicts on-site, as traffic will move in a single direction. The proposed drop-off areas for each Division of the School are as follows:

- Lower School: A 220-foot curbside drop-off zone is proposed, located adjacent to the Lower School
 entrance. The drop-off zone can accommodate up to 11 vehicles. Up to 3 school monitors will assist
 students.
- Middle School: A 140-foot curbside drop-off zone is proposed, located adjacent to the Middle School entrance. The drop-off zone can accommodate up to 7 vehicles. Up to 2 school monitors will assist students.
- Upper School: A 140-foot curbside drop-off zone is proposed, located adjacent to the Upper School entrance. The drop-off zone can accommodate up to 7 vehicles.

Enforcement of the drop-off zones will be undertaken by staff to ensure students are not dropped off outside designated locations. Parents with students attending different schools on the Site may drop off their children at a single location to improve efficiencies of the drop-off process. In order to ensure a quick and efficient drop-off process, parents will not be allowed to park or exit their vehicle. Once the student has departed the vehicle, the parents may drive out of the lane, with staff support, to keep the drop-off line moving. Peak arrival is expected to occur between 7:45 and 8:00 AM for the Lower, Middle, and Upper Schools.

Furthermore, as improved in the interim Phase 1, the counterclockwise circulation plan remains for the dismissal period as the arrival period. Dismissal periods and pick-up areas are as follows:

- Lower School: 3:45 PM; picked up adjacent to the Lower School building
- Middle School: 4:00 PM; picked up adjacent to the Athletic Center following the conclusion of their mandatory athletics period
- Upper School: 5:30 PM (for junior varsity athletes); 6:00 PM (for varsity athletes). Picked up adjacent to the athletic center following the conclusion of athletic activities 10.

During these time periods, parents/guardians with authorized tag numbers may enter the campus from Wilson Lane and then enter the counterclockwise loop. Students will be held in a waiting area close to the entrance within each pick-up area and monitors will relay the vehicle tag number by short-range communication system to the student queue. Students who are being picked up by the same vehicle but attend different Divisions will assemble at a single pick-up location. The student(s) associated with the vehicle tag number will then be escorted to the vehicle by the on-site monitor. As with the morning drop-off period, parents will be prohibited from parking or exiting their vehicles during the pick-up process. Once the student(s) is safely in the vehicle, the parent may depart and pull out of the curbside lane. School monitors at each location will be opening car doors and helping student into vehicles, particularly for Lower School students.

Buses, Existing and Proposed

The Landon School operates a robust bussing program which is a requirement of the Transportation Management Plan for the academic school year. For the 2019-20 academic year, 145 students (22% of the student body) utilized the service. The buses are operated by external vendors and also serve the nearby Holton Arms School. Six routes provide transportation for students. The routes serve the following areas:

- 1. Alexandria
- 2. Georgetown/Spring Valley/Friendship Heights
- 3. McLean

-

¹⁰ All Upper School students must participate in an athletic activity after school.

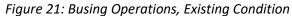
- 4. Silver Spring/Prince George's County
- 5. Great Falls
- 6. Potomac/Gaithersburg

Under existing operations, all buses arrive on-site between 7:35 and 7:50 AM. Following the drop-off procedure, some buses park on-site at a parking lot located on the western portion of the campus until the pick-up procedure/dismissal period begins. The buses that do not park on-site following the morning arrival period depart campus and are staged in locations determined by the external vendors.

Starting at 3:15 PM, the buses begin pick up operations, picking up students at the same location as the drop-off (the Performing Arts Center). Between 4:00 and 4:05 PM, all buses depart the school towards their respective destinations. For students involved in after-school or after-care activities, a late bus is provided. Five of the six routes are provided in the late service, with a departure time between 6:10 and 6:20 PM. Following the conclusion of bus services, some buses return to the parking area at the School for overnight storage and some buses are stored overnight in locations determined by the vendors.

As part of the Phase 1 of the Campus Master Plan, bus operations will shift the main pick-up and drop-off locations. In coordination with the proposed access changes, buses will drop off students curbside adjacent to the Middle School and Upper School entrances. A designated drop-off area will accommodate up to 3 buses, which will allow for buses to continue their staggered arrivals, drop off students, and then drive immediately to the bus parking area or depart campus. Proposed bus drop-off operations are shown on Figure 21 and Figure 22 for the interim Phase 1 and full build out of the Landon School Campus Master Plan, respectively.





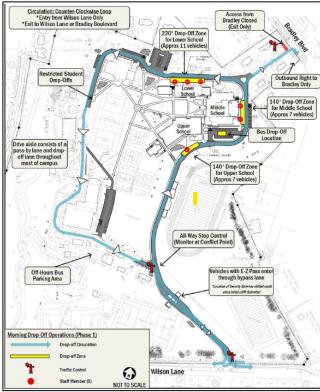


Figure 22: Busing Operations, Proposed Full

As part of the pick-up operations, buses will be stationed on the west side of the campus, adjacent to the Mondzac Building and athletic fields. A designated pick-up area will be reserved for buses. This 160-foot queuing area will accommodate four large yellow buses on staggered pick-ups and allow for buses to easily depart via Bradley Boulevard or Wilson Lane.

Access Management (Security Gates)

Under existing and future conditions, vehicular and school bus access to the campus is provided from the Wilson Lane and Bradley Boulevard gates. Consistent with existing conditions, the Bradley Boulevard entrance will be access-controlled by a vehicular security gate equipped with a readable sensor to allow registered vehicles to pass through. The Bradley access gate is located approximately 300 feet from Bradley Boulevard and as conditioned, no vehicles of students' parents or guardians will enter the campus during morning pick-up periods, Monday through Friday, during the academic school year.

The gate at the Wilson Lane entrance remains open during school hours and the Wilson Lane security station is staffed such that it can control access from this entrance. The Wilson Lane security station will be relocated from its current location within campus to approximately 200 feet from Wilson Lane. The Wilson Lane approach at the new security station will also be widened to allow a second inbound lane. This will allow 2 vehicles to be processed at a time (with the inner lane reserved for visitors and the outer lane reserved for authorized vehicles displaying access decals or numbers) and reduce potential delays or backups.

Parking

Under existing conditions, 370 surface parking spaces are provided across the campus. For special events, including athletics, additional parking is provided by allowing vehicles to park on certain athletic fields on-site.

Once the Campus Master Plan is fully built out (Phase 2), parking will be increased from 370 to 386 spaces. The proposed supply will meet the practical demand of a typical school day, for the typical day during the Summer Camp sessions and meet Zoning Requirements. Under Montgomery County Zoning Requirements, a private educational institution is required to provide one space for every employee and 0.25 spaces for every student (grades 9-12 or age 16+). By providing 386 parking spaces, the Applicant can provide parking for 190 staff persons. Applying the rate of 0.25 spaces per students, the remaining 198 spaces can accommodate up to 784 students, which exceeds the maximum enrollment cap for the entire school during the academic session (736), which is not proposed to change with this Application. In other words, the proposed parking for the Site exceeds the minimum required for staff and students, per the County Code. During the Summer Camp sessions, the Site can accommodate parking spaces for each of the 250 staff persons. Campers will not require parking.

The number of parking spaces provided for the School will meet the practical needs of staff/faculty, student drivers, and parents of students. The proposed parking plan is presented in Figure 23.

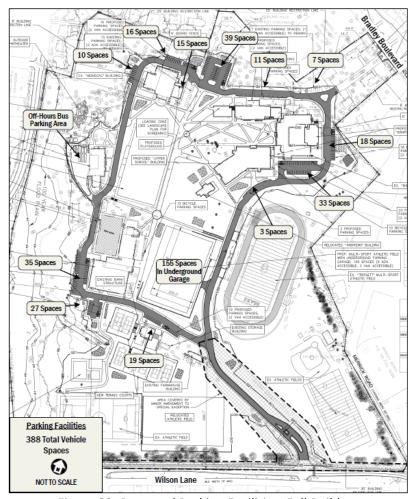


Figure 23: Proposed Parking Facilities, Full Build-out

The 386 proposed spaces will provide reserved spaces for staff/faculty, visitors, student drivers, and carpoolers, as well as electric vehicles (2 spaces), and ADA (17 van accessible spaces, 25 total spaces). Parking will also be available for bicyclists (20 spaces), and motorcycles (10 spaces). Parking spaces for student drivers will be located in areas that contain fewer vehicle conflicts and are easier for new drivers' access. Following the recommendation of school staff, student driving spaces were placed near the athletics fields, as Upper School students can immediately walk to their cars following the end of athletic activities.

Transportation Management Plan for the Academic Year and Summer Camp

Given the complexities of the Subject Application and the heavy reliance on busing to manage Site generated trips, the Applicant is already subject to a perpetual Transportation Management Plan (TMP) that identifies specific strategies to mitigate site-generated trips. The Transportation Management Plan was first approved with S-686-C, the "2002 modification". To address potential transportation impacts of the proposed increase in summer camp enrollment, the Applicant proposes a new Summer Camp Transportation Management Plan, specific to the summer camp activity during the 11-week period between June and August each year. All applicable agencies have reviewed the submitted Summer Camp TMP and recommend approval, as conditioned.

The TMP for the Summer Camp mirrors the TMP for the academic school year and includes three components: the minimization of vehicle traffic, management of on-site traffic, and the distribution of traffic away from the surrounding roadways during peak hours.

Minimizing vehicular traffic to and from the Site is addressed by heavily promoting carpooling by helping students in neighboring areas connect with one another, and by providing private bus transportation along four routes in Bethesda, Chevy Chase, Potomac and Northwest DC. The number of bus routes can increase as necessary as enrollment increases. These practices are in place for the Summer Camp today but are now formalized by including it in the Summer Camp TMP.

Managing on-site traffic is achieved by staffing personnel throughout the campus to enforce the designated pickup and drop-off zones, and the protocols which prohibit parents from parking and escorting children into the buildings. As needed, the school will hire off-duty Montgomery County Police personnel to assist with egress movements at both campus entrances as they do now during the academic school year.

Distributing traffic is achieved by directing staff to access and leave the campus outside of peak travel hours. Events will also be scheduled such that they will not generate traffic to and from the site during peak travel hours.

Landscaping

The Property is extensively landscaped with a wide variety of trees, shrubs, grass, and flowering plants. Impacts to landscaping will be minimized where possible with the majority of the existing buildings and grounds maintained in their existing condition. The areas being altered by the proposed redevelopment allow the Subject Property to comply with current standards including ADA, stormwater management, circulation and access, and current building codes. Locations where the Site will be modified to accommodate the School use will primarily be internal to the Site and not readily visible to the adjacent residential properties.

Forest Conservation

In lieu of a Natural Resource Inventory/Forest Stand Delineation (NRI/FSD), a simplified NRI in support of a Forest Conservation Exemption request was submitted by the Applicant. This Exemption Request, No. 42020192E, was approved for the Subject Property on May 1, 2020. As such, this Application is subject to Chapter 22A Forest Conservation Law but is exempt from the requirement to submit a Forest Conservation Plan under Section 22A-5(t)(1) for modification to an existing special exception approved before July 1, 1991. Previous Special Exceptions CBA-916 and S-615 were approved for the Property in 1960.

Although many large mature trees will be cut and removed, the project meets the requirements of the Montgomery County Code Chapter 22A (Forest Conservation Law), Section 22A-5(t)(l) for modifications to existing, non-residential developed property in which no more than 5,000 square feet of forest is cleared at one time or cumulatively; the modification does not result in the cutting, clearing, or grading of any forest in a stream buffer; the modification does not require the approval of a new subdivision or special exception plan; the modification does not increase the developed area by more than 50%; and the pending development application does not propose any residential uses. However, this exemption approval specifies that the Applicant must submit a new Forest Conservation Exemption Application and Tree Save Plan for each construction phase in order to verify that the construction project is within the limits of disturbance as shown on approved exemption number 42021029E and that the conditions of 22A-5(t)(1) are being met.

Accordingly, a Tree Save Plan has been submitted and approved as a part of this submittal. The submitted Tree Save Plan shows that approximately 4,667 square feet of forest will be cleared with this Project. To date, this proposed clearing of 4,667 square feet is the only forest clearing on the Property. No forested stream buffer will be impacted by the project, the subject Property is not within a special protection area, the project maintains the current development and does not require approval of a new subdivision plan, and the Project will increase the development area by approximately 25%. As conditioned, this Application satisfies all requirements of Chapter 22A, Forest Conservation Law.

The proposed project is to be completed in different phases with multiple sediment control permits. As required by Exemption Approval No. 42020192E, the Landon School must submit for prior approval to the Montgomery Planning Department a forest conservation exemption and tree save plan for each construction phase. The purpose of each tree save plan is to verify that the construction project is within the limits of disturbance shown on approved Exemption No. 42021029E, confirm the conditions of Chapter 22A-5(t)(1), as described above, are being met with each new phase of development and to encourage the Landon School to take steps to preserve trees on the Property. In support of the long-term preservation and health of the trees and forested areas on the Property, Staff is additionally recommending, via condition of approval, that the Applicant submit a Maintenance and Management Agreement which includes invasive species management/control measures. Although this project is exempt from submitting a Forest Conservation Plan, and thus supplemental plantings which are typically associated with such plans, this project proposes forest clearing which may create an environment for invasive species to spread. Management of invasive species onsite will help prevent further spread of these species and lessen the impact of species, such as ivy, which currently present health impacts to trees on the property.

Stormwater Management

The Application meets the stormwater management requirements of Chapter 19 of the County Code. Stormwater management will be provided using Environmental Site Design (ESD) practices to the Maximum Extent Practicable (MEP). Specifically, the approved stormwater management concept, dated June 26, 2020, proposes to meet the required stormwater management goals via micro-bioretention planters. A detailed review of stormwater management computations will occur at time of detailed stormwater management plan review.

Agency Approvals

The Application was reviewed by public agencies for conformance with the County Code and best practices for site design. A summary of that review is provided below, and agency approval letters are included in Attachment H for the record.

- The Montgomery County Department of Transportation ("MCDOT") recommended approval of the Subject Application in their letters dated January 25, 2021 and April 14, 2021;
- The Maryland State Highway Administration ("SHA") recommended approval of the Subject Application in its letter dated May 14, 2021;
- The Montgomery County Department of Permitting Services ("MCDPS"), Fire Department Access and Water Supply Section recommended approval of the Subject Application in its letter dated June 8, 2021.

SECTION 4: ANALYSIS AND FINDINGS

Master Plan

The Property is within the 1990 Bethesda-Chevy Chase Master Plan (Master Plan) area and is further contextualized within the Mid-Bethesda Northern BCC Area (pages 51-57). The proposed use is consistent with the Master Plan, in terms of the nature and the appropriateness of the use, and it will be compatible with other adjacent uses including the residences surrounding the campus. The Master Plan supports the continued existence of the R-90 zone for the Subject Property and surrounding neighborhood. The use is intended to serve the community and meets the Master Plan objectives. Private Educational Institutions are allowed by special exception in the R-90 zone. The Master Plan recommends the continued use, within the existing zoning of large land uses like private schools (page 33). These properties are recognized as an important private open space resource, particularly in an area that is largely developed like Bethesda.

Transportation

The 1990 Bethesda – Chevy Chase Master Plan notes that the major transportation concerns within this area are traffic volumes and congestion. The transportation recommendations, specific to the Mid-Bethesda Northern BCC area emphasize improving and incentivizing non-motorized transportation and transit travel conditions to make non-motorized travel appealing for commuting and other daily trips.

Master-Planned Roadways and Bikeways

The Site is bounded to the south by Wilson Lane (MD 188), which is designated as an Arterial with a master-planned right-of-way of 80 feet and a posted speed limit of 30 mph. Dedication along the Site's frontage will be needed to achieve 40 feet of right-of-way from the centerline to the Site property line as recommended in the Master Plan and the Applicant has agreed to dedicate the necessary additional right-of-way, by deed or other format acceptable to MDOT SHA. A sidepath is planned on the north side, on the Site frontage, along Wilson Lane between MacArthur Boulevard and Bradley Boulevard as part of the County's *Breezeway network* per the 2018 Bicycle Master Plan. Permanent speed cameras have been installed along Wilson Lane approaching the campus driveway in an effort to calm traffic approaching the school property.

The northern Site frontage is bounded by Bradley Boulevard (MD 191), which is designated as an Arterial with a master-planned right-of-way of 100 feet and a posted speed limit of 30 mph. A sidepath is planned on the north side, opposite the Site frontage, as well as conventional one-way on-road bike lanes on either side of the street, along Bradley Boulevard between Aberdeen Road and the Capital Beltway per the 2018 *Bicycle Master Plan*. The changes proposed in this Application do not preclude future implementation of the master planned bikeway. Sidewalks are not present on either side of Bradley Boulevard.

On the western boundary of the Site is Whittier Boulevard, which is designated as a Primary Residential Roadway, with a master-planned right-of-way width of 70 feet and is owned and maintained by MCDOT. The posted speed limit on the roadway is 25 mph, but with the existing speed bumps, the design speed of the road is reduced to 20 mph. Four-foot sidewalks with 6-foot tree panels are present on either side of the roadway. While the Site has frontage along Whittier Boulevard, there is no access for motorists or pedestrians along the roadway and no change to this configuration is being requested as part of this Application.

The remaining Site frontage roads, Poe Road and Merrick Road, are residential roadways and are therefore not included in the 2018 *Master Plan of Highways and Transitways*. No bicycle facilities are identified in the 2018 *Bicycle Master Plan* on these roadways.

Site Access and Circulation

Improved traffic safety and flow both to and within the campus were significant driving forces for the Project Application. Interior to the Site the Application proposes removing vehicular traffic from the campus core, separating vehicular traffic and pedestrian circulation, designating pick-up and drop-off zones, and improving and relocating security gates at the 2 Site entrances. In addition to the proposed changes to the roads and pathways, the Application proposes more efficient and intuitive transportation operations which includes changes to ingress and egress patterns at the existing driveways on Bradley Boulevard and Wilson lane to avoid queuing on the adjacent roadways.

The Applicant has agreed to reconstruct the bus stop pad northeast of the Bradley Boulevard driveway entrance to meet minimum ADA design standards (8-foot by 5-foot concrete pad).

A qualitative queuing analysis was conducted for the proposed operations based on the internal circulation and operation changes and the proposed summer camp enrollment increase. As proposed, the Landon School Campus Master Plan envisions a drive aisle that consists of a pass-by lane and pick-up/drop-off lane throughout campus. The following improvements are proposed:

- Wilson Lane Entrance: As part of the Master Plan, the existing security gate to the school from Wilson
 Lane will be relocated approximately 550 feet to the south. The relocated security gate will allow for
 approximately 200 feet of queueing space from the driveway intersection with Wilson Lane to the
 entrance gate. Furthermore, a bypass lane will be provided in order to allow registered vehicles to
 drive through the secured area while visitors and unregistered vehicles use the security gate to gain
 access to the site.
 - O Under the proposed counterclockwise circulation, all vehicles will enter through this gate in the morning pick-up and afternoon drop-off periods. Over 1,700 feet of queueing space is available along the counterclockwise driveway between the Wilson Lane gate to the Lower School pick-up/drop-off area, which can accommodate close to 100 vehicles. This will allow the entirety of the internal circulation roadway to accommodate queuing for the Lower, Middle, and Upper Schools, if necessary and without spillback on to the public right of way. The drive aisles at the Upper School and Middle School pick-up/drop-off areas will be at least 20 feet wide, allowing for Lower School vehicles to bypass the Middle School queues.
- Bradley Boulevard Entrance: The Bradley Boulevard entrance gate will remain in its current location located off Bradley Boulevard. During the school year, entry from Bradley Boulevard will be restricted and all vehicles of students' parents and guardians will enter from Wilson Lane.
 - Per feedback from Landon School staff/faculty, restricting outbound access to right-turns only during the morning arrival and afternoon dismissal periods will minimize queues at this intersection.
 - O During summer camp operations, entry restrictions will not be in place as summer camp pick-up/drop-off areas are distributed throughout the site depending on summer program offerings. Additionally, the School provides specific instructions on which entrance to use based on designated pick-up/drop-off zones in order to minimize congestion on campus and impact to the surrounding network. No queueing issues associated with existing summer camp operations have been reported.

As part of the pick-up and drop-off periods, traffic control personnel will be stationed outside the two driveways to assist vehicles entering and exiting campus, as needed.

A quantitative queuing analysis was also performed for the School's proposed operations during the academic year based on the approved 736-student enrollment and the proposed summer camp enrollment of 1,200 campers to determine whether future queues can be accommodated on campus without impact to Wilson Lane and Bradley Boulevard.

The morning peak hour queuing analysis for drop-off operations evaluates the capacity of the Upper School drop-off zone (7 vehicles) as this is the first drop-off location drivers would encounter on campus. The afternoon peak hour queueing analysis for pick-up operations evaluates the capacity of the Lower School pick-up zone (11 vehicles) as this is the first pick-up location drivers would encounter on campus. The projected queues during the academic year are all well within the available stacking capacity during the morning drop-off and afternoon pick-up operations. The longest calculated 95th percentile queue is 7 vehicles at the Upper School drop-off zone during the morning peak hour. This queue can be accommodated on campus and will not spill back onto Wilson Lane as the drop-off zone is located approximately 1,400 feet from Wilson Lane with a stacking capacity of approximately 56 vehicles.

Similar to the academic year's projected queue lengths, the summer camp project queues are all well within the available stacking capacity on campus for all analyzed scenarios. The longest calculated 95th percentile queue is 8 vehicles at the Upper School drop-off zone during the morning peak hour.

Transit Service

Montgomery County Ride-On bus stops are located on either side of both driveway entrances to the Landon School campus on Wilson Lane and Bradley Boulevard. Wilson Lane is served by routes 29 and 32, providing service between Bethesda, Glen Echo, and Friendship Heights and between Cabin John and Navel Center Carderock, respectively. Bradley Boulevard is served by route 36, which provides service between the Bethesda Metro Station and the greater western Bethesda area.

The eastbound bus stop on Wilson Lane is outfitted with a shelter, bench, and trash can, while the westbound stop (on the campus) does not include a shelter but includes a stone knee wall. Both bus stops on Bradley Boulevard include the minimum requirements for a bus stop, which includes a metal stop plaque mounted on a U-channel signpost. In their condition today, they are not ADA compliant. The Applicant will be required to install a concrete pad for the eastbound stop on the Site frontage to address Americans with Disabilities Act (ADA) accessibility design guidelines prior to building permit.

Parking, Loading, and Trash

Under Montgomery County Zoning Requirements, a private educational institution is required to provide one space for every employee and 0.25 spaces for every student (grades 9-12 or age 16+). The Applicant has demonstrated that they can accommodate parking for 190 staff and up to 792 students of driving age (which exceeds the maximum enrollment for the entire school).

Under existing conditions, 370 surface parking spaces are provided across the campus. For special events, including athletics, additional parking is provided by allowing vehicles to park on certain athletic fields. The Project, at Future Build-out of the Landon School Campus Master Plan, will provide 386 vehicle parking spaces, 20 bicycle parking spaces, and 2 electric vehicle charging stations. The number of parking spaces reserved for the School will meet the practical needs of staff/faculty, student drivers, and parents of students.

The current loading and trash collection services for the campus are conducted primarily from the Barn Building. 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. The relocation was made because the Wilson Building is in an interior location that can be shielded effectively from the rest of the campus and the adjacent neighboring properties. Delivery services to the Mondzac Performing Arts Building will continue. Additional screening has been included in the Special Exception Amendment for both loading areas to shield delivery activities from other campus activities.

Local Area Transportation Review (LATR)

The Landon School is current approved with an enrollment cap of 736 students during the academic school year and 700 students during the summer camp sessions, based on a Transportation Impact Study (TIS) that was conducted and approved as part of the S-686-C Amendment of the Special Exception. The Applicant seeks to increase the established maximum cap on the summer camp enrollment from 700 to 1,200 maximum campers for any one session offered between June and August. To demonstrate that there would be no adverse effects on the adjacent transportation network, the Applicant submitted a TIS in compliance with the 2016-2020 *Subdivision Staging Policy* and 2017 *Local Area Transportation Design Guidelines* (LATR).

Summer Camp Site-Generated Traffic Analysis

In order to estimate the increase in traffic volume on study intersections, a trip rate per camper needed to be determined. Typically, Applicants apply a trip rate based on the Institute for Transportation Engineers Trip Generation Manual. However, the County's 2017 *LATR Guidelines* allows applicants to use site-specific data when it would more accurately capture the Site's trip generation. This is permitted on a case-by-case basis, by the LATR.

The trip generation rate for the Landon School was estimated based on driveway counts captured by security camera footage at both driveway entrances. From the footage, the Applicant was able to capture the total number trips throughout the day, identify the peak travel hour, and also track the specific modes (motor vehicle, bus, pedestrian, etc.) of each person-trip in and out of the campus. For these reasons, Planning, MCDOT and MDOT SHA staff agreed to allow the Applicant to estimate a trip-per-camper rate based on the driveway counts of the most recent summer camp operations.

The Applicant derived a trip generation rate for both the morning and evening peak hours, based driveway counts when camp enrollment was at its highest in 2019 (960 campers¹¹) which can most accurately estimate what the rate of trips will be with the proposed total registrants of 1,200. After applying a trip credit for the trips generated by the maximum number of students permitted for enrollment during the school year (736), which was previously studied and approved as part of S-686-C, the Applicant estimates that an increase of 230 net new trips in the morning peak hour and -73 net new peak hour trips in the evening peak hour.

35

¹¹ All vehicles were captured by security camera footage between 7:30 AM (when the campus opens) and 6:00 PM (when the campus closes). The trip generation rate, derived from the highest camp attendance day recorded, includes trips made by buses, guardians, and staff.

Table 2: Summer Camp Peak Hour Trip Generation						
		AM Peak Hour	PM Peak Hour			
Approved Academic Enrollment Cap Ap Trips	pproved					
736 Students		859	332			
Proposed Sumer Camp Enrollment Cap						
1,200 Registered Campers						
Trip Generation Rate Based on 2019 Driveway Counts		0.91	0.22			
	Subtotal	1,089	259			
	Net New	230	-73			

Source: Gorove/Slade Transportation Impact Study dated November 30, 2020, revised March 26, 2021

The net new trips in the evening peak hour results in a negative number because the Summer Camp operations are significantly different from the academic school year. During the fall and spring semesters, the majority of students arrive and leave during the peak travel hours, with some arriving earlier and some staying for after-care. In contrast, the Summer Camp has three options for the daily sessions: morning-only, afternoon-only, and full-day. Before- and after-camp care is also available. As a significant number of campers choose to enroll in the morning-only session¹², these campers are leaving in the middle of the day and not during the evening peak hour. In other words, the number of campers who are leaving in the evening peak hour during the Summer Camp is significantly fewer when compared to students leaving the campus during the evening peak hour of the academic school year.

Vehicle Adequacy

With 230 net new trips estimated during the peak travel hour, the Applicant was required to study 1 tier of intersections. The Applicant evaluated a total of 6 intersections, including the site driveways, in proximity to the Site. A map of the intersections studied are shown in Figure 24.

¹² For each of the one-week sessions offered over the summer, the Landon School offers morning-only, afternoon-only, and full-day enrollment. During the week with the highest enrollment, nearly 30% of students participate in morning only enrollment.

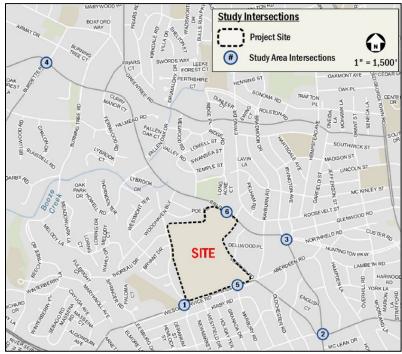


Figure 24 - Intersection Analysis Map

COVID-19 Pandemic Temporary Traffic Counts Collection Policy

The COVID-19 virus pandemic introduced a new level of uncertainty into traffic analysis in Montgomery County. The impact on business, public offices, schools, other facilities, transit, coupled with the expansion of telework, substantially reduced the total amount of motor vehicle and other traffic in the County starting in March of 2020. Given the Governor's stay at home request, the Planning Department temporarily augmented the 2017 *LATR Guidelines* in May of 2021 to accept traffic counts conducted within the past 3 years (previously restricted to one year), with a growth rate applied based on historical traffic count data.

Effective October 1, 2020, the Planning Department resumed accepting new traffic turning movement counts as scoped for transportation impact studies, after lifting a moratorium that was brought into effect on March 14, 2020. New turning movement counts were required to be adjusted to account for Montgomery County Public Schools not being in session, in-person. The adjustment factor was applied countywide for all counts conducted during the morning peak period and before 4:30 PM. Applicants were permitted to scope transportation impact studies with new traffic counts (applying the adjustment factor as directed) and counts collected within the past three years (with adjustment factors as necessary) in coordination with Planning and MCDOT staff.

The Applicant was permitted to conduct counts at three study intersections:

- 1. Bradley Boulevard & Burdette Road
- 2. Wilson Lane & Marbury Road/Landon School Driveway
- 3. Bradley Boulevard & Landon School Driveway

Per the County's policy on new counts, an adjustment factor of 1.07 was applied to volumes collected before 4:30 PM.

Historical counts from MCDOT's Intersection Analysis online application were used at the following study intersections:

- 1. Bradley Boulevard & Huntington Parkway, collected Tuesday, May 7, 2019.
- 2. Wilson Lane & Whittier Boulevard, collected Thursday, October 25, 2018.
- 3. Bradley Boulevard & Wilson Lane, collected Wednesday, October 31, 2018.

Adjustment factors based on MDOT SHA historical data between 2012-2019 on the adjacent roadway segments were applied to the turning movement counts. The adjustment factors were reviewed and approved by staff.

The Site is in the Bethesda/Chevy Chase Policy Area, which is designated as an Orange Policy Area by the 2016-2020 Subdivision Staging Policy. Traffic congestion in Orange Policy Areas is measured using Highway Capacity Manual (HCM) delay-based level of service standards, which applies to all signalized study intersections. The HCM average vehicle delay standard for the Bethesda/Chevy Chase Policy Area is 80 seconds. All intersections were found to be within the 80-second delay standard for the Bethesda/Chevy Chase Policy Area. As a result, no mitigation is necessary to satisfy the vehicular adequacy test. Detailed results of this analysis included in Table 3.

Table 3: Intersection Level of Service Highway Capacity Manual Methodology Seconds of Vehicular Delay							
Intersection	Congestion Standard	Existing		Background		Total Future	
	_	AM	PM	AM	PM	AM	PM
Whittier Boulevard and Wilson Lane	80 seconds	19.7	14.1	62.9	14.0	20.5	14.0
Bradley Boulevard and Wilson Lane	80 seconds	29.7	24.2	34.5	23.9	45.2	25.6
Bradley Boulevard & Huntington Parkway	80 seconds	13.1	21.5	19.5	25.1	13.6	22.1
Burdette Road & Bradley Boulevard	80 seconds	7.9	7.3	8.3	7.5	8.4	7.5
Wilson Lane & Wilson Gate (Unsignalized)	80 seconds	32.6	4.0	149.3	4.5	56.6	3.3
Bradley Gate & Bradley Boulevard (Unsignalized)	80 seconds	0.8	0.3	0.6	0.1	1.9	0.1

Source: Gorove/Slade Transportation Impact Study dated November 30, 2020, revised March 26, 2021

As compared to Background Conditions with the approved enrollment, delays are reduced in Total Future Conditions at the following intersections due to vehicular access being open from Bradley Boulevard during summer camp operations:

- Whittier Boulevard and Wilson Lane intersection (reduction in southbound left turns)
- Bradley Boulevard and Huntington Parkway intersection (reduction in westbound left turns), and
- Wilson Lane and School Driveway intersection (inbound volumes reduction).

As compared to Background Conditions with the approved enrollment, minimal delay increases in Total Future Conditions are anticipated at the following intersections as a result of increased traffic volumes associated with the proposed summer camp enrollment:

- Bradley Boulevard and Wilson Lane intersection (overall increase in volumes)
- Bradley Boulevard and Burdette Road intersection (overall increase in volumes), and
- Bradley Boulevard and School Driveway intersection (inbound volumes increase).

Despite the higher morning trip generation for the proposed summer camp enrollment, impact to the surrounding roadway is minimized due to proposed operations that allow inbound access from Bradley Boulevard and enrollment dispersion across the different daily session options. Under Total Future

conditions with the proposed summer camp enrollment of 1,200 campers, none of the study intersections exceed the congestion standard of 80 seconds. Per the 2017 *LATR Guidelines*, the TIS concludes that the Total Future scenario will not increase congestion levels beyond the capacity standard, and therefore no mitigation is required.

Historic Preservation

The Master Plan recognizes that occasionally a private school needs to construct new facilities or additions, which require special exception amendment approval. The Plan notes that these are reviewed on a case-by-case basis to ensure compatibility with area residence and conformance with master plan objectives. While the Plan expects private school use to continue, if redevelopment of the campus occurs it should respect the environmental setting that has been established by for the historic Lansdale House.

The environmental setting is comprised of 11.77 acres of the campus and is included in the Master Plan for Historic Preservation (Atlas No. 35/16). It includes the house, a barn, a stable structure, the tree-lined drive to Wilson Lane and the vista across the school's playing fields to Wilson Lane. The Historic Preservation Staff have reviewed the propose special exception amendment in this context of the environmental setting and found it acceptable.

The Subject Application continues to meet the overall vision of the Master Plan by continuing a long-term, stable use to the Site and retains the existing vegetation located along the perimeter of the Site, around the vehicular loop road and parking spaces, and along either side of the main entrance from Wilson Lane. This vegetation helps screen the Special Exception use from the adjacent residential neighborhood and reinforces the existing character and feel of the Site frontages.

The applicants appeared before the Historic Preservation Commission (HPC) at the March 24, 2021 HPC meeting with a Historic Area Work Permit (HAWP) application for alterations within the Master Plan-designated environmental setting. The proposed work included widening the driveway/entrance from Wilson Lane at the south end of the property, replacing the chain link fencing along Wilson Lane with ornamental metal fencing, installing new fencing along the south driveway/entrance, replacement of the gatehouse, removal of twenty-two (22) trees, signage replacement, and ADA and traffic control improvements. The HPC unanimously approved the application.

While only the Lansdale House and surrounding 11.77 acres are included in the Master Plan for Historic Preservation, the remaining campus was determined eligible for the National Register of Historic Places in 2002. On April 28th, the Historic Preservation Commission (HPC) heard a discussion item regarding Special Exception Amendment No. S-686-D, the "Landon School", during their regularly scheduled meeting. The Applicant requested a review of the proposed relocation of the Andrews House and demolition of the Torrey House. In general, the HPC conveyed support in their transmittal letter to the Planning Board dated May 19th, 2021 recommending mitigation that incorporates educational opportunities with historic preservation efforts. This could be a multidisciplinary approach involving students with varying background and interests and supervision from educators and experienced professionals. (Example: Students with an interest in architecture or historic preservation could create measured drawings and document the conditions of the buildings; those with an interest in photography could photograph the buildings; those with an interest in history could conduct further research into the history of the buildings; and those with an interest in design or museum studies could create exhibits or markers, utilizing the created and/or collected information. Additionally, students with an interest in videography could document the entire project, and those with an interest in web design or communications could create a blog or website to share the project with the public.) The HPC transmittal letter is included in Attachment H to this staff report.

Zoning Ordinance Standard for Evaluation (59-G-1.2.1)

A special exception must not be granted without the findings required by this Article. In making these findings, the Board of Appeals, Hearing Examiner, or District Council, as the case may be, must consider the inherent and non-inherent adverse effects of the use on nearby properties and the general neighborhood at the proposed location, irrespective of adverse effects the use might have if established elsewhere in the zone. Inherent adverse effects are the physical and operational characteristics necessarily associated with the particular use, regardless of its physical size or scale of operations. Inherent adverse effects alone are not a sufficient basis for denial of a special exception. Non-inherent adverse effects are physical and operational characteristics not necessarily associated with the particular use, or adverse effects created by unusual characteristics of the site. Non-inherent adverse effects, alone or in conjunction with inherent adverse effects, are a sufficient basis to deny a special exception.

The Applicant proposes changes to the existing Special Exception Use. The first is implementation of the Landon School Campus Master Plan and the second is an expanded enrollment of the Summer Camp that has been provided by the Landon School for several years.

Staff evaluated seven criteria to identify the physical and operational characteristics of the proposed amendments to the existing Special Exception Use. Those criteria are size, scale, scope, lighting, noise, traffic and the environment. Through this evaluation, Staff determined the effects of these criteria are minimal and would not create adverse impacts sufficient to result in denial of the Application. The inherent, generic physical and operational characteristics associated with a private educational institution and summer camp are similar. They include the following: buildings to house student and camper activities, parking for students/campers and staff, pick-up and drop-off areas and times, outdoor play areas and fields, trash removal and deliveries, and sufficient lighting.

As stated previously, the Applicant is maintaining the current school operations but proposes expanding the maximum enrollment of the existing Summer Camp from 700 students to a total of 1,200 students and 250 staff, held for 11 weeks when school is not in session (June-August). The core hours of operation (9:00 AM - 4:00 PM) will remain the same with available before and after care (7:45 AM - 6:10 PM). The Applicant has committed to keeping groups of 25 campers or more at least 30 feet from the property line of the Site to address any potential noise impacts. Reviewing the operational and physical aspects of the Summer Camp, the inherent aspects of such a use and facility have been planned and designed to have minimal impact on the neighborhood.

Adequate parking is provided to accommodate the parking needs of the facility and there would be no negative impacts on the adjoining residential community. The facility will be substantially distanced from the nearest residences and ample vegetative screening and fencing provides a buffer between the Site and adjacent properties. Noise associated with outdoor play will be limited to daytime hours during the week and will not begin prior to 8:00 AM. Parking and drive aisles on-site will exceed the minimum tree canopy requirement through the provision of 28,391 square feet of mature tree canopy.

As proposed, trash collection and deliveries will be relocated to the Wilson Building on the northwestern portion of the campus. 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 Amendment for both loading areas to shield delivery activities from other campus activities.

The scale of the proposed new buildings, the improved internal vehicular circulation system, and the onsite parking areas shown on the site plan are operational characteristics typically associated with a Private Educational Institution. Based on the traffic analysis conducted for the proposed internal roadway configuration and the proposed Summer Camp enrollment, the vehicular and pedestrian movement surrounding the site would be safe, adequate, and efficient. The Property is extensively landscaped with a wide variety of trees, shrubs, grass, and flowering plants. Impacts to landscaping will be minimized where possible with the majority of the existing buildings and grounds maintained in their existing condition. The areas being altered by the proposed redevelopment allow the Subject Property to comply with current standards including ADA, stormwater management, circulation and access, and current building codes. Locations where the Site will be modified to accommodate the School use will primarily be internal to the Site and not readily visible to the adjacent residential properties. The lighting concept, as depicted on the lighting plan, demonstrates that proposed lighting levels along the perimeter of the Property are in compliance with the maximum foot candles permitted under Section 59-G-1.23(h) of the Zoning Ordinance.

The proposed Private Educational Institution Use is consistent with all applicable standards of the R-90 Zone and satisfies all applicable requirements. Staff did not identify any non-inherent adverse impacts associated with the Subject Application.

Compatibility

The Subject Application will be in harmony with the general character of the neighborhood, considering population density, design, scale, and bulk of any new structures, intensity and character of activity, traffic and parking conditions, and number of similar uses.

The existing buildings on the Site were subject to prior Special Exception and Conditional Use approvals and found to be in harmony with the general character of the neighborhood. Alterations proposed as part of the Subject Amendment are located interior to the Site away from adjacent properties and will not be detrimental to the surrounding neighborhood.

The proposed use will not result in excessive concentration of special exception uses along major highway corridors, as the proposal will amend an existing special exception and not result in an increase of special exception uses. There are four adjacent special exceptions located within the defined neighborhood, three of which are for accessory apartments. The remaining approval is "S-1283," for a home occupation (dress maker).

Section 59-G-1.21. General Conditions

- (a) A special exception may be granted when the Board, the Hearing Examiner, or the District Council, as the case may be, finds from a preponderance of the evidence of record that the proposed use:
 - 1. Is a permissible special exception in the zone.

A Private Educational Institution is permitted as a special exception in the R-90 zone per Prior Zoning Ordinance Section 59-C-1.3 I (D). As described in the Project Description section, the Landon School has had approval for a Special Exception Private Educational Institution use on the Site since 1950.

2. Complies with the standards and requirements set forth for the use in Division 59-G-2. The fact that a proposed use complies with all specific standards and requirements to grant a special exception does not create a presumption that the use is compatible with nearby properties and, in itself, is not sufficient to require a special exception to be granted.

As conditioned, the proposed special exception satisfies the standards and requirements for approval of a Private Educational Institution special exception. Further analysis is provided below under the development standards associated with Section 59-G-1.23 and 59-G-2.19.

3. Will be consistent with the general plan for the physical development of the District, including any master plan adopted by the Commission. Any decision to grant or deny a special exception must be consistent with any recommendation in a master plan regarding the appropriateness of a special exception at a particular location. If the Planning Board or the Board's technical staff in its report on a special exception concludes that granting a particular special exception at a particular location would be inconsistent with the land use objectives of the applicable master plan, a decision to grant the special exception must include specific findings as to master plan consistency.

The proposed Special Exception Amendment is consistent with the applicable provisions of the 1990 Bethesda-*Chevy Chase Master Plan* in that it maintains the current approved Special Exception use. The Landon School's 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 *Bethesda-Chevy Chase* 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 submitted Historical Summary and Evaluation, the Landon School's Campus Master Plan retains and preserves the farmhouse, barn, and surrounding grounds. The Landon School's Campus Master Plan 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. Will be in harmony with the general character of the neighborhood considering population density, design, scale and bulk of any proposed new structures, intensity and character of activity, traffic and parking conditions and number of similar uses. The Board or Hearing Examiner must consider whether the public facilities and services will be adequate to serve the proposed development under the Growth Policy standards in effect when the special exception application was submitted.

The proposed Special Exception Amendment will be in harmony with the general character of the

neighborhood. 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 Amendment 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 Amendment is not anticipated to have a detrimental impact on traffic or cause parking issues in the surrounding residential neighborhood. Further, per the Transportation Impact Study, even with the increased number of campers proposed during the Summer Camp sessions, the use will not have a detrimental impact on the transportation network.

5. Will not be detrimental to the use, peaceful enjoyment, economic value or development of surrounding properties or the general neighborhood at the subject site, irrespective of any adverse effects the use might have if established elsewhere in the zone.

The proposed Special Exception Amendment 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 Landon School Campus Master Plan. The site plan implements designated pick-up and drop-off locations on campus thereby creating predictable behavior, reducing queuing on adjacent public roadways, and reducing time spent on campus during the pick-up and drop-off periods. Furthermore, the buildings that comprise the private educational institution use will remain at a significant setback from the property lines. Finally, as noted in the Traffic Impact Study, even with the increased summer camp participation, the private educational institution use will not have a detrimental impact on adjacent transportation network capacity.

6. Will cause no objectionable noise, vibrations, fumes, odors, dust, illumination, glare, or physical activity at the subject site, irrespective of any adverse effects the use might have if established elsewhere in the zone.

The proposed Special Exception Amendment will not cause objectionable noise, vibrations, fumes, odors, dust, illumination, glare, or physical activity at the Property. As conditioned, groups no larger than 25 campers will be permitted to gather closer than 30 feet of the adjacent properties. Furthermore, 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 for the academic school year or for the Summer Camp.

The buildings associated with the Special Exception are set back significantly from adjacent properties (a minimum of 110 feet 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. Will not, when evaluated in conjunction with existing and approved special exceptions in any neighboring one-family residential area, increase the number, intensity, or scope of special exception uses sufficiently to affect the area adversely or alter the predominantly residential

nature of the area. Special exception uses that are consistent with the recommendations of a master or sector plan do not alter the nature of an area.

The Special Exception Amendment does not propose any new special exception uses. It only proposes the enhancement of the campus through the implementation of the School's Campus Master Plan and an increase in maximum enrollment of the summer camp, currently in operation. There will be no negative impacts to the surrounding neighborhood and will not alter the nature of the area. Furthermore, the Landon School is identified amongst other Special Exceptions in the 1990 *Bethesda Chevy Chase Master Plan,* as one that should continue, as it is a long-standing stable use within the plan area. Therefore, as conditioned, the proposed Special Exception Amendment is consistent with the applicable master plan.

8. Will not adversely affect the health, safety, security, morals or general welfare of residents, visitors or workers in the area at the subject site, irrespective of any adverse effects the use might have if established elsewhere in the zone.

As conditioned, the proposed Special Exception will not adversely affect the health, safety, security, morals or welfare of residents, visitors or workers in the area. The Subject Application does not propose any additional lighting and will not generate additional noise either with the proposed increase in Summer Camp enrollment or full build-out of the site plan. The proposed changes to the Site access and circulation during the academic school year and the Summer Camp will improve traffic flow and safety to, from, and within the campus.

- 9. Will be served by adequate public services and facilities, including schools, police and fire protection, water, sanitary sewer, public roads, storm drainage and other public facilities.
 - (A) If the special exception use requires approval of a Preliminary Plan of subdivision, the Planning Board must determine the adequacy of public facilities in its subdivision review. In that case, approval of a Preliminary Plan of subdivision must be a condition of granting the special exception.

The Special Exception use is not subject to approval of a future Preliminary Plan of Subdivision. Based upon the traffic analysis submitted with the Subject Application, the Applicant has demonstrated that sufficient transportation capacity exists to serve the proposed Special Exception Amendment.

- (B) If the Special Exception:
 - i. does not require approval of a new Preliminary Plan of subdivision; and
 - ii. the determination of adequate public facilities for the site is not currently valid for an impact that is the same as or greater than the Special Exception's impact;

Then the Board of Appeals or the Hearing Examiner must determine the adequacy of public facilities when it considers the Special Exception application. The Board of Appeals or the Hearing Examiner must consider whether the available public facilities and services will be adequate to serve the proposed development under the Growth Policy standards in effect when the application was submitted.

The Property is served by adequate public facilities. According to the Traffic Impact Study, the Project will not have a detrimental impact on the surrounding transportation network (as shown on pages 34-39 of this report). 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.

(C) With regard to public roads, the Board or the Hearing Examiner must further find that the proposed development will not reduce the safety of vehicular or pedestrian traffic

The proposed amendment to the previously approved Special Exception use will be adequately served by existing public facilities. The 2017 *Local Area Transportation Review* (*LATR*) *Guidelines* require that a traffic study be performed if the use generates 50 or more peak hour person trips. Based on the information contained in the Transportation Impact Study submitted by the Applicant, the site would generate 230 net new morning peak hour vehicle trips and a net reduction of 73 evening peak period vehicle trips¹³ when compared to the already studied and approved site-generated traffic at the maximum enrollment during the academic school year.

Pedestrian access to the campus will continue to be provided from the existing sidewalks on Wilson Lane. Furthermore, pedestrian access and safety internal to the campus will be improved once the School's Campus Master Plan is fully realized as it envisions a new internal sidewalk to be used by pedestrians and bicyclists along the Wilson Lane driveway and several separated pedestrian pathways across the proposed campus quad. The School's Campus Master Plan envisions consolidating the internal roadway network such that forms an outer ring road around the buildings, in a one-way operation, significantly reduces potential conflicts with both pedestrians and other vehicles. The Transportation Impact Study determined the new internal roadway configuration will not result in queuing on the adjacent roadway networks.

Development Standards

59-G-1.23 General Development Standards

(a) Development Standards.

Special exceptions are subject to the development standards of the applicable zone where the special exception is located, except when the standard is specified in Section G-1.23 or in Section G-2.19.

The proposed Special Exception Amendment meets the Development Standards for the R-90 zone, as approved through Board of Appeals Case 927. The Parcel was recorded in 1999 as an irregularly shaped 69.74-acre site. The following table summarizes the property development standards for the proposed use and development.

¹³ Trip generation was estimated based on transportation survey data provided by the Landon School. The data accounts for travel modes, travel times and the number of siblings enrolled. From this data a private vehicle rate per-student was determined. As the auto-driver trips were based on actual user data rather than the ITE Trip Generation Manual, as is typically required by the 2017 LATR Guidelines, the vehicle rates were not adjusted for the policy area. This represents a more accurate and conservative estimate of trips generated by the Site and was approved by Staff at the time of scoping the transportation impact study.

	Table 4: R-90 Zone Data Table ¹		
	Required/ Approved	Proposed	
Lot Area (SF/ Acres)	9,000 (0.20)	3,037,715 (69.74)	
Minimum Lot Width at Existing			
Street Line			
Wilson Lane	25 feet	1,673 feet	
Minimum width at Building Line	75 feet	1,647 feet	
Maximum Lot Coverage	911,315 square feet	175,126 square feet	
	30%	6%	
Building Setback Requirements,			
min. ¹			
Upper School			
Street (Wilson Lane)	30 feet	1,307 feet	
Street (Bradley Boulevard)	30 feet	681 feet	
Side	One side: 8 feet	387 feet	
Sum of both Sides	25 feet	1,213 feet	
Rear	25 feet	327 feet	
Banfield Building			
Street (Wilson Lane)	30 feet	1,432 feet	
Street (Bradley Boulevard)	30 feet	447 feet	
Side	One side: 8 feet	78 feet	
Sum of both Sides	25 feet	1,173 feet	
Rear	25 feet	151 feet	
Andrews Building			
Street (Wilson Lane)	30 feet	1,244 feet	
Street (Bradley Boulevard)	30 feet	982 feet	
Side	One side: 8 feet	509 feet	
Sum of both Sides	25 feet	1,288 feet	
Rear	25 feet	595 feet	
Barton Building			
Street (Wilson Lane)	30 feet	797 feet	
Street (Bradley Boulevard)	30 feet	1,394 feet	
Side	One side: 8 feet	369 feet	
Sum of both Sides	25 feet	1,162 feet	
Rear	25 feet	843 feet	

¹Section 59-C-1.32 Development Standards

¹ All buildings are treated as main buildings. All buildings included in the table are either modified or will be new construction as a result of approval of the Application.

Table 4: R-90 Zone Data Table Contd.						
	Required/ Approved	Proposed				
Building Height, max.						
Upper School	35 feet	35 feet				
Banfield Building	35 feet	28 feet				
Andrews Building	35 feet	30 feet				
Barton Building	35 feet	35 feet				
Building Coverage, max.	35%	6% (175,126 square feet)				
Parking						
Vehicle						
Employees	190 spaces ³	190 spaces				
Students	111 spaces	283 spaces				
Total	301 spaces	461 spaces ⁴				
Bicycle	20 spaces	20 spaces				
Motorcycle	10 spaces	10 spaces				
Loading	1 space	2 spaces ⁵				

³ 1 space for each staff member including teachers and administrators and 0.25 spaces per pupil aged 16 and older.

(b) Parking requirements.

Special exceptions are subject to all relevant requirements of Section 59-E 2.83 and 59-E 2.81 of the Zoning Ordinance.

The provisions of Section 59-E-2.83 state:

Parking and Loading facility standards apply to an off-street parking facility for a special exception use that is located in a one-family residential zone if 3 or more parking spaces are provided. These standards are intended to mitigate potential adverse visual, noise, and environmental impacts of parking facilities on adjacent properties. In addition, these requirements improve the compatibility and attractiveness of parking facilities, promote pedestrian-friendly streets, and provide relief from unshaded paved areas. These provisions are as follows:

Location. Parking facilities must be located to maintain a residential character and a pedestrian-friendly street orientation.

All of the parking facilities on-site (existing and proposed) are located internal to the Site and are not visible from any of the Site frontages. Dense, mature vegetation surrounds the perimeter of the Site. All setback and screening requirements for the R-90 Zone per Section 59-E-2.81 are met.

Setbacks. Each parking and loading facility, including each entrance and exit driveway, must be set back a distance not less than the applicable building front and rear yard and twice the building side yard required in the zone.

All parking facilities (existing and proposed) and loading facilities are set back from the rear property line at least 25 feet and from either side property lines at least 16 feet, as required for off-site parking facilities for special exception uses within the R-90 zone (Section 59-E-2.81).

⁴This includes a total of 26 ADA spaces (19 van accessible) and 2 charging stations for electric vehicles

⁵These loading spaces exist on the campus today. No changes are proposed as part of the Application.

Screening. Each parking and loading facility, including driveway and dumpster areas, must be effectively screened from all abutting lots. Screening must be provided in a manner that is compatible with the area's residential character. Screening must be at least 6 feet high, and must consist of evergreen landscaping, a solid wood fence, a masonry wall, a berm, or a combination of them. Along all street rights-of-way, screening of any parking and loading facility must be at least 3 feet high and consist of evergreen landscaping, a solid wood fence, or masonry wall.

The parking and loading facilities will be sited away from the street right-of-way and designed to be effectively screened from abutting lots through the use of a mix of ornamental, evergreen and shade trees, and shrubs, and perennials.

Shading of paved areas. Trees must be planted and maintained throughout the parking facility to ensure that at least 30 percent of the paved area, including driveways, are shaded. Shading must be calculated by using the area of the tree crown at 15 years after the parking facility is built.

Based on the 30% requirement set forth in the Zoning Ordinance, the Site requires a minimum of 24,550 square feet of canopy coverage. The Applicant proposes several trees with mature canopy sizes of 26 feet in diameter for each tree. Based on this provision, parking and drive aisles on-site will exceed the minimum tree canopy requirement through the provision of 28,391 square feet of mature tree canopy.

Compliance Requirement. For any cumulative enlargement of a surface parking facility that is greater than 50% of the total parking area approved before May 6, 2002, the entire off-street parking facility must be brought into conformance with this Section. An existing surface parking facility included as part of a special exception granted before May 6, 2001 is a conforming use.

The proposed increase of 18 vehicular spaces on the full build out do not result of an enlargement of 50% or more of the total parking area, either by parking space count or by total area. All of the surface parking proposed with the SEA application complies with the 30% canopy, 5% interior landscape area, and screening requirements.

(c) Minimum frontage. "In the following special exceptions, the Board may waive the requirements for a minimum frontage at the street line if the Board finds that the facilities for ingress and egress of vehicular traffic are adequate to meet the requirements of section 59-G-1.21: (1) Rifle, pistol and skeet-shooting range, outdoor..."

Not applicable to the proposed special exception use.

(d) Forest conservation. If a special exception is subject to Chapter 22A, the Board must consider the preliminary forest conservation plan required by that Chapter when approving the special exception application and must not approve a special exception that conflicts with the preliminary forest conservation plan.

The project meets the requirements of the Montgomery County Code Chapter 22A (Forest Conservation Law), Section 22A-5(t)(I) for modifications to existing, non-residential developed property in which no

more than 5,000 square feet of forest is cleared at one time or cumulatively; the modification does not result in the cutting, clearing, or grading of any forest in a stream buffer; the modification does not require the approval of a new subdivision or special exception plan; the modification does not increased the developed area by more than 50%; and the pending development application does not propose any residential uses. However, this exemption approval specifies that the Applicant must submit a new Forest Conservation Exemption Application and Tree Save Plan for each construction phase in order to verify that the construction project is within the limits of disturbance as shown on approved exemption number 42021029E and that the conditions of 22A-5(t)(1) are being met.

(e) Water quality plan.

Not applicable, the property is not in a Special Protection Area (SPA).

(f) Signs. The display of a sign must comply with Article 59-F.

Not applicable as no new signage is proposed as part of this Special Exception Amendment.

(g) Building compatibility in residential zones. Any structure that is constructed, reconstructed, or altered under a special exception in a residential zone must be well related to the surrounding area in its siting, landscaping, scale, bulk, height, materials, and textures, and must have a residential appearance where appropriate. Large building elevations must be divided into distinct planes by wall offsets or architectural articulation to achieve compatible scale and massing.

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. Furthermore, the renovated and new buildings proposed as part of the Landon School's Campus Master Plan are internal to the Site and not visible from the public rights-of-way.

(h) Lighting in residential zones. All outdoor lighting must be located, shielded, landscaped, or otherwise buffered so that no direct light intrudes into an adjacent residential property. The following lighting standards must be met unless the Board requires different standards for a recreational facility or to improve public safety: (1) Luminaires must incorporate a glare and spill light control device to minimize glare and light trespass; (2) Lighting levels along the side and rear lot lines must not exceed 0.1 foot candles.

The lighting concept, as depicted on the lighting plan, demonstrates that lighting levels along the property line of the Site will not exceed the maximum foot candles permitted under Section 59-G-1.23(h) of the Zoning Ordinance (0.1); therefore the lighting will be appropriate for the proposed use at the subject location.

Section 59-G-2.19. Educational Institutions, Private

(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 Amendment will not be a nuisance because of the location of the proposed changes or physical activity associated with it. Following the implementation of the Landon School's Campus Master Plan, the private educational institutional use will continue to operate in substantially the same manner as it does today.

When the Special Exception was most significantly amended in 2002, the Board of Appeals approved the continued operation of Landon's summer camp. The Board of Appeals permitted 700 campers on campus at any given time. The Applicant now seeks to increase the maximum number of enrolled campers permitted from a 700 to 1,200 registrants¹⁴ for any single session during the summer. According to the Transportation Impact Study, the increased number of campers will not detrimentally affect the surrounding transportation network. The vehicle trips generated by the Summer camp will not exceed the congestion standard of the adjacent intersections. Further, the Summer Camp Transportation Management Plan will reduce the demand for road capacity.

The Summer Camp activities will be conducted in small groups of no more than 25 campers dispersed throughout indoor and outdoor areas of the campus. No outdoor group activities occur within 30 feet of neighboring residential properties. 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, with extended care in the mornings and afternoons (doors open at 7:45 AM and close at 6:00 PM for approximately eleven weeks in the summer). Because campers will be coming to the Property via buses and parent dropoffs, the only parking demand is for camp staff. With 370 surface parking lot spaces on the Site today and 386 spaces proposed at final build out, the Site can accommodate the maximum cap on staff, which as conditioned, is 250 total (including camp counselors, administrators and janitorial staff). No camp-related lighting changes are needed or proposed. For all of these reasons, the proposed camp will not have an adverse effect on the surrounding neighborhood.

(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;

The proposed renovation of existing buildings and new construction proposed in the Landon /School's 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 set back 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.

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¹⁴ 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) 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 Educational use has existed on the Property since 1936 and is considered a long-standing institution of the surrounding residential community. After implementation of the Landon School's 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.

The Summer Camp has been in operation on the Site since the 1940s. The proposed increase for maximum enrollment has been reviewed for potential noise, traffic, and lighting impacts. The Applicant has provided a transportation impact study, noise analysis, and lighting plan that demonstrate there will be no adverse effects from increasing the maximum number of campers registered from 700 to 1,200.

- (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;
 - b) Proximity to arterial roads and major highways;

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

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

Since 2002, the Applicant has implemented a Transportation Management Plan during the academic school year and continues to take measures to reduce the number of cars traveling to and from the Property each day.

The Application included a new and distinct Summer Camp Transportation Management Plan¹⁵ specially for the Summer Camp which was reviewed and recommend for approval by staff.

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 Landon School's 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;

¹⁵ This new TMP is meant to complement the TMP for the Landon School, currently in effect. It in no way supersedes the previously approved TMP which covers transportation activities during the academic school year.

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 and vegetative screening.

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

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.

With the approved enrollment cap in effect (736 maximum students during the academic school year), the Special Exception will continue to provide 10.5 students per acre. If the proposed expansion of the Summer Camp is approved, (1,200 maximum campers) it would operate at 17 students per acre.

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 set back 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. A 6-foot fence is proposed, surrounding the property which also helps to provide screening of activities on school grounds from the adjacent 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.

The Landon School has operated a summer camp on the Site during the months of June through August since the 1940s. In 2002 The Applicant received approval for a maximum enrollment of 700 campers and with this Application seeks to increase the cap up to a maximum of 1,200 campers and 250 staff. The current hours of operation would continue as they have for the past 10 years and no modifications to the Site are proposed for the Summer Camp. No lighting will be required for camp activities, and there will be no adverse effects due to noise, pollution, or parking. The Transportation Impact Study concluded that the study intersections will continue to operate within the standards of congestion, even when accounting for approved but unbuilt development within the vicinity of the Site. A separate Transportation Management Plan (TMP) specific to the Summer Camp is included with the Application, subject to approval by the Board of Appeals. This TMP identifies strategies to mitigate vehicle trips while the Summer Camp is in session and does not supersede the previously approved TMP for the academic school year, which remans in full effect.

(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.

In 2002, the Board of Appeals approved the continued operation of the Landon School's summer camp. The Board permitted 700 summer camp participants on campus at any given time. Landon now seeks to increase the number of campers permitted from 700 to 1,200 registrants. According to the Transportation Impact Study, the increased number of campers 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 existing Transportation Management Plan and the proposed Summer Camp Transportation Management Plan will reduce the demand for road capacity generated by both the academic year program and the summer camp.

(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.

As stated, the Summer Camp on the Site has prior approval and the maximum enrollment was established in 2002.

(d) Site plan.

- (1) In addition to submitting such other information as may be required, an applicant shall submit with his application a site plan of proposed development. Such plan shall show the size and shape of the subject property, the location thereon of all buildings and structures, the area devoted to parking and recreation facilities, all access roads and drives, the topography and existing major vegetation features, the proposed grading, landscaping and screening plans and such other features necessary for the evaluation of the plan.
- (2) No special exception, building permit or certificate of occupancy shall be granted or issued except in accordance with a site plan of development approved by the board. In reviewing a proposed site plan of

development the board may condition its approval thereof on such amendments to the plan as shall be determined necessary by the board to assure a compatible development which will have no adverse effect on the surrounding community, and which will meet all requirements of this chapter. Any departure from a site plan of development as finally approved by the board shall be cause for revocation of the special exception, building permit or certificate of occupancy, in the manner provided by law.

The Applicant submitted a site plan showing the full build-out of the Landon School's Campus Master Plan. The site plan demonstrates compliance with all development standards in Section 59-C-1.32. The proposed buildings are located internal to the Site and are not visible from the public roadways and adjacent properties due to the setbacks from the property line (25 feet minimum for the rear and 8 feet for the side(s)) and the dense vegetation around the perimeter of the Site. Therefore, there will be no adverse effects on the surrounding community.

(e) Exemptions. The requirements of Section G-2.19 do not apply to the use of any lot, lots or tract of land for any private educational institution, or parochial school, which is located in a building or on premises owned or leased by any church or religious organization, the government of the United States, the State of Maryland or any agency thereof, Montgomery County or any incorporated village or town within Montgomery County. This exemption does not apply to any private educational institution which received approval by the Board of Appeals to operate a private educational institution special exception in a building or on a lot, lots or tract of land that was not owned or leased by any church or religious organization at the time the Board of Appeal's decision was issued.

Not applicable. The Subject Property is a private school.

(f) Nonconforming uses. Nothing in this chapter shall prevent any existing private educational institution which obtained a special exception prior to the effective date of this chapter, from continuing its use to the full extent authorized under the resolution granting the respective special exception, subject, however, to division 59-G-4 of this chapter.

Not applicable. The Subject Property is not a nonconforming use.

- (g) Public Buildings.
- (1) A special exception is not required for any private educational institution that is located in a building or on premises that have been used for a public school or that are owned or leased by Montgomery County.
 - (2) However, site plan review under Division 59-D-3 is required for:
- (i) construction of a private educational institution on vacant land owned or leased by Montgomery County; or
- (ii) any cumulative increase that is greater than 15% or 7,500 square feet, whichever is less, in the gross floor area, as it existed on February 1, 2000, of a private educational institution located in a building that has been used for a public school or that is owned or leased by Montgomery County. Site plan review is not required for: (i) an increase in floor area of a private educational institution located in a building that has been used for a public school or that is owned or leased by Montgomery County if a request for review under mandatory referral was submitted to the Planning Board on or before February 1, 2000, or (ii) any portable classroom used by a private educational institution that is located on property owned or leased by Montgomery County and that is in place for less than one year.

Not applicable. The Subject Property is a private school located on private property.

SECTION 5: COMMUNITY ENGAGEMENT

The Head of School attempted to convene the neighborhood liaison committee by reaching out several times to the surrounding neighborhood associations registered in the M-NCPPC contact database but received no response. Between November and February of 2020 the Applicant met eight times with adjoining neighbors who have previously expressed interest in campus operations. The Applicant also met with representatives from the Kenwood Park Neighborhood Group (September 30, 2020), the Woodhaven neighborhood (May 27, 2021) and the Burning Tree Village Neighborhood Group (June 23, 2021).

The Applicant received concerns about operational and noise impacts associated with the location of campus activities. In response, the Applicant conducted a noise study and offered to meet with neighborhood representatives to discuss the results of the study.

As of the date of this Staff Report, staff received correspondence from the community (Attachment I) raising concerns about potential impacts from a new point of access on the Site. This concern is briefly summarized below.

Staff received an email from a neighboring resident with a concern that the School may attempt to construct a new access driveway connecting to a public right-of-way, increasing the number of driveways to the Site from two to three. Staff explained that any change in access would constitute a substantial change in the nature, character or intensity of the use and could potentially affect traffic within the immediate neighborhood, and would therefore require a petition to amend the approved Special Exception use on the Site, subject to approval by the Board of Appeals. Filing such an application would require public noticing as was required for this Application. No additional access point to the Site is not proposed as part of the current Application.

SECTION 6: CONCLUSION

Staff recommends approval of Special Exception Amendment S-686-D, the Landon School, for proposed maximum cap on Summer Camp enrollment and implementation of the Landon School Campus Master Plan subject to the conditions recommended in this Staff Report which superseded the prior conditions of approval and constitute the new applicable complete set of conditions.

ATTACHMENTS

- A. Previous Approvals
- B. Full Build-out of Landon Campus Master Plan (site plan)
- C. Construction Phasing Plan
- D. Landscape Plans
- E. Applicant's Revised Statement of Justification, dated June 11, 2021
- F. Landon Campus Master Plan Summary Report
- G. Historical Summary and Evaluation
- H. Agency Approval Letters
- I. Community Correspondence