

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

**Application of the Protestant Episcopal Cathedral Foundation
for the National Cathedral School
3609 Woodley Road, NW (Lot 17, Square 1922)
3600 Woodley Road, NW (Lot 25, Square 1924)**

PRELIMINARY STATEMENT OF COMPLIANCE WITH BURDEN OF PROOF

I. Background

This application requests special exception approval to increase the number of faculty and staff at the National Cathedral School ("NCS") from 150 to 165 under section 206 of the Zoning Regulations. NCS is an existing private school approved by the Board of Zoning Adjustment ("Board" or "BZA") most recently in BZA Case No. 17759.

NCS is located on the grounds of the Washington National Cathedral at 3600 Woodley Road, N.W., Washington, D.C. (Lot 25, Square 1924), in the R-1-B District. Its north campus is located across the street at premises 3609 Woodley Road, NW (Lot 17, Square 1922), which is split-zoned R-1-B and R-5-D.

The modest increase in the faculty/staff from 150 to 165 is critically needed to advance and support the mission of the school. Of the 15 new faculty/staff requested, eight are NCS housekeeping staff that are being transferred from the Protestant Cathedral Episcopal ("PECF") payroll to NCS accounts. The remaining seven new faculty/staff will allow the school to expand its academic offerings in language, technology, and advanced mathematics, and to support ongoing fundraising and administrative support initiatives.

Pursuant to Section 3113.8 of the Zoning Regulations, the Applicant will file its Statement of the Applicant with the Board no fewer than fourteen days prior to the public hearing for the present Application. In the Statement of the Applicant, and at the public hearing, the Applicant will provide testimony to meet its burden of proof to obtain the Board's approval of the requested special exception.

II. Burden of Proof

Section 206 of the Zoning Regulations permits use of a private school and residences for teachers and staff in the R-1 District if approved by the Board as a special exception in accordance with Sections 206 and 3104.

- A. *The private school shall be located so that it is not likely to become objectionable to adjoining and nearby property because of noise, traffic, number of students, or otherwise objectionable conditions. (§206.1)*

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National Cathedral School is an existing private school as previously approved by the Board. In BZA Order No. 17759, the Board set a school enrollment cap 585 students and 150 full-time equivalent faculty and staff. With this application, the Applicant requests to increase the number of full-time equivalent faculty and staff to 165.

The requested increase in faculty/staff will not change the existing conditions at the school with regard to noise, traffic, or other potentially objectionable conditions. The school's parking demand is decreased by its proximity to public transportation. The school encourages use of public transportation by providing transportation incentives (i.e., free SmarTrip cards; \$30/month transit subsidy; biking/walking incentives), and by providing van service to the Woodley Park Metrorail station.

The Applicant will further establish at the hearing through expert reports and testimony that the proposed expansion will not result in objectionable conditions.

- B. *Ample parking space, but not less than that required in Chapter 21 of the Zoning Regulations, shall be provided to accommodate the students, teachers and visitors likely to come to the site by automobile. (§206.2)*

Currently, ample parking is provided on the National Cathedral Close for students, teachers and visitors at NCS. The present total zoning requirement for parking spaces under BZA No. 17759 is 148 and 176 spaces have been allocated and provided for NCS. The increase in faculty/staff would require a total of 160 spaces under zoning and the 176 spaces would continue to be provided.

Finally, the special exception will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps and will not tend to affect adversely the use of neighboring property.

Statement of Existing and Intended Use

The property is currently used for private school use in accordance with previous Board of Zoning Adjustment approval. The property will continue to be used for private school use.