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February 19, 2003

BY HAND

Mr. Geoffrey Griffis
Chairperson
Board of Zoning Adjustment
441 Fourth Street, N.W., Room 201
Washington, D.C. 20001

Re: BZA Application No. 16970/National Child Research Center
3209 Highland Place, N.W.; Square 2072, Lot 30 (the Property)
APPLICATION OF SECTION 2516 OF THE ZONING REGULATIONS

Dear Mr. Griffis:

The following brief is filed on behalf of the Cleveland Park Neighbors at the Board's request regarding the applicability of section 2516 of the zoning regulations (11 D.C.M.R. § 2516) to NCRC's use of the playhouse and proposed construction and use of the carriage house. Steve Hunsicker, a party in opposition, joins in this brief.

Initially, it bears remembering that the primary issues is whether the proposed expansion provides for construction of another principal building on the one single subdivided lot owned by NCRC and that with regard to the use of that additional building, NCRC is a child development center, or a pre-school. Thus, the Board must first determine whether the new building is another principal building and, as such, requires additional zoning relief to construct. At the same time as it is looking at the building's use, the Board must recognize that the regulations governing private schools and universities have no application to the issues briefed herein. It is in that context that the Board needs to consider whether § 2516 applies to the expansion of NCRC and whether any of the cases relied upon by NCRC are at all relevant.

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BZA
Case No. 16970
Exhibit No. 119

Board of Zoning Adjustment
District of Columbia
CASE NO.16970
EXHIBIT NO.119

1. Introduction.

The Office of Planning ("OP"), the Cleveland Park Neighbors and Mr. Lindsley Williams argue that the proposed expansion by NCRC involves construction of another principal building and that the present use by NCRC of its playhouse and its proposed playhouse or carriage house uses are not accessory uses. Therefore, the use of separate buildings on NCRC's lot for such uses is in violation of the zoning regulations. In order to construct a new principal building and use these additional principal buildings for such uses, NCRC must either obtain a use variance, in the absence of the creation of a theoretical lot for such structure and use or, in the alternative, a special exception if NCRC is able to subdivide the existing lot into two theoretical lots and comply with the area requirements under § 2516 of the zoning regulations.[1]

In response to the issues raise by OP and others, NCRC claims that it does not need any additional relief because the additional building(s) on its lot house "classroom and indoor motor space", uses that it argues are integral to a child development center, and thus it "is not a principal building but rather an accessory building to its preschool use." While this statement alone is a *non sequitor*, given the size of the building and because the use of the buildings is integral, rather than incidental, to NCRC's operations, the building cannot be classified as an "accessory building" and its use cannot be characterized as accessory. Since NCRC must seek either a use variance or a special exception pursuant to § 2516 of the zoning regulations, such additional relief cannot be considered at the February 25, 2003 hearing, as either a new notice must be published in the D.C. Register and additional information not yet in the record must be provided by the applicant and additional government review will be required.

2. The Playhouse and Carriage House Uses are not Incidental to the Main Building and, Therefore, Are Not Accessory.

In the first place, the uses proposed for the carriage house are not accessory uses. The zoning regulations define "accessory use" as "a use customarily *incidental and subordinate* to the principal use, and located on the same lot with the principal use." 11 D.C.M.R. § 199.1. Incidental is defined as "of a minor, casual, or subordinate nature" and subordinate as "belonging to a class or rank lower than another; one subordinate to another" or "inferior". *Webster's New Riverside University Dictionary* (Houghton Mifflin Company 1994). In contrast, "integral" is defined as "essential for completeness; having everything required: entire." *Id.*

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[1] Since the NCRC's property is in the Cleveland Park Historic District, NCRC must obtain approval from the Historic Preservation Review Board in order to subdivide its site into one or more theoretical or record lots. *See* D.C. Code § 6-1106. At this stage, NCRC has not sought approval of a subdivision nor has it prepared, for review, any theoretical lot for review by the BZA. Thus, NCRC must obtain a use variance to either continue to use the Playhouse for principal uses or to construct and use its proposed Carriage House.

The zoning regulations provide that accessory uses for child development centers include "counseling, education, training, and health and social services for the parents or principal guardians of children attending the center." 11 D.C.M.R. § 199.1. Accessory uses do not include classrooms for the "teaching" of NCRC's children, much less in a building equal to or greater in size then the principal building.

While it is not unusual for pre-school or child care or child development center uses to be accessory to a university, a single family residence, a religious school, a private school, an office building or a variety of other principal uses (*see e.g.*, *Georgetown Residents Alliance v. District of Columbia Board of Zoning Adjustment*, ___ A.2d ___ (slip op. at 12-14, February 6, 2003)[2]; *People v. Bacon*, 133 Misc. 2d 771, 508 N.Y.S.2d 138 (1990); *Unitarian Universalist Church of Central Nassau v. Shorten*, 63 Misc. 2d 978, 314 N.Y.S.2d 66 (Sup. Ct. Nassau Co. 1970)), because of the historically limited nature of nursery schools and child development centers, accessory uses to such uses when they are the principal use are extremely limited.

Clearly, the use of the playhouse and carriage house for classrooms and faculty offices further the primary purpose of NCRC's child development center and are necessary for the completeness of the center. Equally clear is the fact that such uses do not fit within the definitions of "accessory uses" for child development centers. It is axiomatic that NCRC can assert as the primary purposes for its need to expand as the need to reduce classroom size by adding additional classrooms and the integral need for a motor skills room and, in the same breath, claim that these uses are "accessory". Finally, even if the Board should conclude that the uses are accessory, they are not located in an accessory building.

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[2] In *Georgetown Residents Alliance*, the Court recently upheld the Board's determination that another special exception was not needed by Georgetown University to locate a child development center on its campus because it was already provided in its campus plan, and that the child development center use was accessory to the university use since it served the principal university use and university population. Here, in contrast, as OP noted the use of the Playhouse and Carriage House is not incidental to the primary use but is the primary use itself.

3. The Plans for the Playhouse and Carriage House Clearly Illustrate Their Primary Purpose.

NCRC's application is incomplete in that it fails to seek relief pursuant to 11 D.C.M.R. § 2516 to allow more than one principal structure on a single record lot in a residential district. An "accessory building" is defined by the zoning regulations as "a *subordinate* building located on the same lot as the main building, the use of which is *incidental* to the use of the main building." 11 D.C.M.R. § 199.1 (emphasis added).

Although a pool house use is clearly incidental to a residential use, in *Davidson v. District of Columbia Board of Zoning Adjustment*, 617 A.2d 977 (D.C. 1992), the Court looked at what constitutes an accessory structure to house such a use and is, therefore, particularly enlightening on the issue of whether a building is a principal or accessory building. The court in *Davidson* pointed out that:

> The plain language of the District's regulations, by referring not only to 'subordinate' building but to 'customarily incidental' uses, makes clear that a building is not an accessory building where given its *size, design and declared purposes*, it can reasonably be expected to duplicate the functions of the main building rather than in fact serving as incidental to those uses.

Davidson, 617 A.2d at 982-83, *citing Maynard v. Tomyl*, 198 N.E.2d 291, 292-93 (Mass. 1964) (second house is not accessory use even though smaller than main residence, where it is 'a dwelling with adequate facilities for occupancy apart from any other structure') (citations omitted). The court explained that:

> [I]n determining whether or not uses are 'customarily incidental,' the Board could properly look at photographs of the building and the building plans in order to determine what would be the normal uses of the building. The term 'customarily incidental' incorporates an objective, not subjective, standard.

Id. at 983. In supporting the Board's decision, the Court went on to quote from the Board's decision: "'[t]he subject structure is very large and contains some of the kinds of rooms and amenities that are customarily located in a main building.'" *Id.* Finally, the Court commented on cases relied upon by the applicant which had previously approved pool houses as accessory and stated that in those cases no issue was made of the "innocuous structure" built to house the use only whether the use itself was accessory. In contrast, as in the instant matter, the physical size and design of the building indicated that was not meant to be merely accessory to a residential structure.

Thus, OP correctly points out that the playhouse building "plays a major role in the Child Development Center use, has a status nearly equal to the 'principal' Main Building, and is not 'incidental' as per the zoning regulation definition of 'accessory building'." Based on these characteristics, OP concluded that "this building currently functions [and the larger proposed building will function] as a second principal building on the subject property, and is inconsistent with Section 3202.3 of the Zoning Regulations (refer to Exhibit 9)." OP goes on to point out that "more Child Development Center activities will relocate from the Main Building once the Carriage House addition is completed, thereby increasing the nonconformity".

In looking at the plans for the playhouse and carriage house, it is clear that the structures, which double the size of the main residence can not be legitimately characterized as subordinate structures and that all rooms in these buildings are presently being used and will be used as classrooms or faculty offices, in addition to the proposed "motor & community room." Accordingly, a mere review of the development plans and a look at the intended, as well as potential, use of these buildings erases any ambiguity regarding the fact that they are not subordinate to the existing house and the uses are integral to the child development center. NCRC bears the burden of demonstrating that the proposed uses are typically incidental to a child development center and are the size of buildings that are typically subordinate and incidental. NCRC has not done so.

4. Cases Relied Upon by NCRC are Inapplicable to the Instant Matter.

NCRC relies upon several "private school" and "university" cases in arguing that the playhouse and carriage house are incidental. As we previously stated, those definitions are irrelevant. The definition of private schools and universities and the campus plan review process for universities allow for a much broader range of accessory uses and accessory buildings, as recently noted in *Georgetown Residents Alliance, supra.* Indeed, a child development center is defined as "a building or part of a building", not buildings or campuses because child development centers or nursery schools are not historically made up of a complex of buildings. Thus, when NCRC was created and moved to Cleveland Park, it was guided by its own principles that it locate in a single family house. *See Exhibit 5 to Cleveland Park Neighbor's Motion to Dismiss.* Indeed, when looking for a site NCRC considered a number of alternatives such as building "a one-story house on the plan of a Chinese compound, to secure rooms in a public-school building, and to adapt garages or a residence to meet the center's needs." *Id.* at p. 1. A detached house with "adequate yard space, [and] southern and eastern exposure" was found. *Id.* at p. 2. According to NCRC, a "home-like atmosphere" was sought so as to adequately deal with the "natural reactions of young children." *Id.* at p. 3. NCRC's present plans are a far cry from the modest requirements it recognized were essentially for pre-school children, as distinct from the environments of public schools and universities. Accordingly, NCRC's reliance on cases dealing with private school and university uses is misplaced.

Schools, as opposed to child development centers, by definition include:

> [A]ll educational functions, the building or structure required to house them and all accessory uses normally incidental to a public school, including but not restricted to athletic fields, field houses, gymnasiums, parking lots, greenhouses, playgrounds, stadiums, and open space.
>
> The term also shall include a community-centered *school campus* . . .

11 D.C.M.R. §199.1 (emphasis added). The accessory uses listed in the definition for public schools have been found to apply to private schools as well. *See National Cathedral Neighborhood Assn. v. District of Columbia Board of Zoning Adjustment*, 753 A.2d 984, 986 (D.C. 2000)(relying on the definition for a public school, holding that "there is no question that athletic facilities, and the buildings housing them, are an adjunct to the educational mission of a school"). Similarly, it is contemplated by the campus plan procedures that colleges and universities will consist of multiple buildings and uses. *See* 11 D.C.M.R. § 210.

Finally, NCRC fails to cite (and cannot, for that matter) any cases supporting its position regarding accessory uses for child development centers. Furthermore, NCRC has mischaracterized the Board's decision regarding the "Naylor Road Preschool." In the first place it is not a "preschool." The Naylor Road School operates as a private school under § 206 of the zoning regulations, and not as a child development center under § 205 of the zoning regulations. *See NCRC's Exhibit 1* (44 D.C. Register 5311 (September 12, 1997)). Moreover, it appears that the structures on that property predate the zoning regulations, as they were constructed in 1925. *See Exhibit 2* (tax information).

Because the accessory uses listed for both a school and a university are much broader than that the accessory uses allowed for child development centers, the cases referred to by NCRC in its February 11, 2003 submission, all of which pertain to schools and universities, do not support NCRC's contention that buildings housing classrooms and other functions essential and necessary to a child development center are accessory buildings.

5. Given that Relief from Section 2516 of the Zoning Regulations or, in the Alternative, a Use Variance, is Required, the Hearing on This Matter Cannot Proceed on February 25, 2003.

Much more extensive review is required of a special exception pursuant to § 2516 of the zoning regulations then a special exception for a child development center. For example, the applicant, in addition to the usual filing requirements, must file four (4) site plans for all new rights-of-way and easements, and existing and preliminary landscaping and grading plans with approximate building footprints with the initial application. 11 D.C.M.R. § 2516.3. Furthermore, the Property must be subdivided into individual assessment and taxation lots ("A&T Lots"), which, in this case, will require an additional hearing before the Historic Preservation Review Board ("HPRB"). The applicant must demonstrate that the buildings, in relation to the A&T Lots, meets the requirements of the zoning regulations for the height, bulk and open spaces around each building. 11 D.C.M.R. § 2516.4. This will require an amended self-certification form with regard to each A&T Lot. Once a complete application is submitted, more extensive review is required by OP and other government agencies, including environmental review and public safety relating to police and fire concerns.

If the Board were to allow NCRC to orally amend its application, without filing the necessary plats and self-certification forms, the Board will deny both the District government, as well as the community, an opportunity to fully consider the impact of the proposed plans. Moreover, if the HPRB denies the subdivision of the Property, such denial would render the need for a hearing on this matter moot as to the proposed new carriage house.

As the earliest the HPRB could consider an application to subdivide the Property would be March 27, 2003, the hearing in this matter should be continued until after that date. In the interim, NCRC should be required to submit a written amended application that conforms to the provisions of § 2516 of the zoning regulations. In the event that the matter of subdivision is not heard or decided on March 27, 2003, the hearing before the Board should be continued until such a time as HPRB approves the subdivision. If the subdivision is denied by HPRB, the instant application should, likewise, be denied as to the construction of the proposed carriage house and continued use of the Playhouse for integral school purposes, such as classrooms and faculty offices.

In the alternative, NCRC will require a use variance in order to continue its use of the playhouse and to construct and use the carriage house as proposed. In this event, such relief requires the request notice and advertising, as the notice provided for the special exception to operate a child development center is inadequate.

CONCLUSION

Because the use of the playhouse and proposed use of the carriage house is integral, rather than ancillary, to the operations of NCRC's child development center, relief is required under § 2516 of the zoning regulations. As NCRC has failed to include a request for such relief in its original application, it should be required to file a written amended application that conforms to the requirements of § 2516, and the matter referred to OP for the required additional review. In the alternative, NCRC must apply for a use variance. Such relief requires proper notice and advertisement. As a result of the need for this additional review, as well as the need to obtain individual A&T Lots, and/or the need for additional advertisement, this matter should be continued for a period of no less than forty-five (45) days.

Sincerely,

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

Richard B. Nettler
Jeannine Rustad Zigner

Enclosures (as stated)
cc: Neighbors
Mr. Denzel Noble (by hand; w/encl.)
Office of Planning (by hand; w/encl.)
Mr. Robert Kelly, Zoning Administrator (by hand; w/encl.)
ANC 3C (by hand; w/encl.; c/o Nancy MacWood)
Gaylord Neely & Linda Badami (by hand; w/encl.)
Sallie R. Beckner & R. Bruce Beckner (by hand; w/encl.)
Steven R. Hunsicker (by hand; w/encl.)
Henry P. Little (by hand; w/encl.)
"The Friends of NCRC" (by hand; w/encl.)
Katharine Marshall (by hand; w/encl.)
Maureen E. Dwyer (by hand; w/encl.)

GOVERNMENT OF THE DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT

Application No. 16181 of the Naylor Road School, pursuant to 11 DCMR 3108.1 and 3107.2, for a special exception under Section 206 to expand an existing private school from 157 to 255 students and 17 to 22 staff, and a variance from the off-street parking requirements (Subsection 2101.1) for a private school in an R-2 District at premises 2403 Naylor Road and 2305 and 2345 R Street, S.E. (Square 5624, Lot 821).

HEARING DATE: December 4, 1996
DECISION DATE: December 4, 1996 (Bench Decision)

SUMMARY ORDER

The Board provided proper and timely notice of public hearing on this application by publication in the D.C. Register, and by mail to Advisory Neighborhood Commission (ANC) 6C and to owners of property within 200 feet of the site.

The site of the application is located within the jurisdiction of ANC 6C. ANC 6C, which is automatically a party to the application, did not submit a written statement related to the application.

As directed by 11 DCMR 3324.2, the Board has required the applicant to satisfy the burden of proving the elements which are necessary to establish the case for a variance from the strict application of the requirements of 11 DCMR 2101.1 and a special exception pursuant to Section 206. No person or entity appeared at the public hearing in opposition to the application or otherwise requested to participate as a party in this proceeding. Accordingly, a decision by the Board to grant this application would not be adverse to any party.

Based upon the record before the Board, the Board concludes that the applicant has met the burden of proof, pursuant to 11 DCMR 3107 that there exists an exceptional or extraordinary situation or condition related to the property which creates a pratical difficulty for the owner in complying with the Zoning Regulations, and that the requested relief can be granted without substantial detriment to the public good and without substantially impairing the intent, purpose, and integrity of the zone plan as embodied in the Zoning Regulations and Map. The Board further concludes that the applicant has met the burden of proof pursuant to 11 DCMR 3108 and that the requested relief can be granted as being in harmony with the general purpose and intent of the Zoning Regulations and Map. The Board concludes that granting the requested relief will not tend to affect adversely the use of neighboring property in accordance with the Zoning Regulations and Map. It is therefore

ORDERED that the application is GRANTED, SUBJECT to the following CONDITIONS:

1. The school shall operate between 6:30 a.m. and 6:00 p.m., Monday through Friday.

2. The maximum number of students shall not exceed 255.

3. The number of employees shall not exceed 22.

4. All outdoor activities shall take place under staff supervision at all times.

5. The children's arrivals and departures shall be closely monitored by the staff.

6. The grounds of the facility shall be maintained in a neat and orderly condition at all times.

7. Trash and refuse generated by the school shall be collected at least once a week.

8. The applicant shall establish and maintain a community liaison program consisting of representatives of the facility, the ANC, and the neighborhood. The applicant shall conduct meetings of the community liaison members at least four times a year. Notice of the meetings shall be given to the ANC and the owners of all property within 200 feet of the site. The applicant shall be responsible for keeping minutes of all meetings.

Pursuant to 11 DCMR 3301.1, the Board has determined to waive the requirement of 11 DCMR 3331.3 that the order of the Board be accompanied by findings of fact and conclusions of law. The waiver will not prejudice the rights of any party, and is appropriate in this case.

VOTE: 3-0 (Susan Morgan Hinton, Sheila Cross Reid and Laura M. Richards to grant; Angel F. Clarens and Howard R, Croft not present, not voting).

BY ORDER OF THE D.C. BOARD OF ZONING ADJUSTMENT

FINAL DATE OF ORDER: January 3, 1997

PURSUANT TO D.C. CODE SEC. 1-2531 (1987), SECTION 267 OF D.C. LAW 2-38, *THE HUMAN RIGHTS ACT OF 1977*, THE APPLICANT IS REQUIRED TO COMPLY FULLY WITH THE PROVISIONS OF D.C. LAW 2-38, AS AMENDED, CODIFIED AS D.C. CODE, TITLE 1, CHAPTER 25 (1987), AND THIS ORDER IS CONDITIONED UPON FULL COMPLIANCE WITH THOSE PROVISIONS. THE FAILURE OR REFUSAL OF APPLICANT TO COMPLY WITH ANY PROVISIONS OF D.C. LAW 2-38, AS AMENDED, SHALL BE A PROPER BASIS FOR THE REVOCATION OF THIS ORDER.

UNDER 11 DCMR 3103.1, "NO DECISION OR ORDER OF THE BOARD SHALL TAKE EFFECT UNTIL TEN DAYS AFTER HAVING BECOME FINAL PURSUANT TO THE SUPPLEMENTAL RULES OF PRACTICE AND PROCEDURE BEFORE THE BOARD OF ZONING ADJUSTMENT."

THIS ORDER OF THE BOARD IS VALID FOR A PERIOD OF SIX MONTHS, UNLESS WITHIN SUCH PERIOD AN APPLICATION FOR A BUILDING PERMIT OR CERTIFICATE OF OCCUPANCY IS FILED WITH THE DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS.

Prev

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Property Detail

Address: 2306 - 2403 NAYLOR RD SE
SSL: 5624 0821

Record Details

Neighborhood:	Randle Heights	**Sub-Neighborhood:**	A
Use Code:	83 - Educational		
Tax Type:	TX - Taxable	**Tax Class:**	02 - Non-Residential
Homestead Status:	** Not receiving the Homestead Deduction		
Assessor:	Herron, Consuelo	**Assessor Phone No.:**	442-6720
Building Square Footage:		**Ward:**	8
Land Area:	43,010	**Triennial Group:**	1

Owner and Sales Information

Owner Name:	NAYLOR ROAD SCHOOL CORPORATION
Mailing Address:	2403 NAYLOR RD SE; WASHINGTON, DC 20020
Sale Price:	Not Available
Sale Date:	Not Available
Instrument No.:	

Tax Year 2003 Preliminary Assessment Roll

	Old Value	Proposed New Value (2003)
Land:	$215,050	$236,560
Improvements:	$149,950	$164,940
Total Value:	$365,000	$401,500

** If you believe you should be receiving tax relief through the Homestead deduction program and if you are domiciled in the District and this property is your principal place of residence, you can access the link below, complete the form, and return it per the instructions. For additional information regarding the Homestead program, call (202)727-4TAX. Click here to download the Homestead Deduction and Senior Citizen Tax Relief application *

View Tax Info

PROPERTY INFORMATION

1) Property: **2306-2403 NAYLOR RD SE, WASHINGTON DC 20020-4518 C047**

APN:	**5624-0000-0821**	Tax Code:	**04**	Use:	**UNIVERSITY**
County:	**DISTRICT OF COLUMBIA, DC**	Prop Tax:	**$6,752.50**	Total Value:	**$365,000**
Census:	**76.01**	Tax Yr:	**2002** Delinq:	Land Value:	**$215,050**
Map Pg:	**10-1022C**	Exemptions:		Imprv Value:	**$149,950**
Neighborhd:	**43**			Assd Yr:	**2002**
Subdivision:	**RANDLE HIGHLANDS**			% Improve:	**041%**
Phone:				Owner Vest:	/ /

Owner: **NAYLOR ROAD SCHOOL CORPORATION**

Mail: **2403 NAYLOR RD SE; WASHINGTON DC 20020-4534 C047**

Owner Transfer = Date: Price: Doc#: Type:

SALE & FINANCE INFORMATION

	LAST SALE	PRIOR SALE
Record/Sale Date:	**01/13/1999**	
Sale Price/Type:		
Liber/Folio:	**3251**	
Deed Type:		
1st Mtg Amt/Type:	**$23,161** **CONV**	
Rate/Type/Term:	/ /	
Lender:		
2nd Mtg Amt/Type:		
Rate/Type/Term:	/ /	
Title Company:		
Seller:		
New Construction:		

Other Last Sale Info = # Parcels: Type 2: Pend:

SITE INFORMATION

Zoning:	**R2**	Acres:	**0.99**
County Use:	**083**	Lot Area:	**43,010**
# Bldgs:	**1**	# Res Units:	
Legal Blk/Bldg:	**5624**		
Legal Lot/Unit:	**0821**		

Legal Desc:

IMPROVEMENTS

Gross Area:	**10,383**
Bldg/Liv Area:	**10,383**
Bsmt Area:	
$/SF:	
Bedrms:	
Ttl Baths/Fixt:	
Yr Built/Eff:	**1925**
# Stories:	**2.00**
Fireplace/#:	
Ext Wall:	**CONCRETE BRICK/PAN**
Int Wall:	
Roof Type:	**HIP**
Roof Matl:	**COMPOSITION SHINGL**
Roof Frame:	
Roof Shape:	**HIP**
Heat Fuel:	
Heat Type:	**HOT WATER**
Parcel Fuel:	
Floor Cover:	
Air Cond:	

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