BEFORE THE BOARD OF ZONING ADJUSTMENT
OF THE DISTRICT OF COLUMBIA

Tudor Place Foundation, Inc.) Application for Special Exception) under Section 217 to continue the) previously approved operation of a) museum by a non-profit) organization)	BZA Case No. 16974 Hearing Dates: April 15, 22 and 29, 2003

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MOTION TO REOPEN THE RECORD FOR SUBMISSION OF ADDITIONAL STATEMENT CONCERNING USE OF DOWER HOUSE

At the public meeting held by the Board of Zoning Adjustment on June 3, 2003, the Board discussed the possibility of imposing certain conditions to the operation of the Dower House that had not previously been touched upon on the record during the course of this proceeding. Because these conditions were not discussed in the evidence, the record does not contain of evidence regarding the effect of such conditions on the Applicant.

In order to make an informed decision on whether or not to impose such restrictions on the operation of the Dower House, the Board should weigh the adverse impacts on the neighbors, if any, of the Applicant's proposed operation of the property, against the burden imposed on the Applicant by the creation of yet more restrictive conditions to the operation of the Dower House.

To provide the necessary factual background allowing for the Board to make an informed decision on these matters, the Applicant prepared a Statement

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describing certain particularities of the Tudor Place main house and the Dower House. This factual background should bear significant weight on the Board's decision as to which conditions to impose to the operation of the Dower House.

Therefore, the Applicant hereby requests that the Board reopen the record for the submission of the enclosed additional Statement by the Applicant.

Respectfully submitted,

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July 14, 2003

CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing Motion to Reopen the Record for Submission of Additional Statement to be served, this 14th day of July, 2003, on:

Don W. Crockett
3070 Q Street, NW
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Gordon C. Wilson

SUPPLEMENTAL STATEMENT OF LESLIE BUHLER
CONCERNING USES OF DOWER HOUSE

I attended the Board of Zoning Adjustment deliberations on June 3, 2003 concerning Tudor Place's application, and I am very concerned that the Board may be considering imposing conditions on the use of Dower House that were not discussed at the hearings or in the written submissions. Because these restrictions were not considered in the evidence, the Board may not appreciate what a severe impact such restrictions would have on the operation of Tudor Place. I am providing this information in the hope that it will better inform the Board's deliberations.

Dower House has (1) the only heated and air-conditioned multifunction rooms available anywhere on the property, and (2) the only accessible working kitchen on the property (the only other working kitchen is inconveniently located above the second story of the "servant's apartment" over the garage). Therefore,

- Dower House is the only indoor venue where we can comfortably hold our education programs year round (including adult lectures, children's workshops that are open to the public, and school group programs).

- Dower House is the only place where we can offer indoor space for use by approved outside groups (which has in the past included use by the Georgetown Garden Club, the DC Preservation League and the Smithsonian Women's Committee).

- Dower House is also the only space on the property where a seated indoor lunch or dinner can feasibly take place, which is an important feature of our private tours of the main house when weather conditions do not permit holding such activities outdoors.

Due to the small size of Dower House, all of the functions that use this space are necessarily quite small, and, to my knowledge, have no adverse impacts on the neighborhood. For example, the small size of the functions often enables parking needs to be accommodated on site in a parking area behind Dower House (which, together with other parking on the property, can readily accommodate approximately 25 cars without the need to "stack" vehicles). To the extent that use of on-street parking is associated with Dower House events, such usage is minimal and generally indistinguishable from usage associated with events at the main house. Approximately 50% of the guests at Dower House functions enter from the side of Dower House facing the main house rather than from the front entrance of Dower House on the street.

I have not heard anything during the BZA proceedings or the numerous meetings leading up the BZA proceedings suggesting that any adverse impact is associated with our limited use of Dower House. To the contrary, as the opponents acknowledge: "no one has objected to the operations of Tudor Place tours and events over the past two years". (Snider Findings of Fact, paragraph 24). Such operations during the last two years have regularly included Dower House educational events, small receptions and uses accessory to tours.

I urge the Board to consider carefully the above matters before constraining our use of the Dower House beyond the uses proposed in our Application. The additional limitations that the Board has been discussing may seem as minor refinements to the Board, but they in fact would have a devastating effect on the ability of Tudor Place to carry on its core educational functions and maintain financial viability.

Please let me know if there is any further information we could provide that would be helpful to the Board in reviewing the above matters.