BEFORE THE DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT

Application of St. Albans School, on behalf of the Protestant Episcopal Cathedral Foundation of the District of Columbia, 3101 Wisconsin Avenue, NW Lot 25, Square 1944

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PRELIMINARY STATEMENT OF COMPLIANCE WITH BURDEN OF PROOF

I. Background

This application requests special exception approval of additional facilities to serve St. Albans School, such private school use having been previously approved by the Board of Zoning Adjustment (the Board). The subject property is located at 3101 Wisconsin Avenue, NW (Lot 25, Square 1944) and is part of the Washington National Cathedral Close, which is bounded by Woodley Road to the north, 34th Street to the east, Garfield Street and Massachusetts Avenue to the south and Wisconsin Avenue to the west.

The portion of the subject property included in this application is currently used as a college preparatory school for boys, chartered by the Protestant Episcopal Cathedral Foundation of the District of Columbia, in Washington, DC. The School is dedicated to fostering the spiritual, intellectual, and physical development of its students. St. Albans challenges its students to achieve excellence and to embrace responsibility, and it expects them to act always with honor and to respect and care for others.

The Applicant requests special exception approval of the following additional facilities to serve the private school use: (1) connection of the academic facilities; (2) renovation of the athletic fields and related structures; and (3) construction of a performing arts center. The purpose of these new facilities is to better provide for the existing student body and to connect component parts now separated from each other. The Applicant intends to commence construction on the first two items in June 2006, with occupancy expected by September 2007. Depending on funding, the Applicant hopes to commence construction on the performing arts center by 2010; however, the Applicant requests approval for the performing arts center through the summer of 2015.

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. Section 206.2 requires

BOARD OF ZONING ADJUSTMENT
District of Columbia
CASE NO. 17320
EXHIBIT NO. 8

Board of Zoning Adjustment
District of Columbia
CASE NO. 17320
EXHIBIT NO. 8

that the private school 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. The expansion of St. Albans School will not increase the number of students and results in only a minimal increase in the number of faculty. Furthermore, the Applicant will establish at the hearing through expert reports and testimony that the proposed expansion will not result in objectionable conditions. Moreover, Section 206.3 requires that the private school provide ample parking space, but not less than that required in Chapter 21 of the Zoning Regulations, to accommodate the students, teachers and visitors likely to come to the site by automobile. As will be established by the Applicant's traffic consultant, ample parking will be provided on the Close for parking for students, teachers and visitors. Parking will be provided in accordance with requirements of the Zoning Regulations and will be sufficient to accommodate the proposed demand. 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.

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.

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