Holland & Knight
800 17th Street, NW, Suite 1100 | Washington, DC 20006 | T 202.955.3000 | F 202.955.5564
Holland & Knight LLP | www.hklaw.com

Christine M. Shiker
202.457.7167
christine.shiker@hklaw.com

Christopher S. Cohen
202.469.5127
christopher.cohen@hklaw.com

October 30, 2026

VIA IZIS

Board of Zoning Adjustment
of the District of Columbia
441 4th Street, NW, Ste. 210-S
Washington, DC 20001

Re: Protestant Episcopal Cathedral Foundation of the District of Columbia, in conjunction with Beauvoir, the National Cathedral Elementary School
3500 Woodley Road, NW (Square 1944, Lot 25)
Request for Modification With Hearing

Dear Members of the Board:

This letter is submitted on behalf of the Protestant Episcopal Cathedral Foundation of the District of Columbia ("PECF"), in conjunction with Beauvoir, The National Cathedral Elementary School ("Beauvoir" or the "Applicant"), in support of a request for a Modification With Hearing to BZA Order No. 17996, as modified by Order Nos. 17996-A through 17996-C.[1]

I. Overview and Filing Requirements

The Applicant seeks approval for a modest, one-story expansion which is fully enclosed within the existing interior courtyard to allow for the construction of three new classrooms and related improvements to the courtyard. The proposed modifications will not increase student enrollment or the number of faculty and staff and will otherwise leave the approved private school use unchanged.[2]

[1] The Applicant has filed a concurrent Modification Without Hearing application, BZA Case No. 17996-D, which is scheduled for Board consideration on January 13, 2027. If the Board approves that application, the Applicant will withdraw this Modification With Hearing application.

[2] As explained herein, Beauvoir has existed since the early 1930s and has been the subject of several prior BZA approvals, including BZA Order No. 16274 (1997) and BZA Order No. 17996, as modified by Order Nos. 17996-A through 17996-C. For administrative consistency, and because Order No. 17996-C constitutes the most recent approval governing Beauvoir's private school use, the Applicant seeks approval of the proposed modifications within that approval lineage.

Board of Zoning Adjustment
District of Columbia
CASE NO. 17996E
EXHIBIT NO. 2

This request is filed as a Modification With Hearing pursuant to Subtitle Y § 704 *et seq.* of the District of Columbia Zoning Regulations, Title 11 of the District of Columbia Municipal Regulations ("DCMR"). That section authorizes the Board to consider a modification that does not qualify for processing *without* a hearing under Subtitle Y § 703. In support of this application and pursuant to Subtitle Y § 704.2, the Applicant submits the following:

- plans depicting the proposed classroom expansion and courtyard improvements (the "Modification Plans");
- copies of BZA Order No. 17996 and Orders No. 17996-A through 17996-C;
- a copy of BZA Order No. 16274, the most recent case approving the construction of additional school facilities, together with the related zoning analysis that informs the zoning tabulations provided for this application;[3]
- a letter authorizing Holland & Knight LLP to file and process this application on the Applicant's behalf;
- outlines of witness testimony and resume of David Konapelsky, the Applicant's expert witness in architecture and design; and
- a list of property owners within 200 feet of the subject property (two sets of mailing labels provided to the Office of Zoning under separate cover).

The Form 152 – Application for Modification With Hearing is being submitted concurrently via IZIS. Consistent with Subtitle Y § 1600.1(e), the required $312 filing fee is being provided under separate cover.

II. Background on the Subject Property and the Beauvoir School

Beauvoir's site comprises a portion of an approximately 60-acre campus located at 3500 Woodley Road, NW (Square 1944, Lot 25) in the R-1B Zone (the "Property"). The Property is located on the grounds of the Washington Cathedral and is surrounded by a mix of residential, institutional, and educational uses, including St. Albans School and the National Cathedral School.

Beauvoir has operated on the Property since the early 1930s and has been the subject of multiple Board approvals throughout its history. In 1997, the Board approved BZA Case No. 16274, which authorized an addition to the school and established enrollment and staffing limits of 400 students and 85 faculty and staff. Thereafter, in 2009, PECF filed BZA Case No. 17996 seeking approval to increase the number of faculty and staff at Beauvoir and to establish a child development center as a principal use. The application was subsequently amended and bifurcated, with the child development center approved pursuant to BZA Order No. 17996-A and the increase in faculty and staff approved pursuant to BZA Order No. 17996, as modified by BZA Order No. 17996-B. Most recently, BZA Order No. 17996-C approved temporary learning cottages and a temporary reduction in required parking during the 2020-2021 school year to accommodate needs arising from the COVID-19 pandemic, while otherwise leaving the prior approvals unchanged.

[3] *See also* Public Record for BZA Case No. 16274, Exhibit 34.

III. Proposed Modifications

As shown on the Modification Plans, the Applicant proposes a one-story expansion within the existing interior courtyard to allow for the construction of three new classrooms and related improvements to the courtyard. The proposed expansion will support Beauvoir's existing educational program, enhance campus functionality, and improve STEAM instructional space for current students. As noted above, the Applicant does not seek any increase in approved enrollment or staffing levels. The project scope, need, and benefits are discussed below.

A. Scope

The modification is limited to a single-story STEAM (Science, Technology, Engineering, Arts, and Mathematics) addition of approximately 2,068 square feet. It is designed to accommodate three adjacent "flex" classrooms that will support and enhance the school's STEAM curriculum. The project also includes related courtyard improvements, including an approximately 500-square-foot brick-paved patio landing, new steps and an accessible ramp connecting to the existing courtyard, and associated planting and landscaping improvements. An arborist has been retained to oversee protection of the existing heritage tree located within the courtyard.

The new classrooms will extend into the courtyard's western portion, necessitating removal of the existing porch elements and outdoor patio. Following construction, the courtyard will remain approximately 6,296 square feet in area and approximately 76 feet, 9 inches in width, thereby continuing to satisfy the closed court requirements of Subtitle D § 209.1. As demonstrated by the zoning tabulations on Sheet 05 of the Modification Plans, the project will remain compliant with all applicable development standards and will not generate any requirement for additional parking or loading. The addition will also incorporate green roof elements to enhance stormwater management.

B. Need for Classroom Expansion

The classroom expansion responds to the continued growth and evolution of Beauvoir's STEAM educational program for its existing student population. The Modification Plans reflect a concept that has been vetted through Beauvoir's planning process and responds to the school's identified need for dedicated, purpose-built STEAM classroom space. Currently, STEAM programming is conducted in a repurposed faculty lounge that was not originally designed for that use. The proposed flex classrooms will provide expanded, more functional instructional space specifically designed to support the school's existing and growing STEAM curriculum.

C. Benefits to Educational Programming and Student Experience

The three new flex classrooms will enhance Beauvoir's ability to deliver hands-on STEAM instruction through purpose-built learning environments, upgraded technology infrastructure, and modern building systems. Together with the other planned interior renovations, which will strengthen the school's technology, music, and assembly facilities, the project will modernize a key portion of the campus and better support Beauvoir's educational mission.

Importantly, the courtyard location was intentionally selected for its direct connection to secure open green space. The location provides students with immediate access to natural light, fresh air, and outdoor learning environments, while creating meaningful opportunities to integrate the surrounding landscape into STEAM instruction. These features support experiential learning and further diversify Beauvoir's student curriculum.

IV. Continued Compliance with Private School Special Exception Standards

The proposed modifications do not alter the nature or intensity of Beauvoir's approved private school use. As discussed below, Beauvoir will continue to satisfy the requirements applicable to private schools in the R-1B Zone and the general special exception standards of Subtitle X.

A. Subtitle U § 203.1(m)

Subtitle U § 203.1(m) permits a private school use in the R-1B Zone by special exception, subject to specific conditions. The proposed modifications continue to satisfy these requirements as follows:

- **Subtitle U § 203.1(m)(1):** ***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;***

The proposed modifications are not likely to become objectionable to adjoining or nearby property because of noise, traffic, the number of students, or other adverse conditions. The project is limited in scope and is located within the fully enclosed interior courtyard. The proposed improvements are intended to support existing educational programming and will remain compatible with surrounding residential and institutional uses. There will be no increase in the maximum number of students or changes to existing transportation operations.

- **Subtitle U § 203.1(m)(2):** ***Ample parking space, but not less than that required by this title, shall be provided to accommodate the students, teachers, and visitors likely to come to the site by automobile; and***

Pursuant to BZA Order No. 17996-B, Beauvoir is required to provide 126 parking spaces, including 73 spaces designated for Beauvoir and 48 spaces shared with the child development center. Beauvoir will continue to provide this required parking on-site. Moreover, the proposed modifications do not increase student enrollment, faculty and staff levels, or visitor demand and therefore will not increase parking demand.

- **Subtitle U § 203.1(m)(3):** ***After hearing all evidence, the Board of Zoning Adjustment may require additional parking to that required by this title;***

Given the limited scope of the proposed modifications and the fact the absence of any change in the maximum permitted number of students or faculty and staff, there is no requirement for additional parking beyond that already required under BZA Order No. 17996-B.

B. Subtitle X §§ 104 and 901.2

Subtitle X § 104 provides that a private school use may be approved as a special exception upon satisfaction of the general special exception standards set forth in Subtitle X § 901.2. The proposed modifications continue to satisfy these standards.

- **Subtitle X § 901.2(a):** ***The special exception will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps.***

The proposed modifications are in harmony with the general purpose and intent of the R-1B Zone. Among other things, the purposes of the residential zones are to "recognize and reinforce the importance of neighborhood character" and to "allow for limited compatible accessory and non-residential uses." 11-D DCMR § 101.2(b), (c). Beauvoir is a long-established private school operating pursuant to prior Board approval, and the proposed modifications do not alter the approved nature or intensity of that use. Instead, the project involves a small-scale classroom expansion and related courtyard improvements intended to improve existing educational facilities serving Beauvoir's current student population.

- **Subtitle X § 901.2(b):** ***Will not tend to affect adversely, the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps; and***

The proposed modifications will not adversely affect neighboring educational or residential uses. The project is limited in scope and located fully within the interior portion of Beauvoir's existing campus. The application does not propose any increase in student enrollment, faculty or staff levels, parking demand, loading demand, or other operational characteristics of the approved private school use. In addition, the project includes courtyard landscaping improvements and green roof elements that will improve the functionality and environmental performance of the site.

- **Subtitle X § 901.2(c):** ***Will meet such special conditions as may be specified in this title.***

As discussed above, Beauvoir will continue to satisfy the requirements applicable to a private school use under Subtitle U § 203.1(m). The proposed modifications also remain compliant with applicable development standards and do not trigger a need for additional zoning relief.

V. Compliance with Subtitle Y § 704: Modification With Hearing Criteria

Any request for modification that cannot be processed pursuant to Subtitle Y § 703 requires a public hearing. 11-Y DCMR § 704.1. The public hearing shall be focused on the relevant evidentiary issues and conditions impacted by the proposed modification, and its scope shall be limited to the impact of the modification on the subject of the original application, without permitting the Board to revisit its original decision. *Id.* §§ 704.6 and 704.7.

As discussed above, the proposed modifications are straightforward and limited in scope. They consist of a one-story classroom expansion located entirely within the existing interior courtyard, together with related courtyard and façade improvements. The proposal will not increase student enrollment or the number of faculty and staff, or otherwise alter the approved

nature or intensity of Beauvoir's private school use. Specifically, the Applicant requests that existing Condition No. 5, which addressed a temporary condition, be deleted and replaced with the following:

> **5. The expansion of the existing building shall be constructed in accordance with the plans in the record of BZA Case No. 17996-D as Exhibit ___.**

Accordingly, the proposed modifications present a narrow set of issues for the Board's consideration. They do not alter the approved enrollment, staffing, or nature or intensity of the private school use, but are limited to the proposed physical improvements and corresponding revision to Condition No. 5. The hearing should therefore be confined to those modifications and their impacts, consistent with Subtitle Y §§ 704.6 and 704.7.

The application also complies with the service requirements of Subtitle Y §§ 704.4 and 704.5. The Applicant is serving this request concurrently with its filing with the Office of Zoning on Advisory Neighborhood Commission ("ANC") 3C, a party to the original proceeding, and the Office of Planning. The Applicant is also serving ANC 3A and the District Department of Transportation.

Finally, pursuant to Subtitle Y § 704.9, the filing or approval of this modification will not toll the expiration of the underlying order or extend its validity. The Applicant does not seek any such extension through this request.

VI. Community Engagement

The Property is located within the boundaries of ANC 3C and Single Member District ("SMD") 3C08, represented by Commissioner Rick Nash. Prior to filing the concurrent Modification Without Hearing application, *see* Fn. 1, the Applicant advised Commissioner Nash of the proposed modifications. The Applicant has since been invited to present the proposed modifications to ANC 3C's Planning, Zoning, Housing & Economic Development Committee on December 7, 2026, and to the full ANC on December 14, 2026.

ANC 3A is also an "affected ANC" pursuant to Subtitle Y § 101.8 because its boundary lies immediately north of the Property along Woodley Road, NW, and west of the Property across Wisconsin Avenue, NW. The Applicant has likewise advised ANC 3A of the subject request and will present the proposal at the ANC's November 17 public meeting.

The Applicant will update the Board regarding its engagement with ANC 3C and ANC 3A, as necessary, prior to the public hearing.

VII. HPO Outreach

Given the Property's location within the Washington National Cathedral and Close Historic District, the Applicant has also apprised staff from the Historic Preservation Office ("HPO") regarding the proposed modifications. HPO staff advised that it did not have any preservation or design-related concerns with the request and that the application would be considered administratively by HPO, without the requirement for review by the Historic Preservation Review

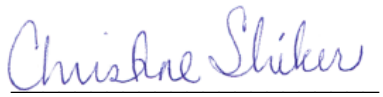
Board. The Applicant will continue coordinating with HPO as the project moves forward, as appropriate.

VIII. Conclusion

For the reasons set forth above, and pursuant to Subtitle Y § 704, the Applicant respectfully requests approval of a Modification With Hearing to BZA Order No. 17996, as modified by Order Nos. 17996-A through 17996-C. The proposed construction of three new classrooms and courtyard improvements will enhance Beauvoir's educational facilities while maintaining compliance with all applicable zoning requirements and private school special exception standards in the R-1B zone. Moreover, the proposed modifications will not increase enrollment or staffing or otherwise alter the approved nature or intensity of Beauvoir's private school use.

Very truly yours,

HOLLAND & KNIGHT LLP

By: 
Christine M. Shiker

By: 
Christopher S. Cohen

Enclosures

cc: Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2026, a copy of the foregoing Application for a Modification With Hearing filed on behalf of the Protestant Episcopal Cathedral Foundation of the District of Columbia, in conjunction with Beauvoir, The National Cathedral Elementary School, was served via electronic mail upon the following persons at the addresses indicated below.

D.C. Office of Planning
Radhika Mohan: radhika.mohan@dc.gov
Maxine Brown-Robers: maxine.brownroberts@dc.gov
Karen Thomas: karen.thomas@dc.gov
Crystal Myers: crystal.myers@dc.gov

District Department of Transportation
Erkin Ozberk: erkin.ozberk1@dc.gov
Noah Hagen: noah.hagen@dc.gov

Advisory Neighborhood Commission ("ANC") 3C
3C@anc.dc.gov

Single-Member District ("SMD") 3C-08
Commissioner Rick Nash, Representative
3C08@anc.dc.gov

Commissioner Janell Marie Pagats
ANC 3C Chair
3C03@anc.dc.gov

ANC 3A
3A@anc.dc.gov

Commissioner Thaddeus Bradley-Lewis
ANC 3A Chair
3A01@anc.dc.gov



Christine M. Shiker
Christopher S. Cohen
Holland & Knight LLP
Counsel for Applicant