

MEMORANDUM

TO: District of Columbia Board of Zoning Adjustment

FROM: Maxine Brown-Roberts, Project Manager
Joel Lawson, Associate Director Development Review

DATE: September 27, 2024

SUBJECT: BZA Case 19606A – Modification with Hearing for St. Albans School at 3101 Wisconsin Avenue, NW in the R-1B zone.

I. SUMMARY RECOMMENDATION

The Protestant Episcopal Cathedral Foundation and St. Albans School (“School” “Applicant”) requests a Modification With Hearing, pursuant Subtitle Y § 704, to modify Condition #1 of BZA Order 19606 to increase the maximum permitted Full Time Equivalent (FTE) faculty/staff from 145 to 160. The Office of Planning (OP) recommends **approval** of the requested modification as follows:

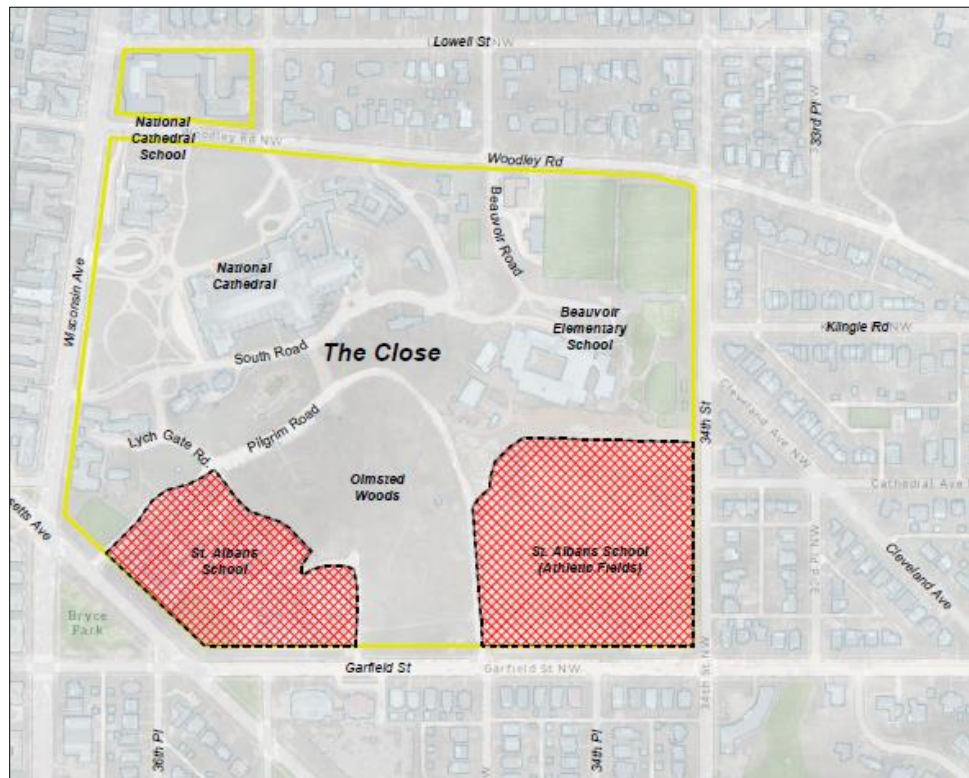
1. *Condition No. 2 in BZA Order No. 17320 is hereby revised to increase the maximum enrollment and employment caps and is replaced with the following condition:*

*The Applicant's maximum enrollment shall not exceed 600 students. The Applicant may employ up to ~~145~~ **160** full-time equivalent faculty and staff. No later than November 1 of each year, the Applicant shall submit to the ANC the total number of students, faculty, and staff for that academic year.*

III. AREA AND SITE DESCRIPTION

Address	3101 Wisconsin Avenue, N.W.
Legal Description	Square 1944, Lot 25
Ward/ANC	Ward 3; ANC 3C
Lot Characteristics	The National Cathedral grounds ("the Close") consists of approximately 57 acres of land at 3101 Wisconsin Avenue, N.W. The Close is bounded by Massachusetts Avenue and Garfield Street to the south, Wisconsin Avenue to the west, Woodley Road to the north, and 34th Street to the east. The topography of the Close is highest at the Cathedral and slopes down towards Garfield Street.

Existing Development	The Cathedral grounds is developed with the National Cathedral, National Cathedral School for Girls, St. Alban's Church, St. Alban's School, the Beauvoir Elementary School, the College of Preachers, residences and accessory buildings. The St. Albans school building are on the southwestern portions of the Close and the athletic fields are on the southeast
Zoning	R-1B
Historic District	The Close is an individual landmark listed in the D.C. Inventory of Historic Places and is on the National Register of Historic Places.
Surrounding Neighborhood Character	To the north are single family detached homes, the St. Luke's Baptist Church and the Mount Zion Baptist Church; to the south are single family detached residences and St. Paul's church; to the west are single family detached residences and the Jesus Christ of Latter Day Saints church all within the R-16 zone. To the east are single family detached residences and West Elementary School in the R-1B zone.
Adjacent Properties	Generally, the area immediately surrounding the Close is residential use. Across Wisconsin Avenue are apartment buildings while along Garfield and 34 th Streets are single-family detached residences. St. Sophia's Greek Orthodox Church is across the street from St. Albans along Garfield Street.



Site Location

II. BACKGROUND and APPLICATION-IN-BRIEF

St. Albans School was established prior to the enactment of the Zoning Regulations. Since then, there have been the following BZA approvals shown on the table below.

Order	Approval date of Order	Activity
BZA Order 8867	October 1, 1971	Addition to the existing school of a Marriott Hall to house library, office and classrooms
BZA Order 12174	November 5, 1976	Renovation of Activities Building; addition to gymnasium; new building for 5 classrooms; maximum 130 parking spaces.
BZA Order 15987	October 1994	Building Addition
BZA Order 17320	September 13, 2005	Allow an increase of 2% over the target enrollment of 568 for a maximum of 579 students; Renovation of Upper School; extension of Marriott Hall; New Underground Performing Arts center; renovation of athletic fields
BZA Order 19606	November 15, 2017	Increase the maximum permitted number of students, faculty, and staff from the then approved 579 students and 143 full-time equivalent faculty and staff to a maximum of 600 students and 145 FTE faculty/staff.
BZA Order 17320A	February 7, 2024	Renovations to and expansion to the Little Sanctuary./

IV. OFFICE OF PLANNING ANALYSIS

The subject site is in the R-1B district and private schools are permitted as a special exception use if they meet the requirements outlined in Subtitle U § 203.1(l) and Subtitle X § 104.1.

2

Subtitle U § 203.1(l) – Private Schools

The proposal to increase the FTE faculty/staff from 145 to 160 meets the requirements of Subtitle U § 203.1(m) as follows:

- (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;*

Noise

No perceptible increase in noise should result from the addition of the fifteen FTE faculty/staff.

Traffic:

The Applicants Transportation Statement [Exhibit 14B](#) states that the additional 15 FTE faculty/staff would generate 8 inbound and 0 outbound trips in the AM peak hour and eight outbound and 0 inbound PM peak hour trips and that this low number of increased peak hour trips is not expected to have a detrimental impact on the surrounding transportation network. The school currently has a Transportation Demand Management (TDM) plan. The statement concluded that there would be:

- No changes to the site access or circulation plan;
- No changes to loading and trash facilities or activity;
- No changes to vehicle parking supply or allocation;
- No changes to bicycle parking supply or allocation;
- The Applicant will continue to implement a pick-up/drop-off plan that provides adequate vehicle circulation so the flow of bicycles and vehicles are not impeded and queueing does not occur in the pedestrian realm;
- No detrimental impact on the surrounding transportation network;
- Continue to implement TDM and the Transportation Statement.

DDOT will provide analysis in a separate report.

Number of Students and Faculty and Staff

No increase in students is being proposed. The proposed increase of 15 FTE faculty/staff is reflective of the need to address the schools needs to address issues brought on by the pandemic and also to address changes in student interest which result in additional staffing needs. The Applicant outlines their needs as:

- Additional security, including receptionists at different entry points to ensure school safety and to enhance the student and visitor experience;
- Additional Information Technology staff to help facilitate and coordinate remote learning opportunities as the school responds to the post-pandemic educational learning environment;
- Additional staff to support the advancement of formalized learning programs which will be tailored to support specific academic needs, differences, and styles (e.g., reading specialists);
- Educational psychology professionals to design accommodations and to formulate educational testing;
- Two on-site health professionals in the School Nurse's office, instead of the current provision of a single on-site nurse, to accommodate post-pandemic health care and record-keeping requirements and to ensure student health and wellness is adequately addressed; and
- Additional development staff to support an upcoming capital campaign that will be launched within the next 12–18 months.
- Some members of the School's administrative, facilities, and/or back-office staff, which were previously considered FTEs of the PECF, will now be counted as FTEs of the School. This alteration does not result in an increase in FTE faculty and staff from those individuals already present at the Property, but it does further the need to increase the School's approved maximum number.

- (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*

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

The proposed increase in permitted FTE faculty/staff would meet the applicable vehicular parking requirements. Per the Zoning Regulations, with the additional staff/faculty the school is required to have a minimum of 189 vehicle parking spaces. However, under BZA Order No. 17320, Condition 4, the school is required to provide 210 to 230 parking spaces. The Applicant states that the school currently provides the spaces within that range. Therefore, the provided parking will remain more than what would be required by zoning regulations for the school.

Additionally, the school currently implements a Transportation Management Plan (“TMP”) that contains several Transportation Demand Management (“TDM”) strategies that were implemented as part of the Board’s approval of BZA Case No. 17320 and BZA Case No. 19606 and would continue to be implemented with the increase in faculty/staff. DDOT will provide a review of impact on the TDM measures.

Subtitle X § 104.1 – Private School Plan

- 104.1 *Education use by a private school shall be permitted as a special exception subject to review and approval by the Board of Zoning Adjustment after its determination that the use meets the applicable standards of Subtitle X, Chapter 9 and conditions of this section.*
- 104.2 *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.*

St. Albans has been at this location for many years as part of the educational campus on Cathedral Close. As demonstrated under the analysis of Subtitle U § 203.1(l), the increase in the number FTE faculty/staff should not be objectionable due to noise, traffic, number of students.

- 104.3 *The development standards for a private school shall be those of the zone in which the private school is located.*

The development standards for private schools in the R-1B zone are outlined in Subtitle U § 203.1(m) and are addressed above.

- 104.4 *In calculating density, the land area shall not include public streets and alleys, but may include interior private streets and alleys within the school boundaries.*

St. Albans is part of the Cathedral Close and this proposal does not include any new construction which would affect the existing density of the development of the Close.

General Special Exception requirements of Subtitle X, Chapter 901.1

- i. *Is the proposal in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps?*

Via the past BZA approvals for the operation of the subject private school the school has been deemed to be in harmony with the purpose and intent of having school in the R-1B zone. As

demonstrated, the proposal would allow the school to better serve the students and the school's needs.

ii. Would the proposal appear to tend to affect adversely, the use of neighboring property?

The requested increase in faculty/staff should not adversely affect the use of neighboring property as the increase should not cause any increase in noise from the school operations. Any potential impacts to traffic and parking will be mitigated through the existing TDM plan.

iii. The special exception will meet such special conditions as may be specified in this title.

The outlined above, the proposal meets the conditions of Subtitle U, § 203 and Subtitle X, § 104 for a private school.

V. COMMENTS OF OTHER DISTRICT AGENCIES

As of the date of this report, comments from other agencies had not been filed to the record.

VI. ANC COMMENTS

The property is within the area of ANC-3C. At its September 16, 2024 meeting, the ANC voted to approve the requested modification [Exhibit 15](#).

VII. COMMUNITY COMMENTS

At the time of this report, there were no letters in the record from any community members.