

# BZA Application No. 19606-A

St. Albans School  
3101 Wisconsin Ave., NW  
(Sq. 1944, Lot 25)



Holland & Knight



# Property Location



# Description of St. Albans

- The School is a college preparatory school for boys which opened in 1909 and is chartered by the Protestant Episcopal Cathedral Foundation of the District of Columbia.
- The School is divided into a Lower School consisting of grades 4-8, and an Upper School consisting of grades 9-12.
- The School currently enrolls less than the enrollment maximum of 600 students.



St. Albans School



# Proposed Modification of Significance to Increase the Maximum Number of FTE Faculty and Staff

- Request for a modification of BZA Order No. 19606 to increase the School's maximum permitted fulltime equivalent ("FTE") faculty and staff from 145 to 160. The School currently employs 142 FTE faculty and staff.
- The requested increase is intended to address the School's hiring needs in the near and long term and includes the following types of staff needs:
  - Reclassification of some members of the School's administrative, facilities, and back-office staff who were previously considered FTEs of the PECF but are now counted as FTEs of the School.
  - Recent hiring needs of the School, which included additional IT staff to facilitate remote learning in the post-pandemic environment and on-site health professionals to accommodate post-pandemic health care and record-keeping requirements. These additional needed positions have resulted in the School nearing the current maximum FTE cap and leaves little room for additional new hires.
  - Near-term hiring needs of the School, which may include additional receptionist at the doors of the School.
  - Long-term hiring needs of the School, which may include additional staff to support children with learning differences or increased staffing for future capital campaigns.

The School anticipates a gradual increase in the number of FTE faculty and staff; the increase will not occur all at once.



# Compliance with the Standard of Review for a Modification of Significance for a Private School

- **Subtitle X § 104, Subtitle U § 203**
  - **11-X DCMR § 104.2; 11-U DCMR § 203.1(m)(1)** – Located so that it will not be objectional to adjoining/nearby properties because of noise, traffic, number of students, or other objectional conditions.
    - *The increase in maximum permitted FTE faculty and staff will not have any perceptible increase in noise levels on adjacent or adjoining properties as the School is not proposing new facilities, renovations, or expansions to existing facilities, and the modest addition of 15 FTE faculty and staff will not create any perceptible difference in existing noise levels.*
    - *The increase in maximum permitted FTE faculty and staff will have a de minimis impact upon the traffic network.*
  - **11-U DCMR § 203.1(m)(2)** – Ample parking shall be provided to accommodate students, teachers, and visitors.
    - *Proposed FTE increase results in a parking requirement of 189, whereas the School is already required to, and does, provide 210-230 vehicle parking spaces.*
  - **11-X DCMR § 104.3** – Development standards will mirror those of the underlying zone.
    - *Proposed FTE increase will have no impact upon the development standards for the R-1B zone.*

# Compliance with the Standard of Review for a Modification of Significance for a Private School

- **Subtitle Y § 704**
  - **11-Y DCMR § § 704.2, 704.3** – Application shall comply with the submittal and filing fee requirements.
    - *See case record. Application includes all relevant information and filing fees.*
  - **11-Y DCMR § 704.5** – Application shall be served on all parties to the original application.
    - *See Certificate of Service. All relevant parties have been served, and community leaders have been notified.*
  - **11-Y DCMR § 704.9** – Filing shall not act to toll or extend the expiration of an underlying order.
    - *Application neither acts to toll or extend the expiration of the underlying orders.*

# Compliance with the Standard of Review for a Modification of Significance for a Private School

- **Subtitle X § 901**

- **11-X DCMR § 901.2(a)** – Will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps.
  - *The modest increase of 15 additional FTE faculty and staff continues to be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps.*
  - *The modest increase of FTE faculty and staff can be granted without causing an undue concentration of population or an overcrowding of land.*
  - *Requested increase provides the School with the flexibility needed to address student needs and to adequately staff operational support functions and administrative needs both in the near- and longer-term.*
- **11-X DCMR § 901.2(b)** – Will not tend to affect adversely, the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps.
  - *The requested increase in FTE faculty and staff will not adversely affect the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps.*
  - *A private school is a use that is permitted by special exception in the R-1B zone.*
  - *The slight increase in FTEs will not cause any impacts to noise, and any potential impacts to traffic and parking will be unnoticeable given the miniscule increase, and because, after a handful of short-term hires, the FTE count will gradually increase towards the maximum overtime.*
- **11-X DCMR § 901.2(c)** – Will meet such special conditions as may be specified in this title.
  - *As discussed on the previous slide, the Application meets the specific requirements for a private school as set forth in both Subtitle U, Section 203 and Subtitle X, Section 104.*

# ANC Support and Community Outreach

- **ANC Engagement and Support**

- **ANC 3C**

- Aug. 8, 2024: Meeting with ANC 3C SMD Representative to discuss the application.
    - Sept. 3, 2024: Presentation to ANC 3C's ZPD Committee.
    - Sept. 16, 2024: ANC 3C voted unanimously to support the application via its consent calendar. (Exhibit 15)

- **ANC 3A (*affected ANC*)**

- Sept. 17, 2024: Presentation to ANC 3A. ANC 3A voted unanimously to support the application.

- **Community Outreach**

- The School engaged with the Neighborhood Liaison Working Group to discuss the School's intent to request an increase to the maximum permitted FTE.



# Office of Planning Report

- **Office of Planning Report** (see Exhibit 17)
  - **OP recommends approval** of the modification to increase the maximum permitted FTE faculty and staff from 145 to 160.
  - OP Report concluded that the increase in the number FTE faculty/staff would not be objectionable due to noise, traffic, or the number of students.

# DDOT Report

- **DDOT Report** (see Exhibit 18)
  - **DDOT has no objection** to the approval of the application subject to the inclusion of its requested condition.
  - DDOT Report concludes that there will be no impact upon the surrounding transportation network given the site's location and the existing TDM Plan, which DDOT continues to support.

# Summary of Existing TDM Plan

- Transportation Demand Management (TDM) is the application of policies and strategies used to reduce travel demand or redistribute demand to other times or spaces.
- School implements a **robust** TDM plan that was originally developed in 2005 as part of BZA Case No. 17320 and updated in 2017 with BZA Order No. 19606. The TDM plan includes the following strategies:
  - No later than November 1 of each year, St. Albans shall submit to the ANC the total number of students, faculty, and staff for that academic year.
  - All faculty and staff who drive to school are, and will continue to be, required to park on the Cathedral Close.
  - St. Albans requires, and will continue to require, all drop-off and pick-up activities to be within areas specifically designated on campus.
  - St. Albans makes available, and will continue to make available, 210-230 parking spaces, located in the Cathedral garage and Cathedral Close on-street parking.
  - St. Albans encourages, and will continue to encourage, its employees to participate in the Foundation's "Commuter Rewards" program to reduce parking demand among faculty and staff.
  - All students who are eligible are encouraged, and will continue to be encouraged, to participate in the DC One Program.
  - St. Albans' parking policy requires, and will continue to require, any student, staff or faculty member who drives to school to register his or her vehicle with the school and to display an identifying hang tag.
  - St. Albans requires, and will continue to require, each parent or legal guardian to agree to the student parking policy when the parent or legal guardian signs each year's enrollment contract. Students who violate the school's parking policy will be subject to disciplinary action to include loss of driving/parking privileges.
  - St. Albans informs, and will continue to inform, all visiting schools in writing of the designated visitor parking and shall direct visitors from such schools to park in those areas. Buses are required to park on the Close or in designated off-street parking spaces.
  - St. Albans limits the hours of its outdoor summer programs from 8:00 AM to 7:00 PM and provides vehicular pick-up and drop-off locations on the Close for participants in the summer programs.

# Summary of Existing TDM Plan (cont.)

- St. Albans does not schedule simultaneous varsity scrimmages or games with other schools on its athletic fields, with the exception of tennis matches and make-up games, and will continue to do so. The school shall not schedule more than five athletic tournaments involving more than one visiting school per year on its athletic fields.
- St. Albans may offer the use of its athletic fields to schools, organizations, or individuals unaffiliated with the school or the Cathedral Foundation during the academic year. The school directs and will continue to direct any unaffiliated users who do not have valid Zone 3 parking permits to park in designated areas on the Close. Unaffiliated users are not permitted to use the athletic fields before or after the school day, or on weekends, during the school year, except for various circumstances.
- St. Albans will continue to offer the use of its athletic fields to unaffiliated users during the summer when school is not in session under the following conditions:
  - St. Albans shall direct unaffiliated users who do not have valid Zone 3 parking permits to park in designated areas on the Close.
  - A single field may be used on a weekday when there is no summer camp activity or St. Albans or Cathedral Foundation activity on that day. The field may be used for up to seven hours, beginning no earlier than 9:00 a.m. and ending no later than 6:00 p.m.
  - A single field may be used four weekday evenings per week; provided, however, that the activity ends no later than 9:00 p.m.
  - A single field may be used each weekend day by a single user either during the day or in the evening if there is no St. Albans or Foundation activity on the weekend day. The field may be used for up to six hours, beginning no earlier than 9:00 a.m. and ending no later than 9:00 p.m.
  - Any vehicular pick-up or drop-off will be directed to occur on the Close.
  - Unless being used by St. Albans, the track may be offered for public use subject to any restrictions placed on such use by the school.
- St. Albans will continue to direct members and require staff and employees of its tennis club who do not have valid Zone 3 parking permits to park in designated areas on the Close when they drive to the St. Albans tennis courts.
- St. Albans works with, and will continue to work with, the previously established neighborhood liaison committee (composed of St. Albans staff and neighbors) for the purposes of coordinating and discussing issues of neighborhood concern, including uses of the athletic fields, traffic, and parking for the School.
- St. Albans routinely coordinates, and will continue to coordinate, with DDOT to enforce parking restrictions in the immediate neighborhood surrounding the Close.

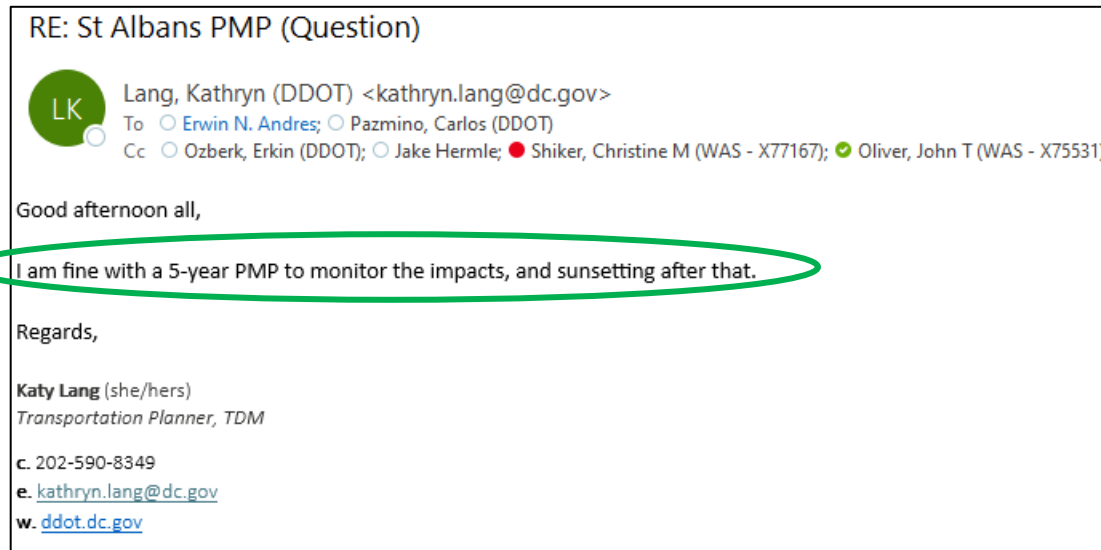


# DDOT Proposed Condition/PMP

- DDOT requests the following condition:
  - The Applicant work with DDOT and goDCgo to modify the TDM Plan submitted in the 9/9/2024 Transportation Statement (Exhibit 14B), and include a Performance Monitoring Plan (PMP) as follows:
    - The Applicant shall submit a report to DDOT once per year. The report will include the following elements:
      - Student enrollment and number of faculty and staff;
      - Total entering vehicle traffic counts for students, faculty, and staff at all site driveways for the busiest morning school drop-off hour;
      - Mode splits, broken down separately for students and faculty and staff, obtained by counters (not travel surveys);
      - Vehicle occupancy counts; and
      - Documentation of any changes to the TDM plan from the previous year, including new or innovative programs.
    - Data collection will be performed on a yearly basis. Data collection will occur on a typical school day during the Spring session when weather conditions are normal. A “typical” school day is defined as a Tuesday, Wednesday, or Thursday when regular school hours are in effect, during a week without holidays, and far enough into the school year that parents, students, and faculty and staff members are accustomed to school operations. Data collection shall include the following:
      - Obtain student enrollment and faculty and staff numbers at the time of reporting;
      - Manual counters or video counters will be employed at each of the four site driveways between the hours of 7:00 AM and 9:30 AM on a typical school day to determine the total entering vehicles during the morning peak hour. These counters will also be used to determine whether the pick-up and drop-off queues extend into public space and the mode split;
      - Manual counters will be employed at the pick-up and drop-off area(s) and the parking lot to count the number of students in each vehicle and the number of employees carpooling. These counts will take place on the same day as the driveway counts; and,
      - A survey of families and faculty and staff will be conducted and cross referenced against the field observations to help determine mode splits by students, faculty, and staff.

# DDOT Proposed Condition/PMP (cont.)

- DDOT's initial condition did not contain a sunset provision. Through discussions, DDOT has agreed to language which would sunset the PMP after five (5) years.



- Applicant believes that a PMP is not necessary because there will be no adverse impact on the surrounding transportation network based on the limited increase in the FTEs. If the Board concludes that a PMP is necessary, the Applicant believes that the PMP should sunset after three (3) years.

# Proposed Modification to Conditions

- Condition No. 1 in BZA Order No. 19606 (which is Condition No. 2 in BZA Order No. 17320-A) is revised to read as follows:
  - The Applicant's maximum enrollment shall not exceed 600 students. The Applicant may employ up to ~~445~~ **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.
- **If the Board determines that the PMP is required**, a new condition would be added as follows:
  - **The Applicant shall submit a report to DDOT once per year, for no more than \_\_\_\_\_ years, in accordance with the requirements set forth in the DDOT Report marked in the record as Exhibit 18.**
- No other modifications to the existing conditions would be required.

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