

## Burden of Proof Statement – Special Exception

Applicant: Children of the Future

Property Address: 2420 Rhode Island Avenue NE, Washington, DC

Relief Requested: Special Exception under Subtitle U § 203.1(g) (Child Development Center)

### 1. Special Exception Criteria

The Applicant (Robert Teachey) seeks approval to operate a child development center at 2420 Rhode Island Ave NE to serve 60 kids with 12 staff (ages 2 ½ to 5 years old) as permitted by special exception under Subtitle U § 203.1(g) of the DC Zoning Regulations. The proposed use meets all criteria established by the Zoning Commission and the Board of Zoning Adjustment:

- Use is expressly permitted: Child development centers are listed as special exceptions in Subtitle U § 203.1(g).
- Neighborhood compatibility: The facility will serve local families and is consistent with the character of the Rhode Island Avenue corridor.
- Traffic and parking: The Applicant has prepared a transportation plan to mitigate traffic impacts. Drop-off and pick-up procedures are designed to avoid congestion.
- Noise and safety: Operations will be indoors, with no adverse noise or light impacts. Safety measures, including a fire evacuation plan, have been developed and submitted.
- Public welfare: The project expands access to early childhood education and supportive services, directly benefiting Ward 5 families.

### 2. Compliance with Zoning Intent

The proposed use is consistent with the intent of the Zoning Regulations to allow childcare and community-serving facilities in residential and mixed-use districts by special exception. The project strengthens neighborhood stability, supports working families, and aligns with District policy goals for equitable access to education.

### 3. Supporting Documentation

- Evacuation Plan: Customized for the site, with labeled exits and compliance features.
- Certificate of Occupancy History: Prior use of the property as a childcare facility (Geneva Ivey Day School, Mind Bloom Preschool) establishes precedent.
- Community Support: Letters of support from ANC representatives.
- Inspection Records: Documentation of passed inspections and compliance with safety requirements.

#### 4. Conclusion

The Applicant respectfully requests that the Board grant the special exception, as the proposed use satisfies all criteria under Subtitle U § 203.1(g), will not adversely affect the public welfare or neighboring properties, and will provide essential services to families in the District.