

## 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:

The Applicant will utilize the church's existing off-street parking lot, which accommodates up to 30 vehicles. This established parking area has historically served the site's community functions and continues to be available for our program's use. The lot provides sufficient capacity to meet staff and visitor parking needs associated with the proposed child development center. Accordingly, the use of this existing 30-space lot ensures compliance with the parking expectations under Subtitle C and supports the Applicant's position that no adverse impacts will result from the operation of the center. The continued use of this lot is fully consistent with the general special exception standards outlined in Subtitle X §901, as it remains in harmony with the purpose and intent of the zoning regulations and will not adversely affect neighboring properties."

- 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.

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#### 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.

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