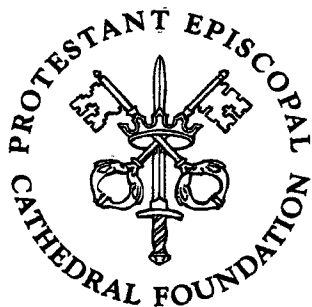




To: District of Columbia Zoning Commission

From: Kathleen Cullen, Executive Director Community Relations,
Protestant Episcopal Cathedral Foundation

Date: December 29, 2008

Re: Summary of Points Relating to Proposed Amendments to
Zoning Regulations – Campus/Institutional

The Protestant Episcopal Cathedral Foundation of the District of Columbia (PECF) wishes to submit its final summary (follow up to December 10th memorandum) of its concerns with respect to proposed zoning regulation changes as they pertain to independent schools.

1. The existing special exception process to the Board of Zoning Adjustment has worked well. Under the basic structure of Zoning, these school uses -- pre-K through grade 12 -- have always been deemed compatible with single-family residential zones, along with other uses that make up a residential community.

If additional information is required for BZA filings or more detailed criteria is needed, such changes could be incorporated in the existing special exception provisions.

2. The inherent nature of pre-K to 12 private schools makes the potential requirement of a campus plan process economically and functionally inappropriate. The magnitude of differences from colleges and universities illustrate why a campus plan process and requirement would be onerous on private schools and harmful to their educational mission. Here are some differences:
 - a. Small administrative and teaching staff. Colleges and universities have hundreds of times that amount.
 - b. Private schools have limited funds and have a difficult time raising funds to exist and carry out their educational and outreach programs.
 - c. Our schools have limited and short-term planning goals based on programs that do not frequently change.
 - d. Facilities are limited. Frequently, schools are located within only one to three structures grouped together. This is nothing like colleges or universities where the permitted gross floor area can be allocated over a large campus area.
 - e. The nature of the school is essentially local and community oriented without a significant national or international composition.
 - f. There normally is no significant residential component, such as the large-scale housing requirements for colleges and universities.

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- g. There are no separate facilities such as libraries or commercial accessory functions which operate at extended night hours.
- h. The schools have limited hours of operation with no regular after-hours student social or academic activity, and little if any activity other than seasonal athletics on the weekends.

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3. The square footages of the total programs are dramatically different from colleges or universities which have extremely large campuses and a multitude of buildings and uses. Square footage includes spaces such as student dance studios, theaters, cafeterias and libraries which do not represent increased intensity of usage. Aside from staff and faculty, there are very few students that drive. Sport activities and extracurricular activities are limited in hours and in scope. Even at a large Homecoming game, the spectators number in the hundreds, not tens of thousands as they do for a university. The extensive costs of a campus plan would require reallocation of funds.
 - a. Under previous Zoning Regulations, separate provisions applied to private schools as compared to academic institutions of higher learning. While both previously were reviewed by the Zoning Commission, the requirements for a campus plan were extensive for the latter but did and do not apply to the former.
 - b. In order to prepare a campus plan, an institution would have to retain the services of many consultants, including educational consultants, economic consultants, land planning consultants, design architects, landscape architects, traffic consultants, engineering consultants and lawyers. The heavy burden of costs for the preparation of such a campus plan should be obvious. Such costs would easily run in the hundreds of thousands of dollars.
 - c. As noted above, private schools have a difficult time meeting their education and outreach missions on the funding that they raise today. A huge proportion of funds would have to be made from those funds to bear the expense of a campus plan, which places an extreme hardship on the private schools.
 - d. The ironic result would be that private schools would have to increase enrollment and build more facilities in order to become financially solvent at a higher level. This, in turn, increases the intensity of use within a given community.
4. Consistent and successful review by Board of Zoning Adjustment.
 - a. Objective measurement of impacts in the community are appropriate when a school is established or enlarged. However, contrary to the apparent position of the Office of Planning, gross floor area is not a measurement that directly relates to impact. In state-of-the-art schools, larger facilities are required simply to accommodate new technology along with social, cultural and athletic opportunities. This does not mean that there is more traffic or noise in a community.

- b. Criteria for the Board of Zoning Adjustment to apply in a special exception has, in fact, measured the placement and size of a private school facility, traffic impacts on circulation and parking, potential for noise as governed by hours of operation and uses, exterior observable lighting and general activity, which is usually very low.
- c. The BZA is certainly competent to measure these facilities, to receive comments from the community, and to impose conditions that are appropriate.

In closing, we believe that the special exception process has worked well and that if additional criteria and filing requirements are needed, they can be accommodated with amendments to the existing Regulations.