

December 14, 2015

BY ELECTRONIC FILING

Chair Martinique Heath, AIA  
Board of Zoning Adjustment  
441 4th Street SW, Suite 200S  
Washington, DC 20024

**Re: Application of J. River 1772 Church Street, LLC and St. Thomas' Episcopal Parish, Case No. 19133**

Dear Chair Heath and Members of the Board:

I am a resident of Ward 2 in the District of Columbia. I am writing in strong **SUPPORT** of the Applicant St. Thomas' Parish and J. River 1772 Church Street, LLC in Case No. 19133. I urge you to grant the application.

**1. The variance for St. Thomas' will benefit the public good of the Dupont Circle community and the District of Columbia.**

St. Thomas' Parish has been on Church Street and has been an active member of the Dupont Circle and Washington, D.C. communities since 1894. St. Thomas once had one of the most prominent church buildings in the District. It provided shelter for those protesting war and social injustice in the 1960s and 1970s. St. Thomas cared for people battling AIDS in the 1980s when very few would, and has been a leading advocate of social justice, including affirmation of same-sex marriage. St. Thomas supports initiatives addressing homelessness and transitional housing. Its facilities are heavily used during the week by a variety of community groups.

In reaction to its social justice advocacy, arsonists burned the main church building to the ground in 1970. Since then, St. Thomas' has operated out of the surviving parish hall that was behind the church. However, the parish hall was never designed as a permanent place of worship, and St. Thomas always intended to rebuild. The parish hall, which is in need of substantial repair, is no longer adequate for the St. Thomas' current needs, much less for sustaining a thriving community through the next century.

The new church building that is part of the Project must meet the essential needs of the parish, as determined through a long and detailed planning process that was conducted by a large number of St. Thomas' members. These essential needs for adequate worship space and program space dedicated to the mission and outreach of the parish to serve the Dupont Circle community drive in part the requested variance.

St. Thomas' has weathered much over the past 45 years as a parish with inadequate facilities, and it does not intend to end up with a facility that does not support the basic needs it has identified for engaging in its ministry and mission for the next 100 years. St.

Thomas' will certainly continue to contribute to the public good by constructing a new building that is designed with that goal in mind. To my knowledge, no opponents to the project allege that St. Thomas' work does not benefit the public good of the Dupont Circle community and the District.

**2. The Project easily meets three-prong test for an area variance.**

The Applicant easily meets the requirements under the BZA's three-prong test for an area variance. It is difficult to build on St. Thomas' site due to the need to preserve the existing historic parish hall structure while constructing parking underneath. As discussed in detail in the Statement of the Applicant, the retention of the surviving parish hall, the necessary characteristics for the church and residential building, and keeping the existing property line all result in an exceptional situation or condition that drives the proposed footprint.

Attempting to deviate from the footprint dictated by those characteristics of the property would create a significant practical difficulty for the Applicant.

**3. Granting of the variance will not cause substantial detriment to the public good or substantially impair the intent, purpose, or integrity of the zone plan.**

Granting the requested variance will not cause substantial detriment to the public good or substantially impair the intent, purpose, or integrity of the zone plan.

***As an initial matter, the requested variance for 86.7% coverage is in fact virtually the same as the lot coverage of the original church and parish hall structure before the arson attack, which I understand from the Applicant's architect is estimated to be between 86% and 87%. Therefore, this variance is best viewed as making St. Thomas whole and returning it to the position it had prior to the fire. St. Thomas should not be penalized for having been the victim of the crime of arson.***

Second, the Applicant has already scaled back the upper floors of the residential structure to accommodate HPRB and neighborhood concerns regarding mass, light, and air. The Project has a proposed FAR of 4.22, which is significantly less than that permitted as a matter of right. The lot coverage on the ground level is what makes the set backs on upper floors possible. Thus, the variance allows for both a less bulky building and lower density, consistent with the purpose of the Zone Plan.

Opponents argue, largely in form letters, that the size and mass of the proposed building is too large for its location. This argument simply has no foundation. As discussed above and in the Statement of Applicant, as the result of numerous meetings with neighbors the Applicant substantially reduced the upper floors of the building to address neighborhood concerns regarding mass, light, and air. Also, as discussed in more detail in the Statement of Applicant, the proposed building is wholly consistent with the height and density of other residential and office buildings in close proximity. Finally, until

destroyed by arsonists in 1970, the St. Thomas' building **in the same location** that **had virtually the same lot coverage**, just like many other existing churches in the Dupont Circle neighborhood. Finally, the DDOT traffic study submitted in this docket show that the traffic impacts on the relevant streets and alley will be minimal, if even noticeable at all. Opponents' arguments have been addressed.

\* \* \*

St. Thomas' unique situation makes it an ideal candidate for a variance. For the foregoing reasons, I strongly urge the Board to approve the subject application.

Respectfully submitted,

*/s/ Brett A. Snyder*

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