



COUNCIL OF THE DISTRICT OF COLUMBIA  
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WASHINGTON, DC 20004

**JACK EVANS**  
Councilmember, Ward 2  
Chair, Committee on Finance and Revenue

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December 10, 2015

Chair Martinique Heath, AIA  
Board of Zoning Adjustment  
1100 4<sup>th</sup> Street, SW, Suite 200S  
Washington, DC 20024

Dear Chair Heath and Members of the Board:

I am writing to express my concern about an application before the Board of Zoning Adjustment regarding 1772 Church Street NW, BZA Case Number 19133, scheduled for your December 15, 2015 public meeting. I have been following this project closely for over a year and assisted in convening a committee of neighbors, ANC Commissioners, and representatives of the applicant to discuss concerns with the project and to seek community consensus on a path forward that meets the needs of the church and is consistent with the Dupont Circle Historic District and Dupont Circle Zoning Overlay District.

Unfortunately, the proposed plan before you today and the request for variance are not consistent with either.

I support St. Thomas Parish in their efforts to rebuild their church, and their desire to remain in the Dupont Circle community, of which they have long been a contributing member. However, my concern and that of many neighbors is that the building as proposed is too massive for Church Street NW. The issue before you today is not simply a request for variance against the typical three-pronged approach, but also a request for variance to the Dupont Circle Zoning Overlay, which states, *"The Dupont Circle area is a unique resource to the District of Columbia that must be preserved and enhanced. Strong protections are needed to retain its low scale, predominately residential character."* Furthermore, the overlay district's stated purpose is to, *"Require a scale of development consistent with the nature and character of the Dupont Circle area in height and bulk; and to ensure a general compatibility in the scale of new buildings with older, low scale buildings by restricting the maximum permitted height and floor area ratio of new buildings to that of the underlying zone."*

With that sentiment in mind, I would strongly oppose the notion by the applicant that the historic nature of the property and presence of a rectangular existing parish hall on a flat, rectangular lot creates a unique impediment to meeting zoning requirements (prong 1).

Additionally, the position of the applicant that the most feasible and historically-compatible design is a large rectangular box, because of again, an existing parish hall, does not hold as the original church structure (indisputably the most historically-compatible design) did not exceed an 80% lot occupancy. The Dupont Circle Overlay District was created to protect the character and particular nature of the neighborhood so as to, *"Enhance the residential character of the area by maintaining existing residential uses and controlling the scale, location, and density of commercial and residential development."* If the proposed 55 unit residential component of the project cannot be built without a variance, then it does not conform to the overlay district, exceeding the weight of any "practical difficulty." Furthermore, the

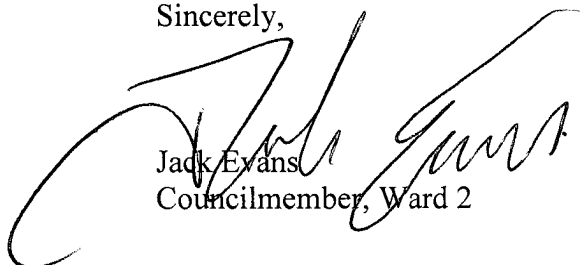
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EXHIBIT NO. 69

applicant states that because the Parish Hall portion of the building does not extend to the 7<sup>th</sup> Floor, it cannot contain the main building core. While that may be true of an elevator shaft or stairwells, the applicant provides no reason by the lobby, mailboxes, trash area, or first floor corridors cannot be contained within the Parish Hall ground floor footprint. (prong 2).

Finally, to the issue of whether this relief can be granted without substantial detriment to the public good and without impairing the intent, purpose and integrity of the zone plan, I believe my previous comments address the issue of why this variance significantly conflicts with the Dupont Circle Zoning Overlay, but would like to further address the issue of public good. This project will be built adjacent to a 12-foot public alley, which if this building is built as proposed, will experience increasing physical and vehicular pressures from both the immediate massing of the building flush with the alley and the cars from the new residential neighbors and the accompanying service vehicles. As the applicant has stated, the project won't push back from Church Street or 18<sup>th</sup> Street, so this variance creates additional lot occupancy on the alley side, on the ground floor and on subsequent levels. In addition to the increased physical harm that this building will place on the alley, the subsequent floor space creates a detriment to the neighbors across the alley, as the Dupont Circle Zoning Overlay sought to preserve "backyards and protect the light, air, and privacy that they provide" (prong 3).

Thank you for your time and attention to this matter. I would like to point to the Advisory Neighborhood Commission 2B resolution in opposition, as well as the testimony of both the Dupont Circle Citizens Association and the 'Church Street Neighbors', as fully clear evidence that this variance is not in keeping with the Dupont Circle Zoning Overlay District, and therefore should not be approved.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Evans", written over a printed name and title.

Jack Evans  
Councilmember, Ward 2