GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF PLANNING

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Office of the Director

MEMORANDUM

DATE: March 9, 2001

TO: District of Columbia Board of Zoning Adjustment

THROUGH: Andrew Altman, Director OP
Ellen McCarthy, Deputy Director OP

FROM: David J. McGettigan, AICP

SUBJECT: Board of Zoning Adjustment Case No. 16648
BP Amoco Store No. 84661
306 H Street, N.E.

ATTACHMENTS:

1. Letter from John Patrick Brown, Jr
2. Joint response from community
3. Response letter from Mr. Brown

BP Amoco Store No. 84661 Supplemental Staff Report

Summary

As indicated in the original report BP Amoco Corporation's request for a special exception for redevelopment and expansion of a gasoline service station in the C-2 district should be denied.

Issues:

- In considering this case, the Board should consider if the application would be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps. Based on the analysis of the Office of Planning, the proposed design will not be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps.
- The Board should determine if granting the special exception would adversely affect the use of neighboring property in accordance with the Zoning Regulations

BZA
Case No. 16648
Exhibit No. 95

Board of Zoning Adjustment
District of Columbia
CASE NO.16648
EXHIBIT NO.95

and Zoning Maps. The inconsistency of the proposed design with the Comprehensive Plan will adversely affect the use of neighboring property as envisioned by the General Provisions, Transportation, Urban Design and Land Use elements of the Comprehensive Plan as well as the Ward 6 Plan. In addition, the increased noise, air pollution, and light pollution will adversely affect neighboring residential dwellings.

- The Board should review the special conditions established in Section 726 for gasoline service stations in the C-2 district. Due to the unacceptable design of the proposed facility the applicant does not meet the special conditions established in Section 726.

Background

The Board of Zoning Adjustment heard preliminary matters regarding this case on December 19, 2000. The project did not have support of the community, the Office of Planning or the Metropolitan Police Department. Council member Sharon Ambrose requested deferral of the hearing to permit her to testify before the Board. The Board, noting the opposition shown to the project, asked the applicant to go back to the community and develop a proposal that would be acceptable.

During this time BP Amoco has continued with demolition of the buildings under its control, excluding the existing canopy and pump islands. In addition, 316 H Street, which was under review for historic designation, still stands, but will soon be demolished if no one agrees to buy and relocate the structure[1]. In a letter dated December 21, 2000 the applicant's attorney requested input from the community with the caveat that "BP Amoco is simply a gasoline company and not able or willing to consider other development options (e.g. office, retail, housing)" (Attachment 1). A joint response from Scenic America, the DC Preservation League, the Committee of 100 on the Federal City, the National Trust for Historic Preservation, the Residents of Square 776, the Capitol Hill Restoration Society, the Stanton Park Neighborhood Association, the Near Northeast Citizens Against Crime and Drugs, and the H Street Association of Merchants and Professionals (Attachment 2) suggested the following goals be used in developing the project:

1) Reflect and contribute to the urban environment
2) Respect the surrounding neighborhood
3) Respect the surrounding neighborhood

To meet these goals the following design changes were recommended:

1) Locate the convenience store—preferably a 2-3 story structure—at the corner of Third and H Street with a pedestrian entrance from the H Street sidewalk. Buildings at corners are especially important and effective in reinforcing the urban streetscape.
2) Retain and re-use any existing historic structures in the redevelopment proposal, especially 316 H Street, NE.

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[1] BP Amoco offered to sell the structure for $1 a follow-up letter if arrangements for relocating it could be made within 30 days.

3) Install the pumps and canopy behind the building, parallel to Third Street, with appropriate screening from adjacent residential properties.
4) Maintain and improve the existing system of alleys to facilitate vehicular circulation to the gas station and residential structures. Reduce to a minimum any curb cuts.
5) Ensure that if there is a car wash - it is oriented and designed to significantly minimize disruption to adjacent residential properties.
6) Develop commercial retail or office uses on that portion of the site between the alley and Fourth St. or facilitate appropriate commercial development of the site.

The plan BP Amoco has now proposed only addresses a part of one of these six suggestions by maintaining the existing alley system.

Plan Description

The resulting plan from the negotiations with the residents of Square 776 has resulted in BP/Amoco bringing a similar design back to the Board that is confined to the limits of existing lot 53. The canopy layout proposed is a 2x4 design instead of the original 1x8 occupying the front half of the site. Behind this fueling area, well back from the street is situated the same 4224 square foot mini-mart originally proposed.

For vehicular access to the development, will maintain the existing two entrances on H Street, two entrances off 3rd Street and a 100' entrance of the existing mid-block alley. The intensity of vehicular use of the site will still be greatly increased. Besides the 16 vehicle fueling stations and associated circulation lanes around the pump islands, the development proposes 20 parking spaces, and a loading space.

The landscaping proposed is inadequate to provide any useful function as a screen or buffer. The original 3' wall has been removed from the plan and the architecture is the same as originally proposed. Instead of the lower monument sign originally proposed on the corner of H and 3rd Streets a larger 15'+ sign is proposed.

Comprehensive Plan Analysis

The new design fails to meet any of the comprehensive plan issues raised in the original staff report. BP Amoco's insistence on a design that is incompatible with the neighborhood and the Comprehensive Plan (D.C. Law 12-275) does not respect the laws and regulations of the District of Columbia. The attempt by the applicant's supplemental statement to convince the reader that the new proposal is "dramatically" scaled back does not reflect how inappropriate and out-of-scale the applicant's initial proposal was.

Zoning Analysis

In Harmony with the General Purpose and Intent

The applicant's proposal to expand the gas station from an approximately 5,000 square foot fueling area to an approximately 16,000 square foot fueling area with accessory convenience store is designed to serve the automobile commuters using the H Street corridor. As indicated in the original OP report, this is not the type of development

appropriate in the C-2-A, Community Business Center District, which is "designed to provide facilities for shopping and business needs, housing, and mixed uses."[2] The applicant has demolished 70% of Square 776 and the entire H Street frontage for their development. The applicant has offered no information on what it will do with the remainder of the property. Having assembled this property, a coordinated development should be designed incorporating a mix of uses including office and residential uses. A mix of uses is required for stability, livability, and security. Development of a large portion of the block for a gas station will deprive the neighborhood of space for uses needed to revive the neighborhood. [3]

As discussed before, good urban design is in harmony with the general purpose and intent of the Zoning Regulations. The role of good urban design in furthering the purposes of the zoning ordinance to provide a use of land "that will tend to create conditions favorable to transportation, protection of property, civic activity, and recreational, educational and cultural opportunities"[4] is encompassed in an entire chapter of the Comprehensive Plan devoted to urban design. As discussed in the comprehensive plan analysis from the original OP report, the design proposed does not represent good urban design.

Adversely Affect Use of Neighboring Property

As indicated in the original report the proposed development will adversely affect the use of nearby properties. The demolition that has proceeded under the auspices of this design and BP Amoco's refusal to abide by the urban design guidance of the Comprehensive Plan (D.C. Law 12-275) will adversely affect the use of nearby properties and cannot be deemed to be in harmony with the general purpose and intent of the Zoning Regulations and Map. The building that originally occupied Lot 53 provided a substantial buffer between the existing station and the adjoining residences. The removal of this building and the design proposed by the applicant would combine to significantly increase the adverse impacts on the residential neighbors.

Special Conditions for Gasoline Service Stations

As indicated in the original report, due to the unacceptable design of the proposed facility, the case will not meet the special conditions established in Section 726. Section 726.1 requires the Board to consider the conditions of Section 3104, which are discussed above, the conditions of Chapter 23, and the provisions of Section 706. Section 726.2 requires referral to the Office of Planning for this report.

As discussed in the original staff report this proposal does not meet the requirements of section 726. BP Amoco's proposal does not meet the design, appearance, screening, lighting, noise, odor, streetscape, landscaping, or buffering concerns of the Office of Planning. The Office of Planning does not object to a small expansion of the existing gas station but does object to a poorly designed one. The current design is so inimical to the urban fabric of the H Street corridor that no requirements pertaining to design,

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[2] Zoning Regulations of the District of Columbia, Chapter 1, Section 720.2, pg. 7-10.

[3] The corridor needs housing, offices, arts, entertainment, restaurants and a defining streetscape.

[4] Zoning Regulations of the District of Columbia, Chapter 1, Section 101.1(c), pg. 1-2.

appearance, screening, lighting or other issues listed above could be developed to protect adjacent nearby property.

As discussed in the initial OP report the applicant is required to maintain a 40' separation between the curb lines extended of an intersection and the nearest entrance/exit. BP Amoco proposes to maintain an existing entrance that is in clear conflict with this requirement.

Other Agencies – Comments from the Department of Public Works, the Department of Health, the Office of the Fire Marshall and the Metropolitan Police Department were solicited by the Office of Planning. No new comments have been received from these agencies at the time of this report, except the Trees and Landscape Division. The Trees and Landscape Division has no additional comments.

ANC's and Community Groups – The applicant presented its application to ANC 6A on March 1, 2001. One of the two simultaneous meetings held by different members of the Commission had a quorum and voted to oppose the project. A number of letters have been received in the record against the project. No official comments on this project have been received from ANC 6A at the time of this report.

Recommendation

The Office of Planning recommends that BZA application 16648, requesting a special exception to permit redevelopment and enlargement of a gasoline service station be denied. The applicant's caveat that it "only sells gasoline" prohibited any meaningful discussion of the proposed design with the Office of Planning. The applicant is still unwilling to change the site design.

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December 21, 2000

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801 Pennsylvania Avenue, S.E.
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Re: BP Amoco Corporation
BZA Application No. 16648

Dear Ladies and Gentlemen:

Following the Board of Zoning Adjustment's ("BZA") hearing on December 19, 2000, BP Amoco has requested that I contact the various persons and organizations who have expressed concerns and/or opposition to this project. Over the last three months, BP Amoco has met with a great many persons and organizations, both in support and opposition, in more than a dozen different meetings. The current plan incorporates many, but not all, comments and suggestions which have been offered

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from a variety of sources and at different times. In order to attempt to move this consultation process forward, BP Amoco wants to solicit and receive specific comments which represent the consolidated and coordinated input of the various elements of the community.

Accordingly, on behalf of BP Amoco, I am requesting that the community elements, working together, provide us with specific and detailed written input on this proposed project. As a starting point, consideration should be given to the project as it has evolved and is currently proposed, including the gasoline station, convenience store/foodmart, and car wash. Please note that BP Amoco is simply a gasoline company and not able or willing to consider other development options (e.g. office, retail, housing). In order for BP Amoco to effectively review and respond to the community's input, the information must be specific. For instance, "scaled back" without any specificity as to details of what, where or how much will not be helpful.

Given the impending holidays and the number of community participants, BP Amoco wants to allow sufficient time for the group to meet and formulate its unified views. Hopefully this can be accomplished not later than Monday, January 8, 2001. If this schedule proves difficult, please let me know.

I have attempted to make this letter inclusive (without regard to the limits of party status before the BZA) as it relates to the various community participants. If I have failed to include anyone or any group, it was not intentional and your guidance on who should be added to the list would be greatly appreciated.

GREENSTEIN DELORME & LUCHS, P.C.

Best wishes to each of you for a safe Holidays and successful New Year.

Very truly yours,

GREENSTEIN DELORME & LUCHS, P.C.

By: _____
John Patrick Brown, Jr.

JPB/sp
cc: The Honorable Sharon Ambrose
Ms. Ellen McCarthy, Office of Planning
Mr. David McGettigan, Office of Planning
149256

Scenic America
DC Preservation League
Committee of 100 on the Federal City
National Trust for Historic Preservation

Residents of Square 776
Capitol Hill Restoration Society
Stanton Park Neighborhood Association
Near Northeast Citizens Against Crime and Drugs
H Street Association of Merchants and Professionals

January 10, 2001

Mr. John Patrick Brown
Greenstein DeLorme & Luchs, P.C.
1620 L Street, NW, Suite 900
Washington, DC 20036

Re: BP Amoco Corporation
BZA Application 16648
S.O. Application 00-90

Dear Mr. Brown,

Pursuant to your request in a letter dated December 21, 2000 for specific comments that "represent the consolidated and coordinated input of various elements of the community", we have tried below to provide you with some guidance which we believe represents the majority view. It is unlikely that all elements of the community will ever be in full agreement; however, the community and the Office of Planning have given you a remarkably consistent set of comments. Those comments have been echoed by organizations with significant local and even national stature such as the Capitol Hill Restoration Society, the Committee of 100 on the Federal City, the National Trust for Historic Preservation, and Scenic America. The Office of Planning prepared a 15 page report outlining in great detail the incompatibility of your proposal with the goals of the Comprehensive Plan, good urban planning principles, and efforts to revitalize this commercial corridor.

Overwhelmingly, the comments you have received repeatedly stressed the need to: substantially improve the existing site in a manner consistent with the urban fabric; provide neighborhood-serving, pedestrian-friendly retail; and eliminate from your plan the need to close the existing system of alleys. These critical issues were identified very early in the review of your project, but are yet to be addressed. Summarized below are some of the goals which we believe to be generally agreed upon, together with suggested ways to accomplish each goal.

1) reflect and contribute to the urban environment
- promote neighborhood-serving, pedestrian access
- maximize retail activity on the street frontage
- provide a density of development consistent with this urban neighborhood

2) respect the surrounding neighborhood
- provide goods and services targeted at the residential community
- develop a project design which is compatible with surrounding uses
- create a project design which increases the value of nearby property

3) encourage additional investment
- demonstrate the potential for redevelopment of existing buildings

On a site this large, there are numerous alternative design possibilities, and we do not want to preclude other, more creative site development solutions. The overwhelming consensus in the community is for BP Amoco to focus its redevelopment efforts on improving the existing gas station, and facilitate a more positive outcome for the H Street frontage to the east and west of the alley. We believe the following suggested site organization could be designed to make a substantial positive contribution to the H Street Corridor:

a) Locate the convenience store - preferably a 2-3 story structure -at the corner of Third and H Street with a pedestrian entrance from the H Street sidewalk. Buildings at corners are especially important and effective in reinforcing the urban streetscape.

b) Retain and re-use any existing historic structures in the redevelopment proposal, especially 316 H Street, NE.

c) Install the pumps and canopy behind the building, parallel to Third Street, with appropriate screening from adjacent residential properties.

d) Maintain and improve the existing system of alleys to facilitate vehicular circulation to the gas station and residential structures. Reduce to a minimum any curb cuts.

e) Ensure that if there is a car wash - it is oriented and designed to significantly minimize disruption to adjacent residential properties.

f) Develop commercial retail or office uses on that portion of the site between the alley and Fourth St. or facilitate appropriate commercial development of the site.

As currently proposed, the project adversely affects the dominant scale and pattern of the H Street Commercial Corridor. It will not provide net benefits to either the Corridor or the surrounding residential community. Please understand it is not the community which bears the responsibility to design an acceptable project, and the above comments should not be construed as the only acceptable solution. It is the responsibility of BP Amoco to design a project which meets the broad general requirements of the District's zoning and planning guidelines; is consistent with the Comprehensive Plan; and is an architectural statement of sufficiently high quality to win community support.

The BP Amoco Corporation has the breadth of the guidance contained in the Planning Office's 15 page report, has heard a consistent set of comments from the community and other organizations, and has ample time to respond with a design that provides a positive model for corporate responsibility.

The Board of Zoning Adjustment has provided an opportunity to redesign this project. We strongly recommend that BP Amoco begin to take seriously the comments which the Office of Planning and the community has provided, and engage in a meaningful process to design an appropriate project.

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cc: Mayor Anthony Williams
Councilmember Sharon Ambrose
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February 12, 2001

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Attachment 3

Re: BP Amoco Corporation
BZA Application 16648

Dear Ladies and Gentlemen:

Since the Board of Zoning Adjustment continued this case, BP Amoco and its representatives have been busy making an internal review of this proposed project and receiving constructive input from the various participants. As a result, I want to provide an update and respond to several issues raised in recent letters.

1. **Community Input/Project Design**. On Saturday, February 3, 2001, we met with a sizable group of Square 776 residents. This meeting with the most directly affected neighbors was extremely beneficial and BP Amoco obtained clear and specific guidance from its neighbors. Based on this meeting and the more general comments in a January 10, 2001 letter forwarded by Mr. Tallant, BP Amoco is currently working on the development of a revised proposal for this project which uses the existing site (Lot 53) and excludes the proposed car wash. I expect to have plans for a revised proposal within the next 10-15 business days and a copy will be provided for review at the offices of ANC 6A.

2. **Environmental Issues**. In its prehearing statement, and at numerous meetings, BP Amoco has provided information and responded to the questions regarding environmental issues at this site. Specifically, the December 13, 2000 ANC 6A meeting included an extensive discussion of environmental issues. At that meeting, D.C. environmental officials for Underground Storage Tanks attended and expressed the view that they had no environmental concerns with the project. However, BP Amoco is more than willing to respond to any additional specific environmental questions. Please direct those inquiries in writing to my attention. I will ensure that BP Amoco provides appropriate written responses. At the same, please note that the Environmental Impact Screening Form ("EISF") is outside the jurisdiction of the BZA. Mr. Sockwell, now Chairman of the BZA, made that clear at the December hearing.

3. **316 H Street, N.E.** The Residents of Square 776 are in favor of the demolition of the buildings fronting on H Street including 316, for public safety reasons. Before going forward with this demolition, BP Amoco has decided to offer this building for One Dollar ($1.00) to the Stanton Park Neighborhood Association, or other appropriate organization, willing to relocate and restore the structure. However, given the continuing public safety threat and nuisance posed by this building, this offer must be accepted within thirty (30) days and a fast track relocation program set in place.

Thank you for your patience while BP Amoco makes appropriate and requested changes to its development proposal. In the interim, if you have any additional questions, please do not hesitate to contact me.

Very truly yours,

GREENSTEIN DELORME & LUCHS , P.C.

By: _____
John Patrick Brown, Jr.

JPB:jc

cc: BP Amoco
The Honorable Sharon Ambrose
Ms. Ellen McCarthy, Office of Planning
Mr. David McGettigan, Office of Planning
Ms. Karina Ricks, Office of Planning

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