

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Jennifer Steingasser, Deputy Director

DATE: August 27, 2012

SUBJECT: **Public Hearing Report** for ZC #11-17, Adams Morgan Church Hotel Consolidated Planned Unit Development and Related Map Amendment

I. SUMMARY RECOMMENDATION

Adams Morgan Church Hotel, LLC has submitted an application for a consolidated Planned Unit Development (PUD) and related map amendment to construct a hotel within and adjacent to the church building owned by the First Church of Christ, Scientist, at Euclid and Champlain Streets, NW in the Reed Cooke neighborhood. In addition to the related map amendment from R-5-B and Reed-Cooke/C-2-B to C-2-B, three areas of zoning flexibility would be required.

The proposal consists of the hotel itself, an adjunct restaurant, a pool, a health club and spa, and underground parking. While the proposal is supported by some Comprehensive Plan policies, the proposed height of 81 feet (as measured from Euclid St.) is inconsistent with several other policies, the land use maps of the Plan, as well as the intent of the Reed-Cooke Overlay. The introduction of a large hotel and restaurant would go against the intent of the Reed-Cooke overlay which seeks to protect the residential character of the neighborhood while allowing some small-scale commercial enterprises. The Office of Planning, therefore, while it supports redevelopment of the site and preservation of the church, cannot conclude that the PUD as proposed is not inconsistent with the Comprehensive Plan or that the PUD would be consistent with the intent and purpose of the Zoning Regulations as required by 11 DCMR §2404 and cannot recommend approval of the PUD as proposed.

II. APPLICATION-IN-BRIEF

Location: Corner of Euclid and Champlain Streets, NW; East of 18th Street, NW and south of Columbia Road, NW; Ward 1, ANC 1C.

Applicant: Adams Morgan Church Hotel, LLC

Current Zoning: R-5-B and Reed-Cooke/C-2-B



Property Size: 42,279 sf

Proposal: A PUD-related map amendment to C-2-B; Construction of a hotel addition to the church building, owned and previously used by the First Church of Christ, Scientist. The maximum proposed height is 81 feet as measured from Euclid Street. The proposed FAR is 3.91.

Relief and Zoning: The proposal would require the following zoning flexibility:

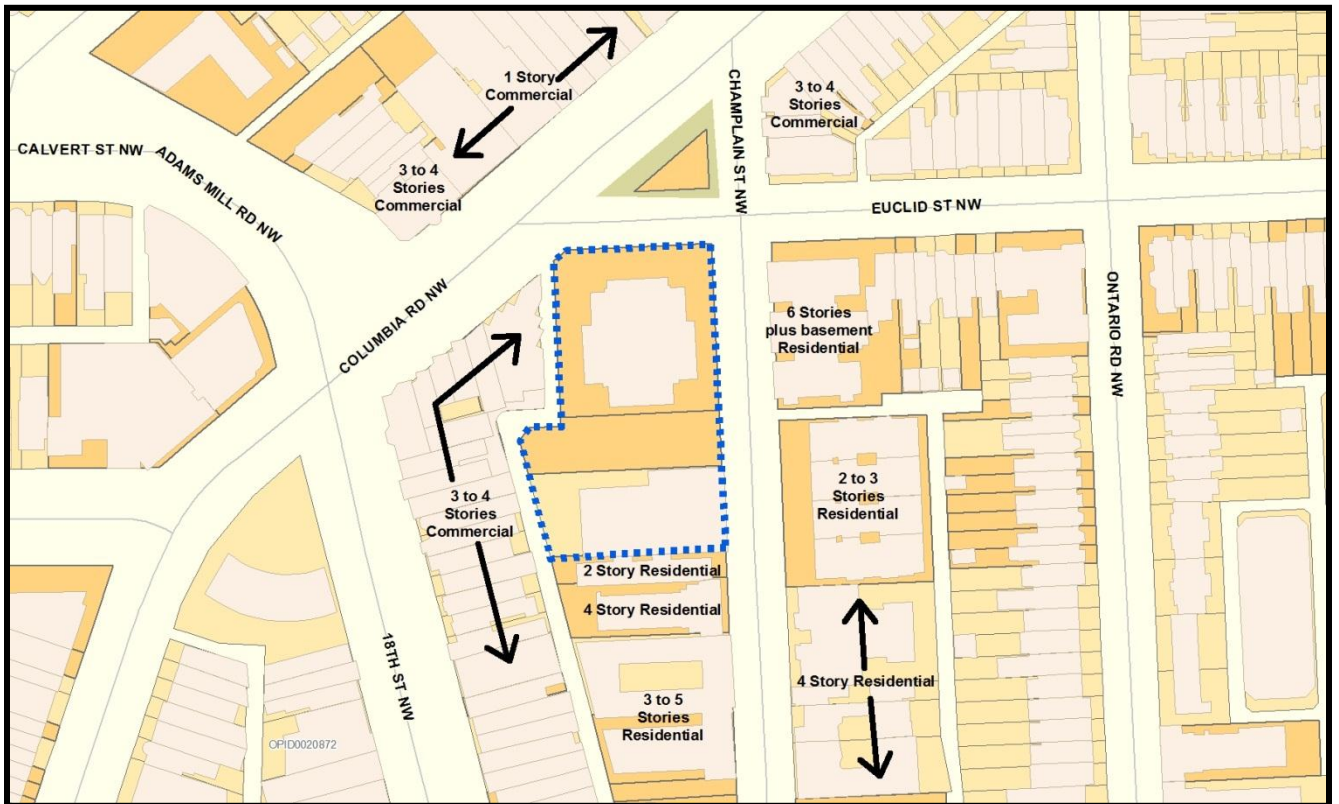
1. PUD-related map amendment;
2. Rear yard (§ 774);
3. Rooftop structure requirements (§ 777); and
4. Loading (§ 2200).

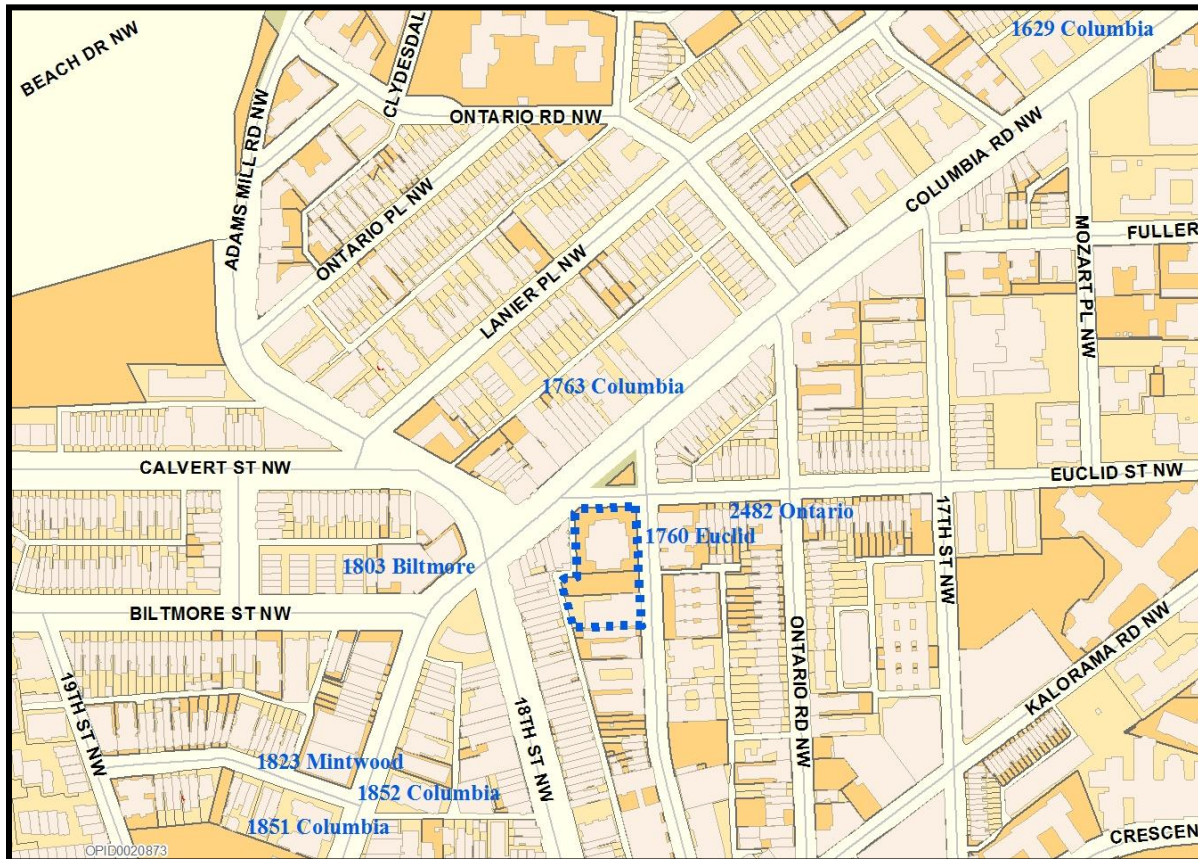
III. SITE AND AREA DESCRIPTION

The subject site is located at the corner of Euclid and Champlain Streets, just east of 18th Street and just south of Columbia Road in the Reed-Cooke neighborhood. An existing church building is on the north end of the site with its main entrance facing Euclid Street. The church building has a height of just under 65 feet. Behind the church building is a parking lot, and south of the parking lot is a three story office building that forms the southernmost part of the subject property. The property slopes down a total of about 13 feet from north to south.

To the east and south is a primarily residential neighborhood with a combination of older apartment buildings and rowhouses. Directly across Champlain Street from the north end of the site and the church building is the Cortland apartment building, which is approximately 70 feet tall and has six stories plus a basement. Adjacent to the south is a two story apartment building. Further to the south along Champlain Street, among other older buildings, are some apartment buildings constructed in the past ten years. Some commercial uses exist along Kalorama Road in the middle of the Reed-Cooke neighborhood. Columbia Road and 18th Street, north and west of the site, respectively, are characterized by moderate density commercial uses. The subject site is separated from the 18th Street commercial uses by an alley that varies in width from 15 feet to about 17.5 feet.

The three images below show an aerial photo of the neighborhood, the number of stories of adjacent buildings, and the locations of buildings cited in the application materials as being comparable in height to what is proposed. Many of the structures in the third image appear in the applicant's site sections on Sheets 18 and 19 of the August 15th plan set, although several of them are two blocks away from the subject site and on the ground are not perceived as being in the vicinity of the subject site. An elevation drawing that only shows the buildings on the west side of Champlain Street would provide a clearer sense of immediate context.





Hotels in a Residential Context

OP was asked about hotels in residential communities and while in general a hotel adjacent to a residential setting would not be unique, the context and proposal for the present application would be unprecedented for the District. In DC there are very few large hotels located near lower-scale structures. One example is the Wardman Park Marriot, which is across Woodley Road from smaller scale development; But it is set back from the street by over 200 feet. The Hilton on Connecticut Avenue adjoins R-5-B, but the surrounding streets – Connecticut Avenue, 19th and T streets – all have much wider rights-of-way than the fifty-feet (50') of Euclid and Champlain streets and the drop-off, parking entrance and loading are dispersed between the three streets. The proposed hotel would directly abut a two story residential building and would be across Champlain Street from three story residential buildings. The proposed hotel would also be constrained in terms of access. While some bed and breakfasts or small hotels exist on narrow streets, OP is not aware of any large hotel with its primary access points on a street as narrow as Champlain. These conditions make difficult the integration of a large hotel into a neighborhood such as Reed-Cooke.

IV. PROJECT DESCRIPTION

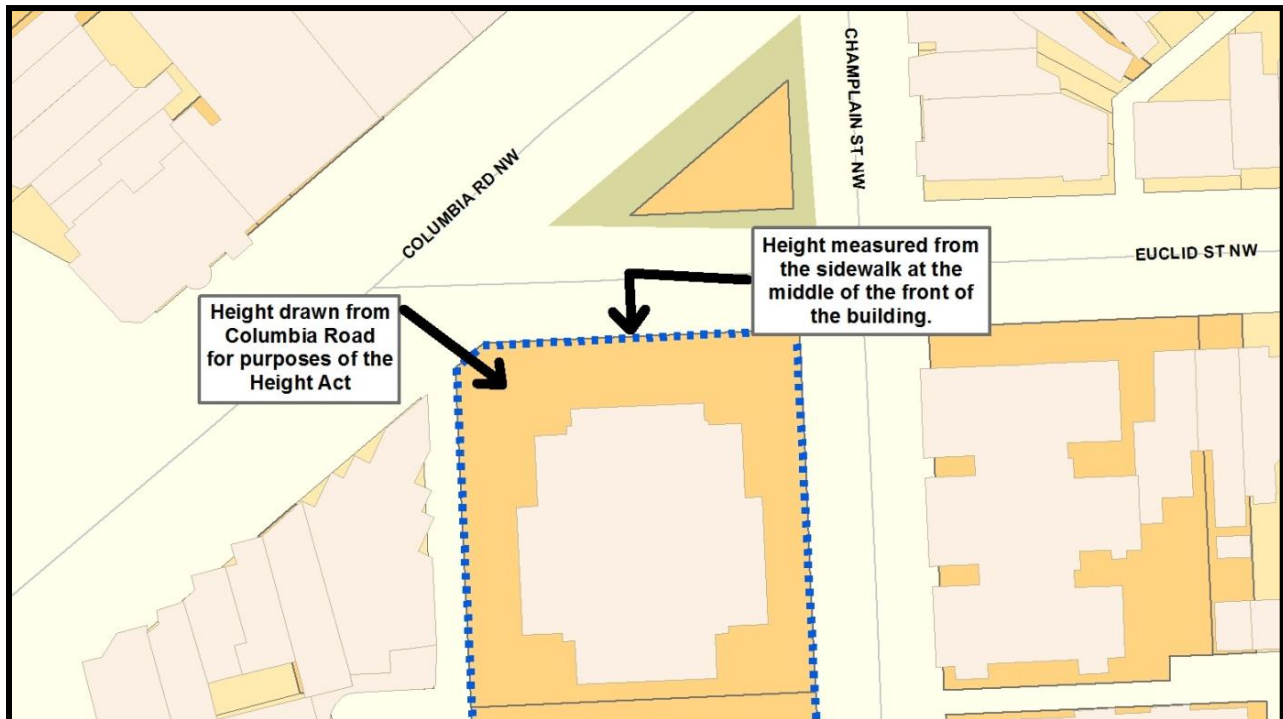
The proposal consists of a hotel addition to the rear of the existing church building. The applicant's August 17, 2012 submission states that the church building has not been used as the

owner's place of worship for the past several years (p. 3). (All application references are to the August submission unless stated otherwise.) The hotel would have up to 227 rooms, and the historic church building would be restored and used as restaurant, lobby and function space. The structures would be connected at the ground and first floors. Entrances would be on Euclid and Champlain streets with an extended porte-cochere and the entrance to the parking garage on Champlain Street. Loading would be from the alley. The hotel addition would generally form a "C" shape with the open end facing south and a swimming pool at ground level of the empty space. In the revised design presented for the public hearing, the arms of the "C" are now double-loaded corridors on the typical floor, whereas they were single loaded at the time of setback.

Height and Design

The applicant proposes a defined zoning height of 81 feet for the hotel as measured from Euclid Street. This is 11 feet less than requested at the time of setback. Nearby road right-of-way widths are 50 feet for Euclid and Champlain Streets and 100 feet for Columbia Road. The northwest corner of the subject property does abut the Columbia Road right-of-way and for purposes of the Height Act, height may be derived from Columbia Road. Height is then measured at the middle of the front of the existing church building facing Euclid Street.

The church building, together with the addition, would be one building. The main roof, as measured from Champlain Street at the center of the porte-cochere, would be about 89 feet above street level. The southeast corner of the building, where the structure steps down, would have a zoning height of 52'9", but would actually be about 66 feet above Champlain Street.



The addition would be eight stories above a ground level where entrances from Champlain Street would be located. The applicant has verbally stated that the ceiling of the ground level would be less than four feet above the Euclid Street measuring point and therefore should be considered a cellar and not a story. The plans, however, do not show the elevation of the ground level ceiling (Plan Set, Sheet 52).

The PUD proposes five levels of below-grade parking, with part of the P1 level occupied by a proffered community center (Sheet 39). The next level up, which would still be below grade, would house a health club and spa. The applicant should provide more information about who would have access to the health club and spa.

The ground level would have a pool, meeting rooms, and a registration desk near the porte-cochere. The applicant should clarify how this registration desk would be used, and how its use would relate to the use of the large reception area in the lobby on the first floor; There is one door just north of the ground floor registration area, but it is unclear if there is a door directly into the registration space (Sheets 41 and 52).

On the first floor, the former main floor of the church would now house the aforementioned reception area, and guest rooms would be located in the new addition. The second floor would be mostly guest rooms, and the third floor – or the upper level of the former church – would house the restaurant. The fourth floor and above would have similar guest room layouts, except there would be a stepback above the fifth floor at the southeastern corner of the building. The applicant should clarify how the south-facing windows may or may not impact privacy for adjacent residents.

The rooftop structures have been significantly reduced in size and complexity since the time of setback (Sheet 50). The main core of the building would result in one structure at the eastern end of the building, and there would be two other smaller and shorter structures at the western end. The roof itself would be open to hotel guests, but the applicant should provide more information about how the roof would be used.

The color palette for the hotel has changed significantly since the time of setback, when most of the building was faced with black brick. The primary material would now be a red brick (Sheet 61). Black granite would provide accents at the base of the building and lighter tan colored brick would be used at the penthouse level. Exterior renderings show the building in context and during day and night (Sheets 70 – 79). Additional information should be provided about signage, as well as the light levels proposed, especially on the Champlain side of the building. Also, additional rendered views would help evaluate the building, including from Biltmore Street near Columbia Road.

V. COMPREHENSIVE PLAN POLICIES

The proposal would further the following Guiding Principles of the Comprehensive Plan, as outlined and detailed in Chapter 2, the Framework Element:

4. The District needs both residential and non-residential growth to survive. Nonresidential growth benefits residents by creating jobs and opportunities for less affluent households to increase their income. (§ 217.4)
7. Growth in the District benefits not only District residents, but the region as well. By accommodating a larger number of jobs and residents, we can create the critical mass needed to support new services, sustain public transit, and improve regional environmental quality. (§ 217.7)
11. The District of Columbia contains many buildings and sites that contribute to its identity. Protecting historic resources through preservation laws and other programs is essential to retain the heritage that defines and distinguishes the city. Special efforts should be made to conserve row houses as the defining element of many District neighborhoods, and to restore neighborhood “main streets” through sensitive renovation and updating. (§ 218.4)
21. Land development policies should be focused to create job opportunities for District residents. This means that sufficient land should be planned and zoned for new job centers in areas with high unemployment and under-employment. A mix of employment opportunities to meet the needs of residents with varied job skills should be provided. (§ 219.6)
24. Despite the recent economic resurgence in the city, the District has yet to reach its full economic potential. Expanding the economy means increasing shopping and services for many District neighborhoods, bringing tourists beyond the National Mall and into the city’s business districts, and creating more opportunities for local entrepreneurs and small businesses. The District’s economic development expenditures should help support local businesses and provide economic benefits to the community. (§ 219.9)

OP is concerned that the application does not adequately address the following Guiding Principles:

6. Redevelopment and infill opportunities along corridors and near transit stations will be an important component of reinvigorating and enhancing our neighborhoods. Development on such sites must not compromise the integrity of stable neighborhoods and must be designed to respect the broader community context. Adequate infrastructure capacity should be ensured as growth occurs. (§ 217.6)
8. The residential character of neighborhoods must be protected, maintained and improved. Many District neighborhoods possess social, economic, historic, and physical qualities that make them unique and desirable places in which to live. These qualities can lead to development and redevelopment pressures that threaten the very qualities that make the

neighborhoods attractive. These pressures must be controlled through zoning and other means to ensure that neighborhood character is preserved and enhanced. (§ 218.1)

The application would further some specific policies from the Comprehensive Plan, including policies from the Economic Development and the Mid-City Area Elements. The project could more sufficiently address policy objectives from the Land Use, Urban Design and Mid-City Elements. The following paragraphs describe some of the applicable policies from the Plan.

Land Use Element

The Land Use Element calls for development along the city's major transit corridors like Columbia Road and 18th Street (§ 306.6). The Plan also supports infill development on vacant or underutilized lots, "provided that such development is compatible in scale with its surroundings..." (§ 307.2). Policy LU-1.4.1 reinforces that concept by stating that "development should complement the established character of the area and should not create sharp changes in the physical development pattern." The design of the proposed hotel should be revisited to ensure that it meets these policies to the greatest extent possible.

Policy LU-2.4.11 calls special attention to hotels by stating that their impacts on surrounding areas should be managed, particularly where they adjoin residential areas. The policy in particular mentions loading, and the loading management plan submitted with the traffic study includes a number of measures to ensure smooth operation of the loading bays.

The Land Use Element also encourages the restoration of unused buildings (Policy LU-2.2.3). Although the church building is still used to some extent, its restoration and integration into a new hotel use would meet the spirit of this policy.

Transportation Element

The Transportation Element supports multi-modal transportation and transportation demand management (§ 400.2). The submitted traffic study includes a number of strategies to encourage the use of bikes and transit, and the walkable neighborhood itself should reduce the necessity for auto trips. Although not immediately proximate to a metro station, the site is within about 0.7 miles from the Woodley Park and Columbia Heights stations.

Economic Development Element

Development of a hotel would help implement some Economic Development policies. Policy ED-1.1.1 suggests that hospitality is a major industry in the District and that its expansion should be supported, and Policy ED-1.1.2 notes that the hotel industry can supply new employment opportunities. Section ED-2.3 speaks in more detail about the hotel economy in the city. It states that the tourism industry should be made more robust, and that hotels should be developed not only in central Washington but also in outlying commercial districts (Policies ED-2.3.1 and 2.3.4). Policy ED-2.3.9 also recognizes that hotels provide a job training opportunity and an

industry for entry-level jobs. The applicant has stated that they will partner with the Adams Morgan Youth Leadership Academy on a jobs training program.

Urban Design Element

Policy UD-2.2.4 speaks about transitions between buildings:

Establish gradual transitions between large-scale and small-scale development. The relationship between taller, more visually prominent buildings and lower, smaller buildings (such as single family or row houses) can be made more pleasing when the transition is gradual rather than abrupt. The relationship can be further improved by designing larger buildings to reduce their apparent size and recessing the upper floors of the building to relate to the lower scale of the surrounding neighborhood.

The Reed Cooke overlay includes this same concept in the overlay purpose statement:

1400.2 The purposes of the RC Overlay District shall be to:

- (a) Implement the objectives of the Reed-Cooke Special Treatment Area, which are to:
 - (1) Protect current housing in the area and provide for the development of new housing;
 - (2) Maintain heights and densities at appropriate levels; and
 - (3) Encourage small-scale business development that will not adversely affect the residential community; ...

The applicant should revisit the design to ensure that it successfully meets this policy.

Mid-City Area Element

The Mid-City Area Element specifically mentions the subject site. Policy MC-1.2.6 states that the First Church of Christ, Scientist, among other historic properties, should be preserved. The proposal would achieve that policy by restoring the church building and putting it to a viable use.

The Plan states that the Reed-Cooke overlay was created “to protect existing housing and ensure compatible infill development (Comprehensive Plan, § 2014.3), and states that that purpose should be achieved by “maintaining heights and densities at appropriate levels and encouraging small-scale business development that does not adversely affect the residential community (ibid, Policy MC-2.4.5).

Policy MC-2.4.1 also says that new construction in Adams Morgan should be consistent with the prevailing heights and densities in the neighborhood. The design of the proposed hotel could more adequately meet these policies by reducing the proposed height to be more compatible with its neighborhood.

VI. COMPREHENSIVE PLAN LAND USE MAPS

The Comprehensive Plan's Generalized Policy Map describes the subject site as a Neighborhood Conservation Area. Neighborhood Conservation Areas are primarily residential in nature and have very little vacant land. Where infill development occurs, however, it should be modest in scale, and major changes in density are not expected (Comprehensive Plan, § 223.4). The Plan also states that:

“The guiding philosophy in Neighborhood Conservation Areas is to conserve and enhance established neighborhoods. Limited development and redevelopment opportunities do exist within these areas but they are small in scale. The diversity of land uses and building types in these areas should be maintained and new development and alterations should be compatible with the existing scale and architectural character of each area. Densities in Neighborhood Conservation Areas are guided by the Future Land Use Map” (ibid., § 223.5).

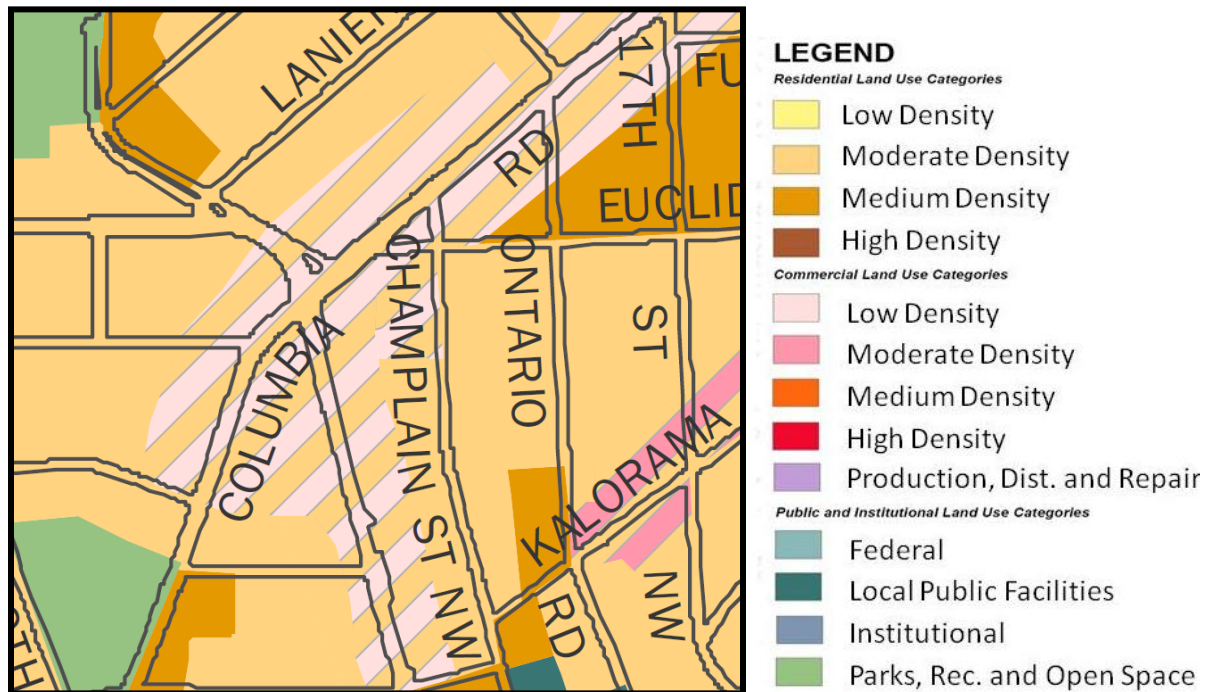
The Future Land Use Map (FLUM) indicates that the site is appropriate for a mix of low density commercial and moderate density residential uses.

Moderate density residential is discussed as follows:

Moderate Density Residential: This designation is used to define the District's row house neighborhoods, as well as its low-rise garden apartment complexes. The designation also applies to areas characterized by a mix of single family homes, 2-4 unit buildings, row houses, and low-rise apartment buildings. In some of the older inner city neighborhoods with this designation, there may also be existing multi-story apartments, many built decades ago when the areas were zoned for more dense uses (or were not zoned at all). The R-3, R-4, R-5-A Zone districts are generally consistent with the Moderate Density Residential category; the R-5-B district and other zones may also apply in some locations. (ibid., § 223.4)

Low density commercial is discussed as follows:

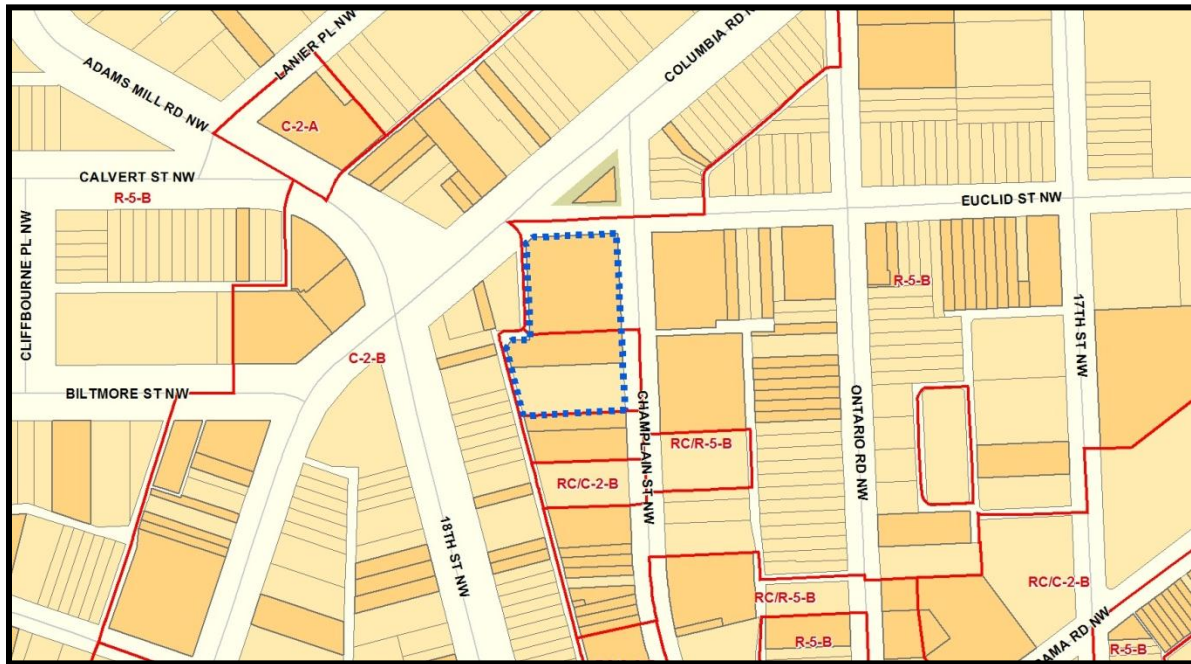
Low Density Commercial: This designation is used to define shopping and service areas that are generally low in scale and character. Retail, office, and service businesses are the predominant uses. Areas with this designation range from small business districts that draw primarily from the surrounding neighborhoods to larger business districts uses that draw from a broader market area. Their common feature is that they are comprised primarily of one- to three-story commercial buildings. The corresponding Zone districts are generally C-1 and C-2-A, although other districts may apply. (ibid., § 225.8)



In regard to the FLUM, the Plan states that “The zoning of any given area should be guided by the Future Land Use Map, interpreted in conjunction with the text of the Comprehensive Plan, including the citywide elements and the area elements...” (ibid., § 226.d). Therefore, while in rare instances and under extraordinary conditions an 81 foot height could be contemplated under a moderate density designation on the FLUM, in this context and taken with the surfeit of written policies encouraging compatible development at this site, the height proposed for the hotel is too tall for the property.

VII. ZONING

The site is currently zoned R-5-B on the lot where the church building sits, and Reed-Cooke/C-2-B (RC/C-2-B) south of the church building as shown on the zoning map below. The Reed-Cooke Overlay is intended to protect existing housing, maintain heights and densities at appropriate levels, and encourage small-scale business development that will not adversely affect the residential community with “traffic, parking, environmental, social and aesthetic impacts” (Zoning Regulations, § 1400.2). The C-2-B zone is a medium density zone that is made consistent with the mixed use moderate designation of the Comprehensive Plan by the application of the Reed-Cooke Overlay.



The RC Overlay limits height in the C-2-B to 40 feet, or 50 feet with affordable housing:

1402.1 The maximum height permitted in the RC Overlay District shall not exceed forty feet (40 ft.) plus roof structure as defined in this title; provided, that in the RC/C-2-B Overlay District, a maximum height of fifty feet (50 ft.), plus roof structures, shall be permitted to provide for the on-site construction of low and moderate income household units, as those households are defined by the Inclusionary Zoning regulations of Chapter 26 or a total gross floor area equal to fifty percent (50%) of the additional gross floor area made possible by the height bonus.

Density in the RC Overlay is limited to matter-of-right levels, even under a PUD, which in the case of the RC/C-2-B zone would be 3.5 FAR:

1402.2 For the purpose of this chapter, no Planned Unit Development shall exceed the matter-of-right height, bulk, and area requirements of the underlying district.

The overlay also lists a number of prohibited uses, including hotel and restaurant.

1401.1 The following uses shall be prohibited in the RC Overlay District:

- (a) Bar or cocktail lounge; ...
- (c) Restaurant or fast food establishment;
- (d) Hotel or inn;
- (e) Transient accommodations that are not home occupations;

The applicant proposes to rezone the entire site to C-2-B, removing the RC Overlay from the commercial portion of the site and changing from the residential zone of the church building. The new zoning would permit the height and density proposed and allow the hotel use. An 81 foot tall building, with higher effective heights along Champlain Street, would not meet the intent of the Reed-Cooke Overlay.

Item	R-5-B MOR	RC / C-2-B MOR	C-2-B PUD (not w/i RC Overlay)	Proposed
Height	50'	40'	90'	81'
Lot Area	n/a	n/a	15,000 sf	42,279 sf
Lot Width	n/a	n/a	n/a	~140'
FAR	1.8 (76,102.2 sf)	3.5 max (147,976.5 sf) 1.5 non-res (63,418.5 sf)	6.0 max 2.0 non-res (84,558 sf)	Rooms / Service* 147,487 sf (3.49 FAR) Adjunct / Function 17,991 sf (0.43 FAR) Total 165,478 sf (3.91 FAR)
Lot Occ	60%	100% (commercial)	100% (commercial)	75%
Rear Yard	4"/ft. at rear 15' min.	15' (below 20' in height may be measured to CL of alley)	15' (below 20' in height may be measured to CL of alley)	Below 20' in height – 8' Above 20' in height – 0' Relief Required
Side Yard	None required	None required	None required	0'
Courts	Open Court 3"/ft. of height, 10' min	Open and Closed Court 3"/ft. of height, 12' min	Open and Closed Court 3"/ft. of height, 12' min	Multiple Courts - Conforming
	Closed Court 4"/ft. of height, 15' min area = 2*(w^2), 350 sf min	Closed Court area = 2*(w^2), 250 sf min	Closed Court area = 2*(w^2), 250 sf min	Conforming
Parking			1 per 2 rooms (227/2 = 114) 1 per 150 sf of largest function room (5,443 sf / 150 sf = 36) <hr/> 114+ 36 = 150	174
Loading			2 berths @ 30' 1 berth @ 55' 1 delivery @ 20' 2 platforms @ 200 sf 1 platform @ 200 sf	2 berths @ 30' 1 delivery @ 20' ~400 sf platform Relief Required

* Numbers in this cell are taken from table on Sheet 6 of the plan set. Not all portions of that table appear to match the floor plans. The applicant should verify all floor area calculations.

The FLUM of the Comprehensive Plan designates the site for mixed use low density commercial and moderate density residential. Removal of the RC Overlay to allow a C-2-B PUD project of the proposed height and density would no longer be consistent with the Comprehensive Plan, as the moderate density zones typically have a maximum FAR of 3.0 and a maximum height of 65

feet. The C-2-B is identified as a medium density zone and is only made consistent with the Comprehensive Plan by the application of the RC Overlay.

The proposal would require a PUD-related map amendment and flexibility from the specific zoning regulations listed below.

1. PUD-Related Map Amendment

The height, density and uses permitted by the C-2-B PUD regulations are requested to construct the project as proposed. A PUD in the C-2-B zone can have a maximum height of 90 feet and a maximum FAR of 6.0, of which no more than 2.0 can be non-residential uses. In the case of hotels, guestrooms and service areas are counted toward residential floor area while function space and commercial adjuncts, such as restaurants, are counted toward non-residential floor area (Zoning Regulations, §§ 771.7 and 771.8). The proposed project would have a height of 81 feet and an overall FAR of 3.91. Approximately 3.49 FAR would be guestroom and service space, while approximately 0.43 FAR would be function and commercial adjunct space.

2. Rear Yard (§ 774)

The application requests relief from the rear yard requirement of 15 feet. In this case, the applicant has chosen the rear yard for this corner lot to be along the alley. Therefore, for the first 20 feet of building height, rear yard depth can be measured to the centerline of the 16 foot wide alley (§ 774.7), and the rear yard would have a depth of eight feet. Above 20 feet in height, the building would have a zero foot rear yard. The building form realized through this flexibility should not have undue impact on the surroundings and would not be out of character for a dense urban area.

3. Rooftop Structure Requirements (§ 777)

The rooftop design proposes multiple structures with unequal heights. That design, however, would have less visual impact than one large and tall roof structure that meets the guidelines of the regulations. The structures would also not meet the requirement for a 1-to-1 setback from the interior courtyard wall. This is partially a result of the “C” shape of the hotel. Overall, the location and design of the rooftop structures should minimize their visual impact.

4. Loading (§ 2200)

Two loading berths and one delivery space would be provided as well as one contiguous platform of about 400 square feet. This program of loading facilities would be slightly less than prescribed by the regulations, but according to the transportation study should be sufficient for the hotel’s use (“Truck Management Plan”, August 16, 2012). The number of expected trips can be adequately handled by the number of berths. In addition, the hotel will employ a loading coordinator to schedule deliveries, and no tractor trailers will be permitted to service the hotel.

VIII. PURPOSE AND EVALUATION STANDARDS OF A PUD

The purpose and standards for Planned Unit Developments are outlined in 11 DCMR, Chapter 24:

- 2400.1 The planned unit development (PUD) process is designed to encourage high quality developments that provide public benefits.
- 2400.2 The overall goal is to permit flexibility of development and other incentives, such as increased building height and density; provided, that the project offers a commendable number or quality of public benefits and that it protects and advances the public health, safety, welfare, and convenience.
- 2400.3 A comprehensive public review by the Zoning Commission of the specific development proposal is required in order to evaluate the public benefits offered in proportion to the flexibility or incentives requested and in order to establish a basis for long-term public control over the specific use and development of the property.
- 2400.4 While providing for greater flexibility in planning and design than may be possible under conventional zoning procedures, the PUD process shall not be used to circumvent the intent and purposes of the Zoning Regulations, nor to result in action that is inconsistent with the Comprehensive Plan.

The subject site exceeds the minimum area requirements of Section 2401.1(c) to request a PUD. The applicant is requesting a consolidated PUD and a related map amendment. The PUD standards state that the “impact of the project on the surrounding area and upon the operations of city services and facilities shall not be unacceptable, but shall instead be found to be either favorable, capable of being mitigated, or acceptable given the quality of public benefits in the project” (§2403.3). Based on agency comments received to date, there appear to be no impacts to city services that could not be addressed or mitigated.

IX. PROJECT BENEFITS

Sections 2403.5 – 2403.13 of the Zoning Regulations discuss the definition and evaluation of public benefits and amenities. In its review of a PUD application, §2403.8 states that “the Commission shall judge, balance, and reconcile the relative value of the project amenities and public benefits offered, the degree of development incentives requested, and any potential adverse effects according to the specific circumstances of the case.” Sections 2403.9 and 2403.10 state that a project must be acceptable in all the listed proffer categories, and must be superior in many. To assist in the evaluation, the applicant is required to describe amenities and benefits, and to “show how the public benefits offered are superior in quality and quantity to typical development of the type proposed...” (§2403.12).

Benefit and amenity evaluation is partially based on an assessment of the additional development gained through the application process. In this case, the application proposes a PUD-related map amendment to C-2-B with a maximum building height of 81 feet and a maximum FAR of 3.91. The applicant would gain 41 feet in height and 0.41 FAR above what the RC/C-2-B zone would permit, and the allowance for hotel and restaurant uses, which are not permitted in the RC overlay or the R-5-B zone.

The application lists several benefits, some of which may be considered amenity items. Please refer to page 17 et seq. of the August 17th written statement.

1. *Historic Preservation* – Construction of the project would include the restoration and preservation of the historic church structure.
2. *Community Center* – 4,000 square foot community center, available for use by community groups for the life of the project. The City Council passed legislation granting a tax abatement for the hotel project, and one of its requirements was the provision of a community center.
3. *Unity Park* – Refurbish and maintain Unity Park – the reservation north of the church – for the life of the project. The applicant should clarify whether or not a maintenance agreement has been reached with the National Park Service.
4. *Alley Easement* – An easement will be provided across the subject property so that alley traffic can avoid the existing sharp turn in the alley.
5. *AMYLEA* – The applicant would provide funding for the Adams Morgan Youth Leadership Academy (AMYLEA) equal to \$30,000 per year for the first five years of hotel operation, and \$0.50 per room-night sold in years six through twenty. If this item is to count as a benefit of the project, the applicant should specify how the funds are to be used.
6. *Sasha Bruce Youthwork* – The applicant would engage Sasha Bruce Youthwork to work with the AMYLEA on issues such as high school graduation and occupational skills.
7. *Local Employment* – The following organizations and programs would be used to help staff the hotel:
 - a. Greater Washington Hispanic Chamber of Commerce – for both construction goods and labor and hotel operations;
 - b. Hospitality High School;
 - c. First Source Agreement with the Department of Employment Services;
 - d. Certified Business Enterprises (CBE) Utilization Agreement with the Department of Small and Local Business Development.

The City Council-approved legislation granting a tax abatement for the hotel project also included requirements that:

- a. At least 51% of construction hours shall be filled by District residents and a minimum of 765 construction full-time equivalent employees;
 - b. At least 51% of permanent jobs in the hotel shall be filled by District residents with a minimum of 51% of the District resident jobs reserved for Ward One residents;
 - c. All apprenticeships shall be reserved for District residents with preference given to Ward One residents;
 - d. A job training program, funded by the developer, shall be established through a District nongovernmental organization, trade union, or nonprofit organization whose core mission is to train and employ District residents.
8. *Tree Maintenance* – For the first five years of the project, provide for maintenance of newly planted trees within ANC 1C.
9. *Trash Pickup* – For the first five years of the project, provide for pick up of litter and debris on portions of Champlain Street, Ontario Road, Euclid Street and the adjacent alley.
10. *Community Institutions* – Provide support to the Marie Reed Community Learning Center, H.D. Cooke Elementary School, Jubilee Jump Start, the Sitar Center and For the Love of Children. If this item is to count as a benefit of the project, the applicant should greatly increase its specificity.

The proffered benefits may be commensurate with the amount of flexibility being sought with the application. Significant additional detail is needed for some of the items in order to complete an evaluation.

X. HISTORIC PRESERVATION

On May 24, 2012, the Historic Preservation Review Board (HPRB), as part of its conceptual review of the project, voted 6-3 to find that the revised project design was compatible with the character of the church and consistent with the design direction given to the applicants by the Board in 2008. The Board's direction in 2008 was primarily focused on ensuring that there was adequate distance between the new construction and the church so that the addition did not physically and visually encroach too closely on the historic building.

At the May 2012 hearing, the Board asked for further study of the porte-cochere/first floor treatment of the Champlain Street frontage to make it more urban and pedestrian-friendly, further study of the fenestration and materials with the goal of scaling the building down and making it more vertical in orientation, and further development of the design of the top of the building and the penthouse. Many members of the Board commented that the proposal would be improved by

lowering the height of the new construction, although this was not made a condition of the vote. The Office of Planning has made clear to the applicant that the standard of review applied by the HPRB – general compatibility with the church building – is more limited and potentially less stringent than the broader planning and zoning standards that must be applied by the Zoning Commission, and that satisfying the HPRB’s preservation concerns in no way supersedes or satisfies the requirements of the PUD process.

As stated in the Comprehensive Plan analysis section of this report, the project would fulfill the goal of policy MC-1.2.6 by preserving and restoring the First Church of Christ, Scientist building and putting it to a viable use. The applicant implies in their submission materials that if the hotel project is not built, the church building might be demolished due to costs associated with upkeep of the building (July 29, 2011 Written Statement, p. 35). However, OP notes that there is a pending landmark designation for the building and any demolition would require submission to the HPRB and subsequently the Mayor Agent for Historic Preservation.

XI. AGENCY COMMENTS

The Office of Planning received comments from DC Water and the Metropolitan Police Department (MPD). Please find those comments attached. OP understands that DDOT will submit comments under separate cover.

DC Water indicated that the six inch water main in Champlain Street is available for new connections, but may need to be upgraded pending a further review at the permit stage. In regard to waste water, DC Water believes the 18 inch sewer main would have adequate capacity, but reserves the right to review the application in more detail at the permit stage.

MPD identified a number of potential concerns, including the need to specify security procedures, potential traffic, and noise. OP asked the applicant to address these issues prior to the public hearing, and in their prehearing submittal the applicant discussed security procedures and noise.

XII. COMMUNITY COMMENTS

The site is located in ANC 1C. OP has met with the ANC and with neighborhood groups on several occasions. OP has also received emails in support of the project and emails expressing concerns about the project. Some citizens oppose the height proposed for the project and others state that the proposed height is appropriate. Other points made in support of the project include that it would preserve the historic church and that it would support local businesses. Other concerns expressed about the hotel include traffic, noise, the removal of the RC Overlay, and impacts on the economic viability of neighborhood businesses and residences.

XIII. RECOMMENDATION

As currently proposed the Office of Planning cannot conclude that the proposed PUD is not inconsistent with the Comprehensive Plan or that the proposed PUD would be consistent with the intent and purposes of the Zoning Regulations and therefore cannot recommend approval of the PUD and related map amendment.

XIV. ATTACHMENTS

1. Referral Comments
 - a. DC Water
 - b. MPD

JS/mrj

Attachment 1
Referral Comments

DC Water Comments

The following DC Water comments are collated from a series of emails to the Office of Planning:

“There is an existing 6-inch cast iron water main in Champlain Street NW constructed in 1894, an existing 20-inch cast iron water main in Euclid Street NW constructed in 1916, and an existing 16-inch cast iron water main in Colombia Road NW constructed in 1926. The 6-inch cast iron water main in Champlain Street NW is available for new connections, but the 20-inch cast iron water main in Euclid Street NW and the 16-inch cast iron water main in Colombia Road NW are not available for new connections as these are DC Water distribution mains critical to maintaining water pressure zones. Subsequent to system testing for flow determination, and based on the age and capacity of the surrounding water system, large connections (3-inch diameter and larger) may require replacement [upsizing] of portions of the 6-inch water main in Champlain Street NW.

With regard to sanitary sewer, it is less of a concern for this project. There is an 18-inch combined sewer main running along Champlain Street NW that should have adequate capacity for this project, but again, I emphasize that DC Water will need to evaluate this sewer capacity when the applicant has a better feel for their proposed water/sewer demands.”

MPD Comments

Jesick, Matthew (OP)

From: Porter, Dierdre (MPD)
Sent: Monday, August 06, 2012 5:36 PM
To: Jesick, Matthew (OP)
Subject: RE: Zoning Commission #11-17 - Adams Morgan Church Hotel

Good Day,

Per your request, this request was reviewed by the management staff of the Third District.

Lieutenant John Kutniewski provided the below comments, to wit Commander Jacob Kishter concurred.

Respectfully submitted,
Inspector Porter

-----Original Message-----

From: Kutniewski, John (MPD)
Sent: Thursday, July 19, 2012 6:21 AM
To: Kishter, Jacob (MPD); Mongal, Aubrey (MPD)
Subject: RE: Zoning Commission #11-17 - Adams Morgan Church Hotel

Commander, I have not received any concerns from the citizens about the hotel in relation to our involvement as law enforcement. Mostly the complaints are some want the hotel and others don't, because it would add to an already congested area.

Now having said that, our concerns should be:

What would their security plan be. I would assume it would be like their other hotels, nothing more than security guards.

Traffic in and out of the complex would also be an issue. In my opinion this is the last thing that needs to be added to Adams Morgan area.

What type of nightly entertainment would they be offering. If they offer entertainment, will the location of the venue be soundproofed to avoid more calls for noise disturbances.

Parking in and around the hotel in a residential zone.

Increased foot traffic.

Increase in hotel thefts, theft from autos etc.

Will the hotel be hosting conferences.

As this gets closer to approval, I expect a lot more controversy over this, because the hotel is still being built in a residential neighborhood.

Dierdre N. Porter
Inspector
Metropolitan Police Department
Patrol Services and School Security Bureau
801 Shepherd Street, NW
Washington, DC 20011
Office (202) 576-6600
Fax (202) 576-8077
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Check out the "One City Action Plan"

Read Mayor Gray's comprehensive strategy to create a thriving city for all!
Visit <http://onecityactionplan.dc.gov> to learn more.