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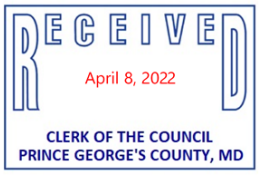
April 8, 2022



Clerk of the County Council
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Largo, MD 20774
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Re: Appeal of the Zoning Hearing Examiner's Decision in CSP-10002-C/DSP-10011-C: Queens Chapel Town Center, LLC.
My File No.: 342-163

Dear Sir/Madam Clerk,

I am the City Attorney for the City of Hyattsville. Pursuant to Maryland Code, Land Use Article § 25-212 and Prince George's County Code ("Code") § 27-135(c)(1), the City of Hyattsville—through undersigned counsel—hereby appeals to the District Council the Zoning Hearing Examiner's decision regarding the amendments to conditions associated with Conceptual Site Plan ("CSP") 10002-C/Detailed Site Plan ("DSP") 10011-C. The City of Hyattsville (the "City") participated in the hearing on CSP 1002-C/DSP 10011-C before the Zoning Hearing Examiner, opposed the approval, and is aggrieved by the Zoning Hearing Examiner's decision. The notice of the Zoning Hearing Examiner's decision was issued on March 25, 2022. The filing of this appeal does not preclude the City from raising these and any other issues before the District Council.

FACTUAL BACKGROUND

The Property at issue in the present appeal is a 6.05-acre shopping center known as Queens Chapel Town Center, which is located at the intersection of Hamilton Street and Queens Chapel Road in Hyattsville, Maryland (the "Subject Property"). *See* Exhibit 5.[1] The Subject Property is zoned as Mixed Use-Transportation Oriented ("MXT"), One-Family Detached Residential ("R-55") and is within the Transportation Development Overlay Zone ("TDOZ"). *Id.* The Subject Property is located within a half mile of the West Hyattsville Metro Station. *See* Exhibit 8.

Queen's Chapel Town Center, LLC (the "Applicant") is the owner of the Subject Property. *See* Exhibit 2. On March 1, 2011, the District Council approved CSP 1002-C and DSP 10011-C.

[1] All citations to the record contained herein will reference the Exhibit numbers designated within the record.

See Exhibits 6, 8. Both site plans contain a condition concerning the operation of restaurants that contain a drive-through ("Condition 3(c)"), which states the following:

> Within Queens Chapel Town Center, any eating or drinking establishment with drive-through service, operating pursuant to an approved detailed site plan as of the effective date of County Council Resolution CR-24-2006, shall remain valid, be considered a legal use, and shall not be deemed a nonconforming use. Such eating or drinking establishments, with drive-through service, and their underlying detailed site plans may be modified pursuant to the existing provisions relating to revisions or amendments to detailed site plans generally as they exist in the Zoning Ordinance. **If the use is discontinued for a period of 180 or more consecutive calendar days, unless the conditions of non-operation were beyond the control of the owner or holder of the use and occupancy permit, then the use shall no longer be considered a legal use.**

See Exhibits 6, 8 (bold added). The Applicant previously leased a portion of the Subject Property to a KFC restaurant. *See* Exhibit 5. The building which KFC occupied contained a drive-through. *See id.* At some point in the early spring of 2021,[2] KFC terminated its lease with the Applicant and discontinued its use of the Subject Property and the associated drive-through. *See* Exhibit 5.

Thereafter, on July 29, 2021 the Applicant requested an amendment of Condition 3(c). *See* Exhibit 2. In the request, the Applicant sought to delete the 180-day limitation contained within Condition 3(c), averring that "this use, although no longer a permitted use in the West Hyattsville TDOZ, is compatible with the surrounding area unlike nonconforming uses and therefore the need to phase this use out, through the 180 day limit set forth in condition 3c, is a mistake." *See* Exhibit 2.

The Zoning Hearing Examiner held a public hearing regarding the Applicant's request on December 15, 2021 and issued its decision on March 25, 2022. The Zoning Hearing Examiner ultimately recommended that Condition 3(c) in CSP-1002-C and DSP-10011-C be revised to indicate the following:

> Within Queens Chapel Town Center, any eating or drinking establishment, with drive-through service, operating pursuant to an approved detailed site plan as of the effective date of County Council Resolution CR-24-2006, shall remain valid, be considered a legal use, and shall not be deemed a nonconforming use. Notwithstanding the above, any cessation of the use for a period of time in excess of 180 calendar days that is not caused by permissible renovations to the use nor required to address Code violations shall constitute abandonment of the use. If the

[2] The date upon which KFC terminated its lease with Applicant is unclear. *See infra* at n.7.

> use has temporarily ceased operation due to permissible renovation or to address a Code violation it shall be reestablished within one (1) calendar year from the date upon which the use last ceased.
>
> Future development of the entire Queens Chapel Town Center Property, as shown on CSP-10002-C and DSP-10011-C, shall not include a quick service restaurant with or without drive-through if the use is not permitted in the zone at the time of redevelopment.

Zoning Hearing Examiner's Decision (the "Decision") at p. 19.

ANALYSIS

The Decision is flawed in several respects. First, the Zoning Hearing Examiner's conclusions of law are contradictory, incoherent, and at odds with the Zoning Hearing Examiner's overall recommendation to the Council. Second, the Zoning Hearing Examiner's recommendation regarding amendment of Condition 3(c) is inconsistent with the intent underlying the Transit District Overlay Zone ("TDOZ") as well as the Prince George's Plaza Transit District Development Plan ("TDDP"). Third, the Zoning Hearing Examiner erroneously misallocated or misinterpreted the burden of proof associated with establishing "good cause" to amend Condition 3(c) under Prince George's County Code ("Code") § 27-135(c). Fourth, the Zoning Hearing Examiner's conclusion that the conditions of non-operation with respect to the drive-through at issue are unsupported by the record. Given these errors, the Zoning Hearing Examiner's Decision is arbitrary and capricious. Each of these errors will be addressed in greater detail below.

I. THE ZONING HEARING EXAMINER'S CONCLUSIONS OF LAW ARE CONTRADICTORY, INCOHERENT, AND DO NOT SUPPORT THE ZONING HEARING EXAMINER'S RECOMMENDATION.

Code § 27-135(c) authorizes the District Council to amend conditions associated with site plans, given certain code-imposed standards are satisfied. Specifically, the amendment must be requested by an applicant, the Zoning Hearing Examiner must hold a public hearing and ultimately make a recommendation to the District Council as to whether the request should be granted. Code § 27-135(c)(1). Such an amendment may only be granted if "good cause" exists for the amendment, and "if the amendment does not constitute an enlargement or extension." Code § 27-135(c). Essentially, the Zoning Hearing Examiner's primary task in analyzing and making a recommendation to the District Council in this case was determining whether good cause existed to grant the Applicant's requested amendment to Condition 3(c).

Even though the Applicant's request to amend Condition 3(c) could only be granted upon a showing of good cause, the Zoning Hearing Examiner implicitly found that good cause did not exist, yet still recommended that Condition 3(c) be amended. Indeed, in the first paragraph of the Zoning Hearing Examiner's Conclusions of Law, the Zoning Hearing Examiner essentially

conceded that "good cause" does not exist to modify Condition 3(c). Specifically, the Zoning Hearing Examiner's first conclusion of law provided the following:

> (1) Pursuant to Section 27-135(c), infra, the District Council may amend the conditions for good cause. **Good cause has been shown to accept the revised condition as proffered if the request is considered in a vacuum** (i.e., without consideration of the goals of the TDDP, the basis for the imposition of the condition initially, and the City's concerns) since there may conceivably be obstacles in finding a tenant, or in developing this portion of the shopping center in the manner conceived by the TDDP. However, **I don't believe good cause can be considered in a vacuum.**

Decision at p. 18, ¶ 1 (bold added). Essentially, the Zoning Hearing Examiner indicated that good cause would exist, if the request to modify Condition 3(c) was viewed in isolation. *Id.* The Zoning Hearing Examiner then remarked that the request cannot be viewed in isolation, citing the resulting inconsistency between modifying Condition 3(c) and the intent of the TDDP, the initial basis for imposing Condition 3(c), as well as the concerns expressed by the City at the hearing. *Id.* Because the request to amend Condition 3(c) could only be granted upon a showing of good cause, the Zoning Hearing Examiner's recommendation to the District Council is inherently inconsistent with and belies her first conclusion of law. To this extent, the Zoning Hearing Examiner's ultimate recommendation is unsupported.

In short, given the Zoning Hearing Examiner's first conclusion of law, it is apparent that good cause does not exist modify Condition 3(c). As will be set forth *infra*, the Zoning Hearing Examiner's recommendation that the District Council modify Condition 3(c) is entirely inconsistent with the intent underlying the creation and enactment of the TDOZ and TDDP.

II. THE REQUESTED MODIFICATION OF CONDITION 3(C) IS INCONSISTENT WITH THE PURPOSES OF THE TDOZ AND THE TDDP.

The "[TDOZ] is intended to insure that the development of land in the vicinity of Metro stations maximizes transit ridership, serves the economic and social goals of the area, and takes advantage of the unique development opportunities which mass transit provides." § 27-548.02. This general purpose permeates every provision regarding the TDOZ within the Code. Relevant to the instant matter, the purposes underlying the TDOZ are: (i) "[t]o promote the use of transit facilities;" (ii) "[t]o provide for convenient and efficient pedestrian and vehicular access to Metro stations;" (iii) "[t]o encourage uses which complement and enhance the character of the area;" and (iv) "[t]o insure that developments within the Transit District possess a desirable urban design relationship with one another, the Metro Station, and adjoining areas[.]" Code § 27-548.03(a).

The underlying principles regarding land use within the TDOZ are also set forth in the TDDP. The 2006 TDDP, which was quoted by the Zoning Hearing Examiner but was not contained within the record, provides the following with respect to the purposes underlying its

enactment and the TDOZ generally:

> The goal of the West Hyattsville Transit District Development Plan (TDDP) is to provide a clear and predictable path for Transit-Oriented Development (TOD) within the West Hyattsville Transit District Overlay Zone (TDOZ).
>
> TOD is not simply development that happens to be located at or near a transit station. The 2002 Prince George's County Approved General Plan (page 44) defines TOD as development that actively seeks to increase transit use and decrease automobile dependency by:
>
> • Locating homes, jobs, and shopping closer to transit services;
>
> • Locating the mix of critical land uses (living/working/shopping) in closer proximity to one another; and
>
> • Establishing land use/transit linkages that make it easier to use transit (rail and bus).
>
> Successful TOD also produces attractive pedestrian-friendly environments around transit stations.

See 2006 TDDP at p. ix**.** The 2006 TDDP indicates that transit-oriented development should result in "compact, mixed-use, and pedestrian friendly [neighborhoods] so that many activities of daily living are within close proximity." *Id*. Under some of the standards applicable to transit oriented development, the TDDP is intended to "promote pedestrian activity[.]" *Id.* at p. x. The 2006 TDDP also expressly sets forth several policies regarding land use. *See Id.* at p. 75–76. The first land use policy is to "[p]romote a pedestrian-friendly transit-supportive development pattern in the Transit District." *Id.* at p. 75.

The Zoning Hearing Examiner's recommendation that Condition 3(c) be amended is entirely inconsistent with the intent and purposes of the TDOZ, the TDDP, and the vision of transit-oriented development established under the 2006 TDDP. Permitting the use of the drive-through at the Subject Property—by approving the amendment to Condition 3(c)—will only serve to increase traffic within the area and encourage the use of automobiles. Doing so will undoubtedly hinder the creation and further development of a pedestrian friendly environment. This inconsistency was raised by the City at the hearing, was recognized by Mr. Ferguson, the Applicant's land use expert, and reflected in the Zoning Hearing Examiner's conclusions of law.

Regarding this inconsistency, Mr. Ferguson opined as follows:

> In fact, in the City's objection they say we don't want to see a drive-thru here because it's not transit friendly and effectively it doesn't conform to the ultimate

> vision for the development that we want to see in the Transit District. **That's the core of what the City said of why they don't want to see this condition removed because they want to see this use go away, and from a high level, absent any particular particularities of a site in the abstract, they're not wrong. A drive-thru is not a transit friendly pedestrian oriented use.**

Tr. at p. 54. After noting the propriety of the City's objections to the amendment of Condition 3(c), Mr. Ferguson simply referred to the testimony of Mr. Maisel, baldly indicating that redeveloping the Subject Property, *i.e.*, to support a business that is not a fast-food restaurant, would be impractical and redevelopment can purportedly only be accomplished if the entire Queens Chapel Town Center is redeveloped.[3] Tr. at p. 54–55. This conclusion is unsupported by any materials contained within the records, aside from Mr. Ferguson's Land Planning Report. *See* Exhibit 5.

Not only did the City and Mr. Ferguson recognize the evident inconsistency between amendment of condition 3(c) and the TDOZ, TDDP, and transit-oriented development in general. The Zoning Hearing Examiner also observed this fact by noting that good cause could only be found without consideration "of the goals of the TDDP, the basis for the imposition of the conditions initially, and the City's concerns[.]" Decision, p. 18, ¶ 1. The Zoning Hearing Examiner also concluded that, under the TDDP, the area in which the Subject Property is located is intended "to become more pedestrian friendly and less dependent on vehicular traffic, and that the drive-through should eventually disappear." *Id.* at p. 18, ¶ 2. In addition, the Zoning Hearing Examiner implicitly recognized that the use of a drive-through on the Subject Property is contrary to the guidance set forth in the TDDP, and that the Applicant was well aware of the same:

> While Applicant notes that it may have an easier time locating a new tenant if the condition is revised, it has known for over twenty years that the uses within that area were to become more pedestrian friendly and less dependent on vehicular traffic, and that the drive-through should eventually disappear.

Decision at p. 18, ¶ 2.

At its most basic, the Zoning Hearing Examiner's recommendation that Condition 3(c) be amended is inconsistent with the purposes underlying the TDOZ, the TDDP, as well as transit-centric development in general. This inconsistency was noted throughout the hearing by the City, as well as the Applicant's expert, and ultimately recognized in the Zoning Hearing Examiner's findings of law. Undoubtedly, the District Council should not accept the Zoning Hearing Examiner's recommendation, given that the Applicant's requested modification of Condition 3(c) is entirely inconsistent with the TDOZ, TDDP, and principles applicable to transit-oriented development. Therefore, the District Council should deny Applicant's request to modify Condition 3(c).

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[3] This point will be discussed with greater particularity *infra*.

III. THE ZONING HEARING EXAMINER APPLIED AN INCORRECT THE BURDEN OF PROOF.

The Zoning Hearing Examiner took the position that Maryland Courts regularly apply the definition of "good cause" as set forth in Black's Law Dictionary. Decision at p. 8, ¶ 3 (citing *In re Trevor A.*, 55 Md. App. 491, 496, 462 A.2d 1245 (1982)). Accordingly, the Zoning Hearing Examiner defined "good cause" as constituting "[a] legally sufficient reason." *Id.* The Zoning Hearing Examiner also noted, based on that definition, that "[g]ood cause is often the burden placed on a litigant . . . to show why a request should be granted or an action excused." *Id.* The comments regarding the allocation of the burden of proof of good cause is consistent with Code § 27-142, which provides that "[t]he burden of proof in any zoning case shall be the applicant's."[4]

Despite the Zoning Hearing Examiner's implicit recognition that the burden of establishing good cause was on the Applicant, the Zoning Hearing Examiner ultimately misapplied this burden and thereby inappropriately relieved the Applicant from making this demonstration. In Paragraph 5 of the Zoning Hearing Examiner's conclusions of law, the Zoning Hearing Examiner concluded that "[w]hile the District Council included a statutory standard in its ordinances of approval of the site plans the language that it used arguably allows Applicant (as owner) to continue to lease the property to an eating or drinking establishment with drive-through **since there is no evidence in the record to indicate Applicant had any control over KFC's decision to vacate**." Decision at p. 19 ¶ 5 (bold added). Simply put, the Zoning Hearing Examiner concluded that good cause existed to amend Condition 3(c), based on an alleged absence of evidence of the same. Such a determination is clearly distinct from a conclusion that the Applicant had submitted sufficient evidence from which to conclude that good cause existed to amend Condition 3(c). This is contrary to the definition of "good cause" utilized by the Zoning Hearing Examiner as well as Code § 27-142.

Instead, the Applicant was required to prove that good cause existed, which it did not, and the mere absence of evidence demonstrating that good cause was lacking was insufficient to satisfy the burden placed upon the Applicant. Therefore, the Zoning Hearing Examiner's recommendation is based on an erroneous allocation of the burden of proof and should not be accepted. Furthermore, the Zoning Hearing Examiner's conclusion regarding the non-operation of the drive-through at issue in the present appeal is unsupported by evidence in the record.

IV. THERE IS INSUFFIENCT EVIDENCE THAT THE NON-OPERABILITY OF THE DRIVE-THROUGH WAS BEYOND THE CONTROL OF THE APPLICANT.

As indicated *supra*, in the Zoning Hearing Examiner's fifth conclusion of law, she purportedly concluded that the non-operability of the drive-through at issue was at no fault of the

[4] Although the definition of "good cause" provided some indication regarding the allocation of the burden of proof, the Zoning Hearing Examiner did not cite to Code § 27-142 or otherwise expressly indicate that the burden of establishing good cause was on the Applicant.

Applicant. However, this conclusion is inconsistent with the testimony adduced at the hearing.

When asked whether the Applicant had made efforts to find a replacement tenant for the Subject Property, Mr. Maisel indicated that the Applicant had been seeking replacement tenants, which included "national as well as some local merchants to lease the property." Tr. at p. 10, 12:13. Mr. Maisel, however, indicated that the potential tenants interested in leasing the Subject Property would not commit to leasing the Subject Property given the uncertainty as to whether the drive-through could be utilized. Tr. at p. 10, 20:25. The People's Zoning Counsel requested that the Applicant submit some form of correspondence demonstrating Applicant's communications with potential replacement tenants and said potential tenant's reservations regarding the use of the drive-through.[5] Tr. at p. 33–34; *see also* Tr. at p. 70–71 (indicating that the Zoning Hearing Examiner agreed to keep the record open to receive copies of those correspondences and notified the Applicant's counsel that any privileged material in said communications could be redacted).

Nonetheless, the record is devoid of any communications with <u>any</u> potential replacement tenants. The only assertions regarding the Applicant's inability to re-lease the Subject Property is the testimony of the Applicant, which is unsupported by the record.

As an alternative to amending Condition 3(c), the Applicant could have simply redeveloped or renovated the Subject Property to attract tenants that are not fast-food restaurants. When Mr. Maisel asked whether the Applicant considered leasing the Subject Property to an alternative tenant, *i.e.*, not a fast-food restaurant, Mr. Maisel indicated that the Applicant did not explore that possibility. Tr. at p. 12. Instead, Mr. Maisel represented that—essentially—leasing the Subject Property to a tenant that was not a fast-food restaurant would require that the Subject Property be renovated or redeveloped, and that the Applicant did not wish to renovate or redevelop the Subject Property in isolation. Tr. at p. 12. In other words, the Applicant did not attempt to contact tenants that were not fast-food restaurants, because adapting the Subject Property to any other use would require some level of unspecified redevelopment or renovation that the Applicant found unsuitable.[6] *Id.* Clearly, given that the Applicant failed to consider this option and contact

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[5] At the hearing, People's Zoning Counsel also requested that the Applicant submit a certificate of good standing into the record. Tr. at p. 13. No such certificate is included in the record.

[6] To this extent, Mr. Maisel's testimony was contradictory to that of Mr. Wiess who testified that,

> We've, we've expanded, we, we have not limited to the, the quick serve fast food type restaurant operations. We've spoken to, you know, retailers, that may frankly be able to use the drive-thru, like a pharmacy, and we've spoke to you know other food uses that typically do not, you know, utilize a drive-thru. But frankly in today's market many of those folks who didn't previously use drive-thrus are now looking to utilize them, given the unfortunate market conditions related to the

potential tenants that were not fast-food establishments, the conditions of non-operability of the drive-through were well within the control of the Applicant, and the Applicant's non-pursuit of replacement tenants that are not fast-food restaurants was expressly within its control.

In other words, the Applicant failed to introduce any evidence, other than self-serving testimony, regarding the alleged communications with alternative tenants and those tenants concerns regarding the potential unavailability of the drive-through. In addition, the Applicant could have sought to redevelop the Subject Property and seek a replacement tenant that was not a fast-food restaurant. The Applicant chose not to do so apparently based on the cost or speculative infeasibility of renovating or developing the Subject Property in isolation. Based on these facts, it strains credulity to suggest that the non-operability of the drive through was beyond the control of the Applicant.[7]

Simply put, the non-operability of the drive-through was not beyond the control of the Applicant, the permitted non-conforming use of the drive-through on the Subject Property would have been extinguished 180 days after some point in March 2021.[8] Therefore, under the Zoning Hearing Examiner's recommended amendment of Condition 3(c), the Applicant would not be entitled to utilize the drive-through on the Subject Property.

CONCLUSION

For the foregoing reasons, the Zoning Hearing Examiner's decision is based upon errors of law, unsupported by substantial evidence, and was arbitrary and capricious. The record clearly reflects that the non-operability of the drive-through at issue was within the control of Applicant. Therefore, because the 180-day period contemplated under Condition 3(c) has elapsed, the

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pandemic.

Tr. at p. 28–29. Given the directly contradictory testimony provided by Mr. Maisel and Mr. Wiess, substantial doubts exist as to the scope of Applicant's search for an alternative tenant and whether said search included seeking tenants that are not fast-food restaurants.

[7] The testimony adduced at the hearing concerned many of the economic aspects associated with the Applicant re-leasing the property, rather than the legal standards applicable to the request, which was observed by the Zoning Hearing Examiner. *See* Tr. at p. 52 (observing that "it seems to me like we're getting into like a marketing expert testimony."); *see also* Tr at p. 54–55, 79–80.

[8] The record does not clearly reflect the date upon which KFC terminated its lease. *See* Tr. at p. 9 (indicating March or April); Tr at p. 14 (same); Tr. at p. 48 (indicating that "the lease was prematurely terminated by Kentucky Fried Chicken in March of 2021); *see also* Exhibit 5 (indicating that "[t]he KFC restaurant ceased operation sometime prior to March, 2021"). No specific date is contained within the record.

Applicant is no longer entitled to utilize the drive-through on the Subject Property. Based on the arbitrary and capricious nature of the Zoning Hearing Examiner's decision, the District Could should deny the Applicant's request to amend Condition 3(c).

Respectfully submitted,

/s/

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Request for Oral Argument

The City of Hyattsville, in connection with its appeal of the Zoning Hearing Examiner's decision in this matter, requests oral argument.

/s/ E.I. Cornbrooks, IV
Counsel for the City of Hyattsville

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of April 2022, a copy of the foregoing was served via email to all persons of record contained in the list of persons of record received from the County Council's Clerk's Office, which is attached hereto and incorporated herein as Exhibit A. I also certify that service will be made to all persons of record identified within Exhibit A via first class mail.

/s/ E.I. Cornbrooks, IV
Counsel for the City of Hyattsville

CSP-10002-C/DSP-10011-C-
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Exhibit A

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Exhibit A

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Exhibit A