



District of Columbia Government
Advisory Neighborhood Commission 6A
Single Member District 6A04
1330 N. Carolina Ave NE
Washington, DC 20002



March 14, 2008

Mr. Jonathan Mellon
Historic Preservation Review Board
801 North Capitol St NE
Suite 3000
Washington, DC 20002

RE: HPA #08-164, Brown AME Church, 130 14th St NE

Dear Mr. Mellon,

I write to present my opposition, and those of my constituents, to the conceptual design for the expansion of the Brown AME church. I represent the Advisory Neighborhood Commission (ANC) Single Member District (SMD) 6A04 in which Brown AME is located. The design was presented to our community at a recent ANC 6A Economic Development Committee.

Brown AME seeks to build a two story addition to the front of the church, enclosing what is now their front porch and creating a new vestibule. This existing porch already extends to the property line. They intend to then build a new front porch and steps in front of that addition, beyond their property line into a public park, necessitating an additional walkway through that park to provide access to the new entrance. This triangle park, formed by the intersections of Constitution Ave and North Carolina Ave NE, is one of the many small parks included in L'Enfant's original design for the city.

After having reviewed the proposed design and discussing it with the residents of my SMD, I believe the following issues must be addressed:

- The front porch, steps and walkway would encroach on several hundred square feet of a historic landmark adjacent to the church's property. This historic landmark, which is part of Pierre L'Enfant's original design for the city, is a public triangle park known as Reservation 236. As you are no doubt aware, L'Enfant's Plan was designated as a historic landmark on the National Register of Historic Places in 1994. These small 'parklets' contained within L'Enfant's Plan, such as Reservation 236, are included in the inventory of contributing features of that historic landmark.

In 1803 surveyor Nicholas King wrote the following argument against alteration of L'Enfant's Plan: "These spacious avenues and streets and open areas or public spaces, at the intersections of streets and avenues (so ornamental and conducive to the purity of the air) which yet remain **ought to be forever secured to the city**". Indeed, early defenders of these small parks argued that they should not be incorporated into



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adjacent lots or sold to private developers; that they "never should be liable to be appropriated to any private use or changed from their original purpose".¹ ,

Brown AME contends that the purpose for the new porch is to maintain historic architectural integrity with the current front facade. But a new porch, that sits on Reservation 236, would be unnecessary without the addition of a new vestibule to the facade. The stated purpose for that new vestibule is to provide an elevator for the mobility-impaired. This is a laudable goal which could easily be accomplished by several alternative locations for the elevator within the existing structure not to mention the proposed addition on the southwest side of the church.

The seizure of any portion of Reservation 236 for private use will compromise the integrity of L'Enfant's Plan. If allowed in this instance, it opens the door for future requests. The cumulative effect of allowing even small pieces of reservations to be appropriated for private use is akin to death by a thousand cuts. We must insist that the plans for Brown AME be redrawn so that the building does not intrude on this historic landmark and that no portion of the park is appropriated for private use.

- We lack confidence in Brown AME's ability and willingness to follow proper protocol. Brown AME has displayed a pattern of disregard for zoning regulations. Just within the past year, they removed the embankment buttressing their neighbor's property and built a new retaining wall along a length (50 ft) of their parking lot and repaved said lot, without permits or permission from HPRB. This action was reported to DCRA, who has confirmed that no permits have been issued within the last two years. Brown AME operates this parking lot despite the lack of a zoning variance which is required for parking lots in its zoning district (R-4). The lack of a variance has been confirmed by a search of BZA orders.

In addition, the parking lot is the site of two former row houses that were demolished sometime after 1978. The Board of Zoning Adjustment Order No. 12671 (Finding of Facts, Item 3) references two vacant row houses on the lots that are now the parking lot. I have found no evidence that approval was given to demolish those row houses.

Given Brown AME's demonstrated lack of respect for the applicable regulations, we are concerned that they will not adhere to any constraints placed on them by HPRB should they be allowed to proceed. Furthermore, their past behavior must certainly disqualify them from any leniency that might be granted.

¹ Elizabeth Barthold, "The Predicament of the 'Parklets' - Understanding Washington's Smaller Parks," Washington History, Vol. 3, No. 1, Spring/Summer 1993, pp. 28-25.



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Regards,

Nicholas Alberti
Commissioner ANC 6A04
alberti6a04@yahoo.com
(202) 329-1193