



District of Columbia Government
Advisory Neighborhood Commission 6A
Box 75115
Washington, DC 20013



November 6, 2008

Mr. Clifford Moy
Secretary of the Board of Zoning Adjustment
Board of Zoning Adjustment
441 Fourth Street, NW, Suite 210
Washington, DC 20001

Re: BZA Case No. 17846 (130 14th Street, NE)

Dear Mr. Moy,

At our regularly scheduled and properly noticed meeting on October 9th, 2008, Advisory Neighborhood Commission 6A voted 6-0 (with 4 Commissioners required for a quorum) to oppose the above referenced application.

The ANC opposes the proposed project at 130 14th Street, NE, because:

- 1) the application is incomplete, and
- 2) the project does not meet the burden of proof for an area variance.

According to the submitted plans, the applicant would like to extend the church on land that is currently used for parking. The church currently does not meet the parking requirements because it has only three on-site parking spaces while zoning regulations require at least ten parking spaces (Section 2101.1 requires one parking space per ten seats in the main sanctuary).

The ANC estimates that the proposed addition on the southwestern boundary of the structure will reduce the number of parking spaces by at least one space, and will likely eliminate two parking spaces. According to Section 2002.2, "nonconformities may not be enlarged upon, expanded or extended." The reduction of parking spaces by the applicant represents an expansion of the parking non-conformity, and thereby requires a variance to the parking requirements in the Zoning Regulations. Because no such request has been made, the application is incomplete.

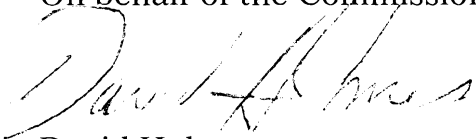
In addition to the application being incomplete, the applicant has not met the burden of proof required for an area variance. There is simply no compelling reason for expanding the footprint of the church because the additions are either not necessary for the expanded use proposed by the church or they can be accommodated within the existing footprint.

The addition of a vestibule to the eastern portion of the structure is not required by an exceptional or extraordinary situation or condition. The lack of this vestibule will not present a difficulty to the applicant's expressed desire to expand its community outreach ministries, provide classrooms for Sunday School purposes, and provide church administrative offices and conference rooms. Furthermore, the addition of the vestibule is detrimental to the public good because the addition encroaches onto parkland designated in L'Enfant's original plan of the Old City.

Not all additions are appropriate for a given lot size. Sometimes, as in this case, the proposed expansion is excessive for the dimensions of the lot.

Nicolas Alberti, Drew Ronneberg, or any officer of the Commission is authorized to act on behalf of ANC 6A for the purposes of this case. Mr. Alberti can be reached at alberti6a04@yahoo.com or (202) 543-3512.

On behalf of the Commission,



David Holmes

Vice Chair, Advisory Neighborhood Commission 6A