



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



December 22, 2008

Mr. Bill Shoon
Public Space Permit Office
Department of Transportation
941 North Capitol Street NE
Washington, DC 2002

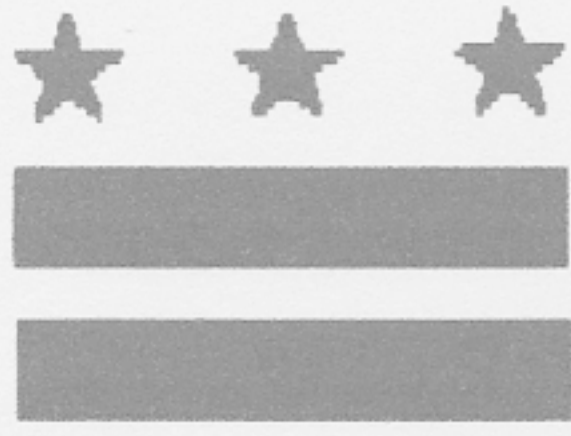
Mr. Shoon:

Brown AME Church has informed Advisory Neighborhood Commission 6A of their intent to file a public space application for approval to occupy a portion of Reservation 236, the public parkland located at the intersection of N. Carolina Ave NE, Constitution Ave NE and 14th St NE. Our Commission opposes the application and requests the public space permit be denied.

Brown AME has presented a proposal to our Commission to expand its current building. This proposal includes plans to incorporate its existing porch into a two-story addition (a vestibule) and add a new porch onto the front façade of the new addition. They propose to build this new porch on Reservation 236. It would be approximately 36 ft by 10 ft. (360 sq ft.) and have side stairs so that egress to the new porch would be from both the Constitution Ave and N. Carolina Ave sides of the park. In addition to the porch, Brown AME proposes to place sidewalks across the park, covering about 400 sq ft of the park. In total, the church is proposing to occupy about 760 sq ft of the park.

At our regularly scheduled and properly noticed meeting on October 9, 2008, our Commission voted 6-0 (with 4 Commissioners required for a quorum) to oppose Brown's proposal to occupy public space that is part of Reservation 236. Our community opposes the proposal to build a porch and sidewalks on Reservation 236 for the following five reasons:

1. **The proposed use of the park is inconsistent with purposes for which it was transferred to the District government.** Although Reservation 236 was transferred to the District for "comprehensive plan" purposes it is still titled to the United States government. While that is one of the broadest categories of transfer, it does not permit the District to sell the property or lease it to a private party to build or expand a building.
2. **Reservation 236 is a historic landmark that is part of Pierre L'Enfant's design for the city. L'Enfant's Plan was designated as a historic landmark on the National Register of Historic Places in 1994.** The small 'parklets' contained within L'Enfant's Plan, such as Reservation 236, are included in the inventory of contributing features of that historic landmark. The proposed taking of a significant portion of this park is detrimental to the integrity of the landmark.
3. **Brown can meet their goals of making the church ADA compliant and expanding space to meet the needs of the congregation without building on the park.** In January 2008 Brown AME Church (130 14th St NE) submitted conceptual plans to the Historic Preservation Office (HPO) for the expansion of their building. This original design required building up to the current property lines but did not include a porch, which confirms that the inclusion of the porch is not necessary to meet the church's needs. The original design was subsequently altered to include a porch that would sit on the adjacent parkland. This change was made at the suggestion of HPO staff solely to



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address aesthetic concerns despite the fact that the church is not a contributing structure in Capitol Hill Historic District.

4. **The porch is not a critical aesthetic element of the proposed building design.** The Capitol Hill Restoration Society (CHRS) strongly disagreed with the HPO's opinion that the addition of a porch is necessary to correct the aesthetic deficiencies of the original plan. The CHRS recommended, to Historic Preservation Review Board, an alternative design for the front entrance that does not include a porch. CHRS suggested a glass façade for the vestibule, allowing the church to embrace the park as a vista and shifting the entrance doorway to the side of the vestibule as was suggested in the original plans. This would allow the church to create a new welcoming plaza at the N. Carolina Ave entrance that could serve as an area on which parishioners and guests could assembly before and after church functions.
5. **The proposed incursion into the park would significantly reduce the size of the park and would adversely impact the quality of this neighborhood amenity.** The park is a much used and appreciated amenity for the neighborhood. The church seeks to occupy a wide across an entire side of the triangle, significantly reducing its utility as a recreational space. It offends the neighbors' sensibilities that this public asset could be annexed for private use without a compelling need.

In close, Brown AME's plans to build on the park have also been opposed by the Capitol Hill Restoration Society, the North Lincoln Park Neighborhood Association and Trees for Capitol Hill Inc. All of these groups oppose the encroachment onto the public space of this historic park for use by any individual party or organization. For the above stated reasons, and with the support of our community organizations, our Commission requests the public space permit be denied.

On behalf of the Commission,

Joseph Fengler, Chair
Advisory Neighborhood Commission 6A

Cc: Peter May, National Park Service
David Maloney, Historic Preservation Office
Councilmember Tommy Wells
Matthew Marcou, Public Space Manager, DDOT
Nancy Metzger, Capitol Hill Restoration Society
Elizabeth Nelson, North Lincoln Park Neighborhood Assoc.
Margaret Missiaen, Trees for Capitol Hill
Mark Grace, Trees for Capitol Hill