



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



April 19, 2004

Lisa Burcham  
Associate Director  
Historic Preservation Division  
801 North Capitol Street, NE, Suite 3000  
Washington, DC 20002

Re: Proposed Historic Preservation Regulations

Dear Ms. Burcham,

At a regularly scheduled and properly noticed meeting on April 8, 2004, Advisory Neighborhood Commission 6A voted to request that the proposed Historic Preservation Regulations (DCMR Title 10A) be amended to provide 30 days written notice to the ANC and to affected Single Member District Commissioners of cases to be considered by the Historic Preservation Review Board under section 322 of the proposed regulations.

Although the proposed regulations state that staff *may* consult with ANCs, and that applicants *should* be encouraged to work directly with ANCs, official notice of cases to be presented to HPRB is limited to 15 days before a public meeting. Typically, this would not provide enough time for notification of affected residents, consideration by the ANC's committee, and official action by the ANC at a public meeting for any given application. Under 325.3 as proposed, an affected ANC may request a deferral of HPRB review of a case. However with only 15 days notice, the ANC still may not have enough time to take a "legally sufficient ANC request" as defined by the ANC Act.

The ANC Act (D.C. Official Code § 1-309.10) requires 30 days written notice, excluding weekends and holidays, of District government actions or proposed actions to ANCs and SMD Commissioners. We ask that the proposed regulations be amended to reflect this requirement. One possibility for accomplishing this recommendation would be to provide notification when staff receives a complete application, instead of waiting for the entire HPRB agenda to be assembled. Under current and proposed notice requirements it is difficult to provide timely feedback for consideration by HPRB.

Please note that the ANC is not requesting 30-day notification of all permit applications or work routinely delegated to staff.

If you require further clarification of these comments, please contact Commissioner Cody Rice, Chair of ANC 6A's Economic Development and Zoning Committee, at 202-544-3734 or [rice6a03@verizon.net](mailto:rice6a03@verizon.net).

Respectfully yours,

Joseph Fengler  
Chair, Advisory Neighborhood Commission 6A

cc: Sharon Ambrose, Ward 6 Councilmember  
Gottlieb Simon, Office of ANCs