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# United States Department of the Interior

## NATIONAL PARK SERVICE

National Capital Region

Rock Creek Park

3545 Williamsburg Lane, N W

Washington, D C 20008-1207

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H2215 (NCA-ROCR)

DEC 10 2009

Mark D. Loud, Chairman  
Government of the District of Columbia  
Board of Zoning Adjustment  
441 4th Street, NW, Suite 210 South  
Washington, D.C. 20001

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D.C. OFFICE OF ZONING

Dear Mr Chairman:

We are writing to express our concerns about the application for variance relief for the proposed Beacon Center (BZA# 17964), as requested by the property owner, Emory United Methodist Church. Specifically, we oppose the applicant's request for relief from the height requirements of Section 770.1 and the Floor Area Ratio requirements of Section 771.2 of the District of Columbia Zoning Regulations. We believe that to grant such relief would indeed occasion substantial detriment to the public good and would impair the intent, purpose, and integrity of the zone plan due to the direct impacts it would have on the adjacent, historic Fort Stevens.

Fort Stevens is a District of Columbia landmark and is listed in the National Register of Historic Places. It is the centerpiece of the Civil War Defenses of Washington, D C., a series of field fortifications which were built on high points overlooking major turnpikes, railroads, and shipping lanes around the city shortly after the outbreak of the Civil War. Fort Stevens was built in 1861, on the same site where the present Emory Church currently stands, to control Seventh Street Road, the turnpike leading to Silver Spring (better known today as Georgia Avenue). The fort was expanded to the west in 1863 to include the grounds and reconstructed parapets which can be seen by visitors today. In 1864, Fort Stevens was the scene of a bold Confederate attack, an attack that would ultimately be the Confederate's only action against Washington, D C. On July 11 and 12, Union troops successfully defended Fort Stevens from the Confederate forces that approached from the north, along Seventh Street Road. History records that the Battle of Fort Stevens saved the Nation's Capital. It was also witnessed by Abraham Lincoln, thereby giving it the distinction of being the only battle in which a sitting U.S. president came under enemy fire during a time of war.

Though not the original church structure, the history of Emory Methodist Church and Fort Stevens has been intertwined since the Civil War. (The existing church replaces an earlier building that served as a barracks, hospital, and jail in conjunction with the operation of Fort Stevens). The unusual and unique topography cited as the decisive feature of the subject

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property that causes the proposed building to depart from the matter-of-right characteristics of the C-2-A Zoning District is the 14 foot high berm running along the Georgia Avenue and Quackenbos Street frontages. The berm itself is a remnant of the Civil War Defenses

Although we appreciate the applicant's desire to retain the views of the existing church building from the street level of Georgia Avenue, we feel that the church's visual relationship to Fort Stevens is equally important. Unfortunately, the proposed additions to the church as currently configured serve to isolate it completely from the historic fort, turning its five-story back on this landmark, while at the same time, the proposed courtyard around the church serves to displace the density of the development and push it closer to Fort Stevens. Further, the applicant's request to treat the berm as an anomalous condition, or in other words as a 14-foot pedestal from which the building height limitation should be measured, results in a significantly higher structure adjacent to the fort. Whereas visitors can now look across the open church yard toward the road from which the Confederate forces advanced, they will only see a looming five-story wall of residential development should the height and FAR variances be granted.

Finally, we disagree with the applicant and do not feel that the variances can be granted without having an adverse impact on the intent, purpose, and integrity of the zone plan, particularly as it relates to historical resources. Chapter 22 of the Revised Comprehensive Plan for the National Capital, 10 DCMR *Comprehensive Plan Part 1* (October 2007) identifies the subject property as being within the Rock Creek East planning area. To paraphrase, the Rock Creek East Plan recognizes the significant historical resources of the area and requires their recognition and protection. The National Park Service feels strongly that this protection should also include historic Fort Stevens, a D.C. landmark and listed property in the National Register of Historic Places. While we feel that the entire project should be held to the matter-of-right 50 foot building height limitation which would greatly reduce the impact to the fort by reducing the height of the of the wall facing Fort Stevens by approximately 14 feet, we also believe that, at a minimum, the proposed project should be held to the existing FAR limitations and be required to step back in its northwest corner in order reduce the mass facing onto the fort.

We appreciate your careful consideration of this matter

Sincerely,



Adrienne A. Coleman  
Superintendent, Rock Creek Park