



**ADVISORY NEIGHBORHOOD COMMISSION 3E**  
**TENLEYTOWN AMERICAN UNIVERSITY PARK FRIENDSHIP HEIGHTS**  
c/o Lisner-Louise-Dickson-Hurt Home 5425 Western Avenue, NW Washington, DC 20015  
[www.anc3e.org](http://www.anc3e.org)

**Resolution Regarding Historic Landmark Application #11-08:**  
**Immaculata Seminary 4340 Nebraska Avenue NW, Square 1728, Lot 1**

**Whereas**, ANC 3E shares concerns of the residents and lauds the goals of historic preservation both in the neighborhood and across the District of Columbia. However, the Commission has consistently expressed concern that historic preservation has played too significant a role in the planning for important infrastructure projects in the neighborhood. Applications for designation are treated as *de facto* designations in non-public discussions with the State Historic Preservation Officer (SHPO) before the Historic Preservation Review Board (HPRB) decides a designation application.

**Whereas**, this process significantly constrains planning options regardless of the historic merits of the application or claims of historicity.

**Whereas**, we have heard architects and others characterize such private, off-the-record conversations with SHPO as “prescriptive” and “directive,” and intimated that they felt that they had no choice but to comply with SHPO’s “suggestions,” whether or not they adversely affected design for the building’s functions.

**Whereas**, holding aside the quality and possible coerciveness of any advice given, this extensive non-public process may give rise to a self-fulfilling prophecy of historical merit, such that designation in fact becomes more likely.

**Whereas**, to wit, the community and American University had been engaged in constructive dialogue regarding options associated with the relocation of the AU Law School to the Tenley Campus, including the issues surrounding the placement, height and massing of new structures, eradication of surface parking lots and traffic management programs and other issues related to the overall program for the campus.

**Whereas**, the Tenley Historical Society filed a landmark application on the entire property. Because the filing was accepted by the State Historic Preservation Office (SHPO), that office became integrally involved in the discussions. However, at no time were the merits of the landmark application discussed before HPRB, which is a public body, or the community. In fact, the filing caused conflict between competing neighborhood organizations (TCNA, TNA and THS) which needed to be sorted out prior to any discussion related to the merits of preservation. While there is little dispute that Capitol Hill merits designation, the balance of the campus, including the reconstructed Dumblane House, have little historicity meritorious for designation.

**Whereas**, preservation has adversely effected planning and implementation for our District of Columbia Tenleytown Fire Station, the Janney Elementary School and Wilson High School and may adversely effect planning for the Reno School;

**Whereas**, the American University Tenley Campus process unfortunately illustrates that dynamic discussed above.

**Whereas**, the 1904 Capital Hall building was built in the Baroque Revival Style and is a limestone clad building which has undergone extensive updates;

**Whereas**, the Chapel, built in 1921 is built with little architectural or historic distinction and is a buff brick building which has undergone extensive exterior additions;

**Whereas**, the 1950's residence halls (Constitution, Federal and Congressional) are built in the modern style of buff colored brick and are characterized in the THS application as "relatively unadorned" with "a complete absence of ornamentation and decoration" and have a "usual lack of adornment" and feature "plain aluminum-framed windows";

**Whereas**, the 1839 Dunblane House was built in the Greek Revival style and has had additions built onto it in 1935, 1970, 1974, possibly the 1850's and was substantially destroyed in a fire in 1997 before being rebuilt;

**Whereas**, according to the THS historic preservation application most of Dunblane's windows and doors have been relocated and are no longer in their original locations;

**Whereas**, according to the THS application Dunblane's entry is "the most character defining element of the façade" but much of what surrounds this door is "possibly a reproduction" and the door itself is a "replacement door";

**Whereas**, THS included no case or discussion for preserving the Garage (date of construction unknown with stucco on tile exterior);

**Whereas**, the axis cited in the application between Dunblane and Capital Hall as being of historic value is, in fact, obstructed by both the Chapel and the existing landscaping on the site;

**Whereas**, the rear (western axis facing) side of Capital Hall is "utilitarian in appearance" and not "clad in limestone as are the principal and side elevations":

**Whereas**, the buildings comprising this application were built at different times in different styles for different purposes and in one case a building was completely destroyed and in other cases buildings underwent extensive renovations and changes;

**Whereas**, no evidence was offered or case made in the application that any of the buildings were designed with each other in mind with regards to their styles, forms, purposes, relation to one another or orientation;

**Whereas**, the THS application makes no comment on the non historic surface parking spaces or driveways on the property but their presence detracts from the alleged quad and green space;

**Whereas**, to date neither the THS application nor the AU campus plan has proposed any specific renovations or restorations to any of the severely altered buildings contained in this application;

**Whereas**, this application, via the non-public consultation process with SHPO, has adversely impacted the AU campus planning process, limiting which existing properties AU can demolish and modify, where new buildings may be erected, to what heights those new buildings may be reconstructed, and even the manner in which these buildings can relate to each other;

**Whereas,** these restrictions have constricted AU's ability to construct a modern urban campus with a fully open quad contained therein, and with good connections to Yuma Street and the nearby Wisconsin Avenue corridor and the Tenleytown Metro station;

**Whereas,** these restrictions have also in some cases forced building masses closer to adjacent single family homes;

**Whereas,** the Capital Hall Dormitory occupies a prominent spot overlooking Tenley Circle and is a landmark in the community and is largely unaltered from its 1904 origins and 1921 addition;

**Whereas,** ANC 3E believes an open quad with publicly accessible green space is a laudable ambition for this campus even if it has not historically existed, however preservation of the chapel directly conflicts with this goal;

**Now therefore be it resolved,** that ANC 3E supports historic designation of the site to the following extent:

- The Commission supports the historic preservation application for Capital Hall;
- The Commission only supports designation of Dunblane House if a credible plan exists to restore it to something akin to its original and historic appearance.
- ANC 3E also supports the retention of a green and publicly accessible quad bounded in the east by Capital Hall and possibly in the west by a restored Dunblane House but we do not believe preserving the Chapel is compatible with this goal;
- The preservation of the chapel also makes connecting the eastern end of this quad to Yuma Street and the Tenleytown metro more difficult.
- ANC 3E also believes that retaining the existing surface parking spaces conflicts with the purpose of retaining the historic quad and finds the applications silence on this matter curious.
- ANC 3E objects to historic preservation status for Constitution, Federal and Congressional Halls as well as the garage and chapel.

ANC 3E urges the Historic Preservation Review Board to give great weight to these recommendations. Since the historical value of most of these buildings is not determined, we encourage the American University architects to interpret the existing condition with an eye towards honoring both the history of the site and its potential to contribute to the neighborhood in the future. This is a design challenge, not a historic preservation challenge.

**Be it further resolved,** that to the fullest extent possible in all cases involving sites and/or structures likely to affect the public significantly, advice from and interactions with SHPO and staff must be made public and transparent.

**Be it further resolved,** that ANC 3E urges that for future projects the HPRB should make clear to the SHPO and its staff, as well as relevant agencies that a mere application for designation should not be equated with designation nor does it mean that all elements of that application are of equal merit or supportable. Further, efforts should be made in the planning for important infrastructure projects not only to preserve buildings and site plans of a certain age, but to balance the imperatives of historic preservation with the needs of future generations.

ANC 3E approved this resolution at its meeting on October 5, 2011, which was properly noticed and at which a quorum was present. Commissioners Jonathan Bender, Matthew Frumin, Tom Quinn, Sam Serebin and Beverly Sklover were present. The resolution was approved by a vote of 3-1-1, with Commissioners Bender, Quinn, and Serebin voting in favor, Commissioner Sklover voting against, and Commissioner Frumin abstaining .

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ANC 3E  
By Jonathan Bender, Chairperson