

15 September 2002

To: Carol Mitten, Chairman, Zoning Commission  
District of Columbia Office of Zoning  
441 4th Street, NW  
Suite 210-S  
Washington, DC 20001

Re: Washington Clinic Site

From: Allison Barnard Feeney  
4519 Chesapeake Street, NW  
Washington, DC 20016

Attached is a letter that I sent to the ANC3E commissioners and Kathy Patterson regarding the relationship of the proposed development at the Washington Clinic site to the Ward 3 Comprehensive Plan. To summarize, I believe that upzoning that particular site is appropriate based on the Ward 3 Comprehensive Plan's dual mandates to increase housing stock in Ward 3 while preserving the residential character of its neighborhoods. This can only be accomplished by increasing housing density at housing opportunity areas, at Metrorail stations, and at commercial centers -- Friendship Heights is all three.

Sincerely,



Allison Barnard Feeney

**ZONING COMMISSION**  
District of Columbia  
Case 02-17  
61

**ZONING COMMISSION**  
District of Columbia  
CASE NO.02-17  
EXHIBIT NO.61

13 September 2002

To: Leslie Kraft Quynn  
Chris McNamara  
Tad DiBiase  
Jill Diskan  
Frank Gordon

CC: Kathy Patterson

Re: Washington Clinic Site

From: Allison Barnard Feeney  
4519 Chesapeake Street, NW  
Washington, DC 20016

I attended the ANC 3E meeting last night, and am writing to express my disagreement with Tad DiBiase's characterization of the Ward 3 Comprehensive Plan. During the ANC 3E representative's discussion, I believe he misrepresented a major theme of the Ward 3 Comprehensive Plan, "protecting the ward's residential neighborhoods," as supporting his position that increased residential density for the Washington Clinic site is inappropriate. I do not agree.

In reality, the Comprehensive Plan calls for maintaining and increasing housing stock in Ward 3 in housing opportunity areas while protecting the character of existing residential neighborhoods. The dual goals of protecting the existing neighborhoods and increasing housing stock can both be satisfied only if housing density increases at the commercial nodes along arterial roads and at Metrorail stations. Friendship Heights is specifically designated in the Plan as a housing opportunity area, it is a regional retail center, it is well served by public transportation, and it is an appropriate place to increase housing density.

The Comprehensive Plan also calls for providing a variety of housing opportunities in Ward 3. According to the Comprehensive Plan, provision of low-/moderate-income or elderly housing is a justification for increased density. This need for this category of housing is mentioned repeatedly in the Plan as a distinct issue with the existing housing stock in Ward 3. Had Stonebridge proposed adding low-income housing stock, there is no question that increased density would be justified under the plan. (Though it is certain that the neighborhood would object.)

These themes are pervasive through out the Ward 3 components of the Comprehensive Plan. Excerpts from the plan are attached.

I believe that the Comprehensive Plan has been objectively crafted and provides a solid foundation on which to base development decisions. While people are more comfortable surrounding themselves with others who they perceive to be just like them, I believe the diversity sought by the comprehensive plan is critical to the health of the city. Apartment dwellers will place different demands on district resources than single-family homeowners. Single-family homeowners place different demands on district resources than the elderly.

I found it encouraging that Stonebridge is still willing to negotiate, and perhaps even reduce density. When you continue negotiations, please keep in mind that they are offering several important amenities under the Comprehensive Plan.

- Traffic mitigation [see 1404.2.g]
- Pedestrian safety [see 1404.2.d]
- Child care [see 1409.2.m]

If Stonebridge is willing to increase the amenity package, perhaps they could increase the amount of money for improvements to the Chevy Chase Playground: the park desperately needs shade trees and the

playground equipment is rapidly deteriorating. For 200K the park could replace the equipment comparable to that in Friendship Park and add shade trees.

I believe this project would be approved by the District, even in the absence of neighborhood support. I watched the representative from the planning office nodding his head in agreement with Chris McNamara's statements to that effect. I encourage you to reach an agreement with Stonebridge as it may well be the best offer that the neighborhood will get.

The five of you are our elected representatives and I trust that you will be able to work with Stonebridge to come up with a solution that is a win for both the neighborhood and the District as a whole. You will be unable to please everyone, and I appreciate that this is a difficult and stressful position to be in. You need to be conscious of doing what is right for the ward and District and not bow to the vocal few to the detriment of many.

Thanks for your efforts in what surely must be a thankless job!

Allison Barnard Feeney

Excerpts from Chapter 14 of the DC Comprehensive Plan  
<http://www.planning.dc.gov/documents/main.shtm>

1401 Ward 3 Economic Development

The Comprehensive Plan for Ward 3 includes the economic development goal of “maintaining and expanding the residential component” [1401.1.a.3].

“Ward 3 presents the opportunity for discrete, highly-focused economic activity at specific locations” including:

- “(b) Development of housing at Friendship Heights, particularly in the extant, large parking lots (Lord & Taylor and Metro) and in the 5300 block of 43<sup>rd</sup> Street, N.W.,”
- “(f) Development of multi-family housing on Wisconsin and Connecticut Avenues consistent with land-use designations in the Land Use Element” [1401.7.b, f].

1402 Ward 3 Housing

“Two (2) characteristics – the prevalence of detached single-family housing and the concentration of medium and high density housing on 3 major avenues – distinguish Ward 3 from the other Wards” [1402.1.a].

“...However, there is underutilized land in the ward that should be the focus for the development of new housing; these areas have been designated in the Land Use Element as housing opportunity areas.” [1402.1.g]

The “relation of Ward 3 to the declaration of major policies in the Housing Element of the Comprehensive Plan”

- “(a) ... The Land Use Element designated several housing opportunity areas in the ward – reflecting the ability of the ward to provide new housing” [1402.2.a]

“The ward’s land use policies as stated in the Land Use Element, have been developed to provide the greatest housing densities on those corridors that have the best access to transportation and shopping. Two (2) of the ward’s housing opportunity areas are designated at Metrorail stations; development potential (if any) should favor housing over commercial at the ward’s other three (3) Metrorail station areas” [1402.2.d]

“Where new development is permitted or is prescribed in the Land Use Element, use such development to provide additional housing, particularly for the elderly and low-to-moderate-income populations. Encourage a mix of populations within new or renovated multi-family structures, with up to twenty percent (20%) of the units set aside for low- and moderate-income residents.” [1402.3.b]

“Expand housing opportunities for the elderly and physically challenged, especially along the major transportation corridors and in the Friendship Heights and Tenleytown Housing Opportunity Areas” [1402.4.b]

“Provide zoning flexibility for the production of new housing, especially for the elderly and for low- and moderate-income households, through the following mechanisms:

- “(1) Permitting increased residential densities (consistent with design scale and infrastructure capacity) in exchange for incorporating low- and moderate-income or elderly housing in development projects;”
- “(5) Giving zoning preference to projects that include housing near each of the ward’s Metrorail stations.” [1402.4.c]

“Provide more stock by encouraging the inclusion of housing in local neighborhood commercial centers” [1402.4.h]

“Revise the Planned Unit Development regulations, and treat housing, when consistent with this ward plan and when for low, moderate, or fixed-income households, and an important public amenity” [1402.5.d]

#### 1404 Ward 3 Transportation

“The district government should do the following:

- “(1) Implement appropriate land use arrangements in Ward 3 that simplify and economize transportation services such as the following:”
- “(b) Medium and high density residential uses (where designated in the Land Use Element) should be limited to the major arterials well-served by either metrorail or metrobus” [1404.3.a]

#### 1409 Ward 3 Land Use

Section 1409.2 relates Ward 3 to the land use policies in the comprehensive plan. In addition to

- “(b) Protect existing residential neighborhoods and enhance their qualities” it includes
- “(k) Maintain and expand the existing housing stock, where feasible and consistent with the Comprehensive Plan to ensure a greater variety of housing types, opportunities and choices”
- “(m) Increase the supply of child care facilities in commercial areas within the ward.” [1409.2]

The Land Use Element designates four (4) housing opportunity areas in Ward 3, including Friendship Heights at Wisconsin and Western avenues. The plan recognizes that new development in residential areas is likely to be controversial, so to mitigate the controversy recommends

- “(1) Encourage interest in and direct development of the housing opportunity areas” [1409.4.a]

“Where the production of new housing is desirable per this plan, zoning flexibility should be considered, especially for the elderly and for low- and moderate-income populations:

- “(1) Consider increased residential densities (consistent with design scale and infrastructure capacity) in exchange for incorporating low- and moderate-income or elderly housing in development projects.”
- “(2) Consider the provision of elderly and low-moderate-income housing, when it is a substantial portion of a project, as an important amenity an PUDs, providing that such housing shall be on site.”
- “(5) Give zoning preference to projects which include housing near each of the ward’s Metrorail stations.” [1409.4.c]

#### Amenities

“Providing ‘amenities’ by meeting the needs of pedestrians and encouraging bicyclists is particularly important for Ward 3.” [1404.2.d]

“Improving the level of service at street intersections to “B,” or “C” at worst, is important for the protection and improvement of the quality of life, air quality, and residential character of the ward.” [1404.2.g]

“Increase the supply of child care facilities in commercial areas within the ward” [1409.2.m]