

3G Chevy Chase
Advisory Neighborhood Commission 3G
MAILING ADDRESS: P.O. Box 6252 Northwest Station Washington, DC 20015

CHEVY CHASE OFFICE
5601 Connecticut Ave. NW
Washington, DC 20015
(202) 363-5803

January 7, 1988

Mr. Edward Curry
Acting Director
Zoning Secretariat
1350 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

RE: Case No.86-26

Dear Mr. Curry:

Attached are copies of our testimony on the downzoning of the west side of Connecticut Avenue from Military Road to Chevy Chase Parkway.

Mr. Jeffrey Norman, the Single Member District Commissioner for the affected area and also our Vice-Chairman, will give the testimony.

If for some unforeseen reason Mr. Norman cannot give such testimony, then it will be given by either Mr. Lee Schoenecker, Vice-Chairman for Planning and Development, Mary Rowse, Treasurer, or myself.

Sincerely,



Allen Beach,
Chairman, ANC 3G

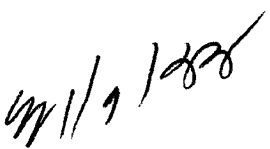
ZONING SECRETARIAT,
DISTRICT OF COLUMBIA

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ZONING COMMISSION

CASE No. 86-26

EXHIBIT No. 157



ZONING COMMISSION
District of Columbia
CASE NO.86-26
EXHIBIT NO.157

TESTIMONY OF ANC 3G
ON THE
PROPOSED DOWNZONING OF A PORTION
OF CONNECTICUT AVENUE

JANUARY 21, 1988

ZONING CASE NO.86-26

**TESTIMONY OF THE CHEVY CHASE ADVISORY NEIGHBORHOOD COMMISSION
ON THE
PROPOSED DOWNZONING OF A PORTION OF CONNECTICUT AVENUE**

Mr. Chairperson and other members of the Zoning Commission:

I am Jeffrey Norman, a member of the Chevy Chase Advisory Neighborhood Commission (ANC 3G). I live at 5315 Connecticut Avenue, N.W., and my Single Member District includes the portion of Connecticut Avenue which is under consideration for downzoning by the Zoning Commission.

I am here to testify in favor of the rezoning of the west side of Connecticut Avenue from Chevy Chase Parkway to Military Road from R-5C to R-3.

I am testifying on behalf of ANC 3G. This testimony was approved by the ANC by a vote of 7-0 (a quorum consists of four members present) at a regularly scheduled public meeting held on January 4, 1988.

The ANC initially and formally requested this rezoning in a letter dated October 3, 1986, to the Zoning Commission, and again in another letter dated November 12, 1987, which reflected the ANC's 7-0 vote on October 26, 1987, in favor of such downzoning. (ATTACHMENTS #1 and #2 respectively)

There are three main reasons why the ANC supports this zoning change:

- (1) To bring land use controls into conformity with the Comprehensive Plan,
- (2) To bring land use controls into harmony with the detached house residential character of the neighborhood to the immediate west of the area proposed for R-3 rezoning,
- (3) To avoid the possibility of local citizens having to bring costly private law-suits to enforce a covenant allowing only single-family structures.

Before I get into these three reasons, I would like to describe the neighborhood context, including a comparison with the other side of Connecticut Avenue.

Neighborhood Context

The immediately impacted area as surrounded by Connecticut Avenue, Chevy Chase Parkway, Reno Road, and Military Road consists of two types of zoning, R-5C and R-1B, to the west as far as Reno Road. The character of this area west of Connecticut Avenue is non-attached, single-family, low density on 5000 square foot lots or larger, with property values running between \$300 and \$500 thousand per structure or higher. In the R-5C area along the western side of Connecticut Avenue, there are five groupings of single-family townhouses which total 59 single-family units whose values run from \$200 to \$400 thousand dollars.

The area across Connecticut Avenue to the east and surrounded by Military Road on the north, Chevy Chase Parkway on the east and the south, and Connecticut Avenue on the west is considerably different in density and mix of single-family homes. Its single-family areas consist of about two-thirds attached houses and one-third detached houses. Its multi-family structures consist of four apartment structures of six to nine stories each and a total of about 360 dwelling units.

Attachment #3 goes into greater detail concerning these comparative densities

Now I would like to further discuss the three reasons for downzoning:

(1) The current zoning is R-5C, a high density zoning that permits large apartment houses. The Comprehensive Plan calls for low to medium density residential development at this location. D.C. law says that the zoning shall not be inconsistent with the Comprehensive Plan. The ANC believes that R-3 would be the most appropriate zoning in order to bring this zone into conformity with the Comprehensive Plan. (R-3 would allow for moderate density townhouses.)

(2) The neighborhood immediately to the west of the zone in question consists exclusively of large detached single-family houses. On Connecticut Avenue, all of the lots in this zone except two are currently occupied by townhouses. One lot is occupied by the Wesley Methodist Church, which would be permitted in an R-3

zone and one lot is vacant at present. The vacant lot is located at the southwest corner of Connecticut Avenue and Military Road. The owner of this vacant property has applied for a building permit to put townhouses there. Therefore, the R-3 zoning would simply maintain the status quo with respect to the already existing buildings and anticipated buildings within this zone.

(3) The entire neighborhood from Chevy Chase Parkway to Military Road and from Connecticut Avenue to Belt Road is subject to a private covenant prohibiting apartment houses. This covenant was upheld by the courts in two cases, one in 1968 and the other in 1986. Except for Connecticut Avenue itself, the zoning for the area covered by the covenant is R-1B, single-family houses, and thus not in conflict with the covenant. By rezoning this portion of Connecticut Avenue to R-3, the entire neighborhood will be in conformity with the covenant and private citizens will no longer be required to go to court to stop the building of apartment houses there.

On February 22, 1985, ANC 3G sent a letter to the D.C. Department of Consumer and Regulatory Affairs, which was the last in a series of letters asking whether the city could deny building permits based on a restrictive covenant. (ATTACHMENT #4)

On April 9, 1985, the Department replied to the ANC in a letter which stated that the Corporation Counsel rendered a written legal opinion on this matter on February 25, 1985. The Corporation Counsel stated that the District Government, in the absence of a court order, could not enforce such covenants through the permit process. (ATTACHMENT #5)

Therefore, private covenants are a cumbersome and unsatisfactory means of permanently protecting the character of a neighborhood. The zoning change is still needed.

Closing and Conclusion

Over the past three years, we have asked numerous people from the neighborhood how they felt about the proposed downzoning of this section of Connecticut Avenue. In December, 1987, the ANC sent a letter to every household in this zone asking their views on the issue (ATTACHMENT#6) To date, we are not aware of any opposition whatsoever to this proposal. As far as we know, our neighborhood is virtually unanimous in its support for the downzoning of Connecticut Avenue from Chevy Chase Parkway to Military Road from R-5C to R-3.

In conclusion, we urge you to expeditiously grant our noncontroversial request to rezone the west side of Connecticut Avenue between Chevy Chase Parkway and Military Road from R-5C to R-3.

Thank you.

Attachments and page reference in testimony:

- #1 Letter - October 3, 1986 (Page 1)
- #2 Letter - November 12, 1987 (Page 1)
- #3 Details on Neighborhood Densities (Page 3)
- #4 Letter - February 22, 1985 (Page 4)
- #5 Letter - April 9, 1985 (Page 5)
- #6 Letter to residents - December 1987 (Page 5)
- #7 Maps of area (2)



Advisory Neighborhood Commission 3G

MAILING ADDRESS: P.O. Box 6252 Northwest Station Washington, DC 20015

CHEVY CHASE OFFICE
5540 Connecticut Ave. NW
Washington, DC 20015
(202) 363-5803

October 3, 1986

Patricia Mathews
Chairperson
D.C. Zoning Commission
The District Building
1350 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Dear Madam Chairperson:

The Chevy Chase Advisory Neighborhood Commission (ANC 3G) strongly recommends that the zoning for the west side of Connecticut between Chevy Chase Parkway and Military Road be changed from R-5C to R-3 or lower because the current zoning conflicts with the Comprehensive Plan. By law, the zoning is not supposed to be inconsistent with the Comprehensive Plan. The Land Use Element of the Comprehensive Plan (D.C. Law 5-18, Title XI, Section 1136 (b)(52)) was enacted into law and became effective on March 16, 1985. The relevant land use policy map, which is part of the Land Use Element, clearly shows that the west side of Connecticut Avenue between Chevy Chase Parkway and Military Road is "moderate density". However, the current zoning, R-5C, which allows high density apartment development, is inconsistent with such Comprehensive Plan.

Furthermore, this same area is covered by a private covenant restricting the use of the land to single-family homes. Many of the neighbors whose property was subject to this covenant organized the Chevy Chase Defense Committee in the 1960's. The Committee sued a private developer, who attempted to construct a 100-unit apartment house on Connecticut Avenue between Harrison and Huntington Streets, in the case of E.A. Ginnetti Company, Inc. et al. v. Angelo Greco et al. (CA No. 2231-62). On January 19, 1968, the United States District Court for the District of Columbia upheld the covenant and the apartment house was not built.

More recently, the Committee won again in the case of Fred Ribe et al. v. Gilbert Oken (CA No. 07694-85), decided on June 9, 1986, in which the Superior Court of the District of Columbia issued a permanent injunction against the building of a 39-unit apartment house on the corner of Connecticut Avenue and Military Road.

The neighbors spent much time, effort, and money in bringing these lawsuits. In order to avoid future expensive and unnecessary lawsuits, and conform with the wishes of the neighborhood and this ANC, as well as the Comprehensive Plan, the Zoning Commission should implement D.C. Law 5-187 by changing the zoning in accordance with that law.

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Attachment #2

CHEVY CHASE OFFICE
5601 Connecticut Ave. NW
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(202) 363-5803

November 12, 1987

Mr. Lindsley Williams
Chairperson, D.C. Zoning Commission
The District Building
1350 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Dear Mr. Williams:

At a regularly scheduled public meeting of the Chevy Chase Advisory Neighborhood Commission (ANC 3G) held on October 26, 1987, the Commission, by a vote of 7-0 (a quorum consists of four members present) decided to again request the Zoning Commission to rezone the western side of Connecticut Avenue from Military Road to Chevy Chase Parkway from R-5C to R-3. The ANC initially and formally requested this rezoning in a letter dated October 3, 1986. However, the Zoning Commission deferred action on this request until the Office of Planning had finished its Connecticut Avenue study. The latter study is now basically complete.

Therefore, we once again ask the Zoning Commission to hold hearings on the above mentioned rezoning at the earliest possible date. The ANC 3G requests to be a petitioner in Z.C. Case No. 86-26 (Map & Text Amendments-Connecticut Avenue) and to be heard at the hearings. We will have an outline of our testimony filed at the office of the Zoning Commission by December 1, 1987, for the pre-hearing conference to be held on December 10, 1987, as stated in the letter from the Zoning Commission to citizens groups (dated November 9, 1987). We would further request, that if at all possible, this particular downzoning be disposed of "early on" in the Connecticut Avenue hearings as it is not controversial.

In the Office of Planning's generally excellent, "Preliminary Report - Connecticut Avenue Corridor Study", the last full paragraph of page 46 reads:

"On the west frontage of the Avenue, from Harrison Street to Military Road, the designation in the Generalized Land Use Map is for "Moderate Density Residential", defined as "Row houses and garden apartments are the predominant uses; may also include low density housing". In the location the Council specifically amended the land use map from High Density



Chevy Chase

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Residential to Moderate Density, in order to reflect the scale and type of existing development, lessen pressures for redevelopment of the recently constructed townhouses, and ensure that any infill development or redevelopment is generally in scale with the existing predominant development pattern.”

In essence, the draft Office of Planning report is saying that zoning regulations are not in conformance with the recently enacted Comprehensive Plan. We certainly agree and believe that the Zoning Commission should rezone this area from R-5C to R-3. These changes would also reflect the existing single-family residential neighborhood now in place.

Page 47 of the recent draft, “Connecticut Avenue Corridor Study”, also indicates that the restrictive covenants are private instruments and do not substitute for public land use controls such as zoning. We agree and have concluded that we must seek appropriate zoning to fully ensure that this particular area retains its single-family character.

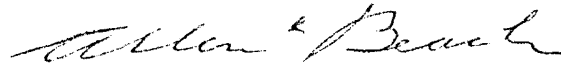
More specifically, if this area is not rezoned to be in conformance with the Comprehensive Plan, and if another application for an apartment building is again brought forth in the future under the present R-5 zoning, it could mean that neighborhood residents will once again have to raise substantial legal fees to fight such an application in the courts. These residents have gone through this type of experience twice within the last 20 years, the most recent being within the last 18 months. While they prevailed in both cases, they should not have to once more go through this costly and traumatic experience.

In short, this particular area needs stabilized and appropriate public land-use controls. Thus, we again request that the Zoning Commission hold hearings in the near future with the intent being to rezone the west side of Connecticut Avenue between Military Road and Chevy Chase Parkway from R-5C to R-3 to be compatible with the Comprehensive Plan and the existing single-family residential neighborhood residential development.

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Sincerely,



Allen Beach
Chairman, ANC 3G

cc:

Jim Nathanson, Councilmember, Ward 3
Fred Greene, Director, Office of Planning
Mark Whitty, President, Chevy Chase Citizens Association
Fred Ribe, President, Chevy Chase Defense Committee

Details in Neighborhood Densities

We would like to put the proposed downzoning in the context of the broader neighborhood community densities. This can be done most readily by contrasting the area to be downzoned and its immediately abutting single-family neighborhood (the single-family Covenant Area) on the west side of Connecticut Avenue.

First, let us examine the residential frontage on Connecticut Avenue on both its east and west sides from Military Road to Chevy Chase Parkway. Both are presently zoned R-5. However, the west side or that side proposed for downzoning, consists of five relatively small complexes of single-family townhouses totalling 59 dwelling units. The Wesley Methodist Church also fronts on the west side of Connecticut Avenue.

The Connecticut Avenue east side frontage, on the other hand, consists of about 380 dwelling units, with 360 being contained in four apartment buildings of six to nine stories each. The biggest of these apartment buildings consists of about 160 units; the smallest contains about 50 units. One of these apartment houses also contains up to 30 doctors' offices according to the management of the apartment house. The remaining 20 units on the east side of Connecticut are located in four small multi-unit buildings.

Second, not only is there a difference in densities between the two street-frontings of Connecticut Avenue, but also of the single-family areas immediately behind Connecticut Avenue frontages on the west and on the east. For example, in that part of the Covenant Area west of Connecticut Avenue as bounded by Harrison Street on the south, 38th Street on the west, Military Road on the north, and the previously mentioned 59 townhouses fronting on Connecticut Avenue, there are 70 single-family, non-attached houses, many of which are quite large. The zoning in this particular area is R-1B.

On the east side of Connecticut, on the other hand, in a geographic area of almost the exact same size and as bounded by Military Road on the north, Chevy Chase Parkway on the east and south, and the previously mentioned apartment houses fronting on Connecticut Avenue, there are 25 single-family, non-attached houses, 30 duplexes containing 60 units, and one small apartment building containing about 15 units. This adds up to a total of about 100 residential units.

Also, if it were not for a large open lot at the southeast corner of Military Road and Connecticut Avenue (site of the Connecticut Avenue Community Garden), densities would be even higher in this particular area. This area is zoned R-2.

We believe that, among other things, the contrasts in neighborhood densities between the two sides of Connecticut Avenue support our case for the downzoning of the western frontage on Connecticut Avenue. The recently adopted Comprehensive Plan is right in calling for a reduction in density. In fact, the western frontage on Connecticut Avenue between Military Road and Harrison Street should never have been zoned R-5. Appropriate actions to downzone this area should rectify this latter mistake.

CHEVY CHASE OFFICE
5540 Connecticut Ave. NW
Washington, DC 20015
(202) 363-5803

February 22, 1985

Carol B. Thompson, Director
Department of Consumer and
Regulatory Affairs
614 H Street N.W.
Washington, D.C. 20001

Dear Ms. Thompson:

On September 28, 1984, the Chevy Chase Advisory Neighborhood Commission (ANC 3G) sent you a letter asking that a permit for a proposed 39-unit apartment building on Lot 820, Square 1872, at the southwest corner of Military Road and Connecticut Avenue N.W., be denied on the grounds that it would be in violation of the restrictive covenant which forbids apartment building at this site. (See attachment #1)

On November 26, 1984, we received a letter from you, stamped November 19, 1984 by your office concerning this matter. (See attachment #2) Among other things, this letter indicated that your Department had asked the D.C. Corporation Counsel for a legal opinion concerning the applicability of the restrictive covenant to the proposed apartment building. It also indicated that you would let us know as soon as a legal opinion had been rendered.

In the middle of February 1985, it came to our attention that an apartment building permit either had been issued or was about to be issued for the site in question. After checking with several people, in your department as well as with the Corporation Counsels Office, we learned that the permit had not yet been issued, but that its issuance was imminent. We also learned that, apparently, a memorandum had been written on or about December 21, 1984, by a former employee of the Corporation Counsel on this matter, indicating that the City could not deny an apartment building on this site because of a restrictive covenant.

It has been three months since we received your interim status letter of November 19, 1984 on this matter and close to five months since we originally transmitted a written request to you on September 28, 1984. And, if in fact, the essence of a

legal opinion was rendered in late December, approximately two months have gone by and we still have not been notified of the same. Certainly, this latter delay runs counter to the intent of your November 19 letter to notify us once an opinion has been received.

Parenthetically, I should add that we have received excellent cooperation from members of your department on this matter. Two people have been particularly responsive. First, Mr. Jim Fahey has been very helpful to date in providing interpretations in this matter. Second, Ms. Patricia Cooper-Morrison has, as appropriate, been most responsive not only to our Commission, but also to citizens raising questions on this subject. Although outside of your department, I should also add that we have recently had excellent cooperation from Mr. Stephen Gell of the Corporation Counsels Office.

Unfortunately, however, for various reasons we have not received a timely and definitive answer to our September 28, 1984 letter. Accordingly, potentially impacted residents are, understandably, becoming increasingly concerned, frustrated, and even angry relative to the disposition of this matter. If in fact, a legal opinion has been rendered, then our Commission should be promptly apprised so that citizens can organize accordingly. To not let us know is less than responsive government.

Therefore, at the earliest possible date, please inform us in writing of the legal status or disposition on this matter as you indicated that you would do in your November 19 letter. If you have any questions, please by all means, feel free to contact me through our ANC office at 363-5803. Thank you very much.

Sincerely,



Lee Schoenecker

Chairman, Chevy Chase

Advisory Neighborhood Commission 3G

(ANC 3G)

cc:

Polly Shackleton
Thomas Downs
Carolyn Shapiro
Jim Fahey
Patricia Cooper-Morrison
James Murphy
Stephen Gell
Judy Toland

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS
OFFICE OF THE DIRECTOR



APR 09 1985

Mr. Lee Schoenecker
Chairman, Chevy Chase
Advisory Neighborhood
Commission 3G
P.O. Box 6252,
Northwest Station
Washington, D.C. 20015

Dear Mr. Schoenecker:

This letter is in response to your letter dated February 22, 1985, regarding the status of a legal opinion from the D.C. Corporation Counsel in regard to the applicability of restrictive land covenants to property designated for the proposed construction of an apartment house at the Southwest corner of Military Road and Connecticut Avenue, N.W., Washington, D.C.

The request for legal opinion was referred to Office of the Corporation Counsel, D.C. Land Use Section, for response. On February 25, 1985, Mr. Stephen Gell, Assistant Corporation Counsel, rendered a written legal opinion concerning the covenant applicability issue. Mr. Gell's opinion reads in part:

..."Private restrictive covenants are enforced by the parties to those covenants in court actions brought for the purpose. The District Government, in the absence of a court order, is not in a position to enforce such covenants through the permit process. It has not been given the authority to arbitrate disputes created thereby. Moreover, if the District were to assume the burden of enforcement, it would subject itself to liability not only for failure to discover such covenants every time a permit application is filed, but also liability for incorrectly

CHEVY CHASE OFFICE
5601 Connecticut Ave. NW
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**IMPORTANT NOTICE
FROM THE
CHEVY CHASE ADVISORY NEIGHBORHOOD COMMISSION (ANC 3G)**

Dear Fellow Citizens:

The Chevy Chase Advisory Neighborhood Commission 3G, in connection with the Chevy Chase Defense Committee, would like your support in its efforts to persuade the Zoning Commission to permanently downzone the west side of Connecticut Avenue between Military Road and Chevy Chase Parkway. At the present time, this area is zoned for high-rise apartments. We believe that the law should permit only townhouses or detached houses in that zone.

No apartment houses currently exist in that zone because of a private covenant prohibiting such use of the land. A private organization, the Chevy Chase Defense Committee, has gone to court twice (in 1968 and 1985) to stop developers from putting apartments there.

In 1985, the District of Columbia City Council adopted a new Comprehensive Plan which designates that zone as moderate density (detached houses or townhouses). Unfortunately, the Comprehensive Plan is a general guideline. The Zoning Commission must still actually change the zoning. The law says that the zoning may not conflict with the Comprehensive Plan, but it does not say how quickly the Zoning Commission must act to bring the zoning into conformity with the Plan.

The Zoning Commission has placed this issue (a proposal to downzone that area) on its agenda and a Hearing will take place on January 21, 1988)

(OVER)

3G Chevy Chase
Advisory Neighborhood Commission 3G
MAILING ADDRESS: P.O. Box 6252 Northwest Station Washington, DC 20015

CHEVY CHASE OFFICE
5601 Connecticut Ave. NW
Washington, DC 20015
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Your neighborhood has been a single-family home neighborhood for nearly a hundred years and we think that the sentiment of nearly everyone living there is to keep it that way indefinitely. We hope that you agree.

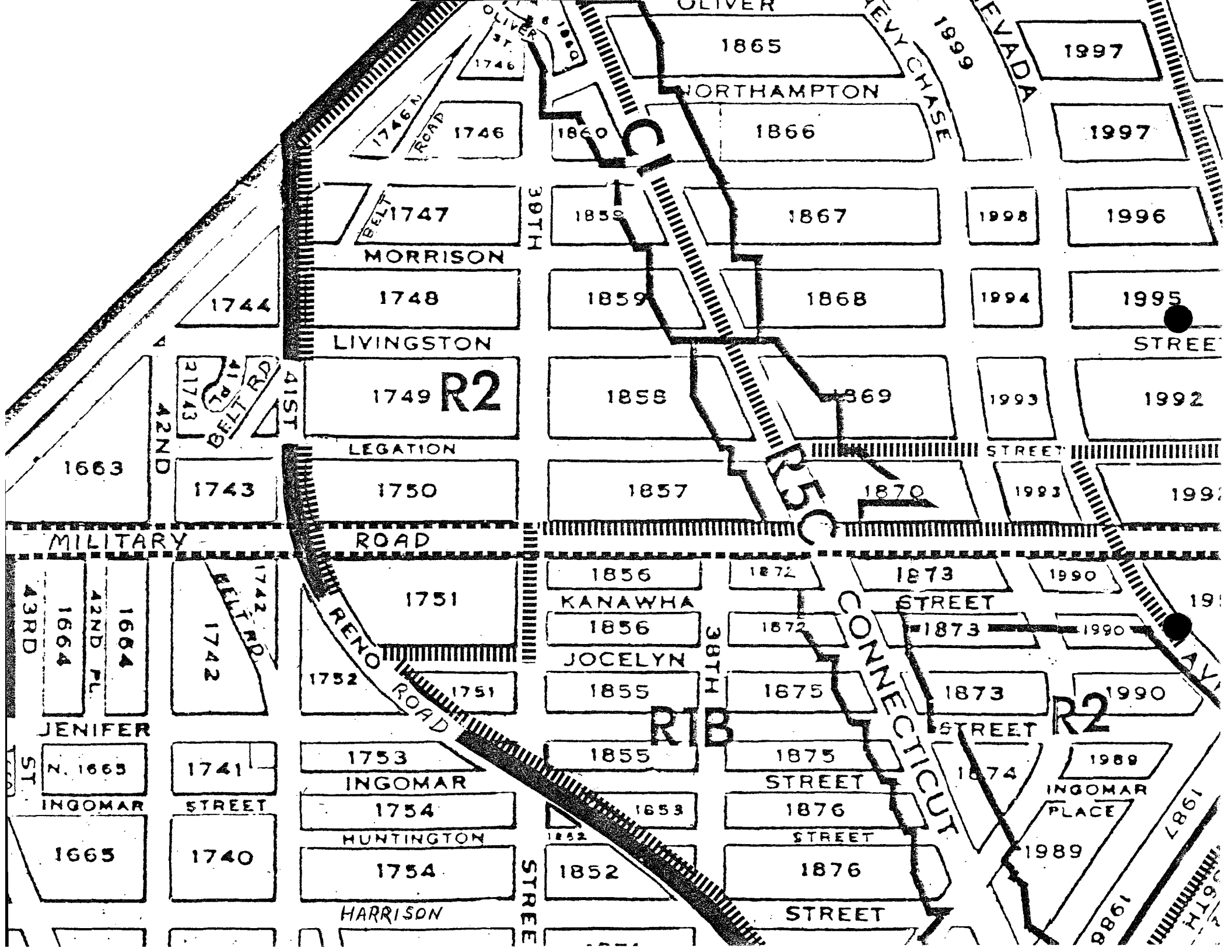
If you would like to express your views on the downzoning proposal or to get further information about attending the hearing, you may call the ANC office at 363-5803 between 9 a.m. and 1 p.m. weekdays or write to:

Mr. Allen Beach, Chairman,
Chevy Chase ANC 3G
P.O. Box 6252 Northwest Station
Washington, D.C. 20015

Sincerely,



Allen Beach, Chairman



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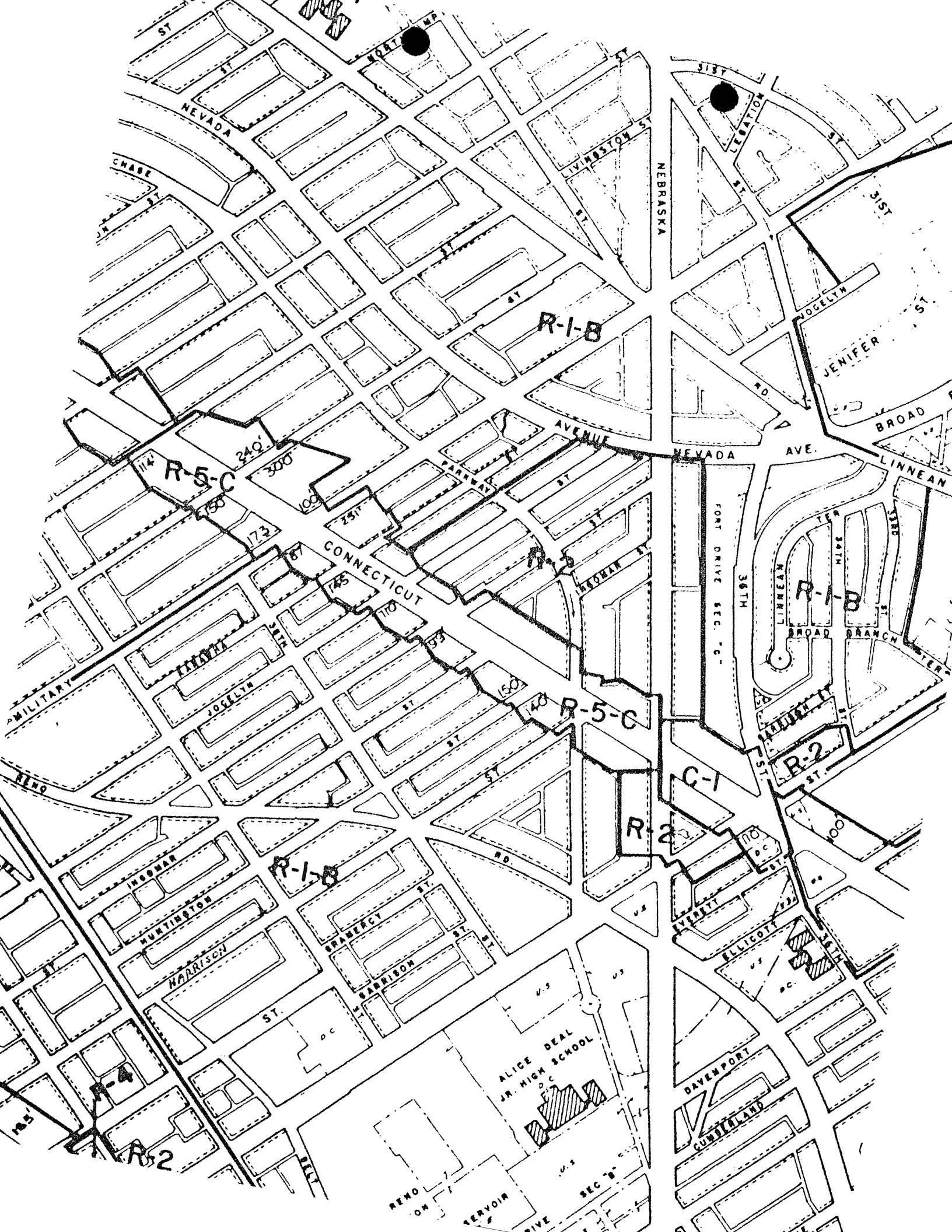
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