

4104 Legation Street, N.W.  
Washington, D.C. 20015  
November 8, 2002

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BY HAND DELIVERY

Carol J. Mitten, Chair  
Zoning Commission  
District of Columbia Office of Zoning  
441 Fourth Street, N.W., Suite 210-S  
Washington, D.C. 20001

Re: Zoning Commission Case 02-17, A Proposed One-Stage Planned Unit  
Development with Related Map Amendment at 5401 Western Avenue, NW -  
Square 1661, Lot 805 and a Portion of Lot 7

Dear Chair Mitten:

I live at 4104 Legation Street, N.W., with my wife Lucy and my 2-yr. old son, Levi, and the following views are my personal ones. I enclose a paper entitled "History of Zoning and Land Use Planning of the Washington Clinic Site from 1974 - 2002," and the cover letter dated October 30, 2002, that I sent with this paper to the Office of Planning. This paper is intended to provide the Zoning Commission, the Office of Planning, neighbors, Stonebridge Associates and other interested persons with essential background information on the history of zoning decisions and planning principles applicable to the Washington Clinic site, Square 1663, Lot 805, 5401 Western Avenue, NW, Washington, DC. I urge that you review this paper carefully when considering Stonebridge's request to dismantle half of the transition zone that the Zoning Commission created to protect the surrounding low-density neighborhoods from the high-density commercial uses on Wisconsin Avenue.

I also enclose a four-page packet of zoning map information that demonstrates that the Stonebridge Application, at Drawing D-1, is seriously misleading by showing the entire Square 1661 as zoned C-3-B, and if uncorrected this visual context would skew the analysis of the Application. Lastly, I enclose a three-page packet of Zoning Map excerpts that demonstrate the erosion of the transition zone in Squares 1663 and 1661 from 1974 to the present, and that visually demonstrate the Applicant's request to dismantle about half of the remaining narrow transition zone.

I hope this information is useful to you and the other commissioners.

Sincerely yours,



Laurence J. Freedman

cc: Douglas Firstenberg, Stonebridge Associates

ZONING COMMISSION  
District of Columbia  
Case 02-17  
Exhibit 109

ZONING COMMISSION  
District of Columbia  
CASE NO.02-17  
EXHIBIT NO.109

4104 Legation Street, N.W.  
Washington, D.C. 20015  
October 30, 2002

Mr. Andrew Altman, Director  
Ms. Ellen M. McCarthy, Deputy Director for Development Review  
District of Columbia Office of Planning  
401 North Capitol Street, N.W., Suite 4000  
Washington, D.C. 20002

Re: Zoning Commission Case 02-17C: Stonebridge Application

Attn: Stephen Cochran

Dear Mr. Altman and Ms. McCarthy:

I enclose a paper entitled "History of Zoning and Land Use Planning of the Washington Clinic Site from 1974 - 2002." This paper is intended to provide the Office of Planning, the Zoning Commission, neighbors, Stonebridge Associates and other interested persons with essential background information on the history of zoning decisions and planning principles applicable to the Washington Clinic site, Square 1663, Lot 805, 5401 Western Avenue, NW, Washington, DC. This letter and my contribution to the enclosed paper are in my individual capacity as a resident of Friendship Heights, and the views expressed in this letter are my personal ones.

I urge that you review this paper carefully when considering Stonebridge's request to dismantle the transition zone that the Zoning Commission created to protect the surrounding low-density neighborhoods from the high-density commercial uses on Wisconsin Avenue. Specifically, I urge that you consider (i) the past zoning decisions and planning rationales for this site; (ii) the extent of changes, if any, that have occurred in the neighborhood since that time that might justify changing the zoning; and (iii) the short-term and long-term impact on the surrounding neighborhoods and the Western Avenue corridor if this small, but critical, transition zone is eliminated.

At the most recent ANC3E meeting, Ms. McCarthy made general remarks that the Office of Planning will evaluate PUD applications with an eye toward both protecting the quality of life in residential neighborhoods and promoting development where transit infrastructure exists, dual goals which I and the neighborhood fully support. She then made more specific remarks regarding the Office of Planning's vision for development at this site, and these remarks, if I understand them correctly, are deeply troubling.

In the specific context of considering the Stonebridge application, she said that the Office of Planning intended to set boundaries for high-density residential and high-density commercial development; that the Office of Planning would state where it is inappropriate for high-density residential or commercial development; that she expected the Upper Wisconsin Commercial Corridor Study to "draw a line in the sand" that the City Council would have to adopt regarding high-density development, and that the Office of Planning would draw a "Maginot Line" to separate the high-density development from the rest of the neighborhood.

This "Maginot Line" approach would be fine, and would in fact protect the low-density residential neighborhoods, if the "Maginot Line" simply was drawn today where the Zoning Map shows it to be – between the high-density commercial zoning in Square 1661 and the Washington Clinic site, zoned moderate-density residential.

My understanding of these remarks in the context in which they were made, however, is that the Office of Planning is considering moving the current "Maginot Line" and recommending high-density residential development on the Washington Clinic site, but then declaring the border between Lot 805 (the Washington Clinic site) and Lot 7 (the Lisner Home site) to be the new "Maginot Line" between high-density residential and low-density residential. I may be mistaken in this understanding. However, if this approach is actually under consideration, I believe most strongly that this "Maginot Line" approach, premised on moving the line from where it is now to the next site to the east, is deeply flawed as a planning principle for our Friendship Heights neighborhood.

Again, the Zoning Commission, after extensive work by the National Capital Planning Commission, zoned this site as a moderate-density transition zone just like the northeast quadrant of Square 1661, which contains the Courts of Chevy Chase townhomes, and there is no need for a "Maginot Line" unless this transition zone is destroyed. There is no sound planning reason to destroy this transition zone and to purportedly "create" a new transition zone by not upzoning the Lisner land, currently zoned R-2.

The "Maginot Line" approach is inconsistent with the zoning of this site as the transition zone. It is inconsistent with Smart Growth and Transit Oriented Development principles that stress appropriately designed and scaled buildings that integrate with the neighborhood, and that promote transition zones and transition densities. Smart Growth, as I understand it, does not intentionally place high-density uses immediately adjacent to low-density uses. Your Office of Planning relies on the planning principles that Smart Growth and Transit Oriented Development must reflect and respect the scale, character and history of the neighborhood, and it applies this principles to planning efforts in Takoma DC and elsewhere in DC.

Perhaps the "Maginot Line" approach is appropriate when there is a physical buffer that literally blocks all traffic, parking and visual impacts, such as the densely-wooded buffer that exists between the Chevy Chase Center and the adjoining Chevy Chase MD neighborhood. Perhaps the concept of a "Maginot Line" makes sense when there is a pre-existing high-density use adjoining a low-density one and the goal is avoid zoning creep. The "Maginot Line" approach is ill-suited, though, for our neighborhood and is unnecessary unless the Office of Planning intentionally creates a high-density zone immediate adjoining a low-density one. The

"Maginot Line" approach is unnecessary if the current transitional zoning for the Washington Clinic site remains intact, as it should.

The "Maginot Line" approach would permit a high-rise that is completely out of character with the neighborhood and would forever change the character of it. It would provide intense pressure for upzoning the adjoining Lisner land, notwithstanding any current Office of Planning's intentions not to support such upzoning. And, like the actual Maginot Line, I think it is destined to fail, in this case fail to protect our quality of life and our stable low-density neighborhood.

I hope that the enclosed paper provides useful history and background. We look forward to meeting with Ellen McCarthy and Steve Cochran in the next day or two to discuss our specific response to the Stonebridge proposal of October 25, 2002.

Sincerely yours,

A handwritten signature in black ink, appearing to be 'LJF', written over a horizontal line.

Laurence J. Freedman

## History of Zoning and Land Use Planning of the Washington Clinic Site from 1974 - 2002<sup>1</sup>

Prepared in October 2002 for Consideration of Zoning Commission Case No. 02-17C,  
Stonebridge Application for Map Amendment and PUD

### 1. Current zoning for the Washington Clinic Site

The current zoning of the Washington Clinic site, 5401 Western Avenue (Square 1663, Lot 805) is R-5-B (moderate density, single-family or multi-family housing). This 1+ acre site is one of the three most intensively zoned residential sites in the Tenleytown-Friendship Heights corridor.<sup>2</sup> Its R-5-B zoning permits five times the residential density of the surrounding residential neighborhood -- about 76 condominiums or apartments/acre,<sup>3</sup> compared to 15 homes/acre in the surrounding R-2 neighborhood. The entire eastern edge of the site borders land zoned low-density R-2, and the entire southern edge borders land zoned moderate-density R-5-B, with the exception of a the zoning line through the very western point of the site, literally at the intersection of Western Avenue and Military Road, which abuts a C-3-A zone.<sup>4</sup> (The northwestern edge borders Maryland.)

This site is part of a gateway to the residential neighborhoods of Friendship Heights and Chevy Chase DC. The current zoning allows a height of 50 feet, a FAR of 1.8, residential development of 78,912 square feet.

There is no denser residential zoning than R-5-B in the Tenleytown-Friendship Heights corridor.<sup>5</sup>

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<sup>1</sup> This paper was prepared by Larry Freedman and Marilyn Simon, residents of Friendship Heights, DC and members of the Friendship Heights Organization for Reasonable Development, who are solely responsible for the accuracy of the research.

<sup>2</sup> Only two other residential sites in the Tenleytown-Friendship Heights Corridor are zoned R-5-B: the WMATA bus terminal on Wisconsin Avenue below Jennifer Street, and the northeast quadrant of Square 1661 that contains the Courts of Chevy Chase townhomes.

<sup>3</sup> This calculation is based on the assumption of approximately 925 square feet (net)/unit, approximately the square footage (net)/unit reflected in the initial Stonebridge Application in March 2002 and its Pre-Hearing submission in August 2002.

<sup>4</sup> This is represented on the Zoning Map of the District of Columbia (Map 2), prepared by the Office of Zoning, as Amended through September 2002, and printed on October 16, 2002, available at [www.dcoz.dc.gov](http://www.dcoz.dc.gov).

<sup>5</sup> Across the street from the Washington Clinic, the Courts of Chevy Chase on 43<sup>rd</sup> Street (29 townhomes) were built on a site zoned R-5-B and built within R-5-B standards -- approximate FAR of 1.85 and height of 45 feet. Though the PUD for that project allowed for the R-5-C status (now designated R-5-D through the 1992 recodification of the regulations), this designation is not meaningful due to the fact that these townhomes were built fully within R-5-B standards. [See Z.C. Order 528, 528-A, 528-B, 528-C, 528-D, Case No. 86-21F/85-9P, April 13,

## 2. Request by Stonebridge for a PUD and Map Amendment

Stonebridge, in a revised pre-hearing submission filed on October 25, 2002, is requesting that the Washington Clinic site be upzoned to R-5-C plus a PUD plus an additional 5% of additional height and 5% of additional density, and is thus equivalent to a zoning of R-5-D.<sup>6</sup> It is planning a building with a legal height of 78.75 feet for an eight-story building (ground floor plus seven stories).<sup>7</sup> The building would include up to 125 condominiums, with each roughly 1200-1500 square feet according to Stonebridge. The density would be 4.15 FAR on the Washington Clinic site. It plans to provide 1.1 parking spaces per unit (inclusive of up to 25% non-accessible "stacked" or "tandem" spaces, inclusive of 8 visitor parking spaces), plus 4 spaces for the 10 child daycare employees, or about 0.75 parking spaces per residential unit without these inclusions. This means that approximately 25% of the unit owners could have 2-spaces, should the owners wish to purchase them at market rate; 50% of the owners could have 1 accessible space, and 25% of the owners could not purchase any accessible spaces.

## 3. Comprehensive Rezoning at Friendship Heights in 1974

In the 1950s and 1960s, in anticipation of new freeways serving Friendship Heights, the Friendship Heights area was largely zoned commercial. [Z.C. Order 87, Case No. 73-29, Statement of Reasons, February 12, 1974, at p. 2.] When it became clear that there would be no freeways serving Friendship Heights, that major road widening was not advisable, and that the new Metrorail system would soon have a station at Friendship Heights, in 1974 the Zoning Commission adopted the National Capital Planning Commission's (NCPC) recommendation to rezone the Washington Clinic Site to R-5-B to provide a transition between high-density commercial zoning (C-3-A) on Wisconsin Avenue and low-density residential zoning (R-2) in the surrounding neighborhood.

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1987, June 11, 1990, June 8, 1992, June 13, 1994, June 10, 1996, respectively.]

<sup>6</sup> Under the Zoning Regulations, the Zoning Commission may grant a request of 5% of additional height or density only if it is "essential to the successful functioning of the project." 11 DCMR 2405.3. This provision does not contemplate requesting both additional height and density, and does not suggest that the term "essential" is meant to accommodate an Applicant that is already seeking a Map Amendment but that simply wants to avoid the otherwise applicable zoning category.

<sup>7</sup> Stonebridge's submission on October 25, 2002, changed the measuring point to 322 feet for the residential building. The elevation at the point of Western Avenue and Military Road is 316 feet, so the actual or visual elevation of the building from that point would be 84.75 feet. Further, the penthouse extends beyond the roofline on both sides of the building, with no apparent setback, and thus the building actually appears to be 98 feet tall, unless the mechanical setback requirements are waived entirely.

After an extensive 17-month planning effort by the NCPC, Montgomery County,<sup>8</sup> the District Office of Planning and Management (predecessor to the current Office of Planning), all impacted government agencies, all interested neighborhood groups, and in full recognition of the benefits of the then-pending Metrorail station at Friendship Heights, on February 12, 1974 the Zoning Commission rezoned all or part of ten Squares in Friendship Heights and decided not to rezone any other Squares in the "1974 Plan Area," bounded by Western Avenue to the north, 41<sup>st</sup> Street to the east, Fessenden Street to the south and 47<sup>th</sup> Street to the west. [See Z.C. Order. 87, Case No. 73-29, February 12, 1974.] As part of this rezoning, the Zoning Commission specifically rezoned Square 1663, Lot 805—the Washington Clinic site—to R-5-B zoning to provide for moderate-density residential development—five times the density of the surrounding residential zoning. [Z.C. Order 87, Case No. 73-29, February 12, 1974, at p. 2, para. 3(c).]

As the current official Zoning Map now reflects, the boundary of that rezoning of the Washington Clinic site was very well defined—a curved boundary of a pie-shaped lot with a radius of exactly 334 feet, and an interior angle of just over 45 degrees – the exact dimensions of Lot 805. In addition, the Zoning Commission deliberately and specifically rezoned part of Square 1661 to the immediate south of the Washington Clinic site to R-5-B as well (Square 1661, Lots 1, 11-16, 812, and that portion of lots 808 and 809 lying further than 150 feet from Wisconsin Avenue) to provide, together with the Washington Clinic site, about a 2-acre swatch of land zoned R-5-B. [Z.C.. Order 87, Case No. 73-29, February 12, 1974, at p.2, para. 3(b).] Why did the Zoning Commission carve out this little swatch of land, nine lots and part of two others, and rezone it R-5-B?

#### **4. In 1974 The Washington Clinic Site was Rezoned to Provide a Transition Between High-Density Commercial Development and Low-Density Residential and Was Rezoned in Anticipation of the Friendship Heights Metrorail Station**

##### **A. Rezoning of the Washington Clinic Site as a Transition**

The Zoning Commission set forth four major objectives of this rezoning of the core of Friendship Heights. The rezoning of the Washington Clinic site, and the rezoning of specified lots on the east side of Square 1661 (currently the location of the Courts of Chevy Chase townhomes), were to achieve the following objective:

**[R]ezoning certain areas on the periphery of the plan area to medium density residential in order to provide a buffer between the high density commercial and mixed use portions of the plan area and the surrounding low density residential community.**

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<sup>8</sup> The chronology of this extensive planning effort is reflected in the 3-page "Friendship Heights Summary of Recent Planning Activities," included at C-1 through C-3 in the "Final Friendship Heights Sectional Development Plan" dated October 3, 1974, that was the NCPC's final report and recommendations.

[Z.C. Order 87, Case No. 73-29, Statement of Reasons, at p. 2 (emphasis added).]

This objective directly reflected the recommendation of the National Capital Planning Commission (backed by the Interagency Task Force on Friendship Heights) to the Zoning Commission that the Washington Clinic site be part of:

**moderately density residential development around the edges of the [Friendship Heights commercial] core area to provide a compatible transition in order the protect the surrounding low-density residential area.**

["Final Friendship Heights Sectional Development Plan," dated October 3, 1974, at p. 10 (emphasis added).] This was a sound planning principle then, and it remains a sound planning principle now.

In fact, this rezoning to R-5-B of this small and very carefully drawn strip of about 2 acres in Squares 1663 and 1661 fit perfectly the task of providing the desired transition zoning. First, obviously this swatch of land was sandwiched between the high-density commercial zones on Wisconsin Avenue and the low-density residential neighborhoods. Second, R-5-B allows for development that would, in all key aspects, provide a the desired transition, by allowing for:

Height of 50 feet,<sup>9</sup> as a transition from the 90 feet that the 1974 rezoning would allow on Wisconsin Avenue to the 3-stories (and 40 feet) allowed in the surrounding neighborhoods;

FAR of 1.8, as a transition from the 3.5 to 4.0 FAR (C-2-B, C-3-A zoning, respectively) allowed on the western part of Square 1661 on Wisconsin Avenue to the low-density surrounding neighborhoods (R-2) (R-2 has no specified FAR, but even with a PUD the R-2 density allowed is 0.4);

Density of approximately 76 apartments/acre (or approximately 40 townhomes/acre), as a transition from approximately double that density on Wisconsin Avenue (if housing were developed in the C-3-A commercial zone) to 15 units/acre in the surrounding neighborhood.<sup>10</sup>

Thus, the Zoning Commission's explicit goal was to make the Washington Clinic site a transitional zone, and it achieved it well by zoning it R-5-B.

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<sup>9</sup> In 1974, R-5-B allowed for a height of 60 feet, but this was adjusted as part of a general review of residential heights and densities reflected in a revision of the zoning regulations in 1992. [Final Rulemaking, 39 DCR 8305-11, November 13, 1992.]

<sup>10</sup> The comparative research in these three points was prepared by the authors of this paper and are not direct quotes.



## **B. Rezoning the Washington Clinic Site in Anticipation of the Metrorail Station**

The rezoning of the Washington Clinic and part of Square 1661 served another key of objective of the 1974 planning efforts, "controlling commercial and residential development within the plan area at a level consistent with the traffic capacity of the main arterial and feeder streets within the plan area." [Z.C. Order 87, Case No. 73-29, Statement of Reasons, February 12, 1974, at p. 1.] Without the freeways anticipated in the 1950's and 1960's to serve Friendship Heights, the Zoning Commission recognized that the existing road transportation infrastructure had serious, and identifiable, limits.<sup>11</sup>

For example, the Zoning Commission specifically stated that "the public interest requires that the existing zoning at [the Friendship Heights area] be revised so as to reduce the potential for high-density traffic generating uses beyond the capacity of the street system," and that "commercial development in Friendship Heights on both sides of the line has created considerable traffic congestion at peak hours and on Saturdays ... that threatens the stability of the adjacent single family residential communities." [Z.C. Order 87, Case No. 73-29, Statement of Reasons, February 12, 1974, at pp. 2, 4.]

The Zoning Commission, however, was fully aware of the planned Metrorail stop at Friendship Heights. The Zoning Commission, in fact, specifically relied on the NCPC and Interagency Task Force's inclusion in their planning efforts the assumption that the Metrorail station in Friendship Heights would carry 30% of all peak hour commuter trips. [Z.C. Order 87, Case No. 73-29, Statement of Reasons, February 12, 1974, at p. 3.] This point could not be clearer: "[t]he development computations and zoning envelopes of the District draft plan are based on these traffic considerations, assuming both the construction of the 'Ring Road' and the availability of access to the the subway system at Friendship Heights." [Z.C. Order 87, Case No. 73-29, Statement of Reasons, February 12, 1974, at p. 3.] Indeed, concentrating residential development near the planned Metrorail stops—what we now call Transit Oriented Development and Smart Growth—was forefront on the NCPC and Zoning Commission agendas. This was considered sound planning at this time.

According to the Zoning Commission, the 1974 rezoning of the core of Friendship Heights shifted from C-3-A (medium bulk—major business and employment center) and C-2-A (community business center—medium density) to C-2-B (high-density mixed use residential/commercial) and R-5-B (medium density residential) as part of an overall effort to reduce high-density uses that "would have a destructive effect on the adjacent residential communities." [Z.C. Order 87, Case No. 73-29, Statement of Reasons, February 12, 1974, at p. 4.] The Zoning Commission reached this solution after carefully considering the zoning and

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<sup>11</sup> The current Comprehensive Plan for Ward 3 reflects this exact theme, as well. It states that the ward's "commercial zoning is a legacy of the 1950's population projections and the extensive freeway system then planned for the district" and that "much of this medium density [commercial] zoning must be downzoned." [DC Comprehensive Plan, Sec. 1409.5.]

development history of Friendship Heights DC and Friendship Heights, Maryland.

The Zoning Commission's key factors were:

Intense commercial, office, and residential development had occurred and was occurring on the Maryland side of Friendship Heights. (This trend continued, and continues today.)

Further development under then-existing high-density commercial zoning on both sides of Friendship Heights would necessitate major widening of existing roadways. The NCPC inter-agency rezoning task force, however, recommended against major widening of existing roadways because it would result in further damage to the neighborhood. (Such widening did not occur and will not occur.)

The NCPC inter-agency task force recommended a new "Ring Road" on both sides of the line to provide better circulation and protect the neighborhoods. (This idea was never acted on and is long-dead.)

The new Metrorail system would be operating in Friendship Heights in 1978 and was expected to carry 30% of all peak hour commuter trips in and out of Friendship Heights. (Today, the Metrorail system remains a commuter-system, not a comprehensive rail system.)

[See Z.C. Order 87, Case No. 73-29, Statement of Reasons, February 12, 1974. (these are paraphrases, not direct quotes, with the parentheticals added).]

These were the salient considerations in 1974 and developments in the area since then have shown them to have been valid. They remain the salient considerations today. There have been no new conditions that warrant a change in the zoning.

## **5. Zoning Changes within the 1974 Plan Area between 1974 and 2002**

Within the 1974 Plan Area, between 1974 and today, the Zoning Commission has made no zoning changes (apart than PUD's).<sup>12</sup> Within the 1974 plan area, between 1974 and today, the Zoning Commission has granted four PUD's for projects with residential components (three of which are in Square 1661, including one that was not built but was superceded by another PUD):

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<sup>12</sup> This conclusion is based on a comparison of Z.C. Order 87 and the current Official Zoning Map referred to in footnote 3.

The "McCaffery PUD" with the Courts of Chevy Chase townhomes on 43rd Street and Friendship Center retail on Wisconsin Avenue, and the predecessor "Miller PUD" that was not built. [Z.C. Order 824 (reducing the residential component from 88,045 to 83,000, providing for 29 townhomes with two parking spaces conveying with each unit); Z.C. Order 528, 528-A, 528-B, 528-C, 528-D, Case No. 86-21F/85-9P, April 13, 1987, June 11, 1990, June 8, 1992, June 13, 1994, June 10, 1996, respectively (Miller PUD)(reducing the maximum height of the residential component from eight-stories to four/five-stories, reducing the heights from the proposed 48 feet/77 feet on 43rd Street to 40 feet/48 feet, reducing the square footage of the residential component from the proposed 124,167 square feet to 88,045 square feet, and requiring at least one fully accessible space per unit for the exclusive use of the owner or occupant); *see* Z.C. Order 493 (original Miller PUD).]

The "Abrams PUD," a mixed-use development, with office and retail space and 6-8 "dwelling units, comprised of one and two bedroom styles," and requiring "at least one fully accessible parking space with each" housing unit that cannot be rented or conveyed separately, at 43rd Street, Jennifer Street, and Wisconsin Avenue. [Z.C. Order No. 519, Case 85-20C, February 9, 1987, pp. 5, 18-20.]

The "Tenley Park LLC PUD" at Nebraska Avenue and Albermarle Street, approving 6 townhomes on a site slightly more than half an acre, 1.1 FAR maximum, and 43 ft. height, and requiring a two-car garage for each unit plus six additional off-street parking spaces.<sup>13</sup> In the case of "Tenley Park LLC PUD" the Zoning Commission specifically "reject[ed] the notion that the property's proximity to the Tenleytown Metro Station would have justified R-5-B rezoning," given the scale and character of the neighborhood. The Zoning Commission also state that "[t]his project is an example of development that is transit-oriented, increased housing density ... and meets with the approval of the nearby residential community. The Zoning Commission had previously "declined to vote" on the Holladay Corporation's Application to build 14 townhomes on this site and rezone it to R-5-B, but instead "suggested changes" that led to the Tenley Park LLC Application that was granted. [Z.C. Order 921, Case No. 00-03C, September 17, 2001.]

Of these four PUD's (three actually built) within the 1974 plan area, the Courts of Chevy Chase provides the obvious and best comparison to the Washington Clinic site because it is part

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<sup>13</sup> This project involved 26,088 of developed square feet on a lot size of 23, 716 square feet, or about 54% of one acre. The equivalent density on the Washington Clinic site would permit 48,225 square feet of residential development, which is 61% of what is allowed under matter of right today after the 1974 rezoning.

of the approximately two acre transition zone created in 1974.<sup>14</sup> The Courts of Chevy Chase involves 29 townhomes on about 1 acre of land, it has a developed residential FAR is approximately 1.85, the neighborhood did not oppose it but supported it, it provides a transition or buffer between the commercial zone and the neighborhood, its design is in harmony with the single-family neighborhood and it has direct and immediate access to the Metrorail station, which is in the same Square as the residences.

**There are no other PUD's reflected on the most current Office of Zoning map within the entire area bounded by Western Avenue, Connecticut Avenue, Nebraska Avenue, and Massachusetts Avenue, a broad area of upper Northwest DC. Thus, cumulatively, the core of Friendship Heights has experienced very dense commercial, office and residential development well above that contemplated and permitted by the zoning that has been in place from 1974-2002. Though Stonebridge may cite this as a precedent for the upzoning through a PUD the Washington Clinic site, instead this fact suggests caution before piling on more density in this very concentrated area.**

Outside but near the plan area, the two permanent zoning changes we have identified have been the downzoning of a commercial strip in Tenleytown<sup>15</sup> and the May 2002 downzoning from R-5-D to R-5-B of the east side of Connecticut Avenue between Nebraska Avenue and Jocelyn Street, N.W.<sup>16</sup> [Z.C. Order 530, Case No. 86-17, September 15, 1988 (downzoning of Wisconsin Avenue between Chesapeake and Rodman Streets, N.W.); Z.C. Order 962, Final Rulemaking, May 13, 2002 (Connecticut Avenue downzoning).]

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<sup>14</sup> The R-5-B transition zone on Square 1661 created by the Zoning Commission in 1974 may have been larger than the 1+ acre of land ultimately used for the Courts of Chevy Chase. As noted above, the Zoning Commission rezoned to R-5-B the land in Square 1661, Lots 1, 11-16, 812, and that portion of lots 808 and 809 lying further than 150 feet from Wisconsin Avenue.

<sup>15</sup> The Zoning Commission comprehensively considered the zoning of this commercial corridor in Tenleytown, and downzoned it based on the recommendations of the Wisconsin Avenue Corridor Committee (twenty-six neighborhood groups and seven ANC's) and the NCPC, with input from the Office of Planning, in an effort to "lessen[] the adverse impact of future development" even if there would be economic detriments to DC and in recognition of neighborhood concerns with "excessive traffic congestion" and preserving residential neighborhoods abutting Wisconsin Avenue. [Z.C. Order 530, Case 86-17, September 15, 1988.]

<sup>16</sup> The Zoning Commission recently approved this residential downzoning from R-5-D to R-5-B due to the general character of the neighborhood balanced with the properties' location on Connecticut Avenue, "an important transportation corridor" that generally accommodates relatively high-density uses, and its designation as "Moderate Density Residential" use on the Generalized Land Use Map. [Z.C. Order 962, Case No. 00-23P, May 13, 2002.]

## 6. The 1990 Ward 3 Plan and the Office of Planning

A "Priority" of the 1990 Ward 3 Plan<sup>17</sup> was:

To determine the appropriate mix, scale, intensity and design of development in the Friendship Heights area to ensure maximum Metrorail access and to protect and preserve the surrounding residential areas.

[Updated Proposed Ward 3 Plan, Government of the District of Columbia, September 19, 1990, at p. 40.]

To implement this Priority, the Office of Planning was directed to take four recommended actions.

The first, and most important of these actions, was that the Office of Planning "should prepare a small area study to determine the appropriate mix, scale, intensity and design of development." *Id.* The Office of Planning, under leadership that pre-dated the current leadership, never undertook a Small Area Plan for Friendship Heights.

Second, the Office of Planning was directed to "continue to implement policies set forth in the Comprehensive Plan ... regarding the designation of Friendship Heights as a Housing Opportunity Area." *Id.* Again, the Office of Planning, under its prior leadership, did not provide boundaries to the Housing Opportunity Area in Friendship Heights, did not provide any definition of what is meant by "Housing Opportunity Area" (beyond the general statements in the Comprehensive Plan), did not specify what tools should and should not be employed to achieve the housing goals and did not provide any specific guidance as to what housing densities were desired at which locations.

Third, the Office of Planning, under its prior leadership, was directed to "work with developers in the Friendship Heights area to ensure that surrounding neighborhoods are not unduly affected by traffic, parking, noise, litter and other potential harmful effects of new development." *Id.*

Fourth, the Office of Planning, under its prior leadership, was directed to "ensure that proposed additional development at Friendship Heights is compatible with the surrounding

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<sup>17</sup> We have the "Updated Proposed" Ward 3 Plan received by the D.C. Public Library on September 19, 1990. We do not have information as to whether this is a draft that was superceded by a final plan.

neighborhoods and does not create adverse environmental effects.” *Id.* at p. 41.

To our knowledge, apart from project specific reviews, the Office of Planning, under its prior leadership, never followed through with these recommendations in any systematic or comprehensive manner, and has never studied the cumulative impact of development to date on the neighborhoods.<sup>18</sup>

While the current Office of Planning is not responsible for these past failures, development of the area since that time supports the wisdom of these mandates. The neighborhood of Friendship Heights DC to this day does not have the benefit of a new Small Area Plan<sup>19</sup> (nor is one planned, except for the limited Upper Wisconsin Commercial Corridor); does not have any definition or guidance regarding the meaning of Housing Opportunity Area at Friendship Heights on the Comprehensive Map; and does not have any mechanism to evaluate or control the cumulative effects of development on traffic and parking apart from the intense pressures of applications for individual specific projects.<sup>20</sup>

## **7. Friendship Heights as a Housing Opportunity Area under the Comprehensive Plan**

Under the DC Comprehensive Plan, the Tenleytown and Friendship Heights Metrorail stations are designated as Housing Opportunity Areas. In the debate over the Stonebridge proposal, it is wrong to assume that this designation necessarily means that upzoning residential land is automatically appropriate, and that the only issue is how much upzoning is appropriate. To the contrary, the goal of Housing Opportunity Areas is simply to create more housing than is presently available within the Housing Opportunity Area – more actual density than under present uses. The Comprehensive Plan contains no statement that current residential zoning is an impediment to creating new housing, nor that upzoning residential land is the preferred tool to create new housing.

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<sup>18</sup> The Office of Planning did point out in its Preliminary Report on the Stonebridge Application that the site “is 150 feet or less from a neighborhood of single family houses, that is already experiencing traffic and parking congestion, and can expect considerably more from the approximately 2 million square feet of new development that will be built in the Maryland section of Friendship Heights.” Currently, as Stonebridge's traffic expert observed, presently there are rarely any available parking spaces in the proximity to the proposed development due largely to parkers for the nearby retail and parkers from other parts of Ward 3 who drive to use the Metrorail Station.

<sup>19</sup> The 1974 Friendship Heights Sectional Development Plan was effectively a Small Area Plan and is effectively the Small Area Plan in place for the core commercial and residential area of Friendship Heights DC.

<sup>20</sup> Within the next year or sooner, we will have the results of the Friendship Heights Traffic Study and the Military Road-Missouri Avenue Cross-Town Traffic Study, which will provide the first framework for identifying, evaluating and addressing some major problems.

The Comprehensive Plan defines Housing Opportunity Areas as:

areas where the District expects and encourages either new housing or rehabilitated housing. These housing opportunity areas are not the only areas where new housing units will become available, but represent locations of significant concentrations. Most Metrorail stations outside the Central Employment Area, and some within, will support additional housing units.

[DC Comprehensive Plan, Sec. 1118.6.] This provision of the Comprehensive Plan then specifies that two “other” ways to provide additional housing at Housing Opportunity Areas are “the conversion of existing nonresidential buildings for housing” and the “return of vacant units to the housing market.” [DC Comprehensive Plan, Sec. 1118.6.]

The Comprehensive Plan also list aspects of Housing Opportunity Areas that make them ripe to support additional housing units, which suggest that methods to achieve additional housing include new development on “vacant or poorly used land,” “surplus property sites,” “sites that exhibit potential for successful joint public and private initiatives,” and “areas where development can be used to improve neighborhood quality.” [DC Comprehensive Plan, Sec. 1118.7.] There is no mention of upzoning or rezoning residential land in these provisions of the Comprehensive Plan.

While upzoning is not mentioned as a tool to achieve development in Housing Opportunity Areas,<sup>21</sup> the Planned Unit Development mechanism (which is not presumed to include rezoning through a Map Amendment) is explicitly described as a way to achieve the desired development in special development areas, which include Housing Opportunity Areas. Section 306 of the Comprehensive Plan specifically directs the city to use “Planned Unit Development R-5-A and similar provisions of the Zoning Regulations to encourage the construction or rehabilitation of additional single family and multi-family housing at suitable locations.” [DC Comprehensive Plan, Sec. 306.] Thus, though upzoning of underzoned property may be appropriate anywhere, as is downzoning of overzoned property, it is not specifically contemplated by the Housing Opportunity Area provisions in the Comprehensive Plan.

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<sup>21</sup> The DC Comprehensive Plan for Ward 3 does state that “[w]here 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.” [DC Comprehensive Plan, Sec. 1409.4(c).] The PUD mechanism (without a Map Amendment) clearly is an appropriate method of “zoning flexibility” to be considered on the merits of an Application. Though Section 1409.4(c) does not mention rezoning, it may mean at most that such “zoning flexibility” should be considered, if appropriate under the circumstances. For example, if the Washington Clinic site was currently zoned R-2, as it was until the 1950’s, rezoning might be appropriate.

History of Zoning and Land Use Planning  
Washington Clinic Site, 1974-2002  
ZC Case No. 02-17C

The Comprehensive Plan for Ward 3 lists four Housing Opportunity Areas, including Friendship Heights. [DC Comprehensive Plan, Sec. 1409.4(a).] At the Friendship Heights Housing Opportunity Area, the Comprehensive Plan for Ward 3 specifically identifies three sites as housing development sites: the Lord & Taylor parking lot, the Metro lot (we assume this is the WMATA parking garage), and the 4300 Block of 43rd Street. [DC Comprehensive Plan, Sec. 1401.7]<sup>22</sup> The Lord & Taylor parking lot is zoned C-3-A or C-2-B, so it fits perfectly with the dominant theme of the Comprehensive Plan and the Housing Opportunity Area approach to promote housing in commercial zones; the WMATA is slated for residential development; and the 5300 block of the 43rd Street now have the Courts of Chevy Chase townhomes. The Comprehensive Plan does not specifically mention the Washington Clinic site as a housing development site.

At the Friendship Heights Housing Opportunity Area to implement the Comprehensive Plan, in the authors' view the appropriate planning tools to achieve additional housing units, to the extent the area's infrastructure can support them, include:

Encouraging residential units as part of mixed-use development in commercial zones, similar to the mixed-use Tenley Hill building with 52 condominiums and townhomes in a commercial zone on Wisconsin Avenue [Z.C. Order 904, Case. No. 98-21C, September 13, 1999.];

Endorsing the maximum amount of development that is allowed as a matter of right on residentially zoned sites, such as the infill development at 4200 Military Road that created four housing units in place of one;

Supporting residential development on land zoned as residential but not currently being used for residential development, such as the Washington Clinic site; and

Using Planned Unit Developments (without Map Amendments) to encourage the construction of additional single family and multi-family housing on residential sites, as the neighborhood would consider on the merits if proposed by a

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<sup>22</sup> Section 1401.7, in relevant part, states that: "Economic development outside the central employment area objective and policies: Ward 3 presents the opportunity for discrete, highly-focused economic activity at specific locations: (a) Development of housing, with some retail and limited office space, at Tenleytown on the east side of Wisconsin Avenue between Albemarle and Brandywine streets; (b) Development of housing at Friendship Heights, particularly in the extant, large parking lots (Lord & Taylor and Metro) and in the 5300 block of 43rd Street, N.W."



developer for the Washington Clinic site,

The Washington Clinic site currently has no housing units. Under existing zoning, matter of right development would allow residential development 3.5 times as large as the current Washington Clinic building. A developer could build as a matter of right up to 78,912 developed square feet, which would allow for approximately 40 townhomes, or 76 condominiums or apartments (approximately 925 square feet (net)/unit). Such intense residential development would add a very significant amount of new housing, as envisioned by the designation of the Friendship Heights Metrorail station as a Housing Opportunity Area. Such intense residential development is in full accord with the Comprehensive Plan and the Housing Opportunity Area provisions, especially given the strained infrastructure at the core of Friendship Heights.

Stonebridge proposes to build up to 125 units with 182,000 developed square feet, which is 2.3 times the square footage allowed under current zoning.<sup>23</sup> The Comprehensive Plan and Housing Opportunity provisions nowhere suggest that such radical upzoning of already residentially-zoned land with no current housing units, and on a site that was already rezoned as part of a major planning effort, is an appropriate tool to achieve new housing units.

## **8. Planning Principles Applicable to Friendship Heights**

There are four basic characteristics of the Friendship Heights DC neighborhood that are reflected throughout the Comprehensive Plan for Ward 3, and that have been recognized in the past by the Office of Planning. First, the Friendship Heights DC neighborhood is a stable, low-density residential neighborhood. Such neighborhoods are recognized as a key feature of Ward 3 and are to be preserved and protected. Second, these qualities of the neighborhood attract intense development pressures. Third, these development pressures need to be channeled to appropriate uses, densities, and sites in order to protect the neighborhoods. Fourth, Housing Opportunity Areas, Transit Oriented Development, and Smart Growth are planning concepts that are intended to be adapted to the characteristics of particular neighborhoods—they are not "one size fits all" concepts.

A good comparator for Friendship Heights is the role that the Office of Planning took in the development of the Takoma Central District Plan. [Takoma Central District Plan, Office of Planning, 2002, <http://planning.dc.gov/project/takoma/index.shtm>]. As set out by the Office of Planning, the Takoma plan:

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<sup>23</sup> If a developer's project qualified for a PUD under existing zoning, this would permit 131,520 square feet, which would allow for about 125 units of roughly the size in the March 2002 Stonebridge Application (approximately 925 square feet (net)/unit). Thus, from this perspective, upzoning this site as requested by Stonebridge would only result in larger and more expensive housing, but not any additional housing units.

History of Zoning and Land Use Planning  
Washington Clinic Site, 1974-2002  
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Is the product of a community-driven planning process and reflects the community's vision, as well as city-wide goals;

Defines near and mid-term strategies and articulates broad development goals, urban design guidelines, and priority actions necessary to encourage and facilitate reinvestment in the district;

Serves as a predictable guide that provides the community with a framework to assess the compatibility of new development in the district;

Promotes a consistent and integrated planning and design approach for the benefit of the entire neighborhood;

Reinforces development initiatives that are based on smart growth principles and transit oriented development and improved quality of life; and

Creates a process that encourages citizen participation and embraces the principles of the Mayor's Neighborhood Action Initiative.

[Takoma Central District Plan, Office of Planning, 2002,  
<http://planning.dc.gov/project/takoma/index.shtm>.]

In additional, a prevailing theme throughout the Takoma Central District Plan is respect for the history, character, values and scale of the residential neighborhoods, and integrating new development with these residential neighborhoods. If the Office of Planning is to serve the Friendship Heights neighborhood, and satisfy the mandates given it in 1990, it would do well to replicate the process it followed in Takoma DC.<sup>24</sup>

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<sup>24</sup> We note that, after all the recommended rezoning in Takoma takes place, the densest residential zoning of the multiple sites extremely close to the Metrorail stations (and Ride-On busses and Metro busses) will be R-5-A. Thus, clearly, the Office of Planning does not believe that Smart Growth and Transit Oriented Development are "one size fits all," but instead believes that the scale and the character of the neighborhood are critical. Of the five Priority Redevelopment Sites listed by the Office of Planning, the Office of Planning recommended densities are: 22-32 townhomes/acre on the centerpiece redevelopment site immediately adjacent to the Metrorail station (Priority Redevelopment Site 1); 36 apartments/acre or 22 townhomes/acre (R-5-A zoning) (Priority Redevelopment Site 5), and 71, apartments/acre, 62.5 apartments/acre, and 37.5 apartments/acre as part of mixed-use developments in C-2-A zones (Priority Redevelopment Sites 2, 3 and 4, respectively. Stonebridge seeks a density of 125 units/acre.

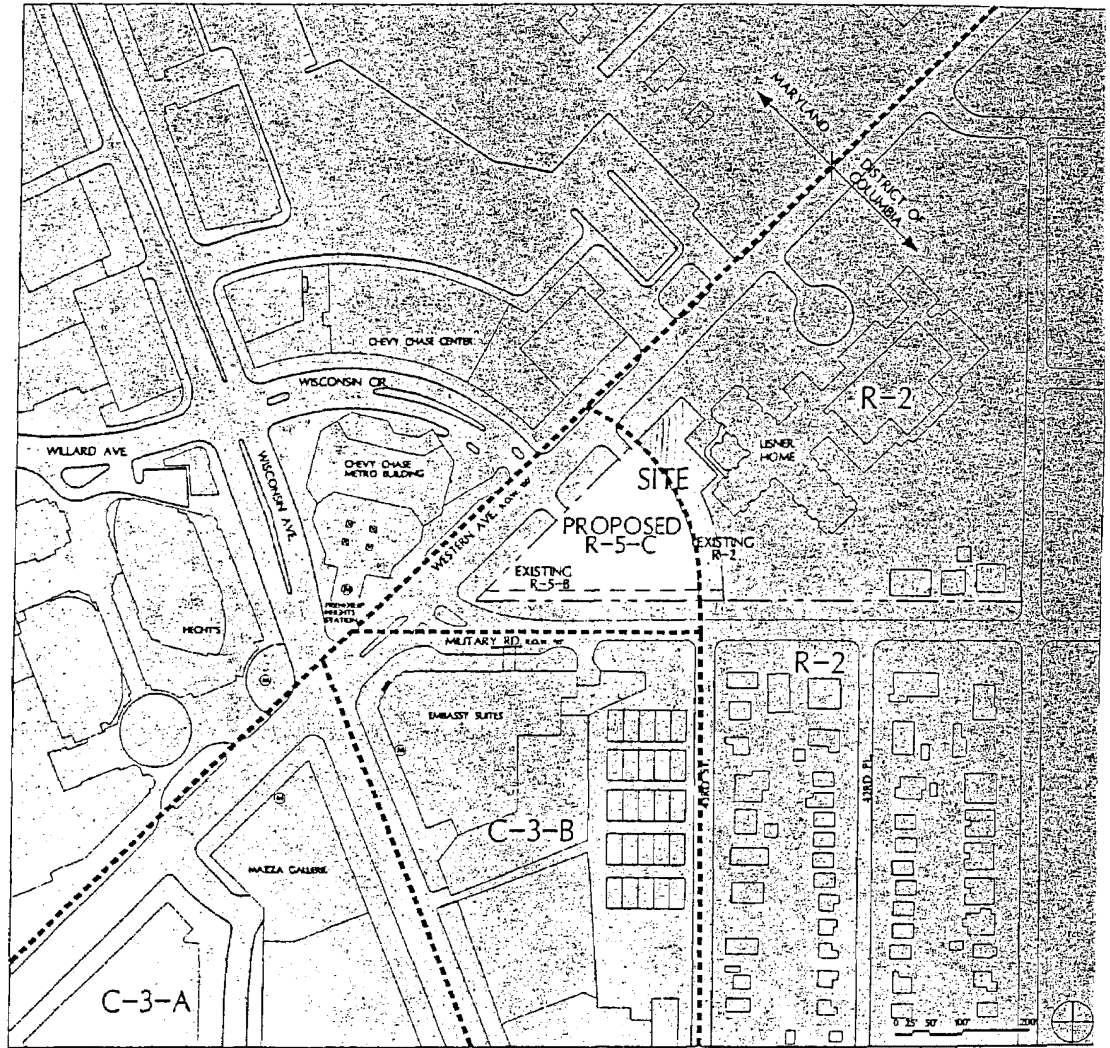
Any evaluation of particular projects, especially those involving requests for changes in zoning, should take account of these principles and the particular characteristics of Friendship Heights that have long been recognized as important to protect in all previous planning guides.

In addition, and especially in the absence of a new Small Area Plan for Friendship Heights, at a minimum the Office of Planning should decline to endorse spot upzoning of sites with the 1974 Plan Area pending three major studies now underway by the District of Columbia: the Upper Wisconsin Commercial Corridor Study (that includes in its Primary Study Area the Washington Clinic site), the Friendship Heights Traffic Study, and the Military Road-Missouri Avenue Cross-Town Traffic Study. In 1975, the Office of Zoning went so far as to declare an "emergency" interim rezoning so that applied for and even already issued building permits for then-matter of right development would be halted pending the rezoning that would occur when the Zoning Commission acted on the recommendations of the National Capital Planning Commission to implement the Friendship Heights Sectional Plan. [Z.C. Order 75, Case No. 73-29, October 18, 1973; *rescinded by* Z.C. Order 87, Case No. 73-29, February 12, 1974.]

Presently, sound planning principles would dictate that spot upzoning of the Washington Clinic site -- one of the very few available key parcels, if not the only one, at the core of Friendship Heights DC -- would be ill-advised just prior to these three important studies, in the event that such upzoning will be inconsistent with these studies. This is exactly what the Zoning Commission did in 1975, in a much more drastic manner, and thus it would be fully appropriate here.

## **9. Conclusion**

The Zoning Commission rezoned this site on the recommendation of the National Capital Planning Commission, based on the work of the Interagency Task Force on Friendship Heights, that it be part of "moderately density residential development around the edges of the [Friendship Heights commercial] core area to provide a compatible transition in order the protect the surrounding low-density residential area." This is a sound planning principle and Stonebridge's request to rezone this single site, dismantle this transition zone and convert it into high-density, and then deem the adjoining parcel of land the new "transition zone" has no grounding in the history of zoning of the Washington Clinic site or in the sound planning principles that are applicable to it.



5 4 0 1 W E S T E R N A V E .

W A S H I N G T O N . D C .

REVISE

This Stonebridge Map is erroneous and misleading.

Square 1661 is not zoned C-3-B, except in part through the "PUD" process.

**This Stonebridge Map is erroneous and misleading.**

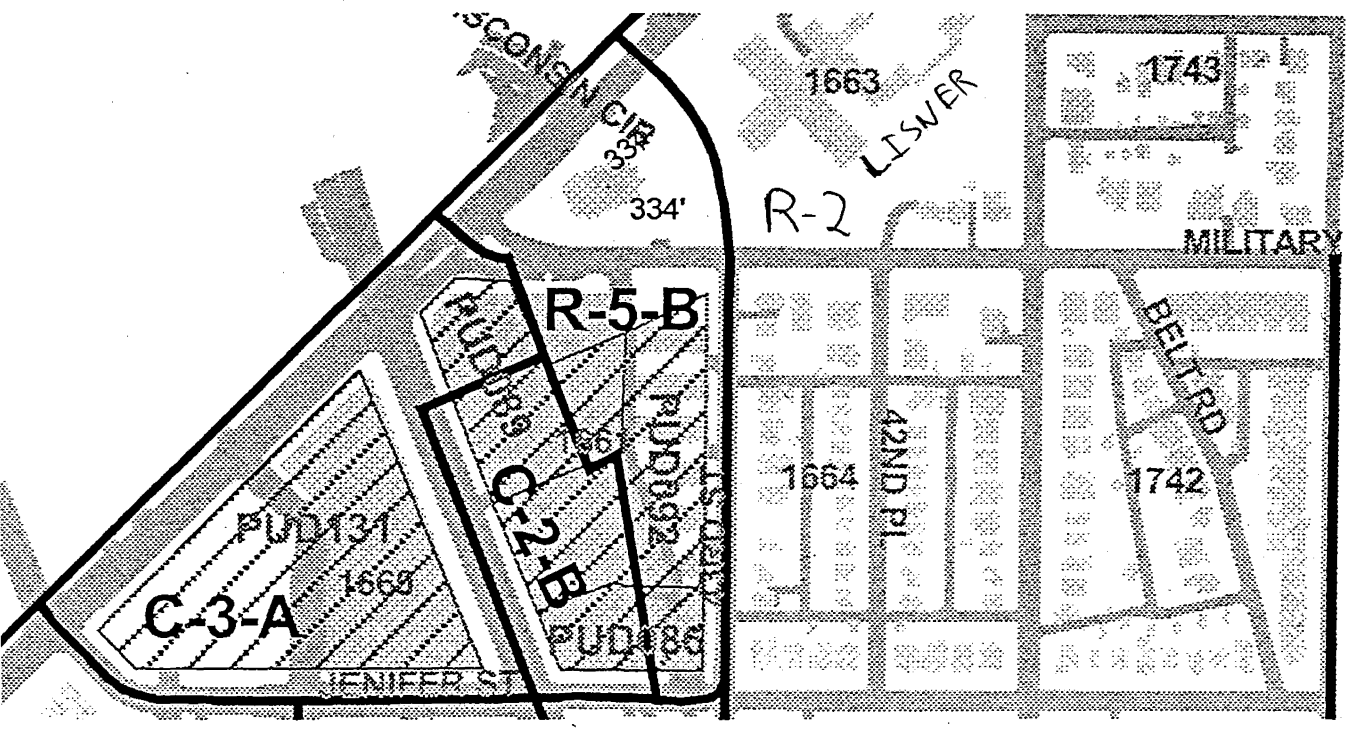
**Square 1661 is not zoned C-3-B, except in part through the "PUD" process.**

**Zoning of this Square under the Sectional Development Plan as shown on the Official DC Zoning Map.**

- The core at the corner of Wisconsin and Western Avenues is zoned C-3-A.
- The rest of the frontage on Wisconsin Avenue to a depth of 150 feet from Wisconsin Avenue is zoned C-2-B.
- The remainder of Square 1661, and the entire eastern portion of Square 1661, is zoned R-5-B.

**Project-specific zoning changes through the "PUD" process, as shown on the Official DC Zoning Map.**

- Chevy Chase Pavilion, rezoned to C-3-B (PUD O89 on the DC Zoning Map). [Z.C. Order 517.]
- Friendship Centre (Eddie Bauer, Maggionio's, Linen's and Things) and Courts of Chevy Chase Townhomes, C-3-B for retail development on Wisconsin Avenue, and R-5-C (but built within R-5-B standards) for residential development on 43rd Street. [Z.C. Order 824.]
- Chevy Chase Plaza (south end of Square 1661), C-3-B for western part, and R-5-C for eastern part. [Z.C. Order 519.]

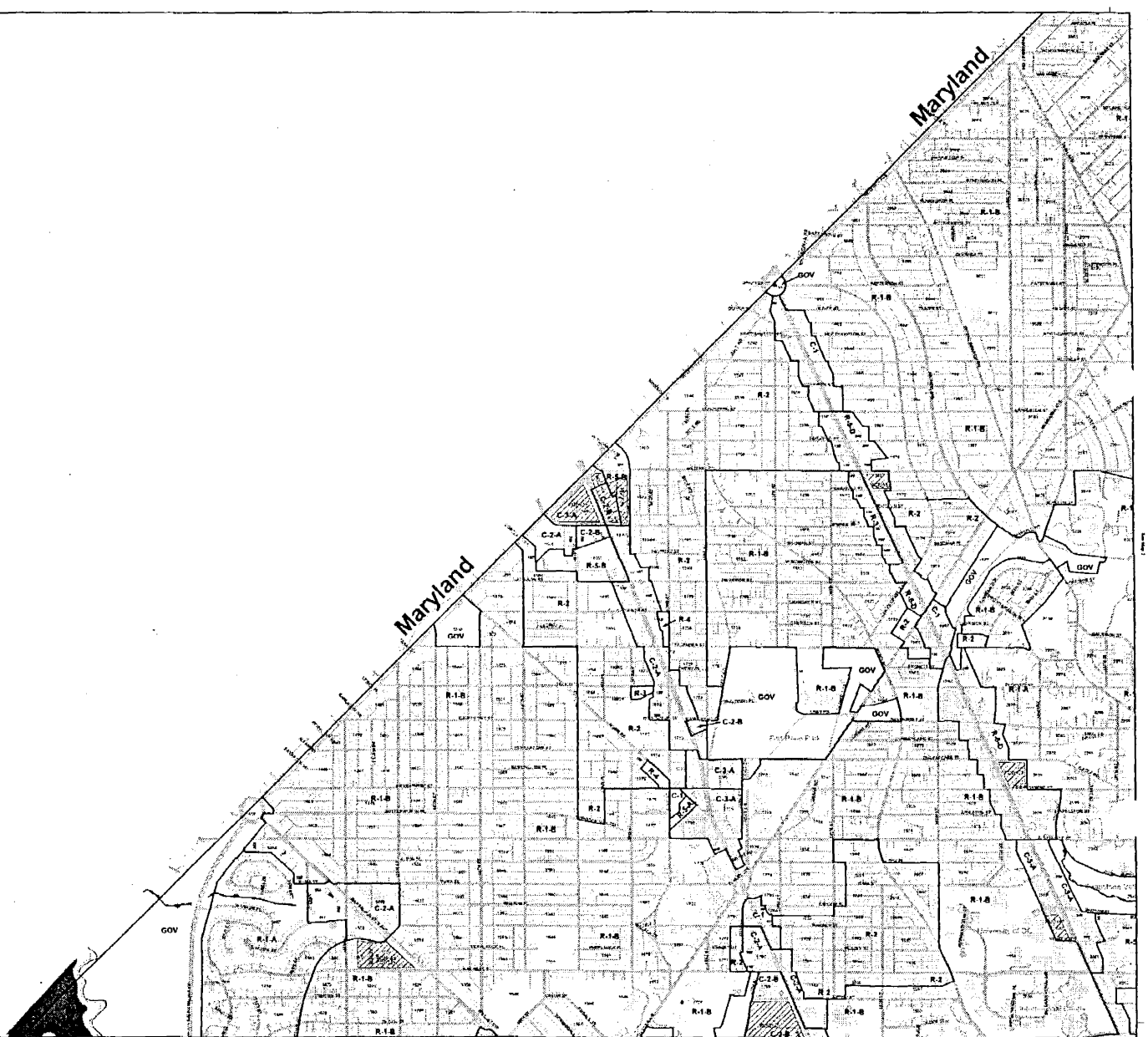


Official Zoning Map of the District of Columbia  
DC Office of Zoning

Amendments Through September 2002  
Printed: October 16, 2002

Maryland

Maryland



**Official Zoning Map of the District of Columbia**  
**DC Office of Zoning**

Amendments Through September 2002  
 Printed: October 16, 2002

Zone#	Description	Zone#	Description	Zone#	Description
C-1	Neighborhood Center	R-1	Single-Family Detached	C-101	Community Center
C-2	Community Center	R-2	Single-Family Detached	C-102	Community Center
C-3	Community Center	R-3	Single-Family Detached	C-103	Community Center
C-4	Community Center	R-4	Single-Family Detached	C-104	Community Center
C-5	Community Center	R-5	Single-Family Detached	C-105	Community Center
C-6	Community Center	R-6	Single-Family Detached	C-106	Community Center
C-7	Community Center	R-7	Single-Family Detached	C-107	Community Center
C-8	Community Center	R-8	Single-Family Detached	C-108	Community Center
C-9	Community Center	R-9	Single-Family Detached	C-109	Community Center
C-10	Community Center	R-10	Single-Family Detached	C-110	Community Center
C-11	Community Center	R-11	Single-Family Detached	C-111	Community Center
C-12	Community Center	R-12	Single-Family Detached	C-112	Community Center
C-13	Community Center	R-13	Single-Family Detached	C-113	Community Center
C-14	Community Center	R-14	Single-Family Detached	C-114	Community Center
C-15	Community Center	R-15	Single-Family Detached	C-115	Community Center
C-16	Community Center	R-16	Single-Family Detached	C-116	Community Center
C-17	Community Center	R-17	Single-Family Detached	C-117	Community Center
C-18	Community Center	R-18	Single-Family Detached	C-118	Community Center
C-19	Community Center	R-19	Single-Family Detached	C-119	Community Center
C-20	Community Center	R-20	Single-Family Detached	C-120	Community Center
C-21	Community Center	R-21	Single-Family Detached	C-121	Community Center
C-22	Community Center	R-22	Single-Family Detached	C-122	Community Center
C-23	Community Center	R-23	Single-Family Detached	C-123	Community Center
C-24	Community Center	R-24	Single-Family Detached	C-124	Community Center
C-25	Community Center	R-25	Single-Family Detached	C-125	Community Center
C-26	Community Center	R-26	Single-Family Detached	C-126	Community Center
C-27	Community Center	R-27	Single-Family Detached	C-127	Community Center
C-28	Community Center	R-28	Single-Family Detached	C-128	Community Center
C-29	Community Center	R-29	Single-Family Detached	C-129	Community Center
C-30	Community Center	R-30	Single-Family Detached	C-130	Community Center
C-31	Community Center	R-31	Single-Family Detached	C-131	Community Center
C-32	Community Center	R-32	Single-Family Detached	C-132	Community Center
C-33	Community Center	R-33	Single-Family Detached	C-133	Community Center
C-34	Community Center	R-34	Single-Family Detached	C-134	Community Center
C-35	Community Center	R-35	Single-Family Detached	C-135	Community Center
C-36	Community Center	R-36	Single-Family Detached	C-136	Community Center
C-37	Community Center	R-37	Single-Family Detached	C-137	Community Center
C-38	Community Center	R-38	Single-Family Detached	C-138	Community Center
C-39	Community Center	R-39	Single-Family Detached	C-139	Community Center
C-40	Community Center	R-40	Single-Family Detached	C-140	Community Center
C-41	Community Center	R-41	Single-Family Detached	C-141	Community Center
C-42	Community Center	R-42	Single-Family Detached	C-142	Community Center
C-43	Community Center	R-43	Single-Family Detached	C-143	Community Center
C-44	Community Center	R-44	Single-Family Detached	C-144	Community Center
C-45	Community Center	R-45	Single-Family Detached	C-145	Community Center
C-46	Community Center	R-46	Single-Family Detached	C-146	Community Center
C-47	Community Center	R-47	Single-Family Detached	C-147	Community Center
C-48	Community Center	R-48	Single-Family Detached	C-148	Community Center
C-49	Community Center	R-49	Single-Family Detached	C-149	Community Center
C-50	Community Center	R-50	Single-Family Detached	C-150	Community Center

This map does not reflect Transfer of Development Rights (TDR) Recreating Zones, or Current Plans. Thereafter shown on this map are reserved from property lines and shown. Buildings and streets are extracted from the 1994 aerial photography. To verify zoning on any property in order to verify a legal requirement, contact the Office of Zoning at the address or telephone listed below.

Amendments Through: September, 2002  
 Date Printed: October 16, 2002



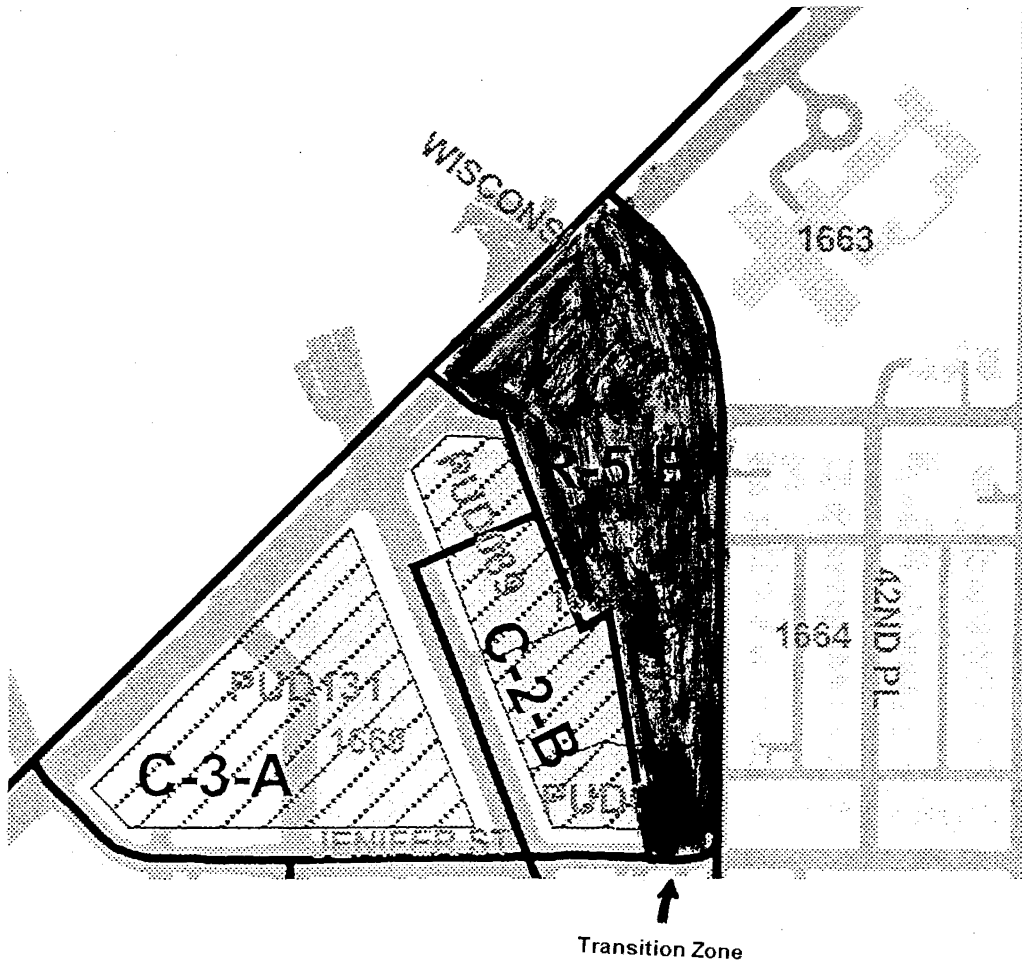
- GOV Major Federal Trains
- Seam
- Area of Cherry District
- Water
- Buildings

- C-101 Community Center
- C-102 Community Center
- C-103 Community Center
- C-104 Community Center
- C-105 Community Center
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- C-150 Community Center



Map 2  
 Zoning Map of  
 the District of Columbia

**Transition of the Transition Zone in  
Square 1663 and Square 1661, 1974-2002**



1974 Plan  
Recommended by  
National Capital Planning Commission

Adopted by Zoning Commission

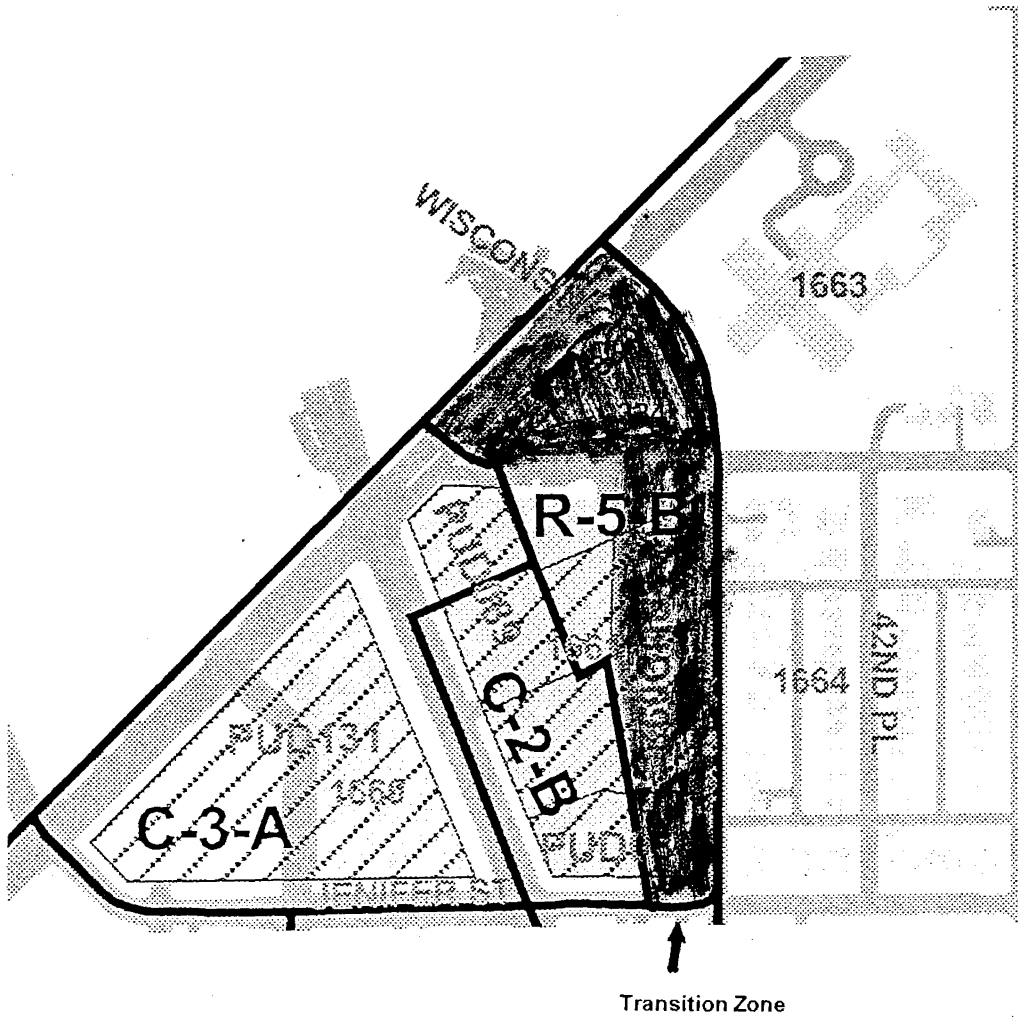
TRANSITION ZONE

WASHINGTON CLINIC SITE

PART OF SQUARE 1661 THAT IS MORE  
THAN 150 FEET FROM WISC. AVE.

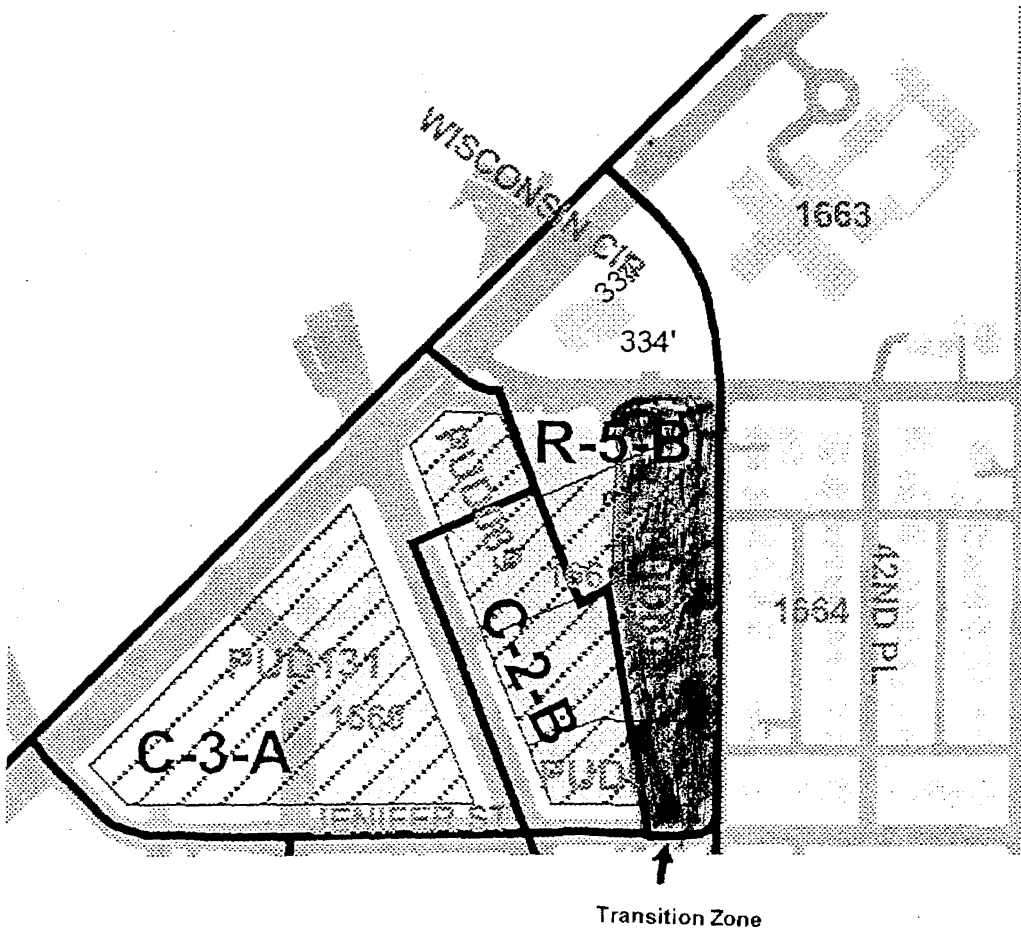


The Elimination of the Transition Zone in  
Square 1663 and Square 1661, 1974-2002



2002 -- TRANSITION AREA SHRINKAGE  
THROUGH PUD PROCESS

The Erosion of the Transition Zone in  
Square 1663 and Square 1661, 1974-2002



STONEBRIDGE APPLICATION --

TRANSITION ZONE OF WASHINGTON  
CLINIC ELIMINATED