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April 5, 2005

Carol Mitten, Chair
D.C. Zoning Commission
441 4th Street, N.W.
Suite 210
Washington, D.C. 20001

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2005 APR -6 AM 10:34

Re: Zoning Commission Application No. 04-24
Rhode Island Avenue – First-Stage PUD

Dear Ms. Mitten and Members of the Commission:

At the Zoning Commission's setdown meeting of November 8, 2004 on the above-cited application, the Commission asked the Applicant to prepare a survey of retail, service and entertainment uses within a 10-minute walk of the PUD site. The primary purpose of the request was to help determine roughly what percentage of future renters of the proposed apartments might not own automobiles. Part of that calculation would be the ability of such residents to meet convenience shopping needs especially, but service and entertainment needs as well, within a reasonable walk of the site.

Attached herewith are twenty copies of an aerial photograph of the area surrounding Rhode Island Avenue Metro PUD site, including a radius of one-half mile (10-minute walk) and indicating in red lettering the commercial and nonresidential uses within the radius. In addition, we offer some preliminary, summary comments, as follows:

Basic Findings by Sector (The railroad tracks and Rhode Island Avenue are the dividers.)

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- Northeast (Lower Brookland): Automobile sales, Fire Station, Christian Center, Automobile repair, Department of Human Services, uniform rental.

  +This area, like the other three quadrants, was zoned industrial for many years up to the late 1990s.

  +Historically there have been only light industrial and heavy commercial uses, such as automobile repair.

  +Until the 1980s, Merkle Press, one of the largest publishers in the country, occupied a large complex on Rhode Island Avenue and supported a large number of subcontractors along Reed Street. With Merkle's departure, this area became

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substantially vacant. Retail uses were not present in the past and have not moved in.

+The eastern part of this area was rezoned C-2-C in the late 1990s; the larger part near the railroad tracks remains industrially zoned (C-M-2).

+The 10-minute walking distance does not reach the lively 12th Street commercial strip in Brookland, which is north of the 10-minute walk radius.

+The walkway over Rhode Island Avenue helps potential customers of stores to cross this multi-lane arterial, but at present there are no retail or service uses there to patronize and no retail momentum.

- Southeast: Bank, large Giant supermarket, Home Depot, two churches, two automobile sales establishments, liquor store, two gasoline service stations, large Brentwood Postal Distribution Facility and the Brentwood Shopping Center.

  +The Brentwood Shopping Center, or "Rhode Island Place," has a liquor store, dollar store, pawnbroker and a few other small shops.

  +The large Giant food store offers convenient grocery shopping and a pharmacy as well.

  +The Home Depot is a plus for various types of household supplies; however, Rhode Island Avenue Metro will only include rental apartments, whose residents will use Home Depot less than would future home owners.

  +This large area has for many years been an underutilized, disjointed and unattractive industrial area. Pedestrian connections are generally non-existent (except to the Postal Facility) and the environment is not pedestrian-friendly, especially after dark.

  +The zoning is M (General Industry), which allows retail uses but does not encourage it given the competing commercial, office and industrial uses allowed at 6.0 FAR and 90 feet as a matter of right.

- Southwest: Auto parts, mini-storage, warehouse, school bus yard, refinery yard, Fire Department, Liquor store, vacant/underutilized land and structures.

  +Like the two previously-cited quadrants, this area is still a declining light industrial area, with no real signs yet of commercial revival in the retail/service/entertainment areas.

  +To reach future retail uses in this area, if they are provided, residents of Rhode Island Metro would use the fairly long stairway down and up the steep slope to the Rhode Island Avenue sidewalk and then walk under the underpass. Some new

residents will also live on upper floors on the Avenue itself and can walk to this quadrant more conveniently.

+Existing zoning is light industrial – C-M-2 (60-foot height limit, 4.0 FAR). The Generalized Land Use Map of the Comprehensive Plan designates this area as Industrial, so the C-M-2 zoning is likely to continue, with little incentive for retail development.

- Northwest: Rhode Island Avenue Center, gasoline, mini-storage, fast food, large church, vacant land, surface parking.

  +This quadrant was rezoned to C-3-A (medium-density commercial) in the 1990s, reflecting the prior construction of a shopping center (Rhode Island Avenue Center) with access from 4th Street. This center includes a Safeway, a CVS and a few other stores, but there is no convenient walking path from Rhode Island Avenue up a significant slope through a declining industrial "no man's land" to get there. From the PUD site the pedestrian would cross the Avenue on the pedestrian bridge, walk along Rhode Island Avenue all the way to 4th Street and then walk a couple of hundred yards up 4th Street just to enter the site.

  +The Giant supermarket with pharmacy near the PUD site probably meets consumers' needs as well as and more conveniently than this older Safeway and CVS.

  +The Rhode Island Avenue frontage is developed with a motley collection of disjointed uses and vacant and underutilized land. Again, there is no retail presence or presence of a group of store fronts or a new office building with ground floor retail, for example, to provide momentum towards a viable aggregate or cluster of retail-service-entertainment uses.

Summary of Findings, Conclusions

1. The most valuable retail-service presence for future residents of Rhode Island Avenue Metro will be the Giant Supermarket within easy walking distance to the east.

2. The nearby Home Depot will have some value to residents for items such as cleaning equipment and other supplies, but will have less utility than the store has for homeowners with home improvement projects.

3. Other retail and service uses are few and far between within the one-half mile walking radius. The Rhode Island Avenue Center in the Northwest Quadrant is of minor utility to future residents of Rhode Island Avenue Metro.

4. The steep slope down to Rhode Island Avenue and the climb back up to the PUD site, together with the wide expanse of the Avenue and lack of nearby retail will make it difficult for future PUD project residents to meet their convenience shopping needs on foot.

5. The land areas surrounding the PUD site, as indicated above, are generally physically unattractive, have very few retail businesses now, and are primarily zoned Industrial, which favors more dense, competing uses.

6. There is no sit-down restaurant and no entertainment establishment within the half-mile radius. There is one fast food restaurant, several gasoline stations, and a branch bank.

7. The retail and entertainment uses proposed in the PUD plan will be a significant source of convenient shopping and some restaurant/café types of uses. There may be something of a "chicken-and-egg" issue, however, in terms of when the retail uses are completely in place vis-à-vis occupancy of the apartments.

8. As to the level of automobile ownership and parking spaces needed for the residents, the Applicant makes the following short comments.

   +This location is removed from the central part of the city and does not have the existing concentrations of retail-service-entertainment uses that locations such as Capitol Hill, Dupont Circle, Friendship Heights or Adams-Morgan enjoy. People who choose to rent at Rhode Island Avenue Metro are likely to desire to own an automobile, although a high percentage will commute to work via Metrorail.

   +Given the generally middle-income households (moderate to upper-middle income range) who will reside here, automobile ownership per household will not be high. Accordingly, the moderate level of parking proposed in the PUD plan is likely to be sufficient but without any excess.

   +Negotiations with WMATA have stressed the importance of maintaining sufficient parking for Metrorail commuters that will not be hindered by the parking needs of the proposed residential and retail development. Nonetheless, the 200-car garage to be built for WMATA is a substantial reduction from the 380 spaces currently available on Metro's surface parking lot.

The Applicant's transportation consultant is preparing a more detailed analysis for the public hearing.

Sincerely,
ARNOLD & PORTER LLP

Cynthia A. Giordano

Nathan W. Gross, AICP

Attachment