

Holland & Knight

2099 Pennsylvania Avenue, N.W., Suite 100 | Washington, DC 20006 | T 202 955 3000 | F 202.955.5564
Holland & Knight LLP | www.hklaw.com

Christopher H. Collins
202.457.7841
chris.collins@hklaw.com

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Zoning Commission for the District of Columbia
441 4th Street, N.W., Suite 210S
Washington, DC 20001

Re: Zoning Commission Case No. 08-06 (Comprehensive Zoning Regulations
Review: Chapters B15, B16 and B17)

Honorable Members of the Commission:

As explained further below, this letter is to express our opposition to certain portions of the proposed regulations as set forth in the Notice of Public Hearing in this case. We have reviewed the letter submitted by the D.C. Building Industry Association, and agree with those concerns. This letter will focus on the adverse impacts of the proposed regulations on the development of large retail shopping facilities in the District. Our primary concerns are as follows:

1. **Section 1503 - Maximum Parking Requirements.**

I understand from a discussion with Mr. Parker of the Office of Planning that this item may be removed from consideration at the Public Hearing tonight, so that there can be further study and coordination between OP and DDOT on this issue. If that is the case, we would welcome the opportunity to have additional dialogue with OP and with DDOT, so that regulations can be crafted in such a way that they do not discourage the development of large retail shopping centers in the District. However, it would be useful to place into the record certain facts regarding large retail development projects, which are entirely different from large office projects and large residential projects in terms of parking requirements.

The amount of parking required by a "Big Box" retailer depends in part upon the type of merchandise sold. However, the typical requirement is 4.5 to 5.0 parking spaces per thousand square feet. As a point of comparison, the retail shopping center known as Rhode Island Place, in Ward 5, adjacent to the Rhode Island Avenue Metrorail Station, has a parking ratio of approximately 4.7 spaces per thousand, but this parking lot is crowded to capacity on weekends. This is true even though the site is adjacent to a Metrorail station. That development site

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contains 21.75 acres of land area (946,994.4 square feet), and approximately 230,000 square feet of 1-story retail buildings. The remainder of the site is devoted primarily to parking and loading areas. The site contains in excess of 1050 parking spaces. The site has parking access from Brentwood Road on the east and Washington Place (the former Metrorail driveway entrance from Rhode Island Avenue) on the west. There are also two separate loading entrances, both of which are accessed from Brentwood Road.

This project could not be built today under the proposed regulations before you. Utilizing a standard factor of 350 sq. ft. per parking space, there would need to be four levels of structured parking in order to keep the parking area within the 100,000 square foot land area limitation with the number of spaces currently on the site. The limitations proposed by DDOT (either 500 parking spaces or 250 parking spaces maximum, and either one or three spaces per thousand square feet) would be well short of what is needed for a facility of this size.

Most of the sites that are capable of development with a large retail project are located in Northeast and Southeast D.C., and do not even have the Metrorail access that Rhode Island Place does. It is not realistic to expect that a majority of shoppers at such retail developments will utilize public transportation for their shopping needs.

These proposed maximum limitations do not provide sufficient flexibility for large retail development projects in the District and should be reconsidered.

2. Section 1507 - Access Requirements.

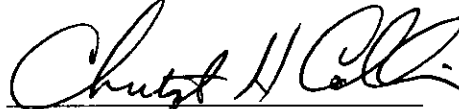
This section provides a hierarchy for where access to a building may be taken, with the preference going first to alleys, then to minor streets, and then major streets. In addition, Section 1507.6 requires that a lot fronting on two or more streets may only have a driveway connection to the street with the lowest volume classification. Further, Section 1507.7 limits the number of driveways for parking access to three when a lot fronts on two or more streets. The same is true for driveways to access loading facilities, under Section 1705.3.

Typically, a retail shopping facility is located on or adjacent to a major street, and often has two or more street frontages. Using the Rhode Island Place Shopping Center cited above as an example, it would be totally impractical to funnel all of the cars entering and leaving that shopping center through the two-lane driveway connecting to Washington Place, which has a lower traffic volume than Brentwood Road. A typical large retail shopping center includes a number of vehicle entrance points, at disbursed locations, around the site, so that the flow of traffic and the pattern of parking is distributed within the site as evenly as possible. The draft regulations would not allow that to occur, and in fact, would create more traffic congestion than what is allowed to occur today under the current regulations.

For the above reasons, we respectfully request that the Commission defer any action on these proposed regulations until a full consideration of the potential impacts of these regulations on development of large retail shopping facilities can be considered by the Office of Planning and the Department of Transportation. Thank you.

Respectfully submitted,

HOLLAND & KNIGHT LLP

By: 
Christopher H. Collins

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