

NO WINGSTOP AT 3831 GEORGIA AVE.

The applicant (Emerald Wings LLC / Wingstop) has not demonstrated that this fast-food use can operate at this specific site without creating adverse impacts on traffic, sanitation, and residential livability, as required under the zoning criteria.

The applicant's submission lacks specific, site-based evidence. No quantified delivery projections were provided and no operational plan addressing peak demand conditions were presented.

TRAFFIC, DOUBLE PARKING & NO LOADING PLAN

3831 Georgia Ave lacks the physical infrastructure to handle delivery-heavy fast food operations.

- There is no dedicated loading zone at Georgia Ave & Randolph St, and no evidence of one being proposed.
- The block already experiences frequent double parking for Safeway and nearby retail & high congestion due to Metro proximity and bus traffic
- A Wingstop will significantly increase DoorDash/Uber Eats clustering, short-term parking turnover & illegal stopping in travel lanes
- The applicant (Emerald Wings LLC / Wingstop) has not provided a credible delivery or curbside management plan. Without a designated loading zone, delivery drivers will predictably double park on an already congested corridor.
- The applicant (Emerald Wings LLC / Wingstop) has delivered no quantified delivery estimates, no staging plan and no curbside management strategy

LITTER, TRASH & RODENT IMPACT

The applicant (Emerald Wings LLC / Wingstop) admitted a problem but offered no mitigation plan.

- Emerald Wings LLC / Wingstop acknowledged the existing rodent and trash issues, but **did not** explain how additional high-volume food waste will be handled, how food packaging will not end up on the street, or address late-night trash overflow.
- Acknowledging an existing rodent problem without presenting a mitigation strategy is not sufficient. The applicant has not demonstrated that this use will not exacerbate known sanitation issues.

LOITERING, SCHOOL KIDS & PUBLIC SAFETY IMPACT

High traffic + low cost fast food near schools = predictable loitering pressure.

- The area has significant student foot traffic. Fast food locations become gathering points that generate extended loitering, noise, and litter.
- Emerald Wings LLC / Wingstop has failed address, crowd management, security presence & anti-loitering strategies
- Emerald Wings LLC / Wingstop has not shown how they will prevent this location from becoming a congregation point that generates noise, litter, and potential disturbances.

OVERCONCENTRATION / DUPLICATION OF USE

The proposed Wingstop does not contribute to the economic diversity of the corridor but rather duplicates existing offerings: too much of the same thing.

- Between Georgia & Harvard streets and Georgia & Upshur streets, 19 locations already serve chicken wings, most are locally owned businesses:

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| 1. Bebop Fusion (3728 Georgia) | 11. Howard China (2827 Georgia) |
| 2. America's Best Wings (3651 Georgia) | 12. Good Eats DC (2851 Georgia) |
| 3. Manny & Olga's (3624 Georgia) | 13. Crab Plug (2917 Georgia) |
| 4. Afro Lounge (3630 Georgia) | 14. Anna's Restaurant (3211 Georgia) |
| 5. Looking Glass Lounge (3634 Georgia) | 15. Eddie Leonard (3300 Georgia) |
| 6. Just Wingin' it (3657 Georgia) | 16. Pizza Hut (4205 Georgia) |
| 7. Cinder BBQ (8th & Upshur– coming back after fire) | 17. Honeymoon Chicken (4201 Georgia) |
| 8. Southern Style Chicken & Waffle (3539 Georgia) | 18. Hook Hall (3400 Georgia) |
| 9. Negril (Georgia & Columbia– coming soon) | 19. Safeway (3830 Georgia) |
| 10. Mamma Tee's Kitchen (828 Upshur) | |

- This proposal does not diversify the corridor, it adds another formula fast-food use
- Zoning intent supports balanced commercial mix, not overconcentration
- This is not a neighborhood-serving gap. It is a duplication of an already saturated use, and it does not contribute to a diverse or balanced food/retail corridor.
- This proposal favors a national chain instead of supporting local economic diversity.

SITE / BUILDING CONSTRAINTS

3831 Georgia Ave is not a purpose-built fast food site. The physical constraints of the building make high-turnover operations incompatible with safe and orderly functioning.

- This specific building isn't suited for this use intensity.
- Mixed-use residential building above with limited space for indoor queuing, delivery staging & trash storage
- Likely spillover onto sidewalks and into traffic lanes causing hazardous conditions.

This application is not about whether restaurants belong on Georgia Avenue , they clearly do.

The issue is whether this specific, high turnover, fast food use, at this specific constrained site, in an already saturated market, can operate without creating measurable harm.

The applicant has not met that burden.