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DISTRICT OF COLUMBIA BUILDING INDUSTRY ASSOCIATION

October 21, 2002

Carol J. Mitten, Chairperson
D.C. Zoning Commission
441 Fourth Street, N.W.
Suite 220 South
Washington, DC 20001

Re: Petition to Amend the Zoning Regulations – Retail Arcades

Dear Chairperson Mitten:

The District of Columbia Building Industry Association respectfully petitions the Zoning Commission to amend the Zoning Regulations to add a new Section 2515.13, which would allow the enclosure of existing open arcades in buildings in commercial districts in the Central Employment Area for which an FAR credit has been granted, so that the enclosed space can be used for retail, entertainment, arts or services uses. DCBIA respectfully requests that the Zoning Commission initiate a Zoning Text Amendment Application on its own motion to adopt this proposed regulation.

Also attached are several documents which provide background information for this request. The DCBIA Retail Business Development Committee began this effort in 1996, working with Charlene Drew Jarvis, then-Chair of the Council's Committee on Economic Development, to identify specific initiatives to make downtown retail spaces more customer-friendly. The attached December 8, 1996 letter from Ms. Jarvis to Jill Dennis, then-Director of the D.C. Office of Planning, explains this in more detail. Also attached is the testimony of the DCBIA Retail Business Development Committee to the Council, in support of an amendment to the Comprehensive Plan to effectuate this proposal. Further, a report dated January 31, 1997, prepared by the Office of Planning, is attached which summarizes the proposed Comprehensive Plan Amendment, and recommends it for adoption. Finally, attached is Section 1108.1(s) of the Comprehensive Plan, adopted by the Council, which sets forth the basis for the proposed Zoning Text Amendment.

DCBIA continues to believe that this proposal will assist in continuing the City's retail growth, while simultaneously creating more interesting streetscapes. We intend to appear as witnesses in support of this important matter.

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ZONING COMMISSION
District of Columbia
Case 02-44
Exhibit 1

ZONING COMMISSION
District of Columbia
CASE NO.02-44
EXHIBIT NO.1

5100 Wisconsin Avenue, NW • Suite 301 • Washington, DC 20016-4162 • (202) 966-8665 • FAX (202) 966-3222
www.dcbia.org

On behalf of DCBIA and the Retail Business Development Committee, we thank you for your consideration and we shall continue to be advocates for the District of Columbia and its success.

Sincerely,

Michael Howard	Len Harris	Shawn Goldstein
Carr America	Transwestern	G3 Advisors
Committee Chair	Vice Chair	Secretary

Attachments

cc. Andrew Altman, Director for Development Review of
DC Office of Planning
Ellen McCarthy, Deputy Director for Development Review
DC Office of Planning

WAS1 #1128042 v1

AMENDMENT TO CHAPTER 25 OF THE ZONING REGULATIONS

2515.13 Notwithstanding the limitations of Section 771.2, an existing open arcade in a building in a commercial district in the Central Employment Area, for which a floor area ratio credit has been granted pursuant to this section, may be enclosed and devoted to retail, entertainment, arts or service uses permitted as a matter-of-right.

COUNCIL OF THE DISTRICT OF COLUMBIA
WASHINGTON, D. C. 20004
(202) 724-8052

CHARLENE DREW JARVIS
Councilmember-Ward 4
Chairperson
Committee on
Economic Development

Committee Member
Human Services
Housing and Urban Affairs
Labor and Human Rights

December 8, 1996

Jill Dennis
Director, Office of Planning
415 12th Street NW Suite 500
Washington, DC 20004

Dear Ms. Dennis:

As you know I have been working for the last 2 years to improve the District's retail climate. As part of this effort, I have been working with the DC Building Industry Association to identify specific initiatives to make our retail spaces more customer-friendly. We believe that one way to make streets more retail-friendly is to allow for the conversion of arcade space into retail space. This will pull retail space out to the building line (or perhaps to the minimum sidewalk line) and eliminate what are often dark and foreboding entrances to retail spaces.

We talked to your staff about this idea in October, and agreed that I would recommend this change to be included in the comprehensive plan modifications that you are working on. I believe that by allowing for the conversion of existing arcade space, even if this causes the reconfigured building to exceed allowable FAR, will make retail spaces more inviting to the consumer and more attractive to the retailer.. The only additional issue that I believe may need to be addressed concerns buildings in historic districts. I will leave it to you whether this issue needs to be addressed in the amendment.

My proposed amendment to the District's Comprehensive Plan is:

Amend Chapter 11 of 10 DCMR, District Comprehensive Plan, add a new Section 1108(s) - "Support modification of the Zoning Regulation to encourage the success of ground floor retail and entertainment uses in the Central Employment Area by allowing arcade space in existing buildings that were built prior to January 1, 1997, to be converted as a matter of right to retail, entertainment, arts or service uses."

The DCBIA Retail Sub-Committee has assembled an excellent set of pictures of arcade spaces in existing properties that would be eligible to use this benefit. I have included this book for your review.

Again, thank you and your staff for your continued interest and cooperation in the revitalization of the District's retail environment.

Sincerely yours,

Charlene Drew Jarvis
Chair, Committee on Economic Development

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BILL 12-99
COMPREHENSIVE PLAN AMENDMENTS ACT OF 1997

TESTIMONY IN SUPPORT OF ADDING NEW SECTION 1108.1(s) TO 10 DCMR, COMPREHENSIVE PLAN

June 10, 1997

Good afternoon Chairman Cropp and members of the Council. My name is Douglas D. Olson, and I am Director of Retail Services at CarrAmerica Realty Corporation. I am here today in my capacity as Co-Chair of the DCBIA Retail Business Development Subcommittee. DCBIA is comprised of approximately 300 member organizations, with over 1,000 individual members, engaged in all aspects of the real estate and related industries in the District of Columbia. Our organization actively promotes economic development and revitalization of all areas of the District. I know that many of you are familiar with our organization.

Before getting into the substance of my testimony, I would like to take a few moments to thank the Council, on behalf of our President, Tom Wilbur, and the members of our organization, for the Council's enactment of Resolution 12-33, recognizing and honoring DCBIA for our revitalization of Watts Branch Recreation Center in Ward 7 during our Fourth Annual Community Improvement Day last fall. Ferebee-Hope School and Recreation Center in Ward 8 was recently chosen as the focus of our Fifth Annual Community Improvement Day to be held this fall.

Today, I am here on behalf of DCBIA to support the adoption of new proposed Section 1108.1(s) of Title 10, DCMR, listed as item number 11 in the Bill, under "Chapter 11 - Land Use." That proposed section states as follows:

> Support modification of the Zoning Regulations to encourage the success of ground floor retail and entertainment uses in the Central Employment Area by allowing arcade space in existing buildings that were built prior to January 1, 1997, to be converted as a matter-of-right to retail, entertainment, arts or service uses.

We believe that this proposal, which was developed with the support and assistance of Councilmember Jarvis, is another step forward to promote the desperately-needed revitalization of retail, particularly in the Downtown area.

I have attached to my testimony the relevant portion of the Office of Planning's "Disposition Recommended" document dated January 31, 1997, which explains in more detail the proposed change. To summarize, an arcade is created by recessing the ground floor retail portion of a commercial office building along the street perimeter, so that there is a covered walkway for pedestrians. The Zoning Regulations were changed in 1962 to allow an equivalent floor area ratio (FAR) credit, up to a maximum of 0.25, for commercial buildings which included open arcades along the street perimeter.

The arcade was a popular planning concept in the 1960's and 70's, but is no longer used. As the Office of Planning stated in its report, "the arcade was invented by an architect, not by a retailer." The use of the arcade recesses the retail away from the street frontage, and from the eye of the urban pedestrian. To quote again from the OP report, "a retailer would never design a building to distance his or her front door and single chance of catching the eye of a potential customer by placing the store away from the sidewalk, under an arcade."

The proposal would allow buildings built with such arcades, that obtained an FAR credit, to recapture that space for retail and similar desired uses as a matter-of-right and move the street-level storefront out to the building line. It is true that this will result in additional usable floor area which has already been compensated by the use of the FAR credit. However, this additional floor area will serve a desirable goal of the District of Columbia, to enhance retail in the Central Employment Area. The economics of Downtown retail dictate that these small in-fill projects will most likely occur only as part of the total renovation of a particular building. In other words, you will not see a stampede of small retail in-fill projects on the day after this amendment is adopted. Rather, these retail in-fill projects will occur over time as building owners seek to upgrade and modernize their properties. The ability to add retail space in this way as a matter-of-right, without the need for any zoning variance or special exception, will help to make these small projects economically feasible, and will help to promote street level retail in the Central Employment Area. For these reasons, we urge your adoption of this provision.

I now would like to shift my testimony to several proposed amendments that were submitted to the Office of Planning, which are <u>not</u> in Bill 12-99, and which were not recommended for adoption by the Mayor. These proposals, which are in the Office of Planning's "Disposition Recommended" document of January 31, 1997, and which you may hear more about during this public hearing, will actually hurt Downtown retail. Specifically, proposed amendments submitted to and rejected by the Office of Planning regarding Sections 900.6, 902.2(b), 925.2(a), and 940.2(g)(1)(D), would reinstitute a 1.5 FAR requirement for retail uses in the Retail Core, and would expand the definition of the Retail Core to extend eastward from 9th Street to 5th Street, N.W. In the last round of

revisions to the Comprehensive Plan, the Council, by unanimous vote, recognized that the imposition of a 1.5 or 2.0 FAR requirement for retail was entirely unworkable, and acted as a disincentive to economic development. For that reason, the Council changed the Comprehensive Plan to the current requirement for ground floor retail only. This amendment to the plan has now been incorporated into the Zoning Regulations.

The economic resurgence of Downtown is currently fragile at best. The reimposition of a 1.5 FAR retail requirement, and the expansion of the Retail Core where that requirement will be imposed, will be more of an impediment to overcome rather than an economic incentive. We urge you not to include those proposed amendments in this Bill.

Thank you very much for your favorable consideration of our request. I would be pleased to answer any questions you may have.

ALL
COMPREHENSIVE PLAN AMENDMENT PROPOSALS

DISPOSITION RECOMMENDED

1/31/97

CHAPTER 11 LAND USE

Proposed Amendment Submission ID Number: 96-044

Proposer: Councilperson Charlene Drew Jarvis, Chair
Committee on Economic Development

Section: 1108 Policies In Support of the Commercial Areas Objectives

Proposed Change: Add a new subsection 1108.1(s) to read:

Support modification of the Zoning Regulations to encourage the success of ground floor retail and entertainment uses in the Central Employment Area by allowing arcade space in existing buildings that were built prior to January 1,1997, to be converted as a matter of right to retail, entertainment, arts or service uses.

Rationale: In concert with the D.C. Building Industry Association, there has been a joint effort to identify specific initiatives to make the District's retail spaces more customer-friendly. An initial product of that collaboration is the above proposed amendment which would allow the conversion of arcade space into retail space by pulling that space out to the building line and eliminating what are often dark and foreboding entrances to retail spaces. It is our belief that allowing for the conversion of existing arcade space, even if this causes the reconfigured building to exceed allowable FAR, will make retail spaces more inviting to the consumer and more attractive to the retailer.

NOTE: All proposed text additions are in boldface: proposed text deletions are in ~~strikeout~~.

Analysis:

Arcades have long been considered to be urban amenities. They provide shelter from hot sun, rain and snow, extend the width of the sidewalk, establish a consistent frame for retail shops set back from the street and help to define the base of the building. However, while arcades do often accomplish some or all of the above objectives, the reality is that this occurs at the expense of other objectives, including the critical objective of enhancing the vitality of the retail function itself.

Arcades are typically somewhat dark during the day and thus can be uninviting. They may invite the pedestrian on hot, sunny, summer days but repel the pedestrian on cold, sunny, winter days. They remove by the depth of the arcade the excitement of merchandise displays and discovery of the interior of the retail space from the automobile, the pedestrian on the sidewalk across the street and the pedestrian on the same side of the street who remains on the sidewalk beyond the arcade.

~~The arcade was invented by an architect, not by a retailer.~~ The architect's goal is to preserve the integrity of the architectural design and effectively control the potentially chaotic appearance of the retail function at the street floor by diminishing its visual presence. A retailer would never design a building to distance his or her front door and single chance of catching the eye of a potential customer by placing the store away from the sidewalk, under an arcade.

Successful retail is the key to the success of Downtown as a vibrant, active, people place. It is the key to ~~encouraging pedestrian movement throughout Downtown. This is particularly important in~~ Washington, where the height limit and resulting lower density of development result in the need to connect the spread out retail, entertainment, residential and office components of Downtown with pedestrian friendly sidewalks. It is not clear that the infill of existing arcades will occur except as a byproduct of the major renovation of a building, and it is also not clear that it will result in any significant addition of retail space as a result of that infill. However, the proposed amendment will likely end up being an important ingredient of a comprehensive strategy anticipated to be forthcoming from the work of the Interactive Downtown Task Force and an upcoming consultant study of a major section of Downtown.

Recommendation: Recommended for adoption.

NOTE: All proposed text additions are in boldface; proposed text deletions are in ~~strikeout~~.

(c) The Central Employment Area also contains the widest range and the largest amount of retail floor space and the greatest sales volume in the metropolitan area, having the largest major department stores and leading specialty shops of the region; and

(d) The Central Employment Area also has numerous boutiques and restaurants and the largest number of hotels in the District. The term "Central Employment Area" is defined in §199.1 of this title.

1108 POLICIES IN SUPPORT OF THE COMMERCIAL AREAS OBJECTIVES

1108.1 The policies established in support of the commercial areas objectives are as follows:

(a) Promote appropriate commercial development, including centers for retail and office uses, to serve the needs of the economy of the District and its neighborhoods, to provide a focus for the expansion of housing and employment that the District will have to accommodate in the future because of its urban center role within the region, and to expand employment opportunities in the region for District residents;

1108.1(s) - arcades

(b) Promote and enhance Downtown according to the objectives and policies of the Downtown Plan Element, through concentrated efforts on promotion, development, and regulatory activities by means of joint public and private action;

(c) Improve existing neighborhood commercial centers and develop new neighborhood commercial centers;

(d) Encourage the District's network of multi-neighborhood commercial centers to provide a satisfactory range of retail and office services for their market areas;

(e) Promote the development of new multi-neighborhood commercial centers in areas where residents now travel long distances for food and other shopping services, through close coordination of ward and neighborhood planning efforts with the District's economic development program, including on-going efforts to encourage large food stores to locate in these areas;

(f) Permit the District's two (2) established regional commercial centers, Georgetown and Friendship Heights, to develop and to evolve in ways which are compatible with other land use policies, including those for maintaining stable neighborhoods, mitigating negative environmental impacts, and reducing traffic congestion;

(g) Stimulate the development of new regional commercial centers at suitable locations in the District where such development is logical, appropriate and

compatible with other land use policies. (This policy applies to the proposed expansion of the existing center at the Hechinger Mall and the centers projected for the Minnesota-Benning and the Anacostia Metrorail station areas.);

(h) Maintain heights and densities in established and proposed regional centers which are appropriate to the scale and function of development in adjoining communities, and develop buffer areas for neighborhoods exposed to new moderate, medium, and medium-high commercial densities;

(i) Encourage the continued diversification of land uses in the Central Employment Area outside of Downtown, including the development of cultural and recreational activity centers and of housing, in order to provide greater levels of activity during evening and weekend periods when offices are closed;

(j) Promote the establishment and growth of mixed use commercial centers at appropriate Metrorail stations and major transportation interchange points to reduce automobile congestion, improve air quality, increase jobs, reduce reliance on the automobile, and ensure neighborhood stability through cooperative public and private efforts to increase the use of Metrorail and Metrobus through "park-and-shop" subsidies, shuttle buses, signs, promotional programs, and more mixed use developments;

(k) Protect residential areas adjoining new commercial centers from negative physical impacts through the use of open-and green-space buffers, use and intensity modulation between residential and nonresidential areas, traffic circulation and parking management initiatives and other related techniques, implemented by means of public actions to modify existing land use controls, traffic and parking regulations, and public sector and private sector sensitivity to neighborhood concerns;

(l) Ensure that residential communities are adequately protected from destabilizing impacts from new commercial uses and commercial uses which have undergone substantial operational changes since the adoption of the District's land use regulations. (Changes may be required in the Zoning Regulations including reclassification of uses, to account for and better control the negative impacts of uses such as fast-food restaurants, video arcades, sexually-oriented businesses, gasoline stations, and convenience stores.);

(m) Discourage concentrations of liquor licensed establishments and public halls;

(n) Attempt to limit commercial development in the Georgia Avenue, N.W. corridor to properties fronting on Georgia Avenue, N.W.;

(o) Support modification of the Zoning Regulations (11 DCMR §100 *et seq.*) to provide that hotels and other transient uses do not meet the residential or housing objectives for mixed use commercial and residential ("CR") development;

(p) Explore utilization of the National Trust for Historic Preservation's "Main Street" program as a means of revitalizing local neighborhood and multi-neighborhood commercial centers;

(q) Preserve development rights for projects in approved urban renewal plan areas when these areas become subject to zoning, in those instances where property owners purchased additional development rights from the Redevelopment Land Agency, such as the development rights for Square 536 in the Southwest "C" Urban Renewal Area;

(r) Encourage the Zoning Commission to expedite the rezoning of Square 213 to the C-4 zone district to encourage the retention and expansion of the National Association of Home Builders at this site, except for the Native American burial ground at this site which is to be perpetual park land. Any development on that square is to respect the historical significance of this special site;

(s) Support modification of the Zoning Regulations to encourage the success of ground floor retail and entertainment uses in the Central Employment Area by allowing arcade space in existing buildings to be converted as a matter of right to retail, entertainment, arts or service uses; and

(t) Encourage the expansion of existing hotels, including the addition of one floor, approximately sixteen feet in height, to the Hay Adams Hotel.

1109 OBJECTIVES FOR PRODUCTION AND TECHNICAL EMPLOYMENT AREAS

1109.1 The objectives for production and technical employment areas are to encourage the growth of centers of high technology, researchs and development, and to provide for essential support services and nonpolluting production activities.

1110 PRODUCTION AND TECHNICAL EMPLOYMENT LAND USE CATEGORY

1110.1 The production and technical employment land use category includes the following:

(a) Restructured industrial land intended to encourage growth industries and industries with a high ratio of employees to land area occupied, such as office support services, communications, printing and publishing, wholesaling, transportation services, food services, and tourism support services;