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March 31, 2005

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2005 MAR 31 PM 3:22

VIA HAND DELIVERY

District of Columbia Zoning Commission
441 4th Street, N.W.
Suite 220 – South
Washington, D.C. 20001

Re: CASE NO.: 04-31 (Definitions: (1) Clear Height Floor to Ceiling; and (2) Glass, Clear and/or Low Emissivity)

Honorable Members of the Commission:

The D.C. Building Industry Association is comprised of over 400 member organizations representing thousands of individuals involved in all aspects of the building industry in the District of Columbia. As further set forth below, DCBIA supports the proposed text amendment as one small part of the District's efforts to promote retail development in our city.

It has become evident from all the successful mixed use developments that have taken place in the city over the past several years that it is time we carefully scrutinize the retail needs in our neighborhoods in order to improve the retail opportunities there. DCBIA fully supports the Office of Planning's initiative to define "clear height, floor to ceiling" and support the use of "glass, clear and/or low-emissivity" in order to improve the retail situation in new developments throughout our city. It is important that the retailers, both local and national, who will be investigating retail expansion, particularly in our "transit oriented development" corridors, understand that we as a city recognize their needs and are trying to address them in a positive fashion.

DCBIA understands that the Office of Planning is proposing "clear height, floor to ceiling" on the ground floor of buildings in certain neighborhoods, in order to provide space that is more attractive to potential retail and arts tenants, and that you will allow developers to increase the total building

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ZONING COMMISSION
CASE No. 04-31
EXHIBIT No. 6
ZONING COMMISSION
District of Columbia
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EXHIBIT NO.6

height by an amount equal to the additional ground floor clear height, so that the developer is still able to develop its property to the full density permitted. We have seen that the adaptive reuse of warehouses and the redevelopment of other older buildings throughout the country can provide dramatic ceiling heights, sometimes in excess of twenty feet. Retailers use those soaring ceiling heights to create signature spaces. If we look at where attractive and successful retail has located in the District, we find it in old department stores, such as Border's in the old Garfinckel's building or H&M in the old Woodward & Lothrop building; we find Barnes and Noble in an old car showroom in Georgetown; DC Coast in the grand ground floor of 1401 K Street; or others in new buildings where there is enough grade change to generate sufficient ground floor ceiling height such as Barnes & Noble and ESPN Zone on 12th Street, NW.

First floor heights in new developments should not be artificially limited to ten feet and sometimes even less due to constraints on commercial building heights. Ground floor ceiling heights should be high enough to allow a restaurateur to successfully install creative lighting or even a chandelier; an apparel retailer to double or even triple hang and have enough height to use fly-in display techniques to showcase merchandise; or a dry cleaner to build a carousel which can hold enough product to service its clientele. Darkly tinted glass should not be used in retail storefronts. Clear glass should be encouraged, to showcase the retailer's merchandise and attract pedestrians into the shop.

We note that the request for increased ground floor retail height is already being incorporated in several pending zoning text amendments for neighborhood commercial areas, and we recommend that the increased first floor heights be encouraged in all new developments in neighborhoods such as Takoma, Columbia Heights, Georgia Avenue/Petworth, Georgia Avenue/Shaw/Howard University, Rhode Island Avenue (from 4th to 24th Street, N.E.) and 4th Street, N.E (one block north and two blocks south of Rhode Island Avenue), Minnesota-Benning, H Street (from 2nd to 14th Street, N.E.), Eastern Market (acknowledging the historic designation there), the Potomac Avenue Metro, and Kennedy Street from Georgia Avenue to 2nd Street, N.W. Many of the neighborhoods listed will include transit-oriented developments, on which the additional ground floor ceiling heights will have an enormous impact.

DCBIA supports the Office of Planning's proposed definitions under consideration by the Zoning Commission in this case. We also respectfully request that the Office of Planning and the Zoning Commission require higher ground floor ceiling heights only in those locations where it can be accompanied with matter of right additional total building heights and retail and arts tenants are to be encouraged. We are excited by what a significant increase in the height of retail and arts spaces can mean, and urge you and the Office of Planning to consider the advantages of additional ground floor ceiling height described herein, particularly in the context of transit-oriented development.

Thank you for taking the comments of the DCBIA regarding these issues into consideration.

Sincerely,

D.C. Building Industry Association

By: _____
Co-Chair, Retail Business Development Committee