



CENTURY
ASSOCIATES

608 6th Street, NE
Washington, DC 20002

Tel 202.905.2724
Fax 202.543.4845

www.century-associates.com

January 3, 2011

MEMO TO: The Zoning Commission of the District of Columbia
RE: Comments on Case No. 10-19

Good evening. My name is Joel Kelty. I am a resident of Ward 6 and my firm, Century Associates, owns commercial property in Square 1027. While we take no position on the extension of the H Street Neighborhood Commercial Overlay, we do believe that the proposed down zoning of commercial property in the H Street corridor runs counter to the overall goals of the Comprehensive Plan, the H Street Strategic Development Plan, and the future economic, social and cultural well-being of the neighborhood for three primary reasons:

1) Reducing density is inconsistent with encouraging development as outlined in the Comprehensive Plan and the H Street Strategic Development Plan

The Comprehensive Plan calls for directing growth specifically to H Street. Policy CH-1.1.4 stipulates that mixed use development with ground floor retail and upper floor residential uses should be encouraged in the H Street/Benning Road Corridor. The Plan encourages redevelopment of commercial zones to provide "needed housing and retail services" and indicates that such development will "reinforce the fabric of the neighborhood," while helping to relieve economic pressures that otherwise result in conversion of residential properties to alternate uses. Down zoning from C-3-A to C-2-A will adversely impact opportunities for medium density mixed use development and will do nothing to relieve development pressure on property in the surrounding R-4 zone.

2) Additional Residential Development needed to support retail uses

The H Street Strategic Development Plan acknowledges that people only walk 1,200 - 1,500 feet for retail. In order for neighborhood retail to survive on H Street, the street needs significant number of additional residents. Because the corridor is surrounded by the R-4 zone, the only logical place to put large numbers of additional residents is in mixed use buildings on the corridor itself. The Plan specifically acknowledges the appropriateness of this approach and calls for attracting investment, encouraging the renovation of existing storefronts and buildings, attracting small office and apartment uses in upper story spaces, and encouraging infill development on vacant and underutilized sites. The proposed down zoning contradicts the recommendations of the H Street Strategic Development Plan.

3) Higher density development will prevent undesirable land uses

Policy CH-1.1.6 of the Comprehensive Plan suggests that fast food outlets, service stations, convenience mini-marts and other "drive thru" businesses should be prevented along the H Street Corridor. Down zoning will actually encourage such low density uses, not prevent them. The most effective approach to preventing undesirable low density land uses is to retain the existing C-3-A zoning in the proposed area, perhaps with overlay zoning to provide additional land use control. The existing moderate allowable density will result in land values that are capable of supporting desirable redevelopment in the future when market conditions permit. Prudent owners

ZONING COMMISSION
District of Columbia

ZONING COMMISSION

District of Columbia
CASE NO. 10-19

CASE NO. 10-19
EXHIBIT NO. 18

or future buyers will replace low density, undesirable land uses with moderate density mixed use properties in order to realize maximum value from their assets.

Conclusion

In conclusion, while we take no position on the proposal to extend the H Street Neighborhood Commercial Overlay to the subject lots, we oppose down zoning any property in the C-3-A zone to C-2-A. It is our position that doing so is counter to the goals and objectives of both the Comprehensive Plan and the H Street Strategic Development Plan, will discourage redevelopment of underutilized property along the H Street Corridor, and do nothing to discourage automobile filling stations, fast food restaurants, drive thru uses and other undesirable and incompatible land uses.

Respectfully Submitted,

Joel Kelty
Century Associates