

MEMORANDUM

January 28, 2016

TO: Planning, Housing, and Economic Development Committee
FROM: Jeff Zyontz, ^{JZ} Senior Legislative Analyst
SUBJECT: Zoning Text Amendment 15-10, Combination Retail Definition

Zoning Text Amendment (ZTA) 15-10, introduced on December 1, 2015, would amend the definition of combination retail. Council President Leventhal is the lead sponsor of ZTA 15-10. Councilmembers Elrich, Hucker, Navarro, and Riemer are co-sponsors.

Currently, Combination Retail means a department or retail store that exceeds 85,000 square feet and that includes a pharmacy and a full line of groceries. Combination Retail does not include a grocery store, or a club or membership store that charges a membership or access fee and sells primarily bulk merchandise. A combination retail store is only allowed by conditional use approval in the CRT, CR, GR, and NR zones. The ZTA would lower the square footage of a combination retail store to 65,000 square feet. Under the ZTA, a department or retail store between 65,000 square feet and 85,000 square feet that includes a pharmacy and a full line of groceries would require conditional use approval, in addition to larger stores that already have that requirement.

A public hearing was held on January 12, 2016. The Planning Board recommended against the approval of ZTA 15-10. In its opinion, the Council's concern might be better focused on the compatible integration of small businesses near Metrorail Stations. In any event, the Planning Board recommends amending the definition of combination retail to include club membership stores due to their similar impact.

Planning Staff recommended approval of ZTA 15-10 as introduced.

The Council received four emails in support of ZTA 15-10 from residents in the Aspen Hill area. These residents believe that approval of the ZTA would support existing neighborhood shopping centers.

Background

Legislative History concerning Combination Retail

The Council has approved three ZTAs in the past 12 years that regulated a Combination Retail use and large floor plate stores.

ZTA 04-04 (2004)

The Council established the combination retail use category by approving ZTA 04-04. The use was defined as having a minimum size of 120,000 square foot of floor area. The Council required such uses to be approved by special exception due to their unique land use burdens. The use was allowed by special exception only in the C-2 and C-3 zones.

ZTA 12-01 (2012)

ZTA 12-01 concerned C-4 zoned property within ½ mile of a Metrorail Station. Retail stores with 50,000 square feet to 100,000 square feet of floor area were limited to a floor plate for a single use to 80,000 square feet and were required to include provisions for small retail spaces for other users. The large floor plate user was required to follow specific design standards but was not required to get approved by special exception. The definition of combination retail was not changed.

ZTA 13-04 (2014)

The Zoning Ordinance Rewrite, ZTA 13-04, included a reduction in the minimum size of all combination retail uses from 120,000 square feet to 85,000 square feet. Where Combination Retail is proposed within 1/2 mile of a Metro station entrance and has a minimum 50,000 square foot footprint or a minimum of 100,000 square feet of all gross floor area designed for a single user, it must satisfy standards to assure a pedestrian compatible use. The use required conditional use approval (the same process for what was formerly called a special exception). The use was allowed as a conditional use in CRT, CR, GR, and NR zones.

Litigation - California

In *Wal-Mart Stores, Inc. v. City of Turlock*, 483 F.Supp.2d 987 (2006), a Federal District Court sustained a prohibition on combination retail stores (called a Discount Superstore in Turlock's code) greater than 100,000 square feet of floor area.¹ The Ordinance also made a requirement for a special

¹ The municipality prohibited 'discount superstores', which are large-scale (greater than 100,000 square feet) retail stores that also devote more than 5% of sales floor area to non-taxable (grocery) items."

Evidence in the record also showed that supermarkets attract customers with the same frequency as a Discount Superstore (each customer shopping two to three times per week), but a Discount Superstore, because of the synergy between its supermarket and Discount Store components, draws customers from over a greater distance. A greater distance per trip would result in more vehicle miles being driven for each visit. More vehicle miles traveled creates more traffic and more air pollution than a supermarket. This rationale also distinguished a Discount Superstore from a supermarket in a shopping center.

The municipality found that a Discount Superstore would threaten the viability of the neighborhood shopping centers. Extensive evidence in the record, including evidence of the actual experiences of other communities, showed for each Discount Superstore that opens, two or three supermarkets close. Such closures, in the municipality's opinion, would threaten the survival of the neighborhood shopping centers anchored by those supermarkets and would lead to urban blight. The other classifications do not have this effect.

exception for smaller such stores, but the special exception aspect of Turlock's zoning code was not challenged.

Current Facts

The Planning Department did not identify any public department stores with a full grocery department in the County that are less than 85,000 square feet of floor area but more than 65,000 square feet of floor area. The largest public department store with groceries was 263,842 square feet; the smallest was 90,632 square feet. There are 8 public stores within this size range; all of the stores were constructed before a special exception was required.

The largest grocery store in the County was found to have 62,000 square feet of floor area. The approval of ZTA 15-10 would not create any non-conforming stores. ZTA 15-10, if approved, would only apply to new stores.

Walmart, as a combination retailer in its larger configurations, recently announced the closure of its smallest stores. All Walmart Express stores will be closed. These stores typically were about 15,000 square feet of floor area in size. Walmart has not publicized its plans for Neighborhood Markets. These stores average about 38,000 to 40,000 square feet and focus on grocery, household supplies, health & beauty items, and pharmacy. The merchandise at the Express stores had a similar grocery focus.

Conditional Use Approval

The requirement for a special exception allows an individual review of specific locations. The Maryland Court of Appeals has often described the nature of a special exception. Conditional Use approval (special exceptions) may be granted after considering both inherent and non-inherent adverse effects.

A special exception use "in a zoning ordinance recognizes that the legislative body of a representative government has made a policy decision for all of the inhabitants of the particular governmental jurisdiction, and that the exception or use is desirable and necessary in its zoning planning ...".² A special exception is a use that has been legislatively predetermined to be conditionally compatible with the uses permitted as of right in a particular zone. Unless amended by code, the appropriate standard to be used in determining whether a special exception should be denied is whether there are facts and circumstances that show that the particular use proposed at the particular location proposed would have any adverse effects above and beyond those inherently associated with such a special exception use.³ The County code requires the Hearing Examiner to make the following finding to approve a conditional use:

To approve a conditional use application, the Hearing Examiner must find that the proposed development: ...

- g. will not cause undue harm to the neighborhood as a result of a non-inherent adverse effect alone or the combination of an inherent and a non-inherent adverse effect in any of the following categories:
 - i. the use, peaceful enjoyment, economic value or development potential of abutting and confronting properties or the general neighborhood;
 - ii. traffic, noise, odors, dust, illumination, or a lack of parking; or

² Mossburg v. Montgomery County, 107 Md. App. 1, 7-8, (1995).

³ Montgomery County v. Butler, 417 Md. 271(2010).

- iii. the health, safety, or welfare of neighboring residents, visitors, or employees.⁴

Issues

Why lower the limit?

By reducing the minimum size of a combination retail store, those stores between 85,000 square feet of floor area and 65,000 square feet of floor area would be required to get conditional use approval to proceed. Currently, only stores larger than 85,000 have that requirement.

The Shorenstein Center at Harvard's Kennedy School reports the following:

In the five decades since, the American retail landscape and built environment have been profoundly altered. At the end of 2015, Wal-Mart had 4,614 stores and Supercenters in the United States, while Target operated 1,805 stores and Best Buy had 1,050. Then there are smaller chains — still huge by any measure — as well as “category killers” and all the diverse residents of the shopping-mall ecosystem. While some big-box retailers have stumbled in recent years, the rise of Internet commerce and the increasing appeal of cities has helped them remain a powerful force: Wal-Mart alone is estimated to employ approximately 1 percent of the American workforce and reported nearly \$486 billion in revenue for fiscal year 2015.

All that retail and economic muscle hasn't come without significant controversy. A 2008 study from the Massachusetts Institute of Technology indicates that Wal-Mart's rapid expansion in the 1980s and 1990s was responsible for 40 percent to 50 percent of the decline in the number of small discount stores. According to 2014 research in *Social Science Quarterly*, a similar effect continues: On average, within 15 months of a new Wal-Mart store's opening, as many as 14 existing retail establishments close. Other research has found that the arrival of Wal-Mart stores was associated with increased obesity of area residents, higher crime rates relative to communities that were not by stores, lower overall employment at the county level, and lower per-acre tax revenues than mixed-use development.⁵

The Planning Staff report says:

.... Over the past decade, the prototypical building size of this use has evolved, including the emergence of smaller building footprints in more urban settings. As such, the Council's proposed modification of the building size threshold is consistent with current trends, especially in urban and metro station areas.

The ZTA would not prohibit any store; it would only increase the potential number of stores that might require conditional use approval. The conditional use process assumes the use is compatible in the zone subject to proof of no inherent or non-inherent effects. The ZTA proposes only a modest change in policy. The ZTA would not prohibit any store. It would not restrict where such stores would be located. It only changes the process of approval for such stores.

⁴ Montgomery County Code Section 59.7.3.1.E.

⁵ <http://journalistsresource.org/studies/government/municipal/impact-big-box-retailers-employment-wages-crime-health>

Staff comment: The effects of large stores are well documented. They attract trips from further distances, thereby increasing traffic and air pollution. Such stores have price advantages over smaller stores due to their buying power and operational efficiency. Those price advantages have led to the closure of competitors and a decrease in retail choices.

The exact point at which a “big box” becomes a small box store is a matter of legislative judgment; however, as the size class approaches the size of grocery stores, the chances of a court challenge to the Council judgment increases. Staff understands the Planning Board’s comment that reducing the size blurs the lines between the impacts of a Combination Retail use and other large Retail/Service Establishments, but also recognizes Planning Staff’s recommendation for approval. The conservative approach would be to not approve ZTA 15-10.

Should the definition of combination retail store include club membership store?

The Planning Board raised this idea in their testimony. In the Planning Board’s opinion, club stores have similar impacts to Combination Retail uses. Club stores can have regional impacts, depending upon their size. **Staff agrees with the Planning Board and recommends amending the definition of Combination/Retail to include club membership establishments.**

<u>This Packet Contains</u>	<u>© number</u>
ZTA 15-10	1 – 3
Planning Board Recommendation	4 – 5
Planning Staff Recommendation	6 – 23

Zoning Text Amendment No.: 15-10
Concerning: Combination Retail -
Definition
Draft No. & Date: 1 – 10/23/15
Introduced: November 3, 2015
Public Hearing:
Adopted:
Effective:
Ordinance No.:

**COUNTY COUNCIL FOR MONTGOMERY COUNTY, MARYLAND
SITTING AS THE DISTRICT COUNCIL FOR THAT PORTION OF
THE MARYLAND-WASHINGTON REGIONAL DISTRICT WITHIN
MONTGOMERY COUNTY, MARYLAND**

Lead Sponsor: Council President Leventhal
Co-sponsors: Councilmembers Elrich, Hucker, Navarro, and Riemer

AN AMENDMENT to the Montgomery County Zoning Ordinance to:

- revise the definition of “combination retail”; and
- generally amend the approval and development standards for combination retail uses.

By amending the following sections of the Montgomery County Zoning Ordinance, Chapter 59 of the Montgomery County Code:

DIVISION 59-3.5. “Commercial Uses”
Section 59-3.5.11. “Retail Sales and Service”

EXPLANATION: ***Boldface** indicates a Heading or a defined term.*
Underlining indicates text that is added to existing law by the original text amendment.
[Single boldface brackets] indicate text that is deleted from existing law by original text amendment.
Double underlining indicates text that is added to the text amendment by amendment.
[[Double boldface brackets]] indicate text that is deleted from the text amendment by amendment.
** * * indicates existing law unaffected by the text amendment.*

ORDINANCE

The County Council for Montgomery County, Maryland, sitting as the District Council for that portion of the Maryland-Washington Regional District in Montgomery County, Maryland, approves the following ordinance:

1 **Sec. 1. DIVISION 59-3.5 is amended as follows:**

2 **DIVISION 59-3.5. Commercial Uses**

3 * * *

4 **Section 3.5.11. Retail Sales and Service**

5 **A. Combination Retail**

6 **1. Defined**

7 Combination Retail means a department or retail store that exceeds
8 [85,000] 65,000 square feet and that includes a pharmacy and a full
9 line of groceries. Combination Retail does not include a grocery store,
10 or a club or membership store that charges a membership or access fee
11 and sells primarily bulk merchandise (See Section 3.5.11.B,
12 Retail/Service Establishment).

13 * * *

14 **Sec. 2. Effective date.** This ordinance becomes effective 20 days after the
15 date of Council adoption.

16
17 This is a correct copy of Council action.

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19 _____
20 Linda M. Lauer, Clerk of the Council



MONTGOMERY COUNTY PLANNING BOARD
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

OFFICE OF THE CHAIR

January 11, 2016

TO: The County Council for Montgomery County, Maryland, sitting as the District Council for the Maryland-Washington Regional District in Montgomery County, Maryland

FROM: Montgomery County Planning Board

SUBJECT: Zoning Text Amendment No. 15-10

BOARD RECOMMENDATION

The Montgomery County Planning Board of the Maryland-National Capital Park and Planning Commission reviewed Zoning Text Amendment No. 15-10 at our regular meeting on January 7, 2016. By a vote of 5:0, the Planning Board recommends denial of the text amendment to revise the definition of "Combination Retail" to reduce the threshold for becoming a combination retail use from over 85,000 square feet to over 65,000 square feet. The Board believes that the ZTA is not necessary since using this strategy brings to question the potential impacts that other much larger Retail/Service Establishments, including club membership stores, have on surrounding communities. Should the County Council decide to move forward with this ZTA, the Board suggests that, potentially, many of the concepts, design and use standards required for Retail/Service Establishments and Combination Retail within ½ mile of a metro station could assist in minimizing concerns typically associated with Combination Retail uses such as: establishing a maximum building footprint of the area designed for a single Combination Retail use; requiring an active entrance on all sides of a building that front an abutting public right-of-way; or requiring space for small retailers. The Board also believes that club membership stores should be added to the definition of Combination Retail, due to the similar impacts these stores have on an area as they tend to have significant regional attraction.

Currently, Combination Retail means a department or retail store that exceeds 85,000 square feet and that includes a pharmacy and a full line of groceries. Combination Retail does not include a grocery store, or a club membership store that charges a membership or access fee and sells primarily bulk merchandise. A combination retail store is only allowed by conditional use approval in the CRT, CR, GR, and NR zones. The ZTA would lower the threshold of a Combination Retail use to greater than 65,000 square feet. Under the ZTA, a department or retail store between 65,000 square feet and 85,000 square feet that includes a

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pharmacy and a full line of groceries would require conditional use approval, in addition to larger stores that already have that requirement.

County Council (PHED Committee) added the Combination Retail use back in the revised zoning code (initially removed by Planning Board in order to address large retail uses as a whole versus distinguishing those that also include a pharmacy and full line grocery store), but changed the threshold from "exceeding 120,000 square feet" to "exceeding 85,000 square feet". Under this distinction, Combination Retail is only allowed as a conditional use, whereas other Retail/Service Establishments greater than 85,000 square feet in size are allowed in some zones as a limited use. The Planning Board believes that further reducing the threshold size for defining a Combination Retail use only blurs the lines between the impacts of a Combination Retail use and other larger Retail/Service Establishments, including club membership stores.

CERTIFICATION

This is to certify that the attached report is a true and correct copy of the technical staff report and the foregoing is the recommendation adopted by the Montgomery County Planning Board of the Maryland-National Capital Park and Planning Commission, at its regular meeting held in Silver Spring, Maryland, on Thursday, January 7, 2016.


Casey Anderson
Chair

CA:GR



Zoning Text Amendment (ZTA) No. 15-10, Combination Retail Definition

GR

Gregory Russ, Planner Coordinator, FP&P, gregory.russ@montgomeryplanning.org, 301-495-2174

PD

Pamela Dunn, Chief, FP&P, pamela.dunn@montgomeryplanning.org, 301-650-5649

Completed 12/31/15

Description

ZTA No. 15-10 revises the definition of "Combination Retail". Specifically, the ZTA reduces the threshold for becoming a combination retail use from over 85,000 square feet to over 65,000 square feet.

Summary

Staff recommends approval of ZTA No. 15-10 as introduced. County Council policy has previously determined that Combination Retail should be examined more closely than other retail/service uses based on unique traffic, environmental, land use and community impacts and that a rational basis exists for increased controls. Over the past decade, the prototypical building size of this use has evolved, including the emergence of smaller building footprints in more urban settings. As such, the Council's proposed modification of the building size threshold is consistent with with current trends, especially in urban or metro station areas.

Background/Analysis

History of Combination Retail in Montgomery County

ZTA No. 04-04, Adopted: November 9, 2004; Effective: November 29, 2004

- The County Council believed that any retail store over 120,000 square feet that includes a pharmacy and full line grocery store has unique traffic, environmental, land use and community impacts and that a rational basis exists for increased controls.
- The Council in taking this action took notice of the considered legislative judgment of local governments around the country that large, retail establishments, known as "super stores," "freestanding discount stores," or "big box stores," create unique land use burdens.
- These legislative conclusions are borne out by traffic data and analyses compiled by the Institute of Traffic Engineers. This information confirms the direct correlation between large retail stores

and increased traffic. This information also confirms that home improvement stores and club or membership stores that sell primarily bulk merchandise *do not* generate the same traffic impacts as large, combination retail stores. *The different types of large-scale retail uses were compared using trip-generation rates that calculate the number of vehicular trips for a store of at least 80,000 square feet of gross floor area.*

ZTA No. 12-01, Adopted: April 10, 2012; Effective: April 30, 2012

- Concerned with the impact of a single larger retail use within a Metro station policy area, the Council established additional requirements in the C-4 zone for retail uses of a certain size, located within ½ mile of a Metro station.
- The purpose of ZTA 12-01 was to limit any potential adverse impact of large retail footprints near Metro Stations and protect the opportunity for the creation of a mixed-use environment.
- ZTA 12-01 regulated C-4 zoned property located within 1/2 mile of a Metro Station if the ground floor footprint of a single retail user was designed to be larger than 50,000 square feet, or the total square footage greater than 100,000 square feet.
- Under these circumstances, ZTA 12-01: 1) *limited the maximum ground floor footprint for a single retail user to 80,000 square feet*; 2) required space for small retailers; 3) required other uses in addition to retail uses; and 4) required conformance to design elements. ZTA 12-01 also allowed increased floor area and building height for projects with large single retail uses that conform to the proposed standards.

ZTA No. 13-04 Comprehensive Zoning Ordinance Revisions, Adopted: March 4, 2014; Effective: October 30, 2014

- County Council (PHED Committee) added the Combination Retail use back in the revised zoning code (initially removed by Planning Board in order to address large retail uses as a whole versus distinguishing those that also include a pharmacy and full line grocery store), but changed the threshold from “exceeding 120,000 square feet” to “exceeding 85,000 square feet”. Under this distinction, Combination Retail is only allowed as a conditional use, whereas other Retail/Service Establishments greater than 85,000 square feet in size are allowed in some zones as a limited use.

Currently, Combination Retail means a department or retail store that exceeds 85,000 square feet and that includes a pharmacy and a full line of groceries. Combination Retail does not include a grocery store, or a club membership store that charges a membership or access fee and sells primarily bulk merchandise. A combination retail store is only allowed by conditional use approval in the CRT, CR, GR, and NR zones. The ZTA would lower the threshold of a Combination Retail use to greater than 65,000 square feet. Under the

ZTA, a department or retail store between 65,000 square feet and 85,000 square feet that includes a pharmacy and a full line of groceries would require conditional use approval, in addition to larger stores that already have that requirement.

The conditional use standards associated with a Combination Retail use include: building design and scale parameters; and if within 1/2 mile of a Metro station entrance and has a minimum 50,000 square foot footprint or a minimum of 100,000 square feet of all gross floor area designed for a single user, then the use must follow similar standards to those depicted above under ZTA 12-01 (Bullet #4) established for other Retail/Service Establishments.

Table of Selected retailers in Montgomery County - by size (Attachment 2)

The attached table (Attachment 2) depicts eight stores that could possibly meet the existing definition for a combination retail (all greater than 85,000 square feet). According to the list of all retailers (Attachment 2) ZTA 15-10 doesn't appear to impact any existing use. It appears that all retail establishments greater than 65,000 square feet are also greater than 85,000 square feet. As such, the proposed legislation would impact only new proposals for a Combination Retail use. All other conditional use standards regarding form and opportunities for small tenant spaces are retained from the 2012 regulations.

Table-COMBINATION RETAILERS BY LOCATION AND LEASED SPACE (Attachment 3)

Table 3 (Attachment 3) depicts a number of stores that typically fall into the category of a Combination Retailer in the region (Kmart, Walmart and Target). Within Montgomery County these stores range in size from over 90,000 square feet to over 263,000 square feet. Outside of Montgomery County (in Maryland, Northern Virginia and Washington D.C.), these retailers range in size from over 56,000 square feet to over 203,000 square feet.

Staff recommends approval of ZTA No. 15-10 as introduced. County Council policy has previously determined that Combination Retail should be examined more closely than other retail/service uses based on unique traffic, environmental, land use and community impacts and that a rational basis exists for increased controls. Over the course of the past decade, the size of this use has evolved into a range of sizes including smaller footprints, especially in more urban settings, and Staff believes that it is important, in areas near metro stations, to ensure that uses are integrated to promote complete communities and that uses and buildings are visually compatible with each other and adjacent communities to provide a harmonious pattern of development. Building placement, height, massing, façade treatments, and the location of parking facilities affect sense of place, orientation, and the perception of comfort and convenience. As such, it is important to retain and promote the compatible integration of small businesses and mix of uses within complete communities to provide diverse employment and retail opportunities and housing choices for all incomes, ages, and family sizes. ZTA No. 15-10 maintains these provisions near metro stations and therefore assists in limiting potential adverse impact of large commercial uses due to size, aesthetics, parking, and loss of small businesses and promote the integration of uses in urban settings near metro stations.

ATTACHMENTS

1. ZTA 15-10 as introduced
2. Table of Selected retailers in Montgomery County - by size
3. Table-COMBINATION RETAILERS BY LOCATION AND LEASED SPACE

ATTACHMENT 1

Zoning Text Amendment No.: 15-10
Concerning: Combination Retail -
Definition
Draft No. & Date: 1 – 10/23/15
Introduced: November 3, 2015
Public Hearing:
Adopted:
Effective:
Ordinance No.:

**COUNTY COUNCIL FOR MONTGOMERY COUNTY, MARYLAND
SITTING AS THE DISTRICT COUNCIL FOR THAT PORTION OF
THE MARYLAND-WASHINGTON REGIONAL DISTRICT WITHIN
MONTGOMERY COUNTY, MARYLAND**

Lead Sponsor: Council President Leventhal
Co-sponsors: Councilmembers Elrich, Hucker, Navarro, and Riemer

AN AMENDMENT to the Montgomery County Zoning Ordinance to:

- revise the definition of “combination retail”; and
- generally amend the approval and development standards for combination retail uses.

By amending the following sections of the Montgomery County Zoning Ordinance, Chapter 59 of the Montgomery County Code:

DIVISION 59-3.5. “Commercial Uses”
Section 59-3.5.11. “Retail Sales and Service”

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ORDINANCE

The County Council for Montgomery County, Maryland, sitting as the District Council for that portion of the Maryland-Washington Regional District in Montgomery County, Maryland, approves the following ordinance:

1 **Sec. 1. DIVISION 59-3.5 is amended as follows:**

2 **DIVISION 59-3.5. Commercial Uses**

3 * * *

4 **Section 3.5.11. Retail Sales and Service**

5 **A. Combination Retail**

6 **1. Defined**

7 Combination Retail means a department or retail store that exceeds
8 [85,000] 65,000 square feet and that includes a pharmacy and a full
9 line of groceries. Combination Retail does not include a grocery store,
10 or a club or membership store that charges a membership or access fee
11 and sells primarily bulk merchandise (See Section 3.5.11.B,
12 Retail/Service Establishment).

13 * * *

14 **Sec. 2. Effective date.** This ordinance becomes effective 20 days after the
15 date of Council adoption.

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17 This is a correct copy of Council action.

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Linda M. Lauer, Clerk of the Council

ATTACHMENT 2

LEASED SPACE BY STORE AND SHOPPING CENTER					
Selected retailers in Montgomery County - by size					
Source: CoStar 9/24/2014; updated to add Target, Kmart and Walmart 8/4/2015					
TENANT	BUILDING PARK	CITY	CENTER TYPE	GLA_STORE	CENTER ADDRESS
TraderJoes	The Shops Of Wisconsin Ave	Bethesda	Neighborhood Center	9,027	6831 Wisconsin Ave
TraderJoes	Shoppes of Burnt Mills	Silver Spring	Neighborhood Center	9,306	10727-10741 Columbia Pike
TraderJoes	Montgomery Village Plaza	Gaithersburg	Neighborhood Center	9,400	18216-18350 Contour Rd
TraderJoes	Federal Plaza Shopping Center	Rockville	Neighborhood Center	9,500	12266-12270 Rockville Pike
Safeway	Shops At Sumner Place	Bethesda	Office Neighborhood Center	14,000	4701 Sangamore Rd
Safeway	Potomac Place Shopping Center	Potomac	Neighborhood Center	20,159	10100-10154 River Rd
HomeGoods	Olney Village Center	Olney	Community Center	23,500	18110-18250 Village Mart Dr
HomeGoods	Quince Orchard Plaza	Gaithersburg	Community Center	23,672	602-644 Quince Orchard Blvd
Marshalls	Montgomery Village Plaza	Gaithersburg	Neighborhood Center	25,000	18216-18350 Contour Rd
Safeway	5000 Bradley Blvd	Chevy Chase	General Retail	25,838	5000 Bradley Blvd

ATTACHMENT 2

Marshalls	Ellsworth Place	Silver Spring	Super Regional Mall	28,000	8661 Colesville Rd	
Bed, Bath & Beyond	Germantown Commons Shopping Center	Germantown	Community Center	28,006	12922-13060 Middlebrook Rd	
HomeGoods	White Flint Plaza	Kensington	Community Center	28,768	5100-5154 Nicholson Ln	
Safeway	Shops at Town Center	Germantown	Neighborhood Center	30,000	19823-19833 Century Blvd	
Bed, Bath & Beyond	Gaithersburg Square	Gaithersburg	Community Center	30,694	516-568 N Frederick Ave	
Marshalls	Montrose Crossing	Rockville	Power Center	31,000	12051-12071 Rockville Pike	
Safeway	Twin Brook Shopping Center	Rockville	Neighborhood Center	32,283	1902 Veirs Mill Rd	
Giant	Cabin John Shopping Center	Potomac	Neighborhood Center	33,373	7817-7973 Tuckerman Ln	
Safeway	909 Thayer Ave	Silver Spring	General Retail	37,537	909 Thayer Ave	
Harris Teeter	Fair Hill	Olney	Neighborhood Center	38,000	18181 Town Center Dr	
Giant	Rockshire Village Center	Rockville	Neighborhood Center	38,384	2401 Wootton Pky	
Giant	Chevy Chase Center	Chevy Chase	Office Community Center	39,752	5425 Wisconsin Ave	
Giant	Bethesda Row	Bethesda	Lifestyle Center	41,644	7142 Arlington Rd	
Giant	Traville Village Center	Rockville	Neighborhood Center	42,289	9719 Traville Gateway Dr	
Best Buy	Milestone	Germantown	Power Center	42,300	20914	

ATTACHMENT 2

	Center				Frederick Rd	
Safeway	Loehmann's Plaza	Rockville	Community Center	42,403	5200-5274 Randolph Rd	
Safeway	Hillandale Shopping Center	Silver Spring	Community Center	42,881	10101-10171 New Hampshire Ave	
Safeway	Quince Orchard Market Place	Gaithersburg	Neighborhood Center	43,000	12243-12251 Darnestown Rd	
Harris Teeter	14101 Darnestown Rd	Germantown	General Retail	43,256	14101 Darnestown Rd	
Safeway	Briggs Chaney Marketplace	Silver Spring	Community Center	44,678	13814-13840 Outlet Dr	
Safeway	Damascus Centre	Damascus	Community Center	45,000	9807-9809 Main St	
Giant	Takoma Park Shopping Center	Takoma Park	Neighborhood Center	45,435	8750 Arliss St	
Best Buy	270 Center	Gaithersburg	Power Center	46,250	15740-15790 Shady Grove Rd	
Giant	Germantown Commons Shopping Center	Germantown	Community Center	46,756	12922-13060 Middlebrook Rd	
Safeway	Safeway At Cloverly	Silver Spring	Neighborhood Center	47,250	15411 New Hampshire Ave	
Harris Teeter	Park Potomac	Potomac	General Retail	48,019	12525 Park Potomac Ave	
Safeway	Rock Creek Village Center	Rockville	Community Center	48,262	5510-5532 Bauer Dr	
Safeway	Goshen Oaks	Gaithersburg	Neighborhood	48,500	20211 Goshen	

ATTACHMENT 2

			Center		Rd	
Safeway	7701 Woodmont Ave	Bethesda	Multi-Family	48,500	7701 Woodmont Ave	
Safeway	10541 Connecticut Ave	Kensington	General Retail	49,000	10541 Connecticut Ave	
Giant	Rockville City Centre	Rockville	Neighborhood Center	50,000	625 Hungerford Dr	
Giant	The Grove Shopping Center	Rockville	Neighborhood Center	50,000	16815-16837 Crabbs Branch Way	
Giant	Potomac Promenade	Potomac	Neighborhood Center	50,000	9812 Falls Rd	
Giant	Colesville Center	Silver Spring	Community Center	50,000	13426-13490 New Hampshire Ave	
Giant	17821 Georgia Ave	Olney	General Retail	50,000	17821 Georgia Ave	
Giant	Georgetown Square Shopping Center	Bethesda	Community Center	50,000	10400 Old Georgetown Rd	
Giant	Leisureworld Plaza	Silver Spring	Neighborhood Center	50,425	3850-3860 International Dr	
Best Buy	1200 Rockville Pike	Rockville	General Retail	50,843	1200 Rockville Pike	
Giant	Muddy Branch Square Shopping Center	Gaithersburg	Neighborhood Center	52,706	802-866 Muddy Branch Rd	
Harris Teeter	Downtown Crown	Gaithersburg	Community Center	53,518	323 Copley Pl	

ATTACHMENT 2

Safeway	King Farm Village Center	Rockville	Neighborhood Center	53,754	403 Redland Blvd	
Giant	Aspen Hill Shopping Center	Silver Spring	Community Center	54,000	13501-13781 Connecticut Ave	
Giant	Goshen Plaza Shopping Center	Gaithersburg	Neighborhood Center	54,835	20004-20044 Goshen Rd	
Giant	Westwood Shopping Center I	Bethesda	Neighborhood Center	55,000	5350-5460 Westbard Ave	
Giant	White Oak	Silver Spring	Community Center	55,000	11201-11267 New Hampshire Ave	
Giant	Flower Hill Shopping Center	Gaithersburg	Neighborhood Center	55,330	18200-18250 Flower Hill Way	
Giant	Milestone Center	Germantown	Power Center	55,439	20934-20950 Frederick Rd	
Safeway	Fallsgrove Village Center	Rockville	Community Center	56,000	14901-14943 Shady Grove Rd	
Giant	Kingsview Village Center	Germantown	Neighborhood Center	57,568	18301-18331 Leaman Farm Way	
Giant	Montrose Crossing	Rockville	Power Center	60,000	12051-12071 Rockville Pike	
Kohl's	Northgate Plaza Shopping Center	Silver Spring	Lifestyle Center	60,000	3901 Aspen Hill Rd	
Safeway	11215 Georgia Ave	Wheaton	General Retail	60,000	11215 Georgia Ave	
Safeway	3333 Spartan Rd	Olney	General Retail	60,000	3333 Spartan Rd	

ATTACHMENT 2

Giant	Westfield Wheaton	Wheaton	Super Regional Mall	60,084	2900 University Blvd W	
Giant	Kentlands Square Shopping Center	Gaithersburg	Community Center	60,854	209-245 Kentlands Blvd	
Best Buy	10901 Georgia Ave	Wheaton	General Retail	61,978	10901 Georgia Ave	
Harris Teeter	Bethesda Center North	Rockville	General Retail	62,000	11845 Old Georgetown Rd	
Bed, Bath & Beyond	Congressional North Shopping Center	Rockville	Community Center	62,040	1501-1519 Rockville Pike	
Kohl's	Milestone Center	Germantown	Power Center	86,584	20918 Frederick Rd	
Kohl's	Orchard Shopping Center	Silver Spring	Power Center	86,835	12024 Cherry Hill Rd	
Kmart	K-Mart	Silver Spring	Freestanding Retail	90,632	14014 Connecticut Ave	
Kohl's	Washingtonian Center	Gaithersburg	Community Center	93,000	9871 Washingtonian Blvd	
Target	Milestone Center	Germantown	Power Center	101,864	20908 Frederick Rd	
Kmart	Kentlands Square Shopping Center	Gaithersburg	Community Center	104,230	209-245 Kentlands Blvd	
Target	Montrose Crossing	Rockville	Power Center	122,000	5700 Bou Ave	

ATTACHMENT 2

Target	Rio Washingtonian Center	Gaithersburg	Lifestyle Center	126,000	25 Grand Corner Ave	
Target	Orchard Shopping Center	Silver Spring	Power Center	185,667	12000 Cherry Hill Rd	
Target	Westfield Wheaton	Wheaton	Super Regional	227,700	11160 Veirs Mill Rd	
Walmart	Milestone Center	Germantown	Power Center	263,842	20910 Frederick Rd	

ATTACHMENT 3

COMBINATION RETAILERS BY LOCATION AND LEASED SPACE									
Kmart, Target and Walmart									
Source: Montgomery County Planning Department analysis of CoStar data (8/4/2015)									
Montgomery County only									
Name	Building/Center Name	Address	City	State	Leased SF				
Kmart	Kentlands Square Shopping Center	209-245 Kentlands Blvd	Gaithersburg	MD	104,230				
Kmart	K-Mart	14014 Connecticut Ave	Silver Spring	MD	90,632				
Target	Rio Washingtonian Center	25 Grand Corner Ave	Gaithersburg	MD	126,000				
Target	Milestone Center	20908 Frederick Rd	Germantown	MD	101,864				
Target	Montrose Crossing	5700 Bou Ave	Rockville	MD	122,000				
Target	Orchard Center	12000 Cherry Hill Rd	Silver Spring	MD	185,667				
Target	Westfield Wheaton	11160 Veirs Mill Rd	Wheaton	MD	227,700				
Walmart	Milestone Center	20910 Frederick Rd	Germantown	MD	263,842				
Outside Montgomery County									
Name	Building/Center Name	Address	City	State	Leased SF				
Kmart	Big K	6411 Riggs Rd	Adelphi	MD	99,200				
Kmart	K-Mart Plaza Shopping Center	4217-4251 John Marr Dr	Annandale	VA	107,888				
Kmart	Sully Place Shopping Center	13910-13954 Metrotech Dr	Chantilly	VA	104,300				
Kmart	Clinton Plaza	8827-8909 Woodyard Rd	Clinton	MD	130,000				
Kmart	Frederick County Square	1003 W Patrick St	Frederick	MD	130,000				

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Kmart	Herndon Centre II	490-494 Elden St	Herndon	VA	88,562			
Kmart	Rivertowne Commons	6041-6235 Oxon Hill Rd	Oxon Hill	MD	84,640			
Kmart	Springfield Plaza	6354-6364 Springfield Plz	Springfield	VA	76,223			
Target	6600 Richmond Hwy	6600 Richmond Hwy	Alexandria	VA	125,807			
Target	Potomac Yard Center	3101-3551 Jefferson Davis Hwy	Alexandria	VA	128,327			
Target	Bowie Gateway Center	4410-4600 Mitchellville Rd	Bowie	MD	117,800			
Target	Vista Gardens Marketplace	10401 Martin Luther King Jr Hwy	Bowie	MD	123,948			
Target	Brandywine Crossing	15922 Crain Hwy SE	Brandywine	MD	127,000			
Target	Chantilly Crossing	14391 Chantilly Crossing Ln	Chantilly	VA	143,100			
Target	Fortuna Center Plaza	4310 Fortuna Center Plz	Dumfries	VA	123,735			
Target	Mosaic District	2905 District Ave	Fairfax	VA	168,900			
Target	Target	10301 New Guinea Rd	Fairfax	VA	100,000			
Target	Fair Lakes Shopping Center	13047 Fair Lakes Shopping Ctr	Fairfax	VA	136,654			
Target	Skyline	5115 Leesburg Pike	Falls Church	VA	116,824			
Target	Willston Centre	6100 Arlington Blvd	Falls Church	VA	141,062			
Target	Target	5437 Urbana Pike	Frederick	MD	122,609			
Target	Gateway Center	13093-13301 Gateway Center Dr	Gainesville	VA	174,700			
Target	Beltway Plaza Mall	6100-6200 Greenbelt Rd	Greenbelt	MD	128,981			

ATTACHMENT 3

Target	Prince George's Plaza	3500 East West Hwy	Hyattsville	MD	136,010			
Target	Largo Plaza	10468-10500 Campus Way S	Largo	MD	127,500			
Target	Super Target	1200 Edwards Ferry Rd NE	Leesburg	VA	176,763			
Target	Center at Innovation	1146-9900 Nokesville Rd	Manassas	VA	174,550			
Target	12197 Sunset Hills Rd	12197 Sunset Hills Rd	Reston	VA	114,774			
Target	Springfield Mall	6600 Springfield Mall	Springfield	VA	121,346			
Target	Dulles 28 Centre	45130 Columbia Pl	Sterling	VA	105,000			
Target	Potomac Run Plaza	46201 Potomac Run Plz	Sterling	VA	125,204			
Target	DC USA	3100-3200 14th St NW	Washington	DC	174,039			
Target	Parkway Crossing West	2460 Prince William Pky	Woodbridge	VA	127,833			
Target Express	1500 Wilson Blvd	1500 Wilson Blvd	Arlington	VA	22,500	Office bldg		
Target Express	Landmark College Park	4500 College Ave	College Park	MD	14,617	Multifamily bldg		
Walmart	Kings Crossing	6303 Richmond Hwy	Alexandria	VA	80,047			
Walmart	7910 Richmond Hwy	7910 Richmond Hwy	Alexandria	VA	100,000			
Walmart	5800 Kingstowne Blvd	5800 Kingstowne Blvd	Alexandria	VA	100,500			
Walmart	Duval Village Center	4825 Glenn Dale Rd	Bowie	MD	56,357			
Walmart	3300 Crain Hwy	3300 Crain Hwy	Bowie	MD	114,348			
Walmart	Burke Town Center	6000 Burke Commons Rd	Burke	VA	116,000			
Walmart	Wal-Mart	4368 Chantilly Shopping Ctr	Chantilly	VA	100,000			

ATTACHMENT 3

Walmart	Fairfax Centre	11179-11181 Lee Hwy	Fairfax	VA	90,653			
Walmart	Fair Lakes Shopping Center	13059 Fair Lakes Shopping Ctr	Fairfax	VA	116,411			
Walmart	1811 Monocacy Blvd	1811 Monocacy Blvd	Frederick	MD	135,806			
Walmart	Frederick Crossing	7400 Guilford Dr	Frederick	MD	178,987			
Walmart	Wal-Mart Centre at Hagerstown	17850 Garland Groh Blvd	Hagerstown	MD	180,000			
Walmart	Haymarket Village Center	6530 Trading Sq	Haymarket	VA	56,938			
Walmart	Capital Plaza Shopping Center	6210 Annapolis Rd	Landover Hills	MD	100,000			
Walmart	Shenandoah Square	950-958 Edwards Ferry Rd NE	Leesburg	VA	106,253			
Walmart	9401 Liberia Ave	9401 Liberia Ave	Manassas	VA	145,216			
Walmart	Manassas Mall	8200-8300 Sudley Rd	Manassas	VA	203,091			
WalMart	Parkridge Center 5	10780-10790 Parkridge Blvd	Reston	VA	43,302	Office bldg		
Walmart	Dulles Town Crossing	45591 Dulles Eastern Plz	Sterling	VA	147,657			
Walmart	Tysons West Retail	8595 Leesburg Pike	Vienna	VA	80,052			
Walmart	The Portrait Bldg	701 8th St NW	Washington	DC	11,939	Office bldg		
Walmart	Walmart	99 H St NW	Washington	DC	83,726			
Walmart	Walmart	5929 Georgia Ave NW	Washington	DC	106,243			
Walmart	Fort Totten Square	320 Riggs Rd NE	Washington	DC	122,882			