

**Testimony on Adequacy of Giant PUD Parking Plan
Case 08-15**

My name is John Korbel. I reside at 3420 Newark St., NW, about two blocks from the Giant PUD. In the past, I have consulted with states and local communities regarding economic development and planning, and by virtue of this experience and my academic training, I believe I am qualified to analyze and assess the implications of the data associated with the Giant PUD parking plan.¹

We support a new Giant supermarket and associated development to revitalize the commercial area on Wisconsin Avenue in Cleveland Park. However, given the current parking congestion on neighborhood streets adjoining this project area, we are very concerned about the adequacy of on-site parking to support the new Giant and other new commercial establishments that are part of the proposed PUD, and about the availability of parking for existing business patrons and residents in the PUD's immediate area who have come to depend upon the existing Giant parking lot. On-street parking in this area is already intense and will become further impacted by the 99 new residences (with 37 off-street parking spaces) currently under development at the site of the former nursing home on Wisconsin Avenue at Newark Street.

Without modification to the PUD parking plan, upwards of 300 more cars will likely be added to already crowded streets in the immediate neighborhood. While Giant (also referred to below as "Developer" or "Applicant") and the City would like to encourage patrons of the new commercial establishments to walk and use buses, it's not realistic to expect large-volume shoppers to come to the huge new grocery store without cars. Moreover, many patrons of other new retail such as restaurants and bars will also inevitably come in cars, especially during evening and weekend peak hours. The facts presented by the developers do not support their assertion that the proposed PUD parking is sufficient to prevent spillover parking in the surrounding neighborhood. Hence, the community asks that, among other things, the proposal be revised to:

- Expand the amount of parking available on the South Block;

¹ See resume, Appendix A.

- Meet parking zoning requirements on the North Parcel for commercial customers and employees;
- Reduce the number of North Block residential units to make parking spaces available for commercial use;
- Limit the size and number of restaurants/bars as required by the Macomb-Wisconsin Overlay;
- Prohibit Residential Parking Permits for tenants of the PUD residential housing units; and
- Provide, prior to approval of the PUD, a Parking Management Plan that includes its approach to limiting access and controlling use.

The Developer's request for relief from the amount of on-site parking required by zoning is unwarranted. Rather, given the current congested street parking and current usage of Giant parking, given the size of commercial and residential development in the proposed PUD, given the limited availability and unlikely use of transportation alternatives, and given other development in the immediate area, Giant should be asked to provide spaces beyond that required by current zoning, not fewer. Specifically, on-site parking must be increased by 231 spaces; that is, by as many as 138 spaces on the South Block and 93 spaces on the North Block (as required by zoning for commercial space) in order to prevent undue impact on the adjacent residential neighborhoods. Alternatively, reduction in density and use with the Applicant's proposed parking, or a combination of density and use reduction coupled with some additional parking could also be considered to ameliorate the negative impact of the PUD on the community and local business.

PUD Parking Plan According to the PUD Application, DC Zoning Regulations require 512 parking spaces--435 for commercial space and 77 for the residences (See Table 1).² The PUD proposal includes 535 spaces -- 23 more than the 512 required. However, this "surplus" is misleading. In fact, the proposal offers 47 *fewer* commercial spaces than required by zoning. Of the PUD's 535 parking places, 147 are exclusively for the use of PUD housing residents,

² Zoning requires one space for every 300 SF over 3000 SF of commercial space, one space for each townhouse, and one space for every two apartments.

leaving only 388 parking spaces for all non-residential use.³ The Applicant also proposes to make available “30 community parking spaces” for patrons of existing businesses just south of the PUD.⁴ This recognizes that for years, patrons of Cactus Cantina, Café DeLuxe, 2Amys and other businesses have used the existing Giant lot, with Giant’s permission. While this may be a welcome amenity, it must be recognized that this reduces, by the Applicant’s own admission, the parking spaces for the new Giant and other PUD commercial activity to only 358 spaces, 77 fewer than required by zoning, and only 80 more spaces than are there today.⁵ To put this in perspective, the Applicant would increase the number of parking spaces over what is there today by only 29 percent to support the PUD’s new retail. However, this new retail will be double the amount of “active” retail that is in the PUD area today.⁶ This increase in parking is grossly inadequate to support future PUD demand and other uses of the Giant lot.

Table 1: Parking Spaces Today, PUD Required Spaces , PUD Proposed Spaces					
Land Use	Parking Spaces Today A	PUD Parking Spaces Required B	PUD Parking Spaces Provided C	Difference C-B	Difference C-A
Residential		77	147	70	147
Non-Residential	278	435	388	-47	110
Total	278	512	535	23	257
 Non-Residential After Community Set Aside	 278	 435	 358	 -77	 80

Adequacy of PUD Plan Given Current Parking and Usage Parking in the immediate neighborhood of the Giant is already extremely congested. On many evenings and during the

³ There are 16 spaces for the eight townhouses on the South Block, 7 spaces for the 14 apartments on the South Block, and 124 spaces for the 124 apartments on the North Block.

⁴ See PUD Submission, Exhibit D, Transportation and Parking Management Plans.

⁵ Furthermore, the plan ignores the loss of parking on the south west side of the South Block (3300 Block of Idaho Avenue, across from the 2 D police station), the site of the loading dock entrance and townhouses, and perhaps the loss of some parking on the 3400 block of Idaho due to two-way traffic and perhaps to commercial unloading.

⁶ The PUD plan includes 136,484 SF of retail space. Currently, there is 114,628 SF of retail space on the North and South Blocks, 68,222 SF of which is “active” retail.

day, street parking is difficult if not impossible to find within reasonable walking distance of current businesses in the area, leading many patrons to find space in the Giant south parking lot (See Appendix B). For example, during peak hours, the five restaurants within one block of the requested PUD, that can seat up to 1,121 patrons, generate, based on industry standards, up to an estimated 296 cars that must look for space on crowded streets or take advantage of the Giant parking lot (see Table 2). Numerous older apartment buildings without off-street parking (some quite large) are within two blocks of the site, and their residents qualify for Zone 3 Residential Parking Permits. These uses, plus single-family residences, visits by guests of local residents, and other businesses in the surrounding area, further strain local parking. Evening and overnight parking at McLean Gardens is particularly difficult.

Table 2: Wisconsin Ave in Cleveland Park							
Current Restaurant Parking Demand During Peak Hours							
	Rest. Seats Inside	Rest. Seats Outside	Total Rest. Seats	Vehicles per Seat (1)	Total Vehicles for Inside	Total Vehicles for Outside	Total Vehicles for Restaurants
2Amys	155	25	180	0.264	41	7	48
Café Deluxe	254	36	290	0.264	67	10	77
Cactus Cantina	326	160	486	0.264	86	42	128
Enology	94	16	110	0.264	25	4	29
Sushi Sushi	40	15	55	0.264	10	4	14
Total	869	252	1121		229	67	296
1. <u>Parking Generation</u> , ITE, 3 rd Ed. Calculated demand based on demand for high-turnover family restaurants (with no bar or lounge). Vehicles per 1,000 SF equals 5.55 for urban and 10.1 for suburban for an urban/suburban ratio of .55 (5.55/10.1). With suburban vehicles of .48 per seat for family restaurant (with bar or lounge), estimated urban peak demand equals .264 vehicles per seat (.55 times .48). See, pp. 270-277.							

Today, much of this congestion is alleviated, in part, by the use of the Giant parking lots as essentially public parking, and even without the new development, this is barely enough. For example, according to the Applicant's own parking study, the current parking in the North and

South Blocks exceeds its practical capacity during peak evening hours.⁷ This is an astonishing and alarming finding, given that at least 46 percent of the existing retail space is either vacant or closed during those hours and that the current Giant store is significantly underutilized in its current condition.

The obvious question then is “Why are there so many cars in the Giant lots during these peak hours?” One can reasonably conclude that the vast majority of the 278 spaces of available parking in the Giant lots are filled during these peak hours by patrons and employees of establishments on the Macomb Street side of Giant and by others living in the immediate area. It is obvious that the “30 community parking spaces” for this use in the PUD proposal will not be adequate to meet this current demand, and that, given all the new retail in the PUD, 80 more parking spaces over what is there today, will be no where near enough to prevent cars from spilling over onto already crowded neighborhood streets. Moreover, it is not clear when the “30 community parking spaces” will be available and how the Applicant intends to manage and control use, by these and other customers and residents of the PUD.

Adequacy of Parking for Proposed New Retail and Residential Uses In considering the adequacy of the PUD parking plan to prevent spillover into neighborhoods, except for the “30 community spaces set aside,” the Applicant considers only the needs of the PUD, and significantly underestimates this PUD parking demand. Their analysis suggests that, based on parking spaces per 1,000 SF of business unit space, a measure used by the Giant in its parking analysis to support the adequacy of the PUD parking plan, their on-site parking is sufficient to meet peak parking demand. Their analysis of parking need is based primarily upon a comparison with grocery stores in the surrounding area that are not comparable to the mixed-use development in the Giant PUD.⁸ All of the five stores in the comparison are virtually “stand-alone” and do not have the additional demand for parking caused by high-intensity retail such as restaurants and bars, which will surely be part of the mixed use that characterizes the Applicant’s plan. Moreover, the analysis does not reflect the demand for parking by residential

⁷ See May 14, 2008 PUD submission, Figure 2-19, Wisconsin Avenue Giant Parking Occupancy Counts, Thursday, January 24, 2008. This figure shows that by 7pm on a weekday evening the Giant lots are filled beyond their practical capacity and at 92 percent of capacity. One could only expect the situation to be much worse during weekend peak hours.

⁸ See PUD Submission, Exhibit F, Section 2 parking analysis, Exhibit F, Table 2-2.

guests, which will inevitably add to on-street parking congestion during peak hours. However, had they used the data for a shopping center (which would be more reflective of the PUD anticipated mixed use), and made reasonable adjustments to industry standards for our urban region, they would have found that the PUD has 56 fewer spaces than would be required to prevent spillover on to crowded surrounding streets during peak hours. Actually, with the promised “30 community spaces set aside,” there are 86 fewer spaces than are required to satisfy peak demand for PUD commercial use.⁹

Nevertheless, based upon this faulty and incomplete analysis, the Applicant concludes that “...while the parking provided in the PUD for the project is slightly less than required by the Zoning Regulations, it is in excess of industry standards for retail and, more importantly, consistent with the ratios observed at existing stores in the urban District of Columbia region” and thus, “...the PUD would provide sufficient parking to support the proposed residential, supermarket, and other commercial uses.”¹⁰ Based on our analysis of the Applicant’s data, the Zoning Commission should reject this misleading and false assertion.¹¹

Adequacy of Commercial Parking on the North Block The parking proposal does not adequately address parking for customers of the North Block commerce. Today, customers and employees of commercial establishments on the North Block use the 45 surface parking spaces behind the existing buildings, the four spaces at the bank driveway (for employees), and the street. The Applicant assumes that under their plan, these customers would park in an underground garage a block away. More likely, they will attempt to park on nearby residential streets. Moreover, the proposed traffic light at the Wisconsin/Idaho/Ordway intersection would

⁹ Ibid. The PUD indicates that the parking plan includes 2.84 spaces per 1,000 SF compared to 2.78 spaces per 1,000 SF for the sample of five supermarkets. According to the Institute of Transportation Engineers (ITE), the Applicant’s primary source, the industry standard for urban supermarkets is 2.27 and for general retail (i.e., shopping center) is 2.65. The Applicant demonstrates from its own sample that supermarkets in our urban region utilize 22.5 percent more parking than the standard (2.78 vs. 2.27 spaces). Thus, assuming our general retail is also 22.5 percent over the industry standard, peak demand for general retail parking in our urban region would be 3.25 spaces per 1,000 SF (2.65 times 1.225). Hence, the number of spaces required to meet commercial parking demand for the Giant PUD would be 444 (3.25 times 136.484 SF) compared to 388 in their application; that is, 56 more spaces. Including the promised “30-space set aside,” the Applicant is short by 86 spaces.

¹⁰ Ibid. Exhibit F, pgs. 7-8. The PUD provides 77 fewer spaces less than required by Zoning Regulations, which is hardly “slightly less than required.”

¹¹ The Applicant asserts that they can accommodate more cars than the number of spaces suggests by “making the spaces work harder” but does not specify how they would manage this, and provides nothing in writing.

make streets east of Wisconsin Avenue even more convenient for commercial parking. Current Zoning Regulations require 93 spaces on site for the 30,799 SF of commercial space on the North Block, and common sense would suggest that there is no justification for waiving this requirement, particularly given the likely impact on the surrounding neighborhood.

Adequacy of Parking Given Transportation Alternatives The Applicant believes that limited on-site parking will be mitigated by the availability of public transportation. However, current bus transportation is inadequate to fill this need¹² and Metro stops located at Cleveland Park and Tenley are about a mile away, too far to be useful to shoppers without cars. The new Giant grocery store is designed to encourage bulk shopping, so it is unreasonable to assume that grocery patrons will use a bus if they have access to a car for hauling their goods home. One would also reasonably expect that many of those who frequent restaurants and bars in the area will travel by car, as they do today, particularly during evening hours. While we would all like to see more use of public transportation, walking, or riding bikes, it is not realistic to expect enough use of these alternative modes of transportation to appreciably diminish parking demand.

Adequacy of Parking Given Adjacent Development The Applicant does not consider the impact of other development in the immediate area. Most notable is the nursing home conversion at Wisconsin Avenue and Newark Street. The building will be converted to 99 apartments with only 37 off-street parking spaces. This could put another 60 or so cars on already crowded neighborhood streets. The Zoning Commission must take this into account in considering the Applicant's request for zoning relief and in its parking plan.

Conclusion and Recommendation The community supports the development of a new Giant supermarket and some associated development (including the replacement of stores vacated some years ago) to revitalize the local community. However, without proper mitigation, we believe the PUD parking plan will contribute to an already difficult parking situation for the immediate community, including Wisconsin Avenue, Macomb Street, 38th Street, Idaho

¹² For example, the 30 bus line, which operates on Wisconsin Avenue, is notoriously unreliable and has been the subject of years of WMATA study aimed at improving service and efficiency.

Avenue, Newark Street, McLean Gardens, Ordway Street, Norton Place, and so on. Rather than provide fewer spaces than are required by Zoning Regulations, the Zoning Commission should require the Applicant to provide a plan that recognizes the current parking situation in the community, current uses of the Giant parking lot, and potential demand for the new commercial and residential space, and which considers the issues and concerns raised above. As noted in our introductory comments, with the current size and mixed-use configuration of the Giant project, we recommend that this plan include the following:

- Expansion of the amount of parking available on the South Block by as many as 138 spaces;
- Addition of 93 parking spaces on the North Parcel as required for commercial customers (and employees);
- Substantial reduction of North Block residential units to make available parking spaces for commercial use;
- Limitation on the size and number of restaurants and bars as required by the Macomb-Wisconsin Overlay;
- Prohibition of Residential Parking Permits for tenants of the PUD residential housing units: and,
- Requirement that the Applicant provide a Parking Management Plan, including the community set aside (and other uses mentioned below), indicating how it intends to control use and access.¹³

Overall, these recommendations would require an additional 231 parking spaces to cover the following project deficits:

- 56 Spaces for PUD commercial demand;
- 95 spaces for current users of the Giant parking lots (including the 30 space set aside);
- 50 spaces for PUD resident visitors and loss of on-street parking as a result of PUD; and
- 30 spaces for nursing home conversion residents.

I want to emphasize that the parking issues are created, in part, by a PUD that is inconsistent with the Comprehensive Plan. Particularly, the PUD ignores the current and future

¹³ This plan will also need to address the temporary loss of parking on the South Block during construction.

neighborhood commercial use for this land which, among other things, includes a minimal amount of housing, if any. By ignoring the Comprehensive Plan and proposing dense housing, the Applicant is forced to construct residential parking, and, in so doing, has short-changed the commercial parking requirements. In this instance, compliance with the parking requirements is critical because the PUD will upset long-standing parking patterns and will surely send off-street parkers to search for on-street neighborhood parking. Alternatively, this problem can also be solved by reducing density and limiting the mixed-use of the development and retaining the PUD proposed parking plan, or by some combination of increased parking and reduction in density and limitation on use. The net effect of this recommendation would be to mitigate the adverse impact of the Giant PUD on neighborhood parking, revitalize the local commercial area, and promote sensible and sensitive local economic development for the City and those in the affected area, consistent with the Comprehensive Plan, Zoning Requirements, and the Macomb-Wisconsin Overlay.

Appendix A

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PROFESSIONAL PROFILE

Have held senior management operations positions with P & L responsibilities, day to day operations, risk assessment, and business planning and development. Extensive experience in risk management and compliance and in leading a major government consulting practice serving international, federal, state, and local government clients. Specialized skills in strategic planning; organization development; large scale project management; and education, training, and personnel development.

EXPERIENCE

RHI EXECUTIVE SEARCH, Washington, DC

2008 to Present

A retained search firm that specializes in executive level financial, information technology, sales and marketing, legal and human resources professionals as well as CEOs and COOs across all industry sectors.

Managing Director (2008 to Present)

Working out of the Washington DC office, focusing on senior level executives in finance, operations, governance, and risk management and compliance for national and international placements.

PRICEWATERHOUSECOOPERS

1981-2007

A global professional services firm providing audit and assurance, tax, and advisory services to clients in over 140 countries worldwide and with in excess of 150,000 employees.

Partner, Global Risk Management and Compliance Operations Leader (2005-2007)

Reported to the Global Risk Management and Compliance Leader, responsible for developing and managing \$50 million Global RMC budget, and 15 direct reporting professionals.

- Member of Global Risk Management and Compliance (GRMC) leadership team.
- Development and implementation of GRMC program in key areas including independence, ethics and business conduct, personal privacy and data protection, and line of service risk management.
- Development and implementation of some two dozen risk management standards with cross-border impact among the PwC network of firms in 140 countries worldwide. Standards include guidelines for compliance and for monitoring and testing by each of the PwC member firms.
- Communication of GRMC program through the PwC regional structure and associated training of the PwC regional and member firm leadership.

Partner, Global Independence Operations Leader (2000-2007)

Reported to Global Independence leader, with overall management responsibility for Global Independence Operations of systems and processes to manage auditor independence.

- Member of the Global Independence Leadership Team. Establishment of the PwC Global Independence organization including representative leadership from regions, lines of service and the office of general counsel.
- Development and implementation of systems and processes globally to address SEC and IFAC quality control standards for maintaining auditor independence regarding both firm and personal financial interests and the provision of services.
- Overall management of systems and processes including personal and firm portfolio monitoring systems, Global Entity Management System covering over 300,000 audit clients and related entities worldwide, and authorization for services and violations reporting systems. Management of a global testing program for compliance and implementation of the PwC global sanctions policy.
- Development of systems, databases, and procedures for full compliance with Sarbanes Oxley scope of services pre-approval requirements.
- Communications and training on the PwC global independence policy and associated systems and processes.

Partner, Americas Leader for Learning and Professional Development (LPD) (1998-2000)

Reported to Global Partner responsible for LPD, with responsibility for the Americas, including management of major training program and training center.

- Served as Americas representative to Global LPD leadership team. Post PW and Coopers merger, development and implementation of LPD curriculum for PwC management consulting practice.
- Management responsibility for PwC training center in Tampa. Provision of instructor led training for new employees and extensive technology based learning for staff at all levels.

Partner, Government Consulting Practice, Washington, DC (1986-1998), Senior Manager (1981-1986)

- Served as the partner responsible for business development in a practice with approximately twenty partners, in excess of 1,000 employees, and \$150 million in annual consulting service sales.
- Served a wide range of clients, including international, federal, state and local government agencies, in the areas of strategic planning, business process improvement, program delivery, and economic and community development. In addition, led projects providing technical assistance to nonprofit affordable housing developers, Indian Housing Agencies, and agencies implementing effective services for homeless persons.

Director, Office of Economic Analysis, Policy and Evaluation, US Department of Energy, Washington, DC (1980-81)

- Established Office of Economic Analysis under the Assistant Secretary for Policy and Evaluation.
- Performed analyses of policies related to oil price decontrol, energy conservation, and development of alternative energy sources.

Principal Analyst, Congress of the United States, Congressional Budget Office, Washington, DC, Natural Resources and Commerce Division (1979-1980); Human Resources and Community Development Division (1975-1979)

- Performed policy analyses in areas such as welfare reform, income distribution and impact of government programs, and impact of oil price decontrol on households.

Assistance Professor, Economics, Middlebury College, Middlebury, VT (1974-1975)

- Taught principles of economics, mathematical economics, and statistics.

EDUCATION and AFFILIATIONS

PhD, MA, University of Colorado, Economics, 1974

BA, History, Williams College, 1969

Member, Board of Trustees, Social Science Foundation, University of Denver

Past service on the boards of the National Child Research Center and the Juvenile Diabetes Foundation, Capitol Chapter.

Appendix B
Photos of PUD Area and Surrounding Streets
August 8, 2008, 7PM



Giant Lot S Fri 8/8 6:51pm



Giant Lot S, Fri 8/8 6:52pm



Giant Lot Mid Fri 8/8 6:53pm



Giant Lot S & Mid Fri 8/8 6:53pm



Giant Lot Rear Fri 8/8 6:54pm



Giant Lot S Rear Fri 8/8 6:54pm



Giant Lot S Fri 8/8 6:55pm



Macomb N Fri 8/8 6:56pm



Macomb 3500 block from 36th Fri 8/8 6:58pm



36th from Macomb Fri 8/8 6:58pm