H

Board of Zoning Adjustment
District of Columbia
CASE NO.16702
EXHIBIT NO.27A2

Government of the District of Columbia

Office of the
Director

Office of Planning
415 12th Street, N.W.
Washington, D.C. 20004

June 17, 1998

Mr. Anthony Lanier
EastBanc Inc.
Millennium Georgetown Development L.L.C
1815 Pennsylvania Avenue, N.W.. Suite 1200
Washington, D.C. 20006

Dear Mr. Lanier:

The Office of Planning (OP) has completed its review of the Large Tract Review application for the Georgetown Incinerator site in Square 1189. Our report is enclosed. Approval is recommended with the conditions indicated.

I appreciate your patience and willingness to work with OP, the other District agencies and the affected community during the Large Tract Review process.

Sincerely,

for David W. Cobb
Jill C. Dennis
Director

Enclosure

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JUN [illegible] 1998

Georgetown Incinerator Site
Wisconsin Avenue and K Street
Large Tract Review
Final Report

DESCRIPTION

Location

Millennium Georgetown Development, L.L.C. has submitted an application for Large Tract Review to construct a 246,000 square foot mixed facility containing residential, hotel, retail and theater uses in Square 1189. The site, which contains an old city incinerator and accessory buildings, is currently vacant and has not been used since the mid-1970s. It is bounded by South Street on the north, 31st Street on the east, K Street on the south and Wisconsin Avenue on the west. The Whitehurst Freeway, which runs above the K Street right-of-way, further to define the southern boundary of the site.

Comprehensive Plan

The Comprehensive Plan Generalized Land Use Map places the immediate area of the proposed Georgetown Incinerator site redevelopment in a mixed-use moderate density residential and commercial land use category. The moderate density residential land use designation generally encourages row houses and garden apartments as the predominate uses. The moderate density commercial land use designation encourages shopping and service areas that generally provide a broad range of goods and services. The site is zoned W-1. The W-1 zone district permits matter-of-right buildings with a height of 40 feet and a floor area ratio (FAR) of no greater than 2.5. No more than 1.0 FAR can be used for non-residential purposes. The proposed development at the abandoned Georgetown Incinerator site will have an FAR of 2.5.

Proposed Project

The site of the proposal is owned by the District and has been vacant for at least 25 years. The applicant is in the process of purchasing the property from the city with the intent of constructing a mixed-use development consisting of residential, hotel, retail, restaurant and theater uses.

There are few historically significant structures on the site. They are the Georgetown Incinerator tower and related facilities, the brick yard hill houses and a red frame house on Copperthwaite Lane, a street that bisects a portion of the site in an east-west direction. The incinerator and brick hill houses will remain in their existing locations. The house on Copperthwaite Lane will have to be moved to another location on the site in order to allow for development of the property.

The site slopes dramatically from north to south. The highest point of the site along South Street is approximately 25 feet above the lowest point along K Street. The design of the project takes into account the significant grade change throughout the site. In order to fit in contextually with the surrounding area, the architect for the project has broken up the mass into distinct elements. All of the buildings on the site would be 40 feet in height when measured from a measuring point along South Street.

The entire development would be constructed on top of a plinth built into the side of the hill. The plinth will contain retail space along Wisconsin Avenue and K Street and a 3000 seat, 12-screen movie theater within its eastern portion. The movie theater complex will be accessed from K Street. The loading dock for the entire development and the 580 space, underground, commercial parking facility will also be accessed from K Street.

The incinerator tower, located in the center of the site, will be the focal point of the development on top of the plinth. The northern portion of the site, adjacent to South Street, will contain two new structures. One structure will be located west of the brick hill houses and incinerator facility and the other structure will be located east of these houses. These two new structures, along with the hill houses and related incinerator facility, will be dedicated for hotel/restaurant use. The southern portion of the site, above the plinth and adjacent to the Whitehurst Freeway, will have two three-story residential buildings. The base elevation of the condominiums will be located approximately eight feet above the elevation for the Whitehurst Freeway. The two buildings, which will be connected at the plinth level, will contain between 30 to 45 units. The condominiums will have a separate parking facility. This facility will contain 58 residential spaces and will be accessed from South Street.

REVIEW PROCESS

The Large Tract Review application for the Georgetown Incinerator site was filed with the Office of Planning (OP) on March 17, 1998. Copies of the submission were mailed to the Advisory Neighborhood Commission (ANC) 2E and to property owners within 200 feet of the site on March 19, 1998. A formal presentation on the project was made to the community by representatives of the Millennium Partners of Washington, D.C. at a regularly scheduled ANC 2E meeting on April 14, 1998 and again at a special meeting on April 28, 1998. The deadline for written comments on the project was May 11, 1998. In accordance with Large Tract Review procedures, OP also distributed copies of the submission to the Department of Consumer and Regulatory Affairs, Department of Fire and Emergency Medical Services, Department of Public Works, Metropolitan Police Department and the Office of Corporation Counsel for review and comment.

ISSUES ANALYSIS

The applicant has satisfactorily addressed the issues raised during the Large Tract Review process.

Comprehensive Plan

The proposed Georgetown Incinerator development at Wisconsin Avenue and K Street is consistent with the Comprehensive Plan Generalized Land Use Map designation of mixed-use moderate density residential and commercial land use for the area. The proposed site has been vacant and underutilized since the early 1970's. The residential areas immediately surrounding the site have not achieved a critical mass. The recent development south of M Street has been primarily for office and commercial uses. Consequently, the area south of M Street and immediately adjacent to the freeway has not been considered a secure, stable neighborhood, especially during the evening when the office and most commercial establishments are closed.

The proposed development, which will conform to the mixed-use development designation, will significantly enhance the area of Wisconsin Avenue and K Street, adjacent to the freeway. The project, with its residential units, hotel/restaurant use and retail spaces, will infuse street life into an area that has been somewhat foreboding, because of the elevated freeway. Additionally, the project will preserve and adaptively reuse the historic structures on the site and serve to help connect the rest of Georgetown with a new waterfront park that is being planned along the east bank of the Potomac River immediately south of the site.

The proposed development is supported by the following Comprehensive Plan major theme (objective:

- "...ensuring good quality neighborhoods is of utmost importance to the District. The District elements of the Plan's policies and strategies on increasing housing opportunities, neighborhood commercial facilities and improving transportation in some neighborhoods will be combined with other District policies on historic preservation, environmental quality and public facilities to conserve functioning, stable neighborhoods and to improve those which need redirection." [Subsection 102.4]

Transportation

The main roadways within the vicinity of the proposed project are South Street, 31st Street, K Street and Wisconsin Avenue, along with the elevated Whitehurst freeway. The peak hours of activity for the proposed development will occur during the late afternoon, between the hours of 2:30 p.m. and 4:30 p.m. During this period, the project will generate approximately 371 inbound and 324 outbound trips. It has been determined that the adjacent intersections will still operate at a satisfactory level of service.

In regards to parking within the area, the National Park Service will eliminate approximately 400 spaces with the anticipated closing of the harbor parking lot, immediately south of the incinerator site, in order to construct a park. Even with the imminent construction of the park, the Department of Public Works (DPW) believes the additional parking spaces provided by the development will be a significant benefit to parking within the area. Under the Zoning Regulations, the applicant is required to provide at least 414 parking spaces for the entire facility The proposed facility will have approximately 638 spaces, which is 224 spaces greater than what is required by the regulations. According to a Georgetown parking study conducted for DPW, contrary to popular belief, the peak demand for parking occurs during the weekdays between the hours of 1:30 p.m. and 3:00 p.m. During the early evening hours, the demand for off-street parking drops significantly and parking lots in the surrounding area have a 40 percent to 60 percent vacancy rate. Consequently, the parking lot facility, along with other parking facilities within the immediate area, will satisfy nighttime demands generated by the project.

The loading area for the facility will be located adjacent to K Street. Truck deliveries will use K Street to maneuver in and out of the loading area. This delivery pattern might create some traffic delay and pedestrian inconvenience, depending on the time of day when these deliveries are made. To limit any impacts this might create, DPW recommends that the applicant limit loading activity to off-peak traffic hours.

Community Concerns

The applicant made a presentation on the project to ANC 2E at a regularly scheduled meeting on April 14, 1998 and again at a special meeting on April 28, 1998. At these meetings, the community expressed general support for the project. However, the community did have concerns regarding parking, as it relates to the movie theater complex, and the preservation of the historic buildings on the site, other than the incinerator tower. The applicant has satisfactorily addressed these concerns. The project will have 224 parking spaces above what is required by the Zoning Regulations. All of the commercial parking spaces will be available for patrons of the theate. In terms of the significant buildings on the site, the applicant has agreed to preserve the brick hill houses and the red frame house on Copperthwaite Lane. The brick hill houses will remain in their present location and be reused. However, the red frame house will have to be moved from its present location on the property to another location on the site to facilitate development.

RECOMMENDATION

The redevelopment of the Georgetown Incinerator site will provide an immediate benefit to the surrounding neighborhood and to the District on a number of levels. The incinerator site has been vacant since the early 1970's. It has become an "eyesore"

within the surrounding area and has led to the perception that the adjacent portion of K Street is not safe during evening hours. The proposed project will bring activity to the area.

Additionally, the proposed project will contribute to the economic vitality of the District. Presently, the property does not provide any tax revenue for the city, since the government owns the site. With its sale and redevelopment, the site will generate property, hotel, restaurant and sales tax revenues for the District.

Therefore, the Office of Planning recommends Large Tract Review approval of the Georgetown Incinerator site with the following conditions:

- That the project is generally built in conformance with the drawings from the set of plans submitted on March 17, 1998;

- That the significant structures on the site, the incinerator tower and related facilities, the brick hill houses and the red frame house on Copperthwaite Lane, be preserved either in their present location or at another location on the site; and

- That the applicant make every effort to ensure that all deliveries to the loading area occur during non-peak hour periods, so as not to adversely affect traffic circulation along K Street.



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OCT 16 1998

DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS
Office of Adjudication
614 H Street, NW - Room 619
Washington, DC 20004

IN RE:

Application for Subdivision & Demolition Permits	**HPA # 98-355 through # 98-361 S.O. #1643**

3133 Copperthwaite Alley, N.W.
3135-3141 K Street, N.W.
1003-1015 Wisconsin Avenue, N.W.
3134-36 South Street, N.W., and alley
Square 1189
Washington, D.C.

DECISION AND ORDER

Background

Millennium Georgetown Development (MGD) seeks approval of a subdivision of lots 826 & 827 in Square 1189, the site of an historic landmark, the Brickyard Hill House, subdivision on the entire Square 1189, and, on behalf of the current owners, the demolition of buildings located at 3133 Copperthwaite Alley, N.W.; 3135, 3137, & 3141 K Street, N.W. and for 1003, 1007 & 1015 Wisconsin Avenue, N.W., and the closure of an alley. According to MGD, the subdivision and demolitions would allow MGD to restore the landmark Brickyard Hill House, restore the Georgetown Incinerator and retain two alley dwellings historically associated with the Brickyard Hill House, albeit in a different context.[1]

Because the site is an historic landmark, the application was referred to the Historic Preservation Review Board (the HPRB) for its review and recommendation, pursuant to D.C. Code, Sec. 5-1006(b). At its public meeting held on July 23, 1998, the

[1] At the hearing in this matter, the applicant withdrew its request for a hearing on the demolition permits in light of the finding by the Commission of Fine Arts that the buildings were contributing buildings to the Old Georgetown Historic District. On August 28,1998, counsel for the applicant and the Office of the Corporation Counsel informed the Mayor's Agent that the demolition permits would be dealt with administratively.

Board voted to adopt the Staff Report of the Historic Preservation Division of DCRA, Building and Land Regulation Administration, and recommended to the Mayor's Agent that this subdivision be approved as consistent with the requirements of D.C. Law 2-144, the Historic Landmark and Historic District Protection Act of 1978, (the Act), codified at D.C. Code, Sec. 5-1001, et seq. The administrative hearing was conducted consistent with the requirements of District of Columbia Municipal Regulations (DCMR) Title 10, Chapter 25, and in accordance with the D.C. Administrative Procedures Act, D.C. Code Sec. 1-1501 et seq.

Pursuant to D.C. Code, Sec. 5-1006(c), Subdivisions, a public hearing was held on May 19, 1998, before Administrative Law Judge Rohulamin Quander, the Mayor's Agent for Historic Preservation. Notice of the public hearing was published in the D.C. Register. The Applicant was represented by Richard B. Nettler, Esquire, the Law Offices of Robins, Kaplan, Miller and Ciresi, L.L.P.

The applicant, Millennium Georgetown Development, L.L.C. (MGD), presented the following witnesses on behalf of the application: Shalom Barnes, architect; Emily Eig, architectual historian; Ellen McCarthy, land planning expert; Anthony Lanier, on behalf of the Applicant, MGB; and Rev. David Bird, Rector, Grace Episcopal Church. There was no opposition noted to the granting of this application.

Testifying on behalf of the District of Columbia Government were: David Colby, the D.C. Office of Planning, and James Thackaberry, D.C. Department of Housing and Community Development. Steve Raiche, Chief, Historic Preservation Division, DCRA, was present, but did not testify. However, he was called upon during the hearing to clarify a minor preliminary manner. Several non testifying persons were present as observers of the administrative proceeding, including Bruce Brennan, Esquire, Senior Counsel, Government Operations, Office of the Corporation Counsel.

The Applicant tendered a comprehensive pre-hearing submissions, complemented with multiple exhibits, including: lot surveys and plats; illustrated current layout of the current buildings and immediate area; and multiple photographs. The record was officially closed on August 31, 1998, upon receipt of the Applicants' Proposed Findings of Fact, Conclusions of Law, and Order.

For the reasons that follow, the application for a theoretical subdivision is **GRANTED.**

Findings of Fact

Based on the record taken as a whole, including the evidence submitted at the hearing, the following uncontested Findings of Fact are made:

1. On February 19, 1998, MGD filed for conceptual design review of its proposed development project and the demolition of certain buildings necessary for construction of that project. The proposal was supported by, *inter alia*, the Department of Housing and Community Development, the Office of Planning, the affected Advisory Neighborhood Commission, the Citizens Association of Georgetown, the Georgetown Business and Professional Association and neighboring property owners, such as Grace Episcopal Church.

2. On May 7, 1998, the Old Georgetown Board (OGB) gave conceptual approval to the proposed development and on June 22, 1998, the Commission of Fine Arts (CFA) did as well, including recommending the approval of the demolition of the subject buildings, after a site visit, as non-contributing to the historic district.

3. Preliminary permits for the demolition of the subject buildings were filed in June 1998, on behalf of their current owners, and the demolitions were formally approved by the OGB on July 9, 1998, and the CFA on July 24, 1998, on the grounds that the buildings were not contributing to the Old Georgetown Historic District.

4. On July 23, 1998, a hearing before the HPRB was held on the subdivision request, at which time the HPRB recommended that, "[b]ecause the subdivision calls for the combination of several historic lots and an historic alley into one lot of record, . . . the Mayor's agent . . . [give] great attention . . . to the historic preservation implications of the proposed development." The Mayor did not refer the demolition permits to the HPRB for review.

5. The southern half of Square 1189 is bounded by South Street to the north, Wisconsin Avenue to the west, K Street to the south, and 31st Street to the east. An alley that runs east-west, Copperthwaite Lane (formerly Cooper Shop Alley) bisects this block. This block, now included in Square 1189, was historically part of Georgetown's original Plat of 1751. Many small structures stood in this square in the nineteenth century, including the Brickyard Hill House, Peter's commercial enterprise, as well as a number of small dwellings, rowhouses, and assorted ancillary structures. Over time, substantial changes have occurred to the square.

6. Today, nine (9) buildings occupy the western portion of the southern half of Square 1189. These buildings span two centuries. Brickyard Hill House, originally owned by Robert Peter and leased to tenants, the first mayor of Georgetown, was erected circa 1800. The stone stable behind it (3133 Copperthwaite Lane) was erected sometime in the first half of the nineteenth century, apparently in association with the Brickyard Hill House. A second story of brick was added in 1898, with other changes to turn it into a dwelling, substantially altering its appearance and association with the Brickyard Hill House. The adjacent two-story wood frame dwelling at 3135 Copperthwaite Lane was not erected until the third quarter of the nineteenth century and, if it ever had a relationship to the Brickyard Hill House, the relationship has been severely altered. The building at 3135 K Street, now the Bayou, was constructed in 1939, but appears to have incorporated at its rear a portion of what may be the remains of a nineteenth century cooperage, substantially altered. The buildings at 3137 K Street and 1003 Wisconsin Avenue were constructed as a warehouse for Harlan-Adams in 1918, and have been altered several times since. The building at 1007 Wisconsin Avenue largely dates from 1924-25, with a large rear addition constructed in 1934 and a second story over the western half of the building in 1940. In 1935, Washington Petroleum Products erected a filling station at the corner of Wisconsin Avenue and Water Street (3141 K Street). Between 1954 and 1962, a commercial building was erected at 1015-19 Wisconsin Avenue.

7. The eastern portion of this half of Square 1189 is currently occupied by a single building, the Georgetown Incinerator. This Industrial Art Deco-style building was erected in 1932. Designed by the noted Boston engineering firm, Metcalf and Eddy, the building was constructed by the District of Columbia, and landscape design was provided by the landscape architects Olmsted Brothers of Brookline, Massachusetts. The structure operated as an incinerator from its completion in late 1932 until October 1971, and has remained unoccupied since that time. Currently the property is unattended, overgrown, and in poor condition.

8. MGD proposes to construct a mixed-use retail, entertainment, hotel and residential complex on the site. The subdivision will afford MGD the opportunity to restore the significant historic buildings on the site. MGD will retain and adaptively reuse the Incinerator building. In combination with all the remaining property in square 1189, the mixed use complex will consist of approximately a 450-500 space public parking garage, 100,000 square feet of condominium apartments, a 125 room boutique hotel, a 2,200-3,000 seat multi-theater art cinema, and 75,000 square feet of retail space.

9. In light of the recommendation of the HPRB regarding the subdivisions and the fact that the subdivision involves the site of a historic landmark, MGD sought review of the

application by the Mayor's agent, as required by the Act.

10. Notice of the Mayor's Agent hearing for the demolition application was published in 45 D.C. Register 4544, on July 10, 1998.

11. The matter came before the Mayor's Agent for a hearing on the basis that the subdivision was consistent with the purposes of the D.C. Law 2-144 or necessary to construct a project of special merit.

12. Testifying in favor of MGD was Anthony Lanier for the Applicant; Shalom Baranes, the project architect, Ellen McCarthy, an urban planner and Emily Eig, an architectural historian. No one appeared in opposition to the application.

13. Mr. Baranes reviewed the development plans for the site and stated that the project will create a preservation district composed of the Incinerator, the Brickyard Hill House, and the two alley dwellings. According to Mr. Baranes, subdivision of the Brickyard Hill House site and the Square will allow MGD to restore the landmark Brickyard Hill House by transferring the excess floor area ratio available on the lot to the rest of the site, thereby eliminating development pressures on the landmark building and generating funds for its restoration. Subdivision of the entire square will permit MGD to maximize the restoration of the Incinerator by moving the parking required for the proposed project to other portions of the square, thereby eliminating the need to excavate underneath the Incinerator. Furthermore, subdivision of the entire square allows MGD to save two other buildings on the site and re-position them behind the Brickyard Hill House in a manner which reflects their current configuration.

14. According to Ms. Eig, Square 1189 is located within the Old Georgetown Historic District. It is considered an intact example of a complete historic town, encompassing an area laid out as a port town in 1751 prior to the establishment of the District of Columbia. Later absorbed into the District of Columbia, its narrow grid streets differentiate the port town from L'Enfant's plan. In 1950, the U.S. Congress passed the Old Georgetown Act creating a special district within the District of Columbia to be known as "Old Georgetown". The law, which mandated the regulation of the height, exterior design, and construction of private and semi-public buildings in the Georgetown area, was approved by Congress, "[i]n order to promote the general welfare and to preserve and protect the places and areas of historic interest, exterior architectural features and examples of the type of architecture used in the National Capital in its initial years."[2] Old Georgetown was listed in the National Register of Historic Places and declared a National

2 Public law 808, 81st Congress, H.R. 7670, D.C. Code 5-801, 64 Stat 603.

Historic Landmark in 1967. It was listed on the District of Columbia Inventory of Historic Sites in 1964.

15. According to Ms. Eig, subdivision of the lots will afford MGD the opportunity to preserve and rehabilitate four structures, one of which is an individually designated landmark - the Brickyard Hill House, the others are two small alley dwellings, and the last is the edifice known as the Georgetown Incinerator. With regard to the Brickyard Hill House, it was constructed ca. 1800, and possibly as early as the late Eighteenth Century. It is sited on old Lot 52, of the Georgetown block known as Peter's Square, named for landowner Robert Peter. The house was owned and probably built by Robert Peter, a member of an early prominent Georgetown family. Robert Peter was one of the first Georgetown Commissioners and when the town was incorporated in 1789, its first mayor. He is believed to have rented the Brickyard Hill House for income. Over time, due to neglect, the house, particularly 3136 South Street, has deteriorated. The house is one of the most important structures in the Old Georgetown Historic District. Possibly dating to the eighteenth century, the two-story, wood frame and brick nogging double house is a rare, intact example of a modest dwelling in Georgetown's waterfront district associated with the initial years of the Federal City. Its very existence is threatened at this time.

16. Ms. Eig further testified that the subdivision sought by MGD of the remaining lots on this half of the square is not new to the Old Georgetown Historic District, and examples of it exist from the late nineteenth century when the Capital Power Plant was sited across the street on the waterfront, and in 1932 when the District constructed the incinerator on this very square. While the act of subdivision will alter the lot lines that have been associated with the Brickyard Hill House, and those of the surrounding buildings, all within the Old Georgetown Historic District, such subdivision is common to Georgetown, both before and since the designation of the historic district in 1951. This proposed subdivision is consistent with the purposes of the act, for it will retain and enhance the landmark building, encourage its adaptation for current use, as well as result in its restoration. In summary, the proposed subdivision is the tool that will retain, enhance, and adapt the landmark Brickyard Hill House, by providing the initiative and wherewithal for restoration.

17. According to Ms. McCarthy, she had reviewed past decisions by the Mayor's Agent regarding special merit, and it was her professional opinion that this is one of the clearest instances where the benefits to be derived by the citizens of the District of Columbia from the project are so considerable that they more than outweigh any potential adverse consequences of subdividing the property. Ms. McCarthy explained that the project proposes to take an area which has seen negligible investment in retail and entertainment uses, and to subdivide the property in order to construct an arts cinema,

upscale residential condominiums, a boutique hotel/inn, and high-quality retail. Significantly, the entire exterior of the Incinerator and its smokestack, along with four historic dwellings, will be preserved and restored. In terms of the economic revitalization of the area, it is precisely the type of "bridge" which has been necessary between the retail and entertainment activity along M Street, and the waterfront, where the only major investment in any sizeable non-office use, the retail and residential portions of the Washington Harbor, have been isolated, and thus unable to make their full contribution to the economic vitality of the area.

18. In terms of preservation, Ms. McCarthy stated that the rehabilitation of a huge structure like the Incinerator, especially the preservation of the volume of the building, and the restoration of the Brickyard Hill houses and the two alley-dwellings, go far beyond the usual level of preservation. Finally, in terms of land planning and community benefits, Ms. McCarthy made two observations. First, the Incinerator portion of the project already was extensively analyzed by the Department of Housing and Community Development, and MGD's proposal was judged superior to the other site redevelopment applicants in terms of the benefits it was proposing to the District. Second, the project proposes a number of "preferred uses", i.e., uses such as housing, retail, hotel and arts, which are not generally considered to be as lucrative for a developer as office space, but which provide substantial benefits to the District in terms of tax revenue, employment of District residents, street vitality (especially in the evenings and on weekends), and new residents to participate in our civic life and take an interest in safeguarding and improving the neighborhood. All these are being provided with no zoning concessions, as MGD has asked for no extra density or similar concessions to make it more financially attractive to provide these uses.

19. Ms. McCarthy also testified that the parking component of the project is also significant. Parking is a particular concern in Georgetown. Virtually every large project which has been proposed to improve the economic vitality of the area has foundered on the shoals of community concerns about worsening of the parking situation. She stated that when the District tried, several years ago, to develop this site, it was the inability to satisfy concerns about parking which led to the termination of the development negotiations. Parking has become even more important because of the announced plans to convert several hundred spaces which currently occupy waterfront land owned by the District government into a new waterfront park. MGD's willingness to acquire additional parcels beyond the Incinerator site itself has been the key to being able to accommodate sufficient parking in this project, not only to assure its economic and community viability, but also to permit the construction of the waterfront park to go forward. According to Ms. McCarthy, the need to provide this parking, which really is key to assuring the viability of the site and the ability to preserve the Incinerator and the other buildings, is a major

reason why this subdivision must be made.

20. Ms. McCarthy also stated that, in addition to the contribution which will be made by the on-site parking being provided in this project, it was her opinion that the project will make a positive contribution to solving the overall parking problem in Georgetown. Extensive analysis of parking demand and supply in the southern portion of Georgetown was funded by MGD, and performed cooperatively with the Waterfront Commission, the group charged with implementing the new waterfront park. The analysis discovered that there are hundreds of vacant parking spaces which could be available to meet the demand, largely located in the newer office buildings south of M Street, but the building owners do not open them to the public at night, because of a perception that the spaces would not be used. Ms. McCarthy opined that this situation is because there have been so few activity generators in the southern section of Georgetown. The Incinerator itself has stood, vacant, forlorn and forbidding, discouraging those who are patronizing shopping or dining establishments along M Street from parking to the south. The transformation of square 1189, which will be made possible by the proposed subdivision, should serve to alter public perceptions of safety, particularly since the entire Wisconsin Avenue frontage will be solid retail, creating a bright and inviting path to the waterfront and to the parking available in the vicinity of the project. In addition to the likely increase in public willingness to venture south of M Street, MGD has committed to meeting with the building owners and parking operators in an effort to have them leave their parking facilities open for the evening. In summary, the benefits to the community and the exemplary land planning related to this project clearly provide sufficient merit to outweigh any preservation drawbacks, which, are at worst, minimal.

21. James Thackaberry, project manager within the D.C. Department of Housing and Community Development (DHCD) for the disposition and development of the Georgetown Incinerator property, testified in support of the application. According to Mr. Thackaberry, the proposed land disposition agreement regarding the sale of the site was submitted to the Council of the District of Columbia by the Mayor, and subsequently approved by the Council. After receiving many inquiries from developers regarding the availability of the Incinerator property for development, DHCD released a Request for Proposals (approved on July 1996 by the D.C. Council) to redevelop the Georgetown Incinerator property. Three development teams -- MGD, and two others - submitted development proposals on September 30, 1996 for the redevelopment of the Georgetown Incinerator. The development proposals were reviewed and ranked by a five member DHCD selection panel that included three members from outside the agency. The panel's recommendation, which the DHCD Director accepted, was that MGD be selected for the negotiation of an Exclusive Right Agreement. The Exclusive Right Agreement was executed on June 13, 1997.

22. According to Mr. Thackaberry, the original development proposal, limited to the Incinerator property, was accepted by DHCD, and called for 100,000 square feet condominium apartments, approximately 30,000 square feet of retail space, and a 250 space parking garage. MGD has now obtained control for the remainder of the land in Square 1189 and has expanded the project to include the whole square. According to DHCD's spokesperson, redevelopment of the Incinerator property will remove a major eyesore that has been vacant and unused since the closure of the old Incinerator in the 1970s and will retain the Incinerator building and create adaptive new uses of the site that return it to producing income, sales and property tax revenue for the District. The project development will produce market rate housing units, provide badly needed public parking, add high quality retail space, and add a much needed art cinema to fill the void left by the recent closure of both the Key and Biograph Theaters. The project will also create 530 jobs and 127 spin-off jobs during the construction phase, and upon completion will create 352 permanent jobs with 66 permanent spin-off jobs elsewhere in the District economy. During the year and a half construction period, the project will generate $3,000,000 in taxes. Upon completion, it will generate $8,000,000 annually in taxes for the District from all tax sources.

23. David Colby appeared on behalf of the Office of Planning in support of MGD's application. According to Mr. Colby, the location is the last major private development site in the historic waterfront area. Mr. Colby reviewed the major elements of the project and noted that the Incinerator site, which is owned by the District Government, has been vacant for over 25 years. Mr. Colby also stated that the historic incinerator and smokestack structures would be retained and used as a restaurant and lobby for the hotel, and that five new structures would be built on a plinth surrounding the Incinerator to compensate for the steep differences in the slope of the site (20 to 30 feet) between South and K streets. On behalf of the Office of Planning, Mr. Colby stated that he believes that this project does meet the test for "Special Merit" designation, and concluded that this is an important project in a particularly sensitive area of the city, and that the Office of Planning strongly supports the project and its application for a "Special Merit" designation.

24. Mr. Colby also testified that the proposed development is consistent with the Comprehensive Plan Generalized Land Use Map designation of "mixed-use moderate density residential and commercial land use" for the site. The proposed development is further supported by the following Comprehensive Plan major theme (objective):

> ...ensuring good quality neighborhoods is of utmost importance to the District. The District elements of the Plan's policies and strategies on

> increasing housing opportunities, neighborhood commercial facilities and improving transportation in some neighborhoods will be combined with other District policies on historic preservation, environmental quality and public facilities to conserve functioning, stable neighborhoods and to improve those which need redirection.

25. Mr. Colby also noted that the residential areas immediately surrounding the site have not achieved a critical mass, and that the recent development south of M Street has been primarily for office and commercial uses. Consequently, the area south of M Street and immediately adjacent to the freeway has not been considered a secure, stable neighborhood, especially during the evenings when office and most commercial establishments are closed. Accordingly, the proposed development will significantly enhance the area of Wisconsin Avenue and K Street, adjacent to the freeway. The project, with its residential units, hotel/restaurant use and retail spaces, will infuse street life into an area that has been somewhat foreboding, because of the elevated freeway and derelict environment. Additionally, the project will preserve and adaptively reuse historic structures on the site and help connect the rest of Georgetown with the new waterfront park to be built along the Potomac River directly south of the site.

26. Finally, Mr. Colby testified that because the National Park Service will eliminate approximately 400 spaces for the waterfront park with the anticipated closing of the harbor, the Department of Public Works ("DPW") believes the parking spaces provided by the Incinerator development will be a significant benefit to parking within the area. Under the zoning regulations, the applicant is required to provide at least 414 parking spaces for the entire facility. The proposed facility will have some approximately 224 spaces greater than that required by the regulations. In summary, Mr. Colby stated that the redevelopment of the Georgetown Incinerator site will provide an immediate benefit to the surrounding neighborhood and to the District on a number of levels. The Incinerator site has become an "eyesore" within the surrounding area, and has led to the perception that the adjacent portion of K Street is not safe during evening hours. The proposed project will bring important new street life to the area. Additionally, the proposed project will contribute to the economic and fiscal vitality of the District. Presently, since the District Government owns the site, the property does not provide any tax revenue to the city. With its sale and redevelopment, the site will generate significant income, property, restaurant, hotel and sales tax revenues for the District. Therefore, the Office of Planning recommends that the Millennium Georgetown Development (MGD) be granted a "Special Merit" designation and its applications for the required demolition and new construction be granted.

27. Rev. David Bird, Rector of the Grace Episcopal Church, which is located

directly north of the site on South Street, also testified in support of the application, stating that the church community was very much in favor of the restoration, which will significantly enhance the neighborhood, and restore much of its historic character, which is in danger of being lost, if this application is not approved.

DISCUSSION

Pursuant to D.C. Code, Sec. 5-1005, before the Mayor may issue an Order to authorize a subdivision of an historic landmark, it must be determined whether the subdivision is necessary in the public interest. D.C. Code, Sec. 5-1007(c) & (e). D.C. Code, Sec. 5-1002(10) defines "necessary in the public interest" to mean:

> consistent with the purposes of this subchapter as set forth in Sec. 5-1001(b) or necessary to allow the construction of a project of special merit. (emphasis added)

D.C. Code, Sec. 5-1001(b)(2) specifies that, "[w]ith respect to historic landmarks", its purpose is:

(A) To retain and enhance historic landmarks in the District of Columbia and to encourage their adaptation for current use; and

(B) To encourage the restoration of historic landmarks.

With regard to the subdivision of the lots on which the Brickyard Hill House sits, the byproduct of such an act is the restoration of the landmark building. The site is included within the development project to provide the underground parking deemed necessary for the project and the community and to enable the unusable floor area ratio on the landmark site to be utilized elsewhere. But for the subdivision, neither the unusable floor area ratio nor the parking could be provided. Thus, if the site is not subdivided, it cannot become part of the Incinerator project, will not be restored, but will continue to deteriorate. The connection between the subdivision of the site and the retention and enhancement of the only landmark structure in the Square could not be more obvious.

The Mayor's Agent also concludes that the subdivision is necessary to construct a project of special merit. Section 5-1004(e) provides that no "permit shall be issued unless the Mayor finds that such issuance is necessary in the public interest."

Again, D.C. Code, Sec. 5-1002(10) defines "necessary in the public interest" to mean:

> consistent with the purposes of this subchapter as set forth in Sec. 5-1001(b) or necessary to allow the construction of a project of special merit. (emphasis added)

D.C. Code, Sec. 5-1001(b) specifies that "[w]ith respect to properties in historic districts", its purpose is:

> (A) To retain and enhance those properties which contribute to the character of the historic districts and to encourage their adaptation for current use;
>
> (B) To assure that alterations of existing structures are compatible with the character of the historic district; [and]
>
> (C) To assure that new construction and subdivision of lots in an historic district are compatible with the character of the historic district.

Under the "special merit" provision of D.C. Law 2-144, the Council envisioned the Mayor's Agent balancing the merit, albeit special merit, of a project with the historic value of the contributing building because only projects which offer significant benefits to the District of Columbia or to the community offset the Council's policy in favor of protecting, enhancing and perpetuating the use of properties with historical, cultural and esthetic merit. *See Don't Tear It Down, Inc. v. D.C. Department of Housing and Community Development*, 428 A.2d 369, 373 (D.C. 1981).

As such, there must exist some specific feature of land planning or social benefit having a high priority for community services associated with the proposed development for it to be considered a project of special merit. In *Citizens Committee to Save Historic Rhodes Tavern v. D.C. Department of Housing and Community Development*, 432 A.2d 710 (D.C.), *cert. denied*, 454 U.S. 1054 (1981), the Court held that in special merit cases, "a balancing of historical and development values is required under the Act," inasmuch as decisions "under a locality's historic preservation statute 'should not be made in a vacuum. The architectural and historical characteristics of a building must be weighed against its societal functions and the significance of its preservation in human terms.'" *Id.*, *quoting Young v. Mellon*, 156 Cal. Rptr. 165, 169 (1979). Citing the Act's emphasis on "safeguard[ing] the city's historic, aesthetic and cultural heritage, as embodied and reflected in [its] landmarks and districts," D.C. Code, Sec. 5-1001(a)(2), the Court held that "the Act implicitly requires that, in the case of demolition, the Mayor's Agent balance the historical value of the particular landmark against the special merit of the proposed

project." 432 A.2d at 716. *See also Committee of 100 on the Federal City v. District of Columbia Department of Consumer & Regulatory Services*, 571 A.2d 195 (D.C. 1990).

However, the Act also makes it clear that a proposed amenity must meet rigorous criteria in order to support a finding that demolition is "necessary in the public interest". Thus, only architecture which is "exemplary" in nature, or has specific features of land planning which are considered special, or benefits which have a "high priority" for community service, may be considered. D.C. Code, Sec. 5-1002(11). The point is buttressed by the legislative history to this Act, which states: "Factors which are common to all projects are not considered as special merits." Legislative History, Bill 2-367, "The Historic Landmark and Historic District Protection Act of 1978," at 6. To the same effect is this Court's decision in *MB Associates v. District of Columbia Department of Licenses, Investigations & Inspections*, 456 A.2d 344 (D.C. 1982), which held that contributions which are common to downtown or any development plans and which are not unique cannot constitute proposals of special merit.

This reading of the Act makes sense particularly when it is considered in light of the Act's purposes. The designation of a landmark structure or a historic district constitutes a formal, governmental determination that the affected properties are worthy of "protection, enhancement and perpetuation" as "distinctive elements of the city's cultural, social, economic, political and architectural history." See D.C. Code, Sec. 5-1001(a)(1). Once such a determination has been made, the Act contemplates that it cannot be overridden absent a demonstration that the people of the District of Columbia are obtaining something sufficiently "special" to warrant the permanent and irreversible act of demolition.

In assessing the special merit of the proposed project, it is useful to compare the presentation here with the finding of special merit in other cases. *See Committee of 100, supra*, 571 A.2d at 200, n. 5 (Past projects of special merit included a one-of-a-kind building project which benefited more than just a few people and projects which incorporated historic structures). In the majority of cases, full building restoration, much less four distinct buildings, including a landmark structure, as proposed here, was nonexistent. Here, moreover, the use proposed for the site was one which was subject to a public competition and decided upon as a use that provided the greatest benefits to the community and the city. Judged in that context, the vetting of land planning for this project far exceeds that proposed for other special merit projects, except for the original Convention Center. In addition, the proposed project goes far beyond what could be built as a matter of right to address arts, retail, residential and parking issues which have a high priority in Georgetown, and to provide vitality for a neglected area of Georgetown. Thus, the proposed project will provide social and other benefits having a high priority for

community services.

In sum, the subdivision is consistent with the purposes of the Act in that it both encourages the maximum amount of historic preservation and encourages the adaptation of the historic features for current use. Furthermore, the proposed subdivisions are, in the alternative, necessary to construct a project of special merit.

Conclusions of Law

The foregoing considered, the Mayor's Agent also concludes that:

The subdivision is necessary, and is consistent with the purposes of the Act, the proposed project being one of special merit, which will encourage both the maximum amount of historic preservation and encourage the adaptation of the historic features for current use, as well as provide substantial social and community benefits.

ORDER

ACCORDINGLY, it is this **6th** day of **October, 1998**

ORDERED that the Applicant's request to subdivide Square 1189 into one lot of record, including the closure of the alley, be, and the same is hereby, **GRANTED**; and it is

FURTHER ORDERED that, pursuant to 10 D.C.M.R. 2523.4, this Order will take effect fifteen (15) days from the date of its service as evidenced by the following Certificate of Service pursuant to 10 D.C.M.R. 2503.5(c).

Rohulamin Quander

Rohulamin Quander, Administrative Law Judge, D.C., and Mayor's Agent for Historic Preservation

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Decision & Order was served this 15th day of October, 1998, by mailing a copy of the same via U.S. Mail, postage prepaid, to the following -

Richard B. Nettler, Esq.
Robins, Kaplan, Miller & Ciresi L.L.P.
1801 K Street, NW, Suite 1200
Washington, DC 20006
Counsel for Applicant

And

Steve Raiche, Chief
Historic Preservation Division
Department of Consumer and Regulatory Affairs
614 H Street, N.W., Third Floor
Washington, D.C. 20001

Stacy Washington

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PARKING AND TRAFFIC IMPACT ANALYSIS

GEORGETOWN INCINERATOR
WASHINGTON, D.C.

PREPARED FOR:
MILLENNIUM PARTNERS

PREPARED BY:
GOROVE/SLADE ASSOCIATES, INC.
WASHINGTON, D.C.

February 19, 1998

GOROVE/SLADE ASSOCIATES, Inc.
Suite 700 / 1140 Connecticut Ave. NW / Washington, DC 20036

Executive Summary: Georgetown Incinerator Site Parking and Traffic Impact Study

1. A total of 458 spaces will be provided on-site at the Incinerator. The retail, movie theater and hotel uses will have 400 spaces that will be open to the public, and the condominium and townhouse units will have a total of 58 reserved parking spaces. District zoning regulations require a total of 334 on-site spaces for the entire project. Therefore, a surplus of 43 spaces above code will be provided for the residential use and 81 more than required for the retail, inn and theater uses.

2. The on-site parking supply will be 400 spaces for the retail, movie theater and inn uses. An additional 90 spaces may be created within this facility by stacking vehicles in the aisles, a common practice used to increase parking capacity. Therefore, the effective on-site parking supply is 490 spaces. Access for this facility will be gained from "K" Street.

3. The residential component of the project will have 58 reserved spaces in a separate facility with access from South Street. An additional 18 spaces may be utilized on a stacked basis. This stacking will not occur in the aisles as is commonly done for valet parking. Some of the residential units will have 2 parking spaces stacked end-to-end. The total residential provision will therefore be 76 parking spaces.

4. The 490 parking spaces that will be open to the public on the Incinerator site will have a positive impact on parking in the neighborhood during weekday mornings and afternoons. Based on projected demand, the site demand will be greatest during the weekend evening hours. During the week, 200 to 400 spaces (those not required to accommodate site demand) at the Incinerator will be available for public use. This is critical especially during weekday afternoons, when the off-street parking spaces are nearly at full occupancy.

5. Based on a recent survey taken in Georgetown, approximately 69% of people questioned say they have multiple destinations (i.e. a combined trip for shopping and dining) when they are in the neighborhood. Also, 71% said they would combine a trip to see a movie in Georgetown with another activity.

6. An assumption was made that 25% of visitors will come to the Incinerator site as a secondary trip destination. This value represents a worst-case scenario, as the survey indicates this percentage may be higher in reality. Therefore, these visitors would already be part of the existing parking demand for the Georgetown neighborhood and would not be considered as new trips. There is expected to be a high level of synergy between the Incinerator site and other shopping and dining attractions in the Georgetown neighborhood that are within easy walking distance. The urban setting of the Incinerator will also allow a significant percentage of patrons to walk, bicycle or take public transportation to the site.

7. The on-site parking supply will be sufficient to accommodate the site-generated demand throughout the year except for a few Saturday evenings during the month of July, when a minor shortfall of about 25 vehicles may occur. The month of July is the peak movie season of the year. This infrequent parking overflow situation may easily be absorbed by adjacent off-site facilities currently open within the area.

8. Based on the assumptions, the Georgetown Incinerator site is anticipated to generate a peak parking demand of 488 vehicles during the Friday evening peak, 396 vehicles during the Saturday afternoon peak, and 515 vehicles during the Saturday evening peak. These peak demands will occur during the month of July.

9. There are currently 1,200 off-site parking spaces in the neighborhood that are closed during the weekend evenings, not including the 405 spaces in the Harbour Parking lot that will be displaced in the future.

10. The intersections within the study area at "K" Street with Wisconsin Avenue and "K" Street with 31st Street currently operate at a Level of Service "A" during the AM and PM peak hours. Level of Service "A" is the best operational traffic category possible.

11. The intersections within the study area are projected to operate at a Level of Service "A" during both the AM and PM peak hours in the future after the development of the site. The analysis assumes that the Harbour Parking lot of 405 spaces will be displaced by the waterfront park in the future. The results of this traffic analysis indicate that the development of the proposed Georgetown Incinerator project will not have an adverse impact on the surrounding street system.

GOROVE/SLADE ASSOCIATES, Inc.
Suite 700 / 1140 Connecticut Ave. NW / Washington, DC 20036

Georgetown Incinerator Site Parking and Traffic Impact Study
February 19, 1998

Introduction

This document presents a parking and traffic impact study for the Georgetown Incinerator site located on the block bound by 31st Street, "K" Street, Wisconsin Avenue and South Street in northwest Washington, D.C. The current development plan for the project includes:

- 70,000 to 80,000 Square Feet of Retail Space
- A state-of-the-art Multi-Screen Theater with 1,800 to 2,200 Seats
- An Inn with 100 to 125 Rooms
- A Residential Condominium and Townhouse Component with 30 to 45 Units
- 458 Parking Spaces On-Site

The objectives of this study are as follows:

- Examine the current occupancy levels for off-street parking facilities in the neighborhood
- Determine the parking requirements for the site based on zoning regulations
- Estimate the future parking demand for the proposed development plan
- Assess the adequacy of the on-site parking for the anticipated demand
- Analyze the parking impacts of the project on the surrounding area
- Approximate the traffic impacts that will be generated by the site

Parking Inventory and Occupancy: Off-Street Parking

The off-street parking facilities in lower Georgetown were surveyed during the month of October, 1997 to determine the general occupancy levels that exist at various times of the day and week. The parking occupancy observations were completed through a joint effort by volunteers from the Georgetown Waterfront Commission and Gorove/Slade Associates. This parking study was completed to determine the existing parking demand and the availability of spaces in lower Georgetown during critical times of the day.

The following time periods were the focus of the study due to the high demand for parking spaces that have been observed and reported in previous Georgetown parking studies:

1. Friday Afternoon: 1:00 p.m. to 3:00 p.m.
2. Friday Evening: 8:30 p.m. to 11:30 p.m.
3. Saturday Afternoon: 1:00 p.m. to 4:00 p.m.
4. Saturday Evening: 8:30 p.m. to 11:30 p.m.

The scope of the study area encompasses all off-street parking facilities south of "M" Street in Georgetown, plus a few additional lots just north of "M" Street. A total of 24 parking facilities were considered. Chart 1 provides a parking facility locator map for the area covered in the inventory and occupancy study. Chart 2 gives a description of the type of lot, parking space capacity, and hours of operation for each individual parking facility in the study area. The comprehensive occupancy data observed during the Friday and Saturday time periods in the study are summarized in Table 1. The information for each individual facility and time period is provided as an Appendix to this report.

Based on the results of Table 1, the number of available parking spaces varies over the course of each day from afternoon to evening, as some facilities close during the early evening hours at the conclusion of the business day. There are approximately 1,200 more spaces open to the public on Friday afternoon (1:00 to 3:00 p.m.) than on Friday and Saturday evenings (8:30 to 11:30 p.m).

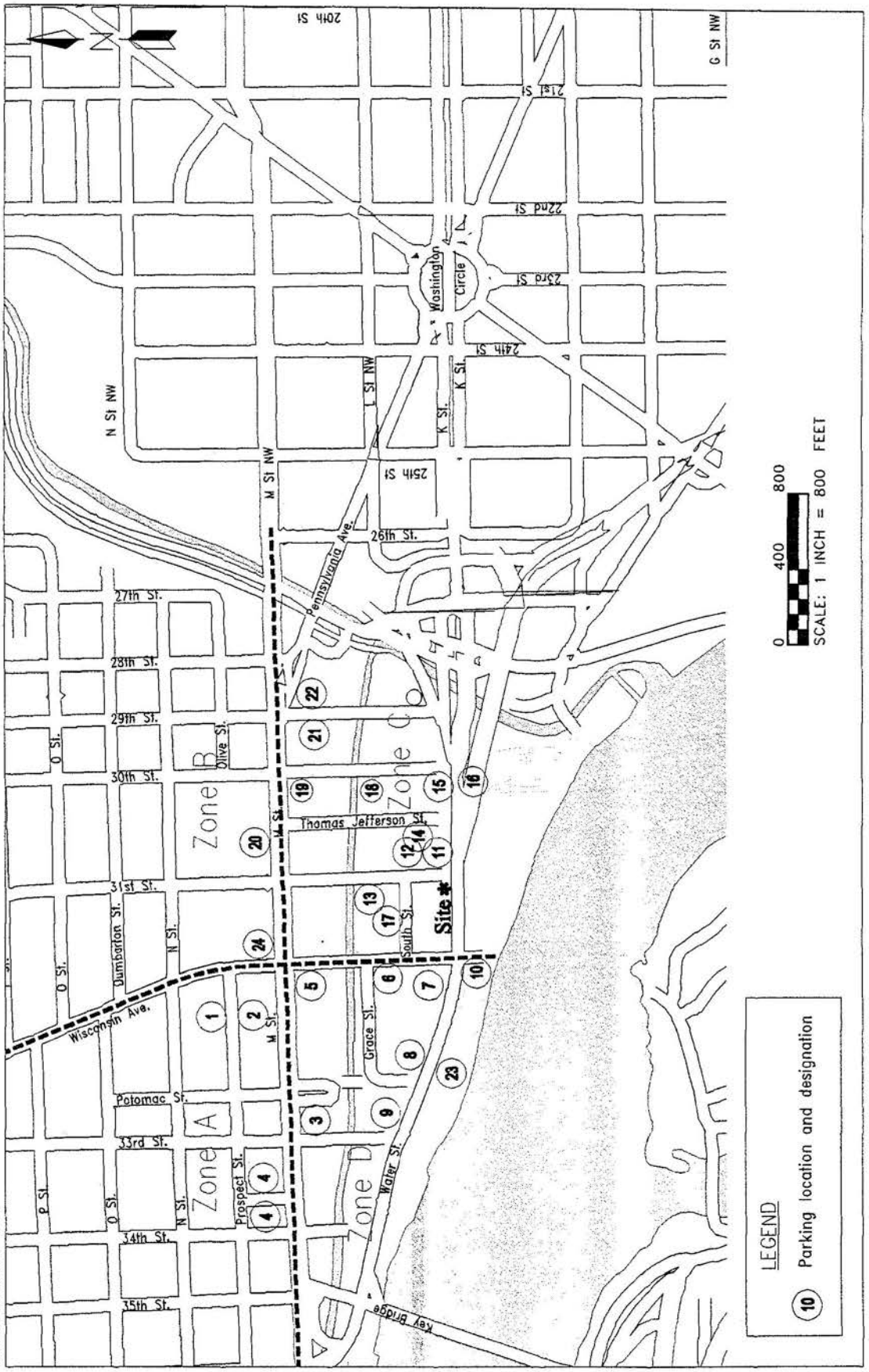


Chart 1
Parking Locator Map

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DATE LAST MODIFIED: 02-19-98

CHART 2
OFF-STREET PARKING SUPPLY
LOWER GEORGETOWN AREA

FACILITY NO.	FACILITY	LOCATION	TYPE*	PARKING CAPACITY	HOURS OF OPERATION	LATE EVENING SURVEY
1	GEORGETOWN COURT	NORTH SIDE OF PROSPECT ST. BETWEEN WISCONSIN AVE. AND POTOMAC ST.	G	128	24 HOURS	YES
2	DOGGETT'S PARKING	SOUTH SIDE OF PROSPECT ST. BETWEEN WISCONSIN AVE. AND POTOMAC ST.	S	80	M-THU:7AM-1AM FRI-SAT:8AM-3AM SUN: 10AM-12AM	YES
3	COLONIAL PARKING	STATION 428 SOUTHEAST OF 33RD ST./"M" ST.	S	48	M-THU: 9AM-1AM FRI-SAT: 9AM-3AM SUN: 10-10PM	YES
4	KINNEY SYSTEMS	NORTHEAST OF BANK ST./"M" ST. - (EAGLE LIQUOR - STAPLES)	S & G	S: 18 G:146	FRI-7AM-3AM SAT: 10AM-3AM SUN: CLOSED	YES, FRIDAY & SATURDAY ONLY
5	GEORGETOWN PARK COLONIAL PARKING	STATION 128 WEST SIDE OF WISCONSIN AVE. BETWEEN "M" ST. AND GRACE ST.	G	574	MON-SA: 10AM-9PM SUN: 12PM-6PM	NO
6	GEORGETOWN PARKING CORP.	WEST SIDE OF WISCONSIN AVE., SOUTH OF GRACE ST.	S	18	10AM-10PM	NO
7	ALTMAN'S	NORTH SIDE OF WATER ST., WEST OF WISCONSIN AVE.	G	277	MON-TUE:7AM-7PM WED-THU:7AM-2AM FRI-SAT:7-3AM SUN: CLOSED	YES, THURSDAY, FRIDAY & SATURDAY ONLY
8	DIPLOMAT PARKING	NORTH SIDE OF WATER ST., BETWEEN POTOMAC ST. AND WISCONSIN AVE. - 3299 WATER ST. (PAPER MILL)	G	CLOSED EXCEPT FOR RESIDENTS AND A FEW HOURLY CARS	CLOSE=6PM	NO
9	COLONIAL PARKING #150	NORTH SIDE OF WATER STREET - WEST OF POTOMAC (FLOUR MILL) STATION NO. 150	G	180	7 AM - 8 PM	NO
10	HARBOR PARKING	SOUTH SIDE OF WATER ST., WEST OF WISCONSIN AVE.	S	405	M-THU:7AM-11PM FRI:7AM-1AM SAT: 10AM-1AM SUN: 10AM-11PM	YES, FRIDAY & SATURDAY ONLY
11	DIPLOMAT PARKING	NORTH SIDE OF "K" ST., EAST OF 31ST ST.	G	135 (FROM ALTMAN)	M-FRI: 7AM - 7PM SAT:3PM-3AM SUN: CLOSED	YES, SATURDAY ONLY
12	SYSTEMS PARKING	EAST SIDE OF 31ST ST., BETWEEN "K" ST. AND SOUTH ST.	G	CLOSED FOR BUSINESS	N/A	NO
13	CONSTITUTION PARKING	WEST SIDE OF 31ST ST., BETWEEN "M" ST. AND SOUTH ST.	G	91 (VALET) ATTENDANT	M-TH:7AM- 1AM FR.-SA:8AM-3AM SUN:11-12:30AM	YES
14	COLONIAL PARKING	WEST SIDE OF THOMAS JEFFERSON ST., BETWEEN "M" ST. AND "K" ST. 1050 THOMAS FEFFERSON #153	G	307	M-THU:7AM-7PM FR.-SAT:7AM-12AM SUN: CLOSED	YES, FRIDAY & SATURDAY ONLY
15	JEFFERSON COURT COLONIAL PARKING	NORTH SIDE OF "K" ST. BETWEEN THOMAS JEFFERSON ST. AND 30TH ST. #195	G	291	M-FRI: 7AM - 7PM	NO
16	COLONIAL PARKING	3000 K STREET (SOUTH SIDE) (WASHINGTON HARBOR) STATION NO. 277	G	449 (455 FROM PROPERTY OWNER)	24 HOURS	YES
17	GUGGENHEIM PROD INC.	3121 SOUTH ST.	S/G	28	24 HOURS FOR PERMIT HOLDERS 5:30PM-10:30PM OTHERS	YES
18	DIPLOMAT PARKING	WEST OF 30TH ST., SOUTH OF "M" ST. (FOUNDRY)	G	243 (WITH RESTR. AREA BELOW G2)	24 HOURS	YES
19	CONSTITUTION PARKING	SOUTH SIDE OF "M" ST., BETWEEN THOMAS JEFFERSON ST. AND 30TH ST.	S	38	FRI:8AM-1AM SAT: 9AM-1AM SUN:11AM-9PM	YES, FRIDAY & SATURDAY ONLY
20	DOGGETT'S PARKING	NORTH SIDE OF "M" ST. BETWEEN THOMAS JEFFERSON ST. AND 31ST ST. - (OLD STONE HOUSE)	S	53	M-THU:7AM-1AM FRI-SAT:8AM-3AM SUN: 10AM-12AM	YES
21	DIPLOMAT PARKING	WEST OF 29TH ST., SOUTH OF "M" ST.	G	149	24 HOURS	YES
22	KINNEY SYSTEMS PARKING	EAST OF 29TH ST., SOUTH OF "M" ST. (FOUR SEASONS)	G	50 VALET (NOT PARK) 198 SELF PARK	24 HOURS	YES
23	ALTMAN'S PARKING	ALTMAN'S ANNEX ON SOUTH SIDE OF WATER STREET	S	68	24 HOURS	YES
24	COLONIAL PARKING #469	ADJACENT TO RIGGS BANK ON M STREET AT WISCONSIN AVENUE	S	23	24 HOURS	YES

* G = Garage Parking; S = Surface Lot Parking
Note: All facilities were surveyed from 1:00 PM to 3:00 PM.

TABLE 1

GEORGETOWN OFF-STREET PARKING SUMMARY

Day and Time Period	Total Parking Capacity (Marked Spaces)	Additional 205 Spaces (Stacked Parking)	Total Capacity	Maximum 15 Minute Period Occupancy (Marked Spaces)	Maximum 15 Minute Period Occupancy (Stacked Spaces)	Maximum Reserve Parking (With Stacked Parking)
Thursday Afternoon	3953	205	4158	3485	83	590
Friday Afternoon	3953	205	4158	3495	83	580
Saturday Afternoon	3527	205	3732	2465	41	1226
Thursday Evening	1841	205	2046	1175	0	871
Friday Evening	2755	205	2960	1878	11	1071
Saturday Evening	2890	205	3095	2356	13	726

Zoning Requirements for On-site Parking

The parking requirements associated with the Georgetown Incinerator project were calculated to assure that the proposed parking plan would comply with the District of Columbia zoning regulations. The parking requirements for each component of the development were obtained from the April, 1987 District of Columbia Municipal Regulations: Title 11 Zoning manual. The zoning requirements reported are for developments within the Waterfront (W) district. The parking requirements for each land use are summarized in Table 2.

Table 2
Zoning Parking Requirements

Land Use	Units	Zoning Requirement	Georgetown Incinerator Parking Requirements
Inn	125 rooms	1:2 rooms	63
Retail	30,000 SF	1:750 SF in excess of 3,000 SF	36
Theater	2,200 seats	1:10 seats	220
Condo/Townhouse	45 units	1:3 units	15
Total			**334**

The proposed Georgetown Incinerator development will require 334 total off-street parking spaces in order to be in compliance with the zoning requirements. There are 458 on-site spaces proposed as part of the development plan to accommodate the parking needs of the project. A total of 58 spaces (reserved) will be provided for the residential component and 400 spaces (open to the public) for the retail, inn and theater uses.

The proposed parking supply is 43 spaces above the required supply for residential use and 81 spaces above code for the retail, inn and theater uses based on zoning regulations. A full analysis of the anticipated parking demand for the site was made to estimate the specific parking impacts that will be created by the proposed development.

Georgetown Incinerator Parking Demand

The parking demand characteristics for the proposed Georgetown Incinerator mixed-use development were projected by estimating the demand for each specific land use at different times of the day. For a mixed-use development such as this one, shared parking adjustments may be considered to account for variations in peak demand by time of day and season of the year. Also, there is expected to be a high level of synergy between the Incinerator site and other shopping and dining attractions in the Georgetown neighborhood that are within easy walking distance.

Based on a recent survey taken in Georgetown, approximately 69% of people questioned say they have multiple destinations (i.e. a combined trip for shopping and dining) when they are in the neighborhood. Also, 71% said they would combine a trip to see a movie in Georgetown with another activity. This survey was taken on Friday January 30, 1998, Saturday January 31, 1998, and Monday February 2, 1998 and is attached as an Appendix to the report.

An assumption was made that 25% of visitors will come to the Incinerator site as a secondary trip destination. This value represents a worst-case scenario, as the survey indicates this percentage may be higher in reality. Therefore, these visitors would already be part of the existing parking demand for the Georgetown neighborhood and would not be considered as new trips. This is a reasonable assumption given the multitude of shopping and dining opportunities in the immediate area of the site.

The average site parking demand was estimated on a Friday and Saturday for each hour between 10:00 AM - 12:00 midnight during both July and December for the retail, inn and theater uses. The parking demand that will be created by the residential units is not anticipated to vary significantly by season.

Table 3 summarizes the estimated hourly parking demand for the proposed Georgetown Incinerator project. The residential component was not included since these spaces will be reserved. The parking demand for the retail and inn uses of this development were calculated using the Institute of Transportation Engineers' *Parking Generation* manual, Second Edition and the Urban Land Institute's *The Dimensions of Parking* manual, Third Edition. Data from the files of Gorove/Slade Associates, Inc. were used to estimate the movie theater parking generation quantities.

The theater parking demand was calculated based on attendance and scheduling data that has been compiled from existing theaters locally and across the country. In order to customize the available data to reflect this specific project, adjustments were made to account for the following:

- Theater size: 12 screens and 2,200 seats
- Transportation mode percentages: 64% by automobile, 22% on-foot, bicycle, public transportation and 14% by taxi
- Average number of persons per vehicle: 2.54

The automobile mode choice and auto occupancy rates for the retail and theater components of the project are based on the Georgetown survey as shown in the Appendix to this report.

TABLE 3
SITE PARKING DEMAND
GEORGETOWN INCINERATOR

July Estimates

Time	Friday				Saturday			
	Inn**	Retail	Theater	Total	Inn**	Retail	Theater	Total
10:00 AM	14	60	0	**74**	12	37	0	**49**
11:00 AM	11	76	18	**105**	11	62	23	**96**
12:00 PM	9	85	41	**136**	9	70	51	**131**
01:00 PM	9	87	196	**292**	9	79	244	**332**
02:00 PM	11	85	242	**338**	11	84	301	**396**
03:00 PM	11	83	223	**317**	12	84	278	**374**
04:00 PM	14	76	175	**265**	15	77	241	**333**
05:00 PM	19	69	209	**296**	19	64	345	**427**
06:00 PM	22	71	260	**353**	22	54	439	**515**
07:00 PM	23	78	297	**398**	25	52	374	**450**
08:00 PM	28	76	384	**488**	28	47	398	**472**
09:00 PM	29	53	336	**419**	29	35	348	**413**
10:00 PM	31	28	306	**365**	31	32	317	**380**
11:00 PM	31	11	291	**334**	31	8	301	**341**
12:00 AM	31	0	220	**250**	31	0	216	**247**

December Estimates

Time	Friday				Saturday			
	Inn**	Retail	Theater	Total	Inn**	Retail	Theater	Total
10:00 AM	14	120	0	**133**	12	74	0	**86**
11:00 AM	11	152	3	**166**	11	124	12	**147**
12:00 PM	9	170	7	**186**	9	141	28	**178**
01:00 PM	9	175	33	**217**	9	157	133	**299**
02:00 PM	11	170	41	**222**	11	167	164	**342**
03:00 PM	11	166	38	**214**	12	167	151	**331**
04:00 PM	14	152	47	**213**	15	154	136	**305**
05:00 PM	19	138	99	**256**	19	127	204	**350**
06:00 PM	22	143	136	**300**	22	107	263	**392**
07:00 PM	23	156	187	**366**	25	104	242	**371**
08:00 PM	28	152	263	**443**	28	94	274	**396**
09:00 PM	29	106	231	**366**	29	70	240	**340**
10:00 PM	31	55	210	**296**	31	64	219	**313**
11:00 PM	31	23	200	**253**	31	17	208	**255**
12:00 AM	31	0	115	**145**	31	0	122	**153**

NOTE: Retail and theater parking demand was reduced by 25% to account for patrons already visting Georgetown

Assumes an average of 2.54 people per vehicle

Assumes an automobile mode choice of 64%

** Assumes taxi mode choice of 75%

Implications of a Future Waterfront Park

There is a current proposal for the development of a waterfront park along the Potomac River frontage east of Key Bridge, west of Washington Harbour, and south of "K" Street. The implication of this plan is that an estimated 405 parking spaces will be displaced from the existing Harbour Parking surface lot. For the purpose of analyzing a "worst case" parking scenario, these Harbour Parking spaces were assumed to be displaced, and are therefore not considered in the future parking supply.

Site Parking Impacts: Off-Street Parking Supply vs. Demand

A total of 458 spaces are planned to be provided on-site for the proposed development. The parking spaces have been designated for each use as follows:

- 400 spaces open to the general public for the retail, inn and theater uses
- 58 spaces reserved for residents of the condominium and townhouse units

The 400 space commercial parking facility will have access from "K" Street and will be physically separated from the residential parking facility. Approximately 80 to 90 additional spaces may be created by stacking vehicles in the aisles, bringing the commercial on-site supply to a total of 490 parked vehicles.

The residential parking access for 58 spaces will occur from South Street. An additional 18 spaces may also be created in this facility on a stacked parking basis where some residential units would have 2 end-to-end parking spaces, bringing the total to 76 spaces for residential use. Thus, with stacked parking, the site can accommodate a total of 566 parked vehicles.

The on-site parking capacity of 490 spaces for the retail, inn and movie theater uses will be sufficient to accommodate the site-generated demand during the weekday morning and afternoon hours (duration of the business day) throughout the year. On Friday evenings and Saturdays, a minor shortfall of on-site parking is anticipated to occur on occasion. This potential overflow situation will be the exception, not the rule.

The two peak months of the year for site parking demand will be July, when the movie season is at its highest and December, the biggest retail month of the year. During other months of the year, the on-site parking supply is anticipated to fully accommodate the site at all times of the day.

The off-street parking supply vs. demand characteristics for the neighborhood were analyzed for the months of July and December. Table 4 summarizes the estimated future off-street peak parking conditions including the anticipated demand that will be created by the development of the Georgetown Incinerator.

TABLE 4
PARKING SUPPLY VS. DEMAND
GEORGETOWN INCINERATOR

FRIDAY AFTERNOON PEAK			
FACILITY DESCRIPTION	PARKING SPACES SUPPLY	DEMAND	RESERVE
PUBLIC, OFF-STREET (MARKED)	3548	3495	53
PUBLIC, OFF-STREET (STACKED)	205	83	122
INCINERATOR (TOTAL PUBLIC SPACES ON-SITE)	490	338	152
TOTAL	4243	3916	327

*FRIDAY EVENING PEAK			
FACILITY DESCRIPTION	PARKING SPACES SUPPLY	DEMAND	RESERVE
PUBLIC, OFF-STREET (MARKED)	2350	1878	472
PUBLIC, OFF-STREET (STACKED)	205	11	194
INCINERATOR (TOTAL PUBLIC SPACES ON-SITE)	490	488	2
TOTAL	3045	2377	668

SATURDAY AFTERNOON PEAK			
FACILITY DESCRIPTION	PARKING SPACES SUPPLY	DEMAND	RESERVE
PUBLIC, OFF-STREET (MARKED)	3122	2465	657
PUBLIC, OFF-STREET (STACKED)	205	41	164
INCINERATOR (TOTAL PUBLIC SPACES ON-SITE)	490	396	94
TOTAL	3817	2902	915

*SATURDAY EVENING PEAK			
FACILITY DESCRIPTION	PARKING SPACES SUPPLY	DEMAND	RESERVE
PUBLIC, OFF-STREET (MARKED)	2485	2356	129
PUBLIC, OFF-STREET (STACKED)	205	13	192
INCINERATOR (TOTAL PUBLIC SPACES ON-SITE)	490	515	-25
TOTAL	3180	2884	296

**1200 spaces are closed during the Friday and Saturday evening time periods*
NOTE: Assumes that Harbour Parking (405 spaces) will be displaced in future by Waterfront Park

Based on the projections in Table 4, the parking demand peaks are expected to occur during the month of July, when the movie season is at its highest level. The Georgetown Incinerator site is expected to generate a peak parking demand of 488 vehicles during the Friday evening peak, 396 vehicles during the Saturday afternoon peak, and 515 vehicles during the Saturday evening peak. The 490 on-site parking capacity will be sufficient during all of these peak periods except for Saturday evening, when there may be a potential shortfall of 25 parking spaces. During other times of the year, the parking demand is anticipated to be less, and the site will be self-sufficient in meeting its parking demand needs.

In the month of December, the peak demand is given as 443 vehicles on Friday evening. Therefore, the site should be able to accommodate the parking demand throughout this month, and every other month of the year except for July.

Of note, Table 4 considers a "worst-case" scenario for the following reasons:

- The 405 spaces from Harbour Parking were assumed to be removed in the future.

- The existing parking demand figures were taken from an October survey, a time when demand throughout the neighborhood is relatively high as compared with other times of the year.

- The month of July was used in calculating the parking demand for the Georgetown Incinerator, a peak month for the theater season. The October parking demand for the site is expected to be less than during July. There will generally be more parking available in the neighborhood during the summer months when the site peaks due to the fact that July is also a popular vacation month.

The following conclusions regarding the impact of the Georgetown Incinerator site on parking in the neighborhood may be drawn from Table 4:

- The 490 parking spaces that will be open to the public on the Incinerator site will have a positive impact on parking in the neighborhood during weekday mornings and afternoons. Based on projected demand, the site demand will be greatest during the weekend evening hours. During weekdays, 200 to 400 spaces (those not required to accommodate site demand) at the Incinerator will be available for public use. This is critical especially during weekday afternoons, when the off-street parking spaces in the area are nearly at full occupancy.

- The parking supply for the Incinerator development is expected to be able to accommodate the on-site parking demand throughout the year except for certain Saturday evenings during the month of July, when the movie season is at its peak. This minor spillover of parking, which may be approximately 25 vehicles, can be easily absorbed by currently open adjacent off-site parking facilities.

- There are currently 1,200 off-site parking spaces in the neighborhood (not including Harbour Parking) that are closed during the Friday and Saturday evening time periods.

Traffic Impact Analysis

A Traffic Impact Analysis was prepared to determine the impacts that the proposed Georgetown Incinerator development will have on intersections within the immediate site vicinity. These impacts were measured using a critical lane analysis in order to determine the level of service (LOS) of each intersection within the defined study area. Levels of service range from "A" (best) to "F" (worst). A level of service "D" is generally used as the minimum acceptable LOS. The following intersections were analyzed as part of this study:

- Wisconsin Avenue/"K" Street, N.W.
- 31st Street/"K" Street, N.W.

Existing Traffic Conditions

Existing traffic counts were conducted on Thursday February 5, 1998 and Friday February 6, 1998 from 5:30 PM-6:00 PM and 8:00 AM-8:30 AM respectively. Based on these counts, the weekday AM and PM peak hour traffic volumes were estimated. The Harbour Parking lot at Wisconsin Avenue and "K" Street was not included in the counts since it is assumed will be displaced in the future by the waterfront park.

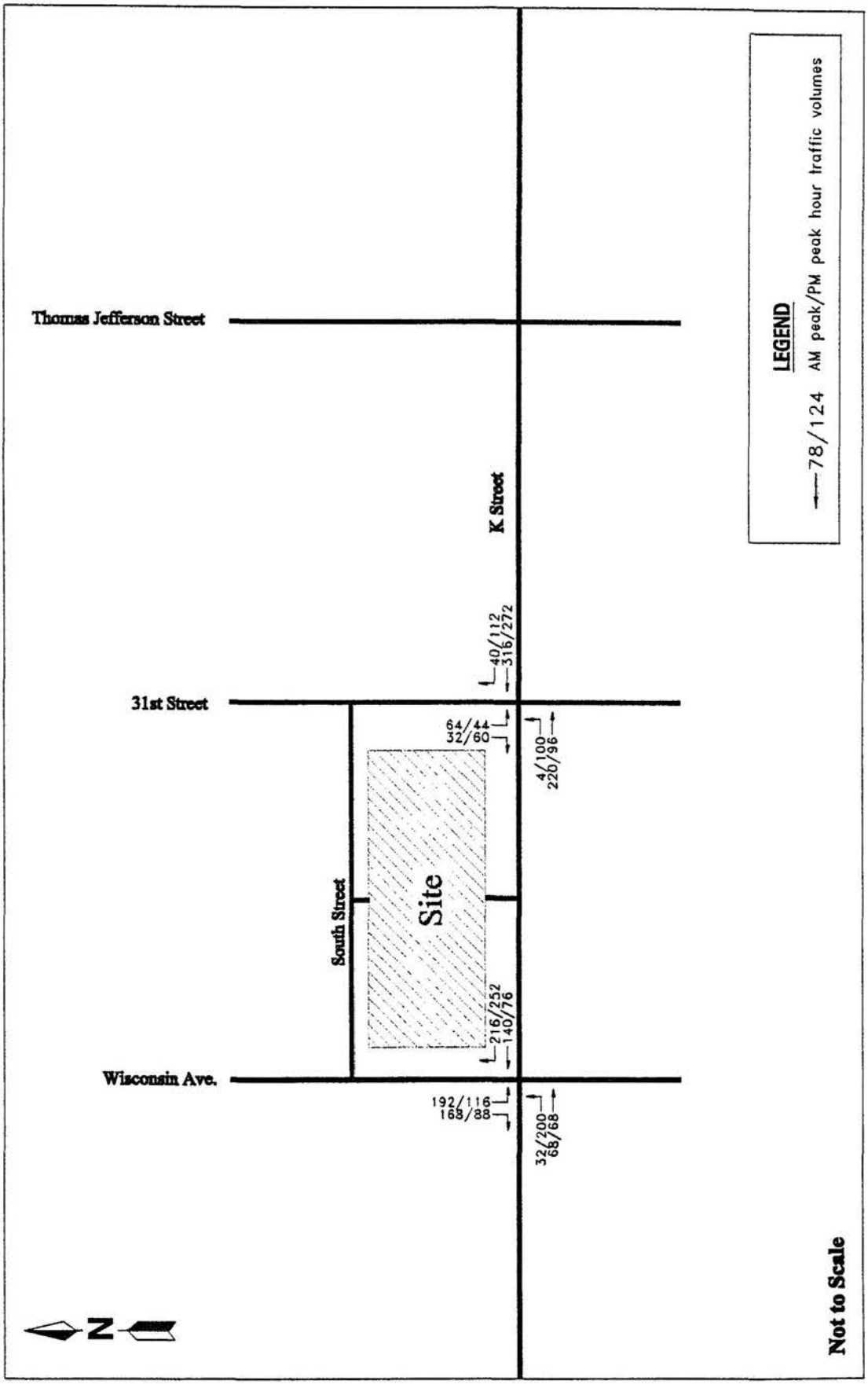
The volumes were taken at a time when "M" Street, the Whitehurst Freeway and "K" Street were under construction. However, the construction does not have as great an impact on the intersections of the study area since the work is occurring to the east of the site along "K" Street. The analysis was made to determine the general traffic operational levels in the neighborhood. The existing traffic volumes are shown in Figure 1.

Intersection capacity analyses were performed for the AM and PM peak hours by calculating the critical lane volume (CLV) of the intersections within the study area. The CLV and corresponding LOS are summarized in Table 5 below. The calculations performed for this analysis are included in the appendix to this report.

Table 5
Existing Critical Lane Analysis

	AM Peak Hour		PM Peak Hour	
	LOS	CLV	LOS	CLV
Wisconsin Avenue/"K" Street	A	816	A	800
31st Street/"K" Street	A	676	A	684

Table 5 indicates that both intersections within the study area currently operate at a LOS "A" during the AM and PM peak hours. Level of Service "A" is the best operational traffic category possible.



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Figure 1
Existing Volumes

Future Traffic Conditions

The site traffic associated with the proposed Georgetown Incinerator development was projected for each specific use outlined in the development plan. The trips generated by the retail, hotel and residential uses were generated using the Institute of Transportation Engineers (ITE), *Trip Generation Manual, 6th Edition*. The trips generated by the movie theater were projected based on previous studies conducted by Gorove/Slade Associates, Inc. These trips are summarized in Table 6.

The traffic volumes projected using the ITE *Trip Generation Manual* are based on research conducted on similar existing facilities. The trip generation characteristics described in the ITE manual are not identical in character to the trip generation for a unique neighborhood such as Georgetown. The traffic volumes projected for the retail portion of this development were calculated using "shopping center" data. The "shopping centers" described in the ITE manual differ from the retail development proposed for this project in the following ways:

- The proposed retail development will be located in an urban location. "Shopping Centers" described in the ITE manual are generally located in suburban locations. Therefore, a higher percentage of people must drive to suburban centers, while the urban setting of the subject property allows people to more readily walk or take public transportation to the site.

- The proposed retail development may consist of two to four quasi-major department stores and restaurants. Shopping centers generally consist of many smaller apparel type stores and other non-merchandising facilities (i.e. banks, health clubs, movie theaters, and post offices) in addition to the major department stores.

- "Shopping Centers" are generally not located in such close proximity to as many other entertainment destinations and shopping facilities as is the case in Georgetown.

Based on these differences, the traffic volumes projected using "shopping center" rates are expected to be higher than the actual traffic volumes generated by the proposed retail component of the site. No numerical adjustment was made for this factor, therefore, it may be considered as the "worst-case" scenario.

Table 6
Trip Generation
Georgetown Incinerator

				July					
			Land Use Code		AM Peak			PM Peak	
				In	Out	Total	In	Out	Total
Inn	125	rooms	310	33	21	54	32	28	60
Retail	80,000	sq. feet	820	67	43	109	203	220	423
Theater	2200	seats	N/A	0	0	0	198	203	401
Condo/Townhouse	37	units	230	4	19	23	18	9	27
Total				**103**	**83**	**186**	**451**	**460**	**910**

				December					
			Land Use Code		AM Peak			PM Peak	
				In	Out	Total	In	Out	Total
Inn	125	rooms	310	33	21	54	32	28	60
Retail	80,000	sq. feet	820	67	43	109	254	275	529
Theater	2200	seats	N/A	0	0	0	136	102	238
Condo/Townhouse	37	units	230	4	19	23	18	9	27
Total				**103**	**83**	**186**	**439**	**414**	**853**

The peak hour traffic volumes for the retail and theater uses were reduced in order to account for the following:

- Some visitors will walk or arrive by means other than automobile.
- Some visitors will park in other off-site facilities in the area. These trips were not considered since they will not impact the intersections within the defined study area.
- Some visitors will not make a special trip to Georgetown to go to the proposed development as their primary destination. An assumption was made that 25% of visitors to the Incinerator site would already be in Georgetown for other purposes, and would be attracted to the site as a secondary trip combined with other reasons for being in the neighborhood.
- Based on a recent Georgetown survey, 69% of people questioned say they have multiple destinations (i.e. a combined trip for shopping and dining) when they are in the neighborhood. Also, 71% said they would combine a trip to see a movie in Georgetown with another activity. Therefore, the 25% value for secondary trips to the site assumed above represents a worst-case scenario, as the survey indicates this percentage may be higher in reality.

The directional distribution for traffic approaching and leaving the site was based on a previous study prepared for the old Rosewood Hotel site (now Harborside) on "K" Street within the vicinity. This directional distribution is illustrated in Figure 2.

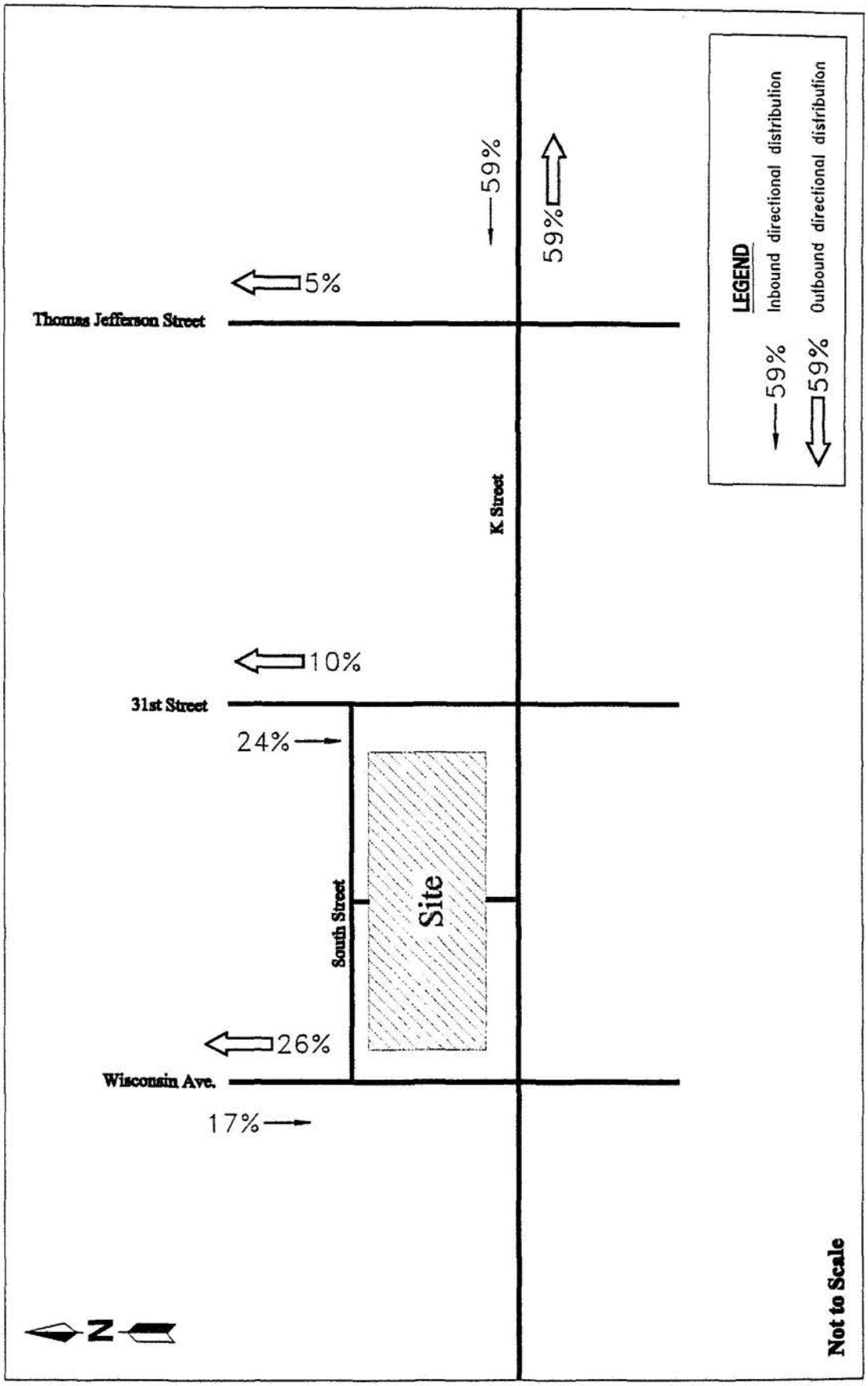
Based on this distribution, the site volumes were assigned throughout the roadway network. The trips generated by the residential development were assigned to the site driveway located on South Street. The site volumes generated by the inn, retail and theater developments were assigned to the site driveway located on "K" Street. This site entrance will be stop-controlled. These site volumes are in Figure 3.

The site trips from Figure 3 were added to the existing volumes shown in Figure 1 in order to project future volumes after the completion of the development. These future volumes were used to perform a future critical lane analysis. The results of this analysis are summarized in Table 6. The calculations for this analysis are included in the appendix to this report.

Table 6
Future Critical Lane Analysis

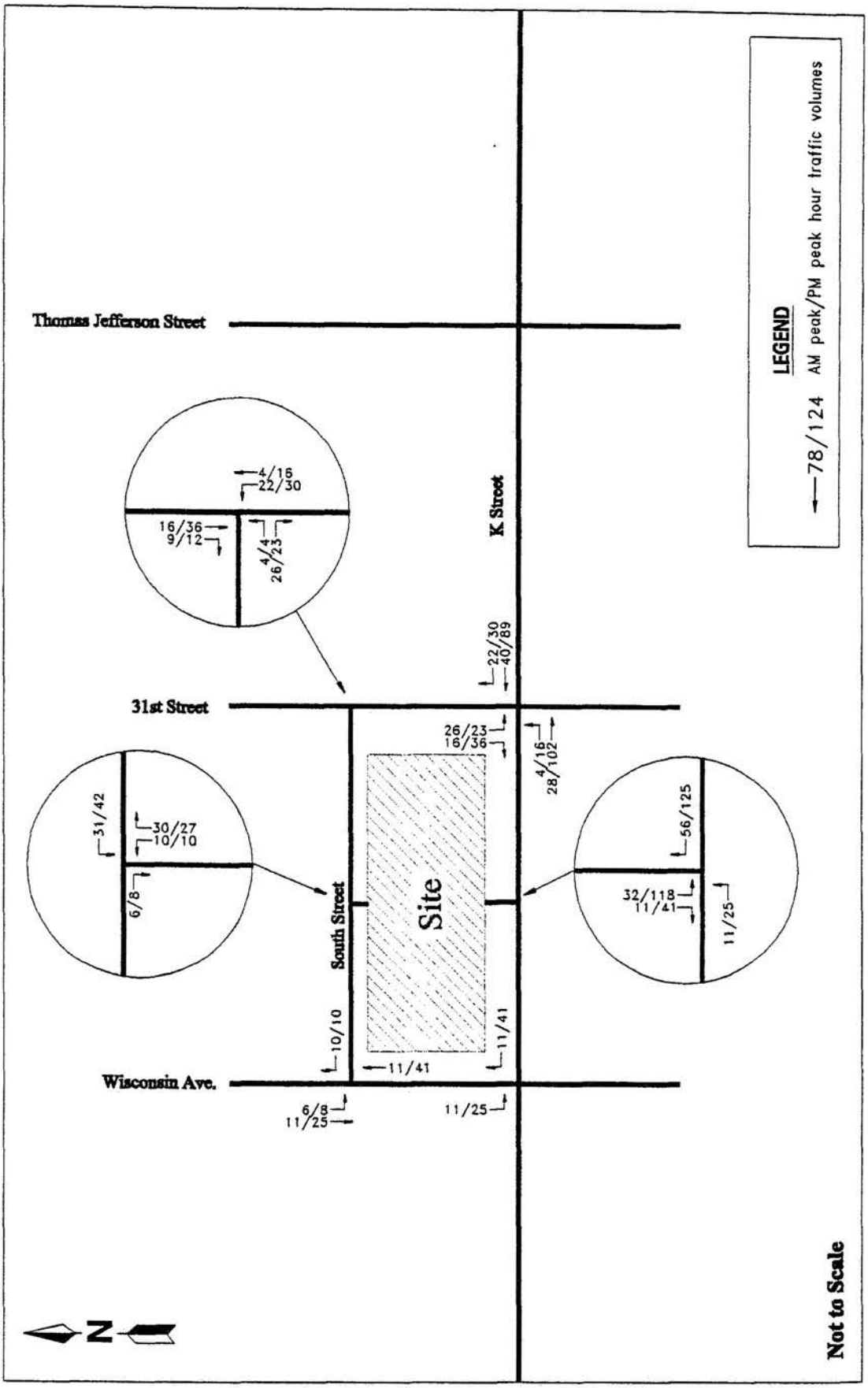
	AM Peak Hour		PM Peak Hour	
	LOS	CLV	LOS	CLV
Wisconsin Avenue/"K" Street	A	838	A	866
31st Street/"K" Street	A	812	A	980

As Table 6 indicates, the intersections within the study area are projected to operate at a LOS "A" during both the AM and PM peak hours in the future after the development of the site. The results of this traffic analysis indicate that the development of the proposed Georgetown Incinerator project will not have an adverse impact on the surrounding street system.



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Figure 2
Directional Distribution



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Figure 3
Site Trips (July)

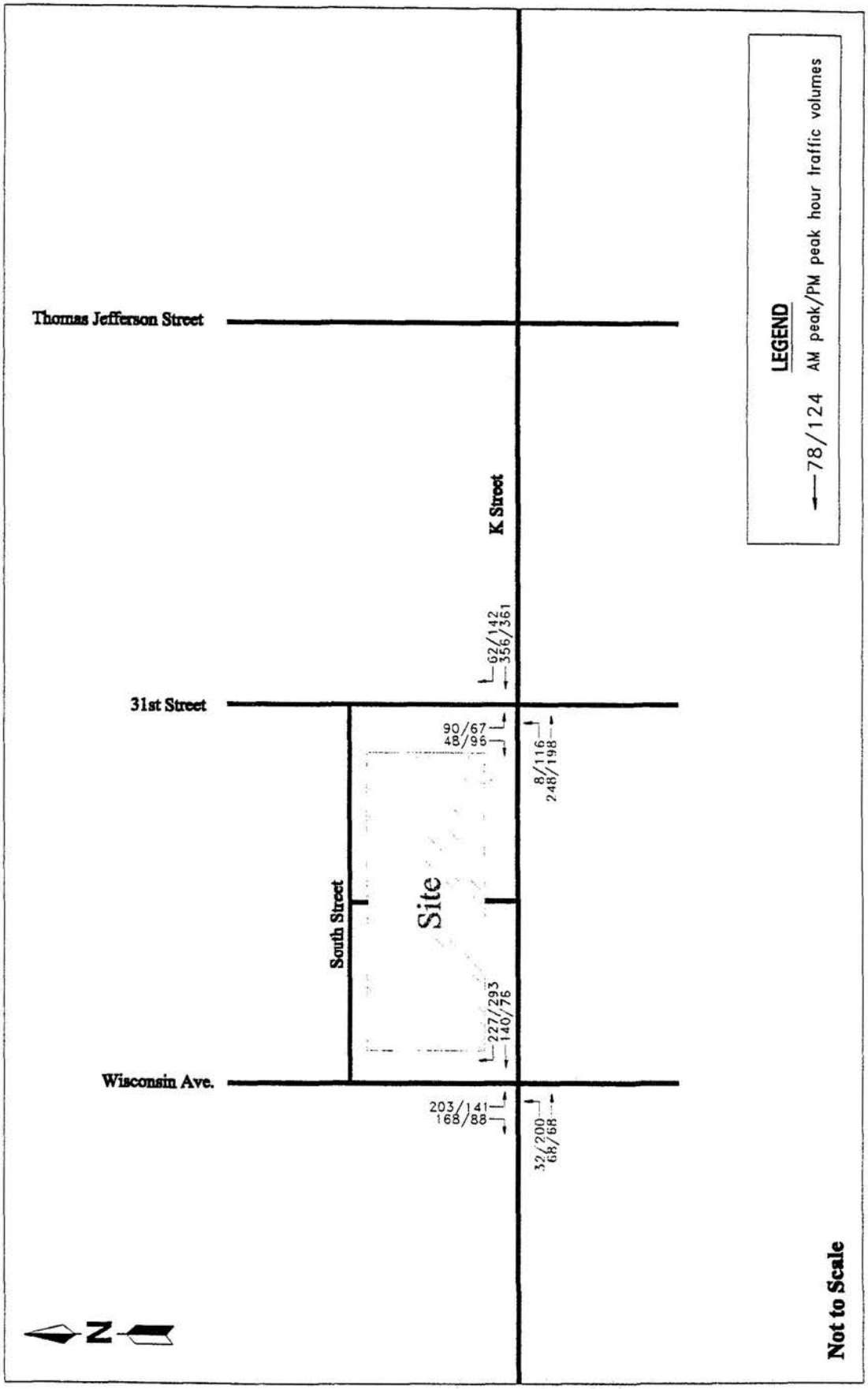


Figure 4
Total Future Traffic Volumes

Summary of Findings and Conclusions

1. The number of available off-street parking spaces in Georgetown varies over the course of a day from the afternoon to the evening, as some facilities close during the early evening hours at the conclusion of the (9 a.m. to 5 p.m.) business day. There are approximately 1,200 more spaces open to the public on the Friday afternoons than on Friday and Saturday evenings. This is due to the fact that the weekday afternoon time period is generally when the off-street parking demand is at its peak. As the demand dwindles in the evening, more facilities close for the day.

2. Currently, there are about 600 available off-street parking spaces out of a total supply of over 4,150 spaces during peak times on weekday afternoons. This figure includes the use of approximately 200 parking spaces that are routinely created by parking facility operators who stack additional vehicles into non-marked parking spaces.

3. A total of 458 spaces will be provided on-site at the Incinerator. The retail, movie theater and hotel uses will have 400 spaces that will be open to the public, and the condominium and townhouse units will have a total of 58 reserved parking spaces. District zoning regulations require a total of 334 on-site spaces for the entire project. Therefore, a surplus of 43 spaces above code will be provided for the residential use and 81 more than required for the retail, inn and theater uses.

4. The on-site parking supply will be 400 spaces for the retail, movie theater and inn uses. An additional 90 spaces may be created within this facility by stacking vehicles in the aisles, a common practice used to increase parking capacity. Therefore, the effective on-site parking supply open to the public is 490 spaces.

5. The residential parking access for 58 spaces will occur from South Street. An additional 18 spaces may also be created in this facility on a stacked parking basis where some residential units would have 2 end-to-end parking spaces, bringing the total to 76 spaces for residential use. Thus, with stacked parking, the site can accommodate a total of 566 parked vehicles.

6. The 490 parking spaces that will be open to the public on the Incinerator site will have a positive impact on parking in the neighborhood during weekday mornings and afternoons. Based on projected demand, the site demand will be greatest during the weekend evening hours. During the week, 200 to 400 spaces (those not required to accommodate site demand) at the Incinerator will be available for public use. This is critical especially during weekday afternoons, when the off-street parking spaces are nearly at full occupancy.

7. Based on a recent Georgetown survey, 69% of people questioned say they have multiple destinations (i.e. a combined trip for shopping and dining) when they are in the neighborhood. Also, 71% said they would combine a trip to see a movie in Georgetown with another activity. Therefore, the 25% value for secondary trips to the site assumed in conclusion number 5 represents a worst-case scenario, as the survey indicates this percentage may be higher in reality.

8. There is expected to be a high level of synergy between the Incinerator site and other shopping and dining attractions in the Georgetown neighborhood that are within easy walking distance. At least 25% of visitors are anticipated to come to the site as their secondary purpose for being in the neighborhood. This is reasonable given the multitude of shopping and dinning opportunities in the immediate area. The urban setting of the Incinerator will also allow a significant percentage of patrons to walk, bicycle or take public transportation to the site.

9. The on-site parking supply will be sufficient to accommodate the site-generated demand throughout the year except for a few Saturday evenings during the month of July, when a minor shortfall of about 25 vehicles may occur. The month of July is the peak movie season of the year. This infrequent parking overflow situation may easily be absorbed by adjacent off-site facilities within the area.

10. Based on the assumptions, the Georgetown Incinerator site is anticipated to generate a peak parking demand of 488 vehicles during the Friday evening peak, 396 vehicles during the Saturday afternoon peak, and 515 vehicles during the Saturday evening peak. These peak demands will occur during the month of July.

11. There are currently 1,200 off-site parking spaces in the neighborhood that are closed during the weekend evenings. This value does not include the 405 parking spaces in the Harbour Parking lot.

12. There is a current proposal for the development of a waterfront park along the Potomac River frontage east of Key Bridge, west of Washington Harbour, and south of "K" Street. The implication of this plan is that an estimated 405 parking spaces will be displaced from the existing Harbour Parking surface lot.

13. The intersections within the study area at "K" Street with Wisconsin Avenue and "K" Street with 31st Street currently operate at a Level of Service "A" during the AM and PM peak hours. Level of Service "A" is the best operational traffic category possible.

14. The intersections within the study area are projected to operate at a Level of Service "A" during both the AM and PM peak hours in the future after the development of the site. The analysis assumes that the Harbour Parking lot of 405 spaces will be displaced by the waterfront park in the future. The results of this traffic analysis indicate that the development of the proposed Georgetown Incinerator project will not have an adverse impact on the surrounding street system.