

**BEFORE THE
BOARD OF ZONING ADJUSTMENT
FOR THE DISTRICT OF COLUMBIA**

**BZA Application 19020
Application of Jemals' Bulldog, LLC, 1011 K St NW
Hearing date: June 23, 2015**

**Testimony of
John A. Boardman, Executive Secretary-Treasurer
UNITE HERE Local 25
901 K St NW, Suite 200
Washington, DC 20001**

My name is John Boardman I am Executive Secretary-Treasurer of UNITE HERE Local 25 a union of over 6,500 hotel workers in the D C metropolitan area working to create middle class jobs within the hotel industry in the District of Columbia I have over 35 years experience in the hotel industry Local 25 has been on the corner of 10th & K Streets for more than 40 years and a part of our nation's capital since 1938

We are the owners of our office space one block away from the proposed hotel development The applicant's proposal to provide no parking at all represents a serious conflict with our work as an organization of hotel workers Furthermore, based on our experience in the hotel industry, we believe this proposal to build a new hotel near the convention center, without providing parking, would significantly impair the intent and purpose of the zoning regulations to ensure adequate parking for residents and visitors Therefore, we ask that you deny the applicant's request for a variance of the requirement to provide 64 off-street parking spaces

The proposal would cause a detriment to the public good

I want to discuss how this proposal impacts Local 25 and its membership. Our union office houses several functions which frequently require our members to visit us for hours at a time

First, our staff is dedicated to representing the interests of our membership On a daily basis, we have hotel workers visiting the office for help on issues ranging from seeking assistance for a workplace issue to filing for a pension

Second, we are a democratic organization The major decisions we make are approved at our Executive Board and full membership at meetings These meetings occur on a regular basis, and involve the attendance of up to 300 members

Third, our staff provides training to our rank-and-file leaders and membership on a regular basis. Training sessions often see up to 300 of our rank-and-file leaders and members coming to the office for a half-day or full-day sessions.

Fourth, our members also frequently take action to help fellow hotel workers or others in the city to promote progressive social change in the District. Our office serves as a hub for members to gather and prepare for those actions.

Fifth, our contract negotiations are held using an “open session” format. This allows any member to attend the bargaining who wishes to attend. On average, those sessions draw 200-300 workers. Bargaining takes an enormous amount of time. Our last major set of negotiations involved more than 60 sessions or related meetings.

In all of these cases, it is very important to who we are and what we do that our members can easily access our office and participate in the life of the union. Even though our contract makes it possible for our members to support their families by working hard at one job, our members are not necessarily in a position to splurge on garage parking. Many of our members do not have cars, but many of them do come from less accessible parts of the city, and for many of them, driving is the most efficient way for them to get to our office and still be able to manage their daily tasks.

Already, it is often difficult for our members to find street parking when they visit their union. The problem is particularly acute during conventions or peak tourism periods. As the area around the convention center continues to develop, the situation is only going to get worse. What we do not need is another influx of hotel guests scrounging the neighborhood for street parking—which we know they already do when forced to search for a garage to park in.

The proposal would impair the intent and purpose of the zoning regulations

Furthermore, based on our experience in the hospitality industry, we believe the applicant’s proposal to develop a hotel without parking would significantly impair the intent and purpose of the zoning regulations.

The main problem with this proposal is that the neighborhood already faces periods of severe congestion and parking shortages based on the volume of tourist and convention traffic. It is worth pointing out that the applicant’s traffic study happened to avoid one of these periods.

The convention center area is already dense with hotel uses. If this were an office or residential project, the demand for parking would be roughly constant and predictable. However, as with any hotel near the convention center, this project would have the highest impact during conventions.

and during peak tourist season. Because it will add another hotel to an area which is already very dense with hotels, it will create the highest unmet demand for parking in our neighborhood at the worst possible times.

There is not much reason to believe that this hotel will require substantially fewer parking spaces than other hotels near the convention center. As the applicant argues, it is possible the hotel's small rooms may discourage some families from staying, on the other hand, the lower prices may have the opposite effect, especially for small families. In any case, it is unlikely the effect will be substantial either way. People will still drive to the District and to this hotel.

The zoning regulations provide some guidance on how the need to provide parking should vary in different situations. For example, in a C-3-C zone such as the one in which the proposed hotel lies, only one parking space is required for every four hotel rooms. That is not an excessive requirement—it assumes that less than a quarter of guests will be driving (because some employees drive). In fact, the applicant's traffic study estimated a mode split of 25% auto usage for hotel guests. We do not dispute this estimate.

The applicant has argued that the site's proximity to Metrorail stations should obviate the hotel's need to provide parking. However, it is extremely common for C-3-C zones to be located within walking distance to Metro. The zoning code does not contemplate that guests will refrain from driving to a hotel near the Metro. In fact, section 2104.1 of the zoning regulations specifically addresses this situation and provides for only a 25% reduction in the number of required parking spaces for projects very close to a Metro station. Furthermore, the exemption does not even apply to this project because the closest Metro station (McPherson Square) is roughly 1,500 feet away from the site—nearly twice the distance required for the exemption. At most, the relief granted to this project should not exceed the 25% relief granted to projects located extremely close to a Metro station.

Finally, I find it inappropriate for the applicant to request relief from the requirements for parking and for a rear yard at the same time. One of the requirements for being granted relief from the rear yard requirements is that the building plan provides adequate space for off-street functions including parking. As proposed, this project does not provide adequate space for parking. Even if the applicant were to demonstrate that the lack of parking provided would not be detrimental to the public interest—which we don't think they do—they would still fail to meet the plain-language standard that the project must provide adequate space for off-street functions, including parking.

In short, we are concerned that this project will undermine our work as an organization of hotel workers, thousands of whom live and work in the District. Our members need to be able to visit our office on a regular basis and they depend on consistently available street parking for that to

happen. Unfortunately, such parking can be impossible to come by during the frequent and sometimes unpredictable boom periods for the hotels nearby. This project threatens to exacerbate this situation. Further, this project would impair the purpose of the zoning regulations regarding parking, which is to ensure adequate access to parking for residents and visitors to the neighborhood. Therefore, we urge you to reject the applicant's proposal to construct this hotel without providing parking in our neighborhood.

Thank you for very much for taking these issues into account.

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