UNITE HERE Local 25

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July 24, 2015

VIA IZIS AND EMAIL

Board of Zoning Adjustment of the District of Columbia
441 4th Street NW
Suite 200S
Washington, DC 20001

Re: BZA Application 19020
Jemal's Bulldog, LLC

Response to Applicant's Transportation Demand Management Plan

Introduction

This memorandum responds to the applicant's revised Transportation Demand Management (TDM) plan submitted on July 21, 2015 in response to comments from the Board of Zoning Adjustment (BZA) at the June 23, 2015 BZA hearing. The Board had asked the applicant for more specific and substantial measures which could serve to mitigate the negative impacts that would result from the applicant building zero parking spaces at the hotel project site.

We find that the applicant has submitted substantially the same TDM plan as before, with only one minor improvement. As before, the TDM fails to address our concerns with the proposed lack of parking at the site. Moreover, it fails to significantly address the effect of the project on the neighborhood with respect to the purposes of the zoning regulations concerning parking.

This memorandum considers the various elements of the proffered TDM plan, and discusses their potential effectiveness in reducing the need for parking at the site.

Transportation management plan analysis

1. ***Transportation demand coordinator***

   The applicant is likely correct in stating that, in order for a TDM plan to succeed in reducing the mode share of private automobiles by guests and employees, a full-time dedicated staff member would be required. However, a staff member can only be successful if he or she is responsible for coordinating a program which includes meaningful incentives. Thus, a transportation demand coordinator, in and of itself, is a necessary, but insufficient condition of a successful program. The applicant's proffered TDM plan does not include adequate incentives to have a significant effect on transportation mode share or the demand for parking at the site.

2. ***On-site services***

   The applicant proposes to provide transit information to users of the site with a TransitScreen and printed materials. This is a useful amenity for guests. However, it is unlikely to increase non-auto mode share, and highly unlikely to reduce the need for parking at the site.

   During their stay, guests may be marginally more likely to opt for transit if information is freely available. However, guests and restaurant patrons will have already arrived at the site—and therefore already decided on their transportation mode—before ever encountering the TransitScreen. Moreover, employees tend to have one or more fixed routes to work, so the provision of information is not sufficient to change their mode; for that, incentives are required. Therefore, the need for parking is unlikely to be affected by this provision.

3. ***Marketing program***

   The applicant proposes to inform potential guests on their website that parking will not be available, and proposes to include information about parking in their guest email confirmations.

   The applicant failed to include any evidence that this kind of marketing can be successful in reducing the number of guests who drive to the site. We do not have empirical evidence on this question, but intuitively, it seems unlikely. First, many guests and patrons will never encounter the website at all. Many restaurant patrons use business rating review websites and online map applications to research and find restaurants. Similarly, a significant number of guests may book their hotel room through an online travel agency (OTA), which may not allow the operating company to market the parking issue in a prominent way, if at all. Roughly half of online bookings take place through OTAs.

More importantly, it seems highly questionable that many guests would change their minds about their means of travel based upon a notice on a website. Most guests have already decided their mode of arriving in Washington, D.C. before booking their hotel, and it seems unlikely that they would decide not to stay at the hotel simply because of the warning.

The TDM marketing plan also includes a designated staff member who greets incoming guests at the front door of the hotel. It is unclear how hiring a doorman is part of a marketing plan, how it provides any additional service to what is typically provided at hotels, or how it would serve to reduce automobile mode-share or relieve parking concerns.

4. ***Transportation incentives***

The applicant proposes to provide Capital Bikeshare passes to guests. This is a nice amenity for guests. However, because only guests already in the course of their stay will have access to bicycles, guests will be unable to initially arrive at the site using the pass. In any case, virtually no guests travel to downtown hotels via bicycle. Therefore, the Bikeshare passes would have no effect on transportation mode-share for guests and patrons arriving at the site, and therefore it would have no effect on parking.

5. ***Bicycle amenities***

The applicant proposes to provide secure on-site bicycle parking.

We represent hotel workers in the District of Columbia, and in the course of our organizing, our staff develops relationships with thousands of hotel employees. Among our staff, we had a difficult time thinking of anyone out of these thousands of employees who rides a bicycle to work. We doubt that a lack of bike parking is the reason for this, or even a major contributor. It may be possible to incentivize some employees to bike to work; however, we can state with confidence that bike parking will not be sufficient.

6. ***Ride-matching program***

The applicant proposes to provide employees with information on carpooling.

In our experience, employees who would be interested in carpooling already know how to find this information.

7. Hotel employee incentives

The applicant proposes to offer a $50/month subsidy as a non-auto incentive to employees for five (5) years, which they can use towards transit fare, a bike share membership, or a car share membership.

The proposed subsidy is the only substantive change the applicant has made to their proposed TDM. However, this measure has several significant shortcomings, including, but not limited to the following:

a. The benefit expires in five (5) years; however, the impact of the hotel will last throughout the entire life of the hotel.
b. The subsidy is probably too small to have any effect. It is less than half of what would be required to cover a full-time employee's monthly Metrorail fares. By comparison, the Federal transit benefit is currently $130.
c. Hotel employees who drive often do so because they live in areas that are not transit accessible. Transit-accessible locations can be highly expensive, and may be unaffordable for many hotel workers. Therefore, most driving employees are unlikely to change their commuting behavior through small monetary incentives.
d. Hotel employees will probably not bike to the site with a bikeshare membership, and car share is not a viable commuting option.
e. Most importantly, the incentive does not provide any parking subsidy, which means that employees who drive will almost certainly seek to use street parking.

For these reasons, the incentive is unlikely to cause a meaningful change in the transportation mode-share of employees, or reduce the parking demand created by the hotel.

Letters from parking garage operators

The applicant has attached two letters from operators of parking garages in the District, one from U Street Parking, Inc. and one from Colonial Parking.

The letter from Colonial Parking states that they will be able to accommodate hotel guest parking at their garage at 1100 L Street NW. Colonial does not provide any sort of binding guarantee, nor does it state that the applicant has reserved spaces at the garage.

The letter from U Street Parking says nothing other than the fact that the company is interested in a business relationship with the hotel.

Together, these letters provide no assurance that there will be adequate parking nearby to prevent garages from becoming full at peak demand times.

Proposed alternative

We support the goals of transportation demand management, but the applicant has not proposed measures which will significantly incentivize employees, guests, or patrons to change their mode share.

Therefore, we propose that the applicant construct the 65 required spaces through the use of an automated parking system. Even though automated parking systems have now become commonplace (and are, in fact, now utilized in D.C.), the applicant failed to account for the possibility of using automated parking at the site. Rather, the applicant argued that the narrowness of the site would require an inefficiently significant portion of the garage to be taken up by ramps. It is unclear why the applicant did not consider all major possibilities in how to meet the zoning requirements.

Automated parking systems do not require ramps and, even on typical sites, they are just as cost-effective as ramp parking because they require roughly half the volume to be excavated (which roughly offsets the costs of the parking machinery).

Because automated parking does not require ramps, the site of the proposed project is just as efficient as any other site. Therefore, there is no exceptional situation at the site which presents a practical difficulty to the developer in meeting the zoning requirements governing parking.

We have received testimony from parking experts which demonstrates how automated parking could work at the site, and which shows that it would be feasible to provide parking at the site. The applicant could construct the required spaces through five, 8-foot high levels. According to the sketch, 13 spaces could be provided per level. The testimony, which we have submitted to the BZA, provides additional information on parking at the site.

We have provided a sketch below (from the expert study) depicting the possible functional layout of automated parking at the site.

Conclusion

The applicant's TDM plan does not significantly address the intents and purposes of parking requirements in the zoning regulations. The plan, if implemented, would have little effect on transportation mode share at the hotel and restaurant in general, and virtually no effect on parking demand in particular.

We have provided information to the applicant and the Board, which should be helpful to the applicant in developing the necessary number of parking spaces at the site.

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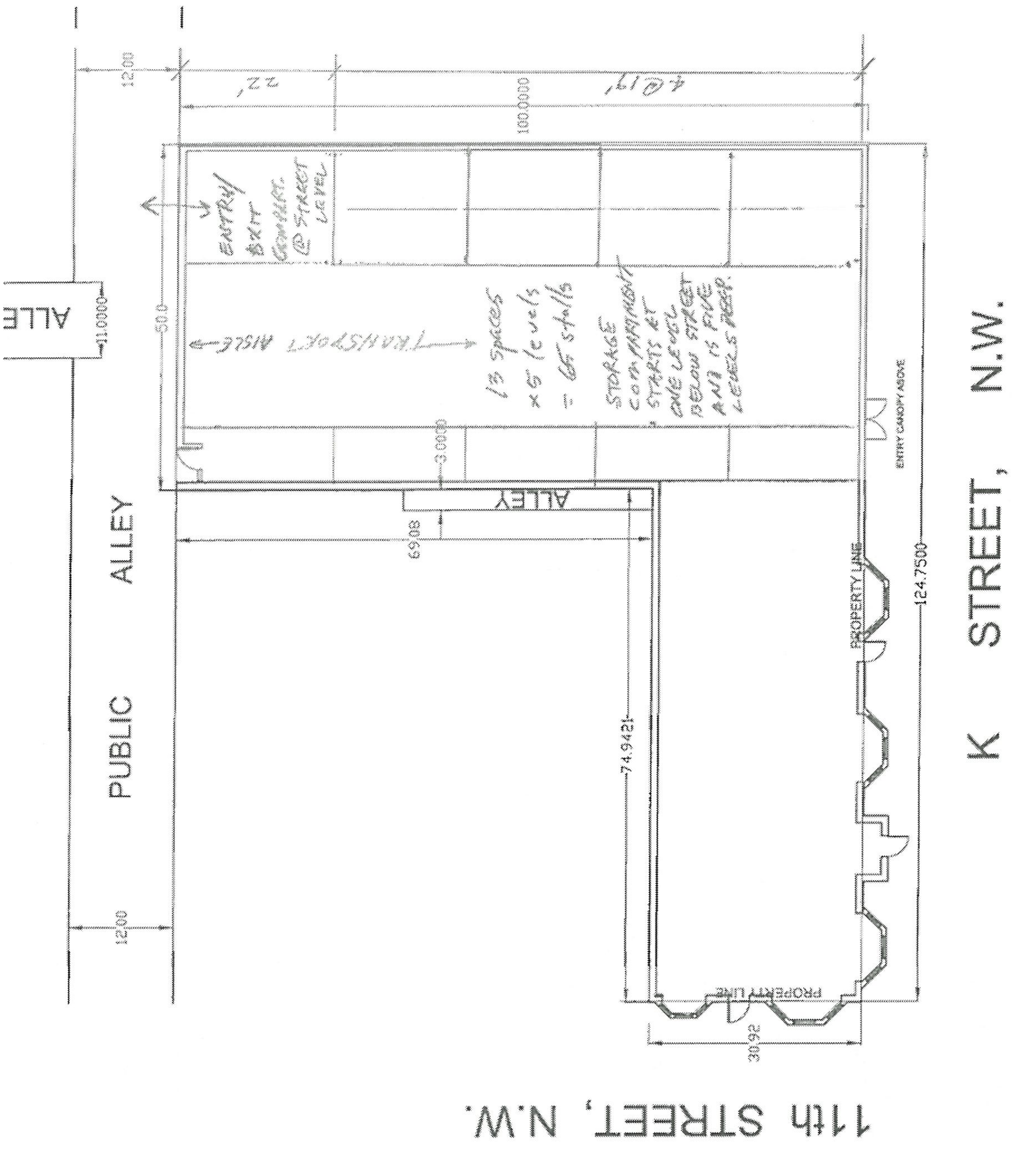

Layout Sketch provided by Don R. Monahan, Walker Parking Consultants, July 2015

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