TESTIMONY OF JOE MEHRA, P.E. PTOE, IN OPPOSITION TO THE 923-925 5th Street NW, Hotel, BZA Case No. 19722. (April 4, 2018)

My name is Joe Mehra. I am the President of MCV Associates, Inc. My office address is 4605 Pinecrest Office Park Dr, Alexandria, VA 22312.

I have reviewed the Comprehensive Transportation Review (CTR) study prepared by Gorove/Slade, dated March 1, 2018 and the DDOT Report dated March 14, 2018. Based on my review, I conclude that the Gorove/Slade CTR is incomplete and does not meet the CTR Guidelines. Further, the Loading Dock access would not function based on the data and information provided by Gorove/Slade in their report. The proposed use is a 153 room hotel with a 120 seat restaurant/bar. The site is located in the D-4-R and is not required to provide vehicle parking. The Applicant proposes to meet the needs of guests who wish to drive to the site by offering off-site valet service. As proposed, guests will drop their cars in a valet zone fronting the building on 5th Street, and an attendee will park the car at a garage within the vicinity of the site.

INCOMPLETE CTR

Section 3.2.3 of the DDOT Guidelines for Comprehensive Transportation Review (CTR) Requirements states that a CTR is expected to include further analysis of vehicle impacts if the proposed site generates 25 vehicle trips in the peak directions for either peak period, AM, PM, or weekend. There are two fundamental flaws in the Gorove/Slade methodology for estimating vehicle trips. The first flaw is using retail use data to estimate hotel trips. Secondly, Gorove/Slade uses data for hotels that provide on-site parking for a hotel that does not have on-site parking.

Gorove/Slade study states, "the WMATA DRSS noted an average of 42 percent auto mode share for retail. For purposes of this study, a 35 percent auto modal split was applied to the trip generation to account for the surplus of non-auto options available." Using data for a retail use Gorove/Slade estimated that the 153 room hotel will generate 25 (15 inbound and 10 outbound) and 31 (16 inbound and 15 outbound) vehicle trips during the AM and PM peak hour. Gorove/Slade concludes that the hotel will not generate 25 or more vehicle trips in the peak directions for either peak period, AM, PM, therefore a full review of the traffic impacts of the development based on DDOT's CTR guidelines is not needed. The vehicle trip generation estimation by Gorove/Slade is not valid. First of all it seems they used retail data to compute hotel trips. Secondly, hotel data is available in the WMATA survey. There is data for two hotels that are located similarly to the proposed hotel, approximately 0.3 miles from Metro rail station. Using WMATA data for the hotel use, the AM and PM peak hour vehicle trip generation is as shown in Exhibit 1. As noted, the morning inbound and the afternoon inbound and outbound movements exceed 25 vehicle trips.

Let me address the second fundamental flaw regarding on-site parking and off-site parking. For a hotel with on-site parking a hotel guest typically makes an inbound trip and an outbound trip or two trips through the adjacent intersections or roadways.

However for a hotel that does not provide on-site parking and relies on valet parking a hotel guest would make the two trips similar to the hotel with on-site parking. The valet generates two additional trips for the same guest. The valet picks the vehicle from the hotel and drives through the adjacent intersection(s) to park the vehicle. The valet then brings the vehicle back to the hotel when the guest is leaving. Please see Exhibits 2 and 3 to see how the adjacent intersection is impacted twice as much as the hotel with on-site parking. The AM and PM peak hour estimates after incorporating valet trips is also shown in Exhibit 1. The Exhibit shows that the AM and PM peak hour trips for all directions exceed 25. Therefore a full review of the traffic study is warranted, as per the CTR Guidelines.

In order to verify the vehicle trip rates computed using WMATA data, we computed the vehicle trips using the trip generation data collected by DDOT for three hotels in the District. Using DDOT data, the AM peak hour inbound trips exceed 25 trips (See Exhibit 4), therefore a full CTR study would be required. Further after incorporating off-site parking impact, all directions in the AM and PM peak hours exceed 25 trips. In conclusion, the WMATA data and the DDOT data show that a full study is required and the Applicant has not met the CTR Guidelines.

LOADING DOCK ISSUES

The Applicant is required to supply two (2) loading berths per zoning. The Applicant is proposing only one loading berth. The Applicant has not demonstrated that one loading dock would suffice for a hotel of 153 rooms (65,125 square feet). The single loading dock is situated such that it would not be accessible based on the truck maneuvers developed using AutoTURN. Gorove/Slade included AutoTURN for a 30 foot truck inbound towards the loading dock and outbound from the loading dock on to I Street using the public alley between I Street and K Street. This alley is not wide enough to allow a truck and an automobile to pass through. Further, there is a lot of activity on this alley. There is a heavy pedestrian movement on this alley. There are vehicles parked diagonally along the east side of the alley and these vehicles have to back out of the parking space on to the alley. This alley also serves the truck traffic including trash pickup for 450K and other buildings in that block. The alley has electric light poles on both sides that restrict the travel width of the alley.

The Gorove/Slade AutoTURN shows that the trucks will clip the I Street building on the east side as it leaves the loading dock (See Exhibit 5). Further, the outbound movement from the loading dock looks to be touching edge of the loading dock wall. Finally and very important the AutoTURNs do not take into account the on-street parking on both sides of I Street NW (inbound and outbound). There is on-street parking on both sides of I Street and leaves approximately 14 feet space between the vehicles parked on both sides. The AutoTURN shows that the truck will not be able to turn in to the alley or turn out of the alley due to vehicles parked on I Street (See Exhibits 5 and 6).

As per DDOT, the site's alley access is constrained by existing walls on adjacent properties, limiting the entry aisle of the alley to be 11.5-feet wide (See Exhibit 6). As such, the Applicant may need to request additional zoning relief from subtitle C § 904.5. The trucks will need to back into the proposed angled space of 11.5 feet, which will require the removal of an existing fence at the alley's hammerhead. The backing movement would require the assistance of another person to guide the driver in to the narrow angled loading dock.

CONCLUSIONS

The traffic study does not meet the CTR guidelines and should be conducted by meeting with DDOT for a Scoping and conduct a full review of traffic impacts. The single loading dock may not meet the needs of the hotel (Zoning requires two loading berths). Further, the single loading dock provided is not accessible as per the truck maneuvers using AutoTURN and provided by Gorove/Slade.

2005 WMATA Ridership Survey Mode Split for Comparable Sites					
Rooms	Site Name	Metrorail	Metrobus & Other Transit	Auto	Walk & Other
221	Holiday Inn Arlington	17.0%	0.0%	67.0%	17.0%
242	Holiday Inn Silver Spring	8.0%	4.0%	54.0%	33.0%
Average		12.5%	2.0%	60.5%	25.0%

Trips based on ITE Trip Rates and WMATA Mode Split								
ITE Code	Land Use	Hotel Rooms	AM Peak Hour			PM Peak Hour		
			IN (Trips)	OUT (Trips)	TOTAL (Trips)	IN (Trips)	OUT (Trips)	TOTAL (Trips)
310	Hotel	153	48	33	81	47	45	92
	Non-Auto Trips (39.5%)		19	13	32	19	18	37
	Metrorail (12.5%)		6	4	10	6	6	12
	Metrobus & Other Transit (2.0%)		1	1	2	1	1	2
	Walk & Other (25.0%)		12	8	20	12	11	23
	Vehicle Trips		29	20	49	28	27	55

Trips based on DDOT Trip Rates including Valet Trips						
Hotel Rooms	IN (Trips)	OUT (Trips)	TOTAL (Trips)	IN (Trips)	OUT (Trips)	TOTAL (Trips)
153	58	40	98	56	54	110

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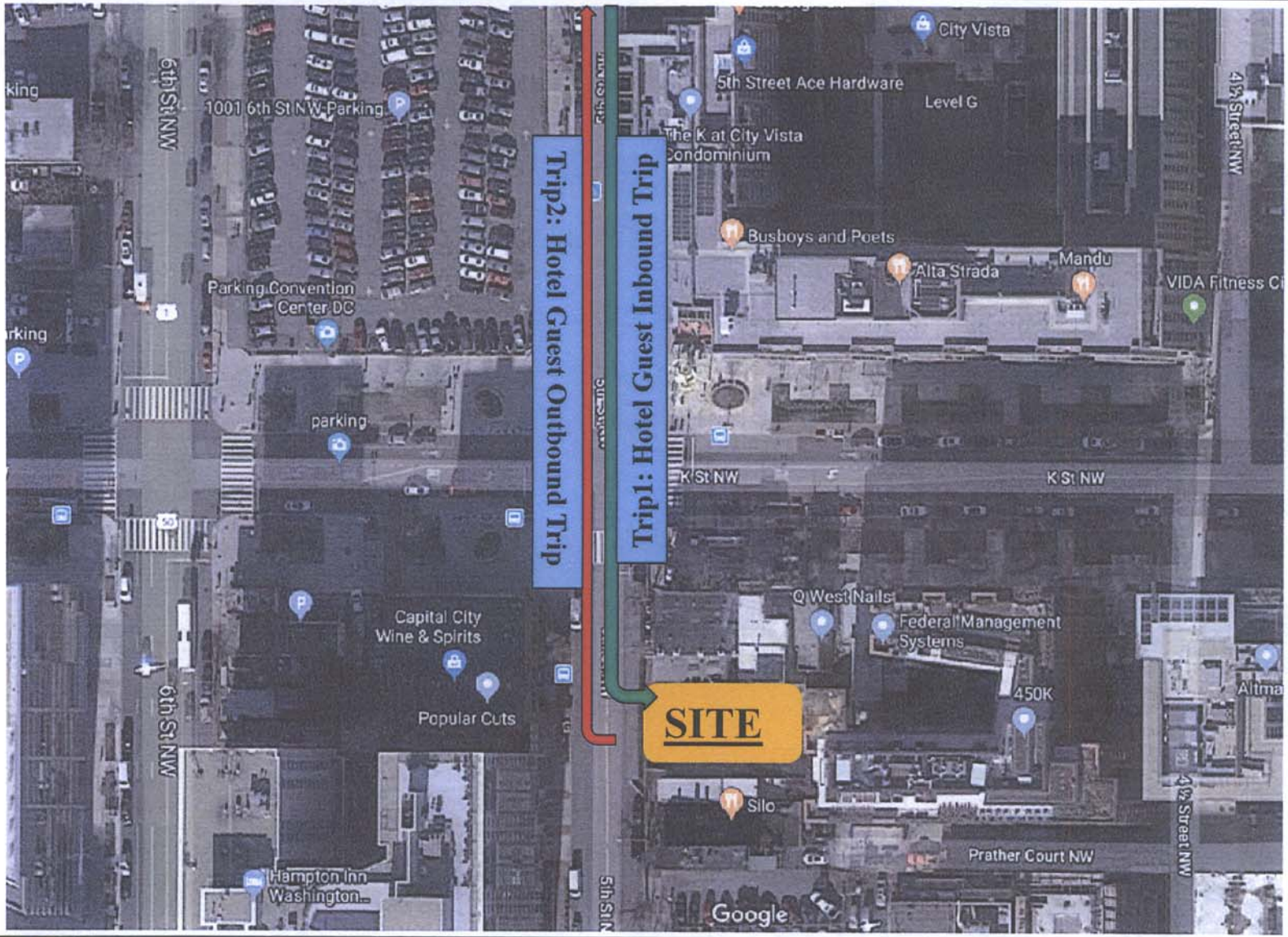
AM/PM Peak Hour Trips based on ITE Trip Rates and 2005 WMATA Mode Split for Comparable Sites

Exhibit 1



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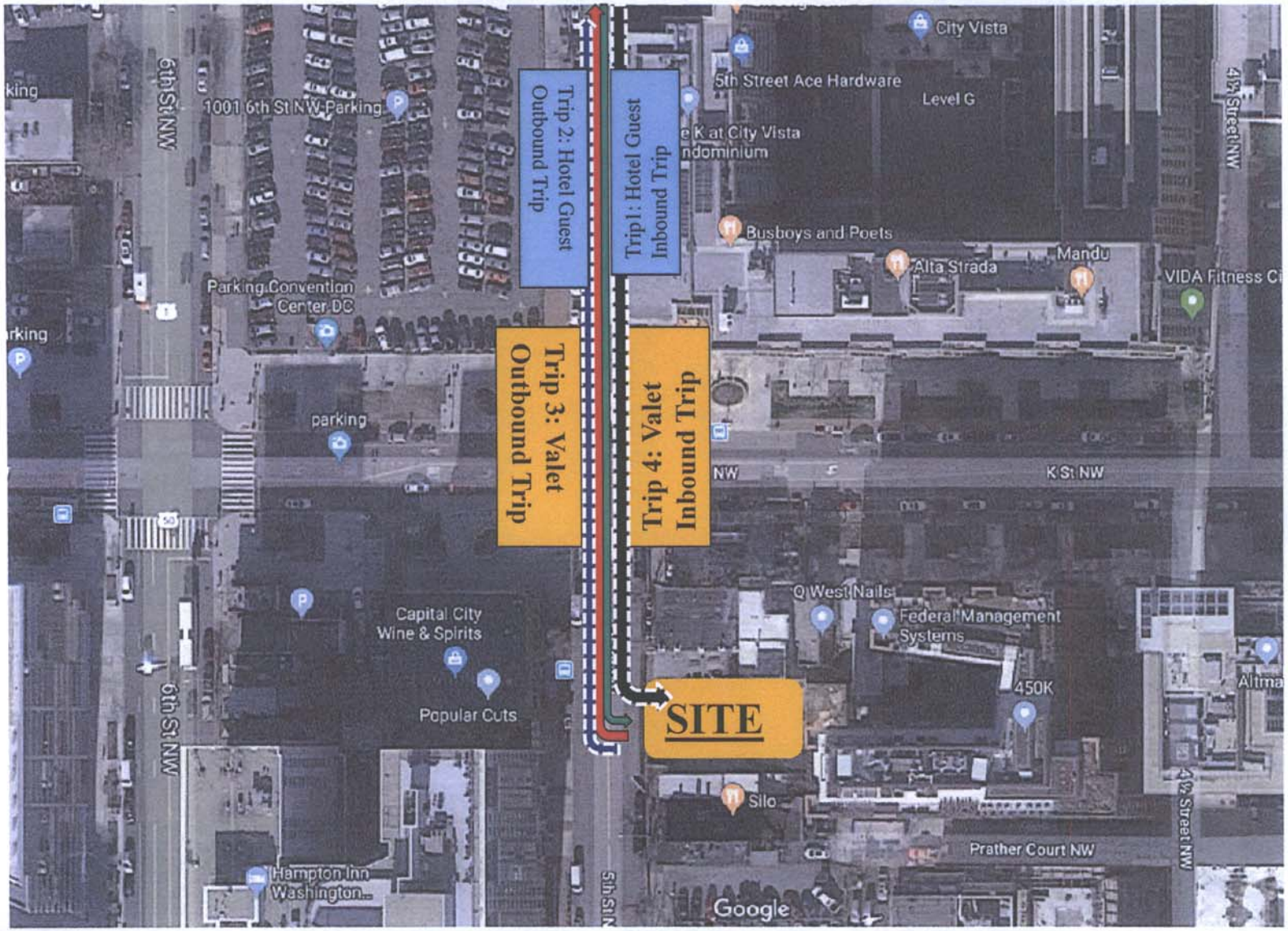
Hotel Guest Trips

Exhibit 2



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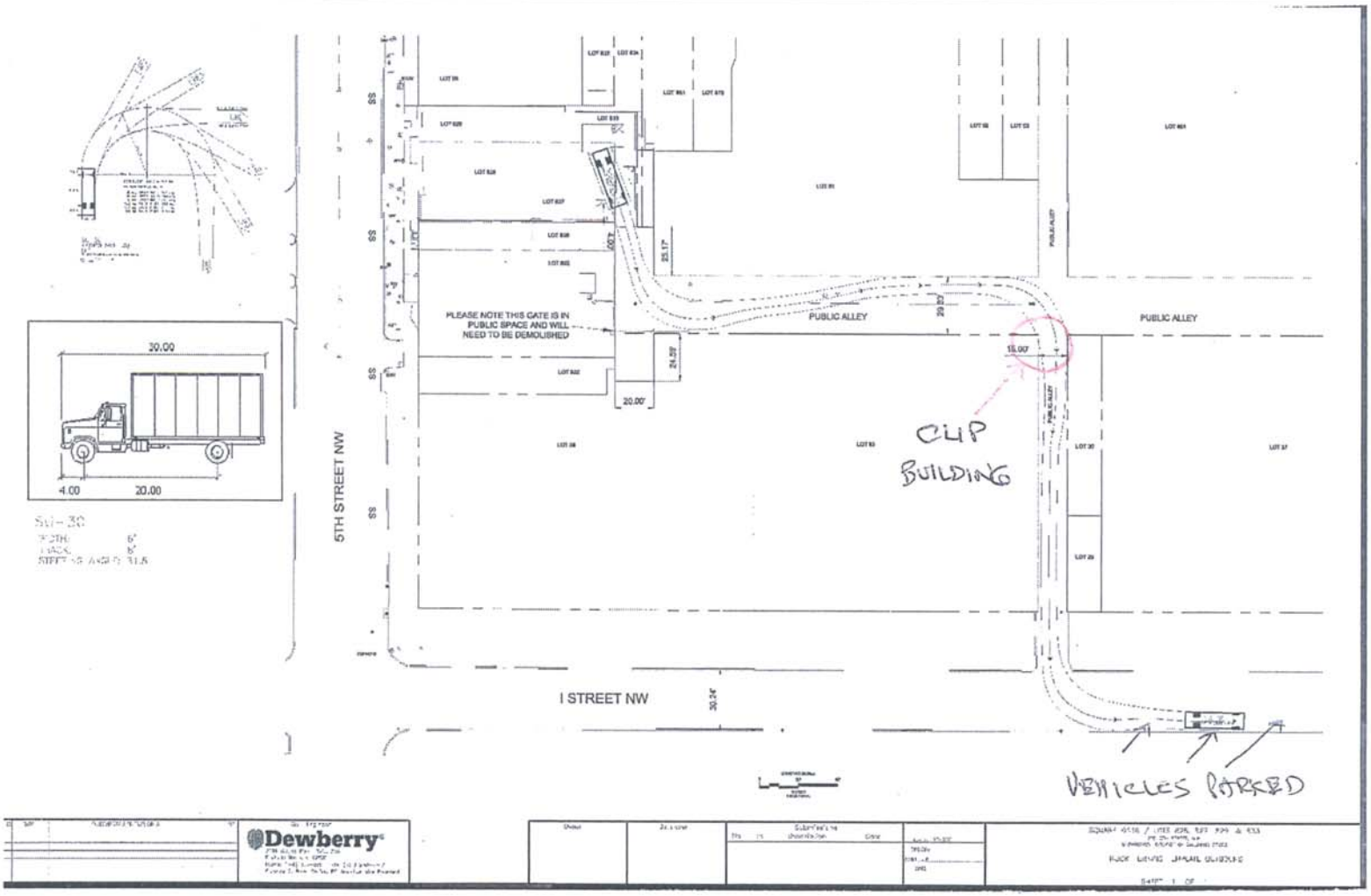
Hotel Guest and Valet Trips

Exhibit 3

Trips based on DDOT Trip Rates								
Hotel Rooms	AM Peak Hour				PM Peak Hour			
	DDOT Trip Rate	IN (Trips)	OUT (Trips)	TOTAL (Trips)	DDOT Trip Rate	IN (Trips)	OUT (Trips)	TOTAL (Trips)
153	0.33	30	20	50	0.31	24	23	47

Trips based on DDOT Trip Rates including Valet Trips								
Hotel Rooms	AM Peak Hour				PM Peak Hour			
	DDOT Trip Rate	IN (Trips)	OUT (Trips)	TOTAL (Trips)	DDOT Trip Rate	IN (Trips)	OUT (Trips)	TOTAL (Trips)
153	0.33	60	40	100	0.31	48	46	94



Source: Gorove/Slade

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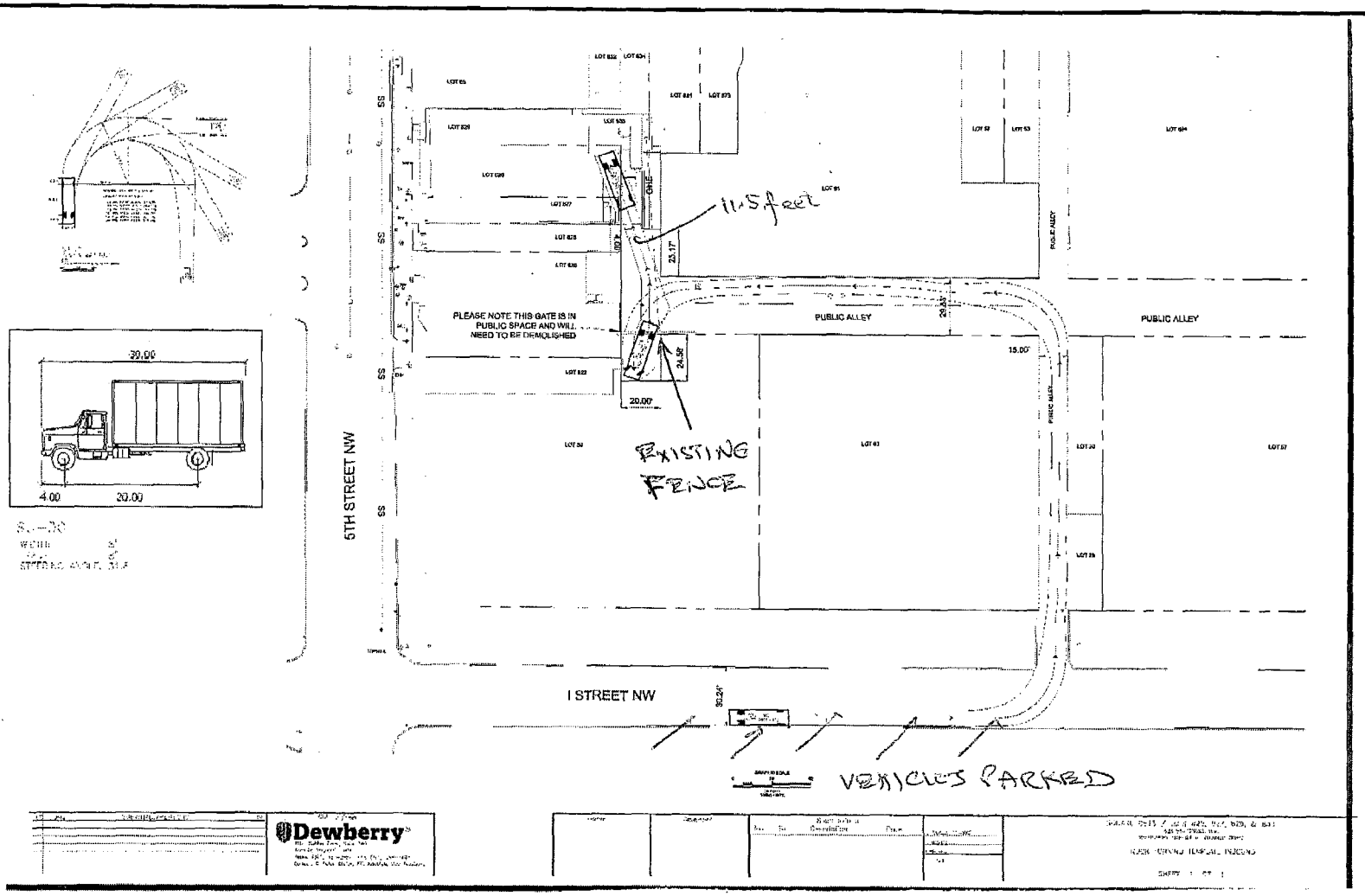
Outbound Truck Turning Maneuvers

Exhibit 5



Source: Gorove/Slade

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Inbound Truck Turning Maneuvers

Exhibit 6