November 4, 2002

P. Kenneth Jadin
1614 S St., NW
Washington, DC 20009

Mr. Geoff Griffis, Chairman
Board of Zoning Adjustment
441 4th Street, NW
Washington, Dc 20001

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Re: BZA No. 16823 – S Street Party Questions for DDOT

In response to your October 29th request for written questions regarding the "Transportation Plan" to be directed to the District Department of Transportation, the S Street Party submits the following questions and statement.

Thank you.

Sincerely,

P. Kenneth Jadin

Cc: Cynthia A. Giordano

BZA
Case No. 16823
Exhibit No. 95

Board of Zoning Adjustment
District of Columbia
CASE NO.16823
EXHIBIT NO.95

QUESTIONS FOR DDOT ABOUT PROPOSED TRANSPORTATION PLAN

The applicant's latest "Transportation Plan" recognizes that the disembarking of passengers from vehicles on 16th Street is both illegal and unsafe, and therefore attempts to direct customer traffic onto Riggs Place. From your review does the applicant's property have the physical configuration and capacity to accommodate all the vehicles (i.e. customers, event attendees, shuttles, service deliveries), that require access to the proposed business from Riggs Place?

As part of the proposed "Transportation Plan" the applicant has submitted in Attachment B a drawing, with dimensions, showing the garage, (labeled "Carriage House"), and driveway. The information presented contains several errors: the distance from the property line to the Riggs Place curb is 10 feet, not the 12 feet indicated as a 6 foot sidewalk and a 6 foot planting space; the distance from the garage door to the Riggs Place curb is less than 19 feet, not the 20 feet shown; the driveway curb cut at Riggs Place is drawn to look about 16 feet in width, (no dimension is given), but the curb cut is actually 9 feet; in the legend the garage door on Riggs is listed as being 9 feet high when the opening is actually 8 feet-four inches, and the garage door on the alley is listed as 8 feet in height and width when the effective opening is 7 feet-five inches in height and width. Without access to the garage interior we do not know the layout and dimensions. Were you able to verify the accuracy of the configuration and dimensions shown? Is it your opinion that all of the vehicular activity involved in the operation of the proposed Bed & Breakfast and Events Facility can take place in this garage? In previous submissions and testimony the applicant has stated that as resident owner of the property he will also park his vehicle in the garage at night, and that taxis and even limousines will let off passengers in the garage. In context of the submitted "Transportation Plan" do you find either of these possible or reasonable?

Do you expect the Riggs Place garage door to be left open in anticipation of the arrival of customers and delivery vehicles? Assume that for safety purposes, (for either the contents in the garage and/or for pedestrians passing by) the garage door is closed. For a customer arriving in an auto and confronted by the closed door, what options are available? Should he pull into the driveway and block the sidewalk? Should he double-park on Riggs Place and block a lane of traffic? Should he park in the alley, blocking access for anyone wanting to go in or out? Or should he stop his car in any of the above places and honk his horn until someone from the B&B comes out to take his vehicle or open the garage door? Are any of these likely alternatives acceptable? Do any of these actions have an adverse impact on the surrounding residential neighborhood?

Do you know the location of the Atlantic Valet parking garage described in the "Transportation Plan?" Letters from Atlantic Valet give the address as 1776 Massachusetts Avenue, which would place it on the south side of Mass. Avenue. One map in the Transportation Plan locates the garage on the north side of Mass. Avenue, east of 17th Street. Another map locates it east of 18th Street. How far away from the Toutorsky Mansion is the parking garage? The "Transportation Plan" and your memo describe it as being a few blocks away.

The submitted "Transportation Plan" makes various assumptions about modal split and other expected behaviors of patrons in regard to transportation affecting the site and neighborhood. Are not other assumptions equally, or even more plausible? For instance, isn't it likely that event attendees who drive will first come directly to the Toutorsky Mansion and drop off passengers, (spouse and children, elderly relatives, etc.), and then drive to the Atlantic Valet garage, park, and return to the mansion via the shuttle? Would not the same occur in reverse when leaving the event? Doesn't this result in two extra vehicular round trips through the neighborhood?

Given the proposed demands on the use of the garage space, is it reasonable to expect the shuttle to unload and load in the garage? What happens if a delivery van or other vehicle is in the garage when the shuttle arrives?

Prior to and after events, with arriving cars likely double-parked to unload or pick up passengers, (and taxis doing the same), and with people milling around on the sidewalk, is it safe for shuttles or vans to be backing in or out of that garage with the driver's view of the sidewalk obstructed by a 7 foot-6 inch high brick wall?

Has DDOT recently conducted traffic studies or counts in the immediate area? Do they include the "local" streets and alleys? What are the results? Would discussions with residents add to the understanding of traffic problems in the area, or of potential problems with a proposed transportation plan from a business wanting to locate in a residential zone? Did DDOT contact any of the affected parties in the neighborhood before making its report?

How many private off-street parking spaces are accessed via the alleys immediately to the north and south of Riggs Place? How many on-street parking spaces are there on Riggs Place?

Are you familiar with neighborhood residents' experiences of having access to their private parking spaces being blocked by transients attending nearby "club" social events?

Did you examine the proposed operation of the transportation plan from the perspective of residents of the neighborhood? Do you think the quality of residential life would be improved or degraded by the increased traffic demands resulting from the introduction of the proposed business activity in a residential zone?

From DDOT's experience does the regular and persistent occurrence of double-parking encourage an increase in more double-parking in adjacent streets and alleys?

What aspects of the likely outcomes of the proposed "Transportation Plan" would be most disruptive or disturbing to nearby residents: the actual blockage of traffic caused by double-parked vehicles, or the resulting noise of honking horns and yelling of frustrated motorists trying to use the public roadways?

Is it District of Columbia governmental policy to recommend approval of changes in land use from residential to business where customers would be required to break traffic laws in order to gain access to the business?

Would not many of the transportation problems identified by residents be alleviated if the basic vehicular functions inherent to the normal operation of the proposed business, (both day to day and special events), could be readily accommodated off-street on the business property, rather than in the public streets and alleys that serve the entire neighborhood?

I suspect that it's probably just a typo, but for the driver from Virginia heading north on 18th St. NW who is advised to turn right on R Street, do you think he will make it to the wedding on time?

Questions For DOT – Addendum

1. Who did the review of the transportation plan.

2. Please provide the name and qualifications of each individual who reviewed and or investigated any part of the proposed plan.

3. Please provide what part each person played in preparing the response of the DOT.

4. On what facts or reports did the DOT rely upon to make an assertion that a valet parking plan as suggested by the applicant is in place in New York and Boston and that it works beautifully.

5.Please specify what programs in New york or Boston were reviewed by your department which are similar to the applicants proposed plan.

6.What does the qualitative term works beautifully mean?

7. Did you measure the distance between the door of the garage cited for deliveries and the sidewalk.

8. What is that distance between the door and the sidewalk?

9. What is the width and height of the brick opening leading to the garage?

10. What is the size of the average passenger car? Length and width?

11. What is the height and width of a standard van?

12. What is the height and width of a 16 foot delivery truck?

13. In your experience, how many minutes before an event such as a reception or wedding do people arrive for the event. Assuming 50 guests how many cars would arrive for that event and how many minutes would they arrive before the event. How would they most likely be staged in their arrival time.

14. At the conclusion of an event how many cars would be expected to epart the event and what would the staging be.

15. What are the traffic and specifically the parking rules with regard to 16th street area in front of the location of the applicant. To what extent does the bus stop in front of the location impact those rules?

16. Is stopping or parking in front of the house on 16th street allowed?

17. With regard to Riggs place what are the specific traffic and parking rules on the street and specifically on the side of the applicant property.

18. Assume that the one space available in the garage is not available for parking what is the DOT view of the delivery plan. Where would the vans be expected to stop and make deliveries? What would be the implications from a parking and traffic flow?

19. In your experience with valet parking how do cars arrive at a site, do tney arrive one at a time or together in blocks of time?

20. What in the plan addresses how the cars will be handled when they arrive that leads you to believe that the plan will work beautifully.

21. If two valet parkers are working and three cars arrive together how long will it take valet parkers to find parking spaces within the Dupont Circle neighborhood.

22. Where do you expect other cars arriving while the two valet parkers are searching out spaces to be left?

23. What are the parking and traffic implications if they are left on Riggs place in the street or on 16th street in the bus lane.

S Street Party

Statement On Parking Plan and DDOT Letter
RE: BZA No 16823

The transportation plan submitted by Shaughn West on behalf of Mr. Gonzalez is contradictory, inaccurate, based on erroneous assumptions, sloppy and so flawed it should not be considered as an acceptable transportation document to support the applicant's request for a variance with regard to special events.
The September 26 DOT letter is arbitrary and capricious in that it is lacking in fact or sound analysis.

1. The transportation plan relies on an inadequate garage area on the Riggs Place side of the building to support both valet parking transfers, guest parking and valet deliveries.

The width and height of the entrance way leading to the garage area in question will not support a 16 foot truck, nor will it easily accommodate more than one car inside the garage and any vehicle be it a car, van, or otherwise pulling up to the doorway will block the sidewalk adjacent to the garage entryway.

Because the entrance way and area is unsuitable for parking for most if not all of the applicant's vehicular visits, cars, and trucks will be forced to double park on the street when no spaces are available which will be on most if not all occasions.

The record has shown that a normal passenger car barely fits in to the width of the opening and when pulled up to the door blocks the sidewalk. A 16 foot truck referenced in the Susan Cage catering plan simply will not fit into the space designated by Gonzalez as the catering unload zone. Nor will it pass under the 8 foot 4 inch garage door height opening.

Two vans will not readily fit into the space either. If the intent is to use the alley garage entrance way, the height and width of the alley entrance which is 7 feet 5inches by 7 feet 5 inches is not wide enough or tall enough to accommodate a truck or van. In addition the alley way is too narrow to have a large vehicle such as a van or 16 foot truck turn into the garage from the alleyway.

Mr. Gonzalez states that he will have at least one guest car in the garage space (See Valet Parking Attachment A for his explanation, of moving cars for guests so that the first guest out in the morning has his car in the garage the night before). That does not leave enough room for two vans.
In addition because of the configuration of the doors and line up of the opening it most likely is impossible to get two cars or one car and a van into the garage. It was also indicated in one part of applicants testimony that Mr. Gonzalez would also park his vehicle in the garage. That would mean that one overnight guest vehicle and Mr. Gonzalez vehicle would make the garage unavailable for use by other vehicles.

2. The Atlantic valet parking plans submitted by Mr. Gonzalez as part of is transportation plan are so grossly inadequate in that they do not give any indication of how and where cars will be held while awaiting valet services that they should not be given any weight whatsoever.

Neither letter submitted by Atlantic Services indicates where cars are to be held when they arrive at the Toutorsky mansion. Reference was made in the testimony that the Riggs place driveway could be used. The Riggs place driveway is inadequate to hold one passenger car without blocking the sidewalk. Neither the Atlantic Services letters or Mr. Gonzalez' plan indicates what will happen when more than three cars arrive at the scene within the period where two of the drivers and perhaps the supervisor will be attempting to find other spaces. Common sense dictates that when the two valet parkers are trying in vain to find parking spaces within a reasonable distance from the site and other cars arrive, the occupants will merely abandon their cars to the supervisor and go into the manston event.

3. Valet parking simply can not handle any amount of cars over three or four for on street parking.

The Atlantic services August 7 letter recommends garage parking only where events will have more than 50 guests. Given the current parking problems in the immediate area of the 14th- 18th street area surrounding the mansion it is impossible to see how a reasonable person can expect more than three or four spaces to be found at best for cars arriving at the Toutorsky mansion.

4. The example given by Mr Gonzalez for sample parking for a wedding are based on unrealistic assumptions with no basis in fact.

A number of assumptions are made by Mr. Gonzalez with no citation to any study or other data upon which to base the assumptions. For example to state that a wedding held at his local would only be composed of 5-15% local people is unrealistic. For example, one could just as easily say that for a wedding of a couple both of whom grew up in the area, the bulk of their friends and relatives would be from the area. The numbers used in his example are drawn from the air and are illustrative of his desire to make up unrealistic situations as the norm. Common sense dictates otherwise.

5. Vendor Requirements have same flaws as cited in number 1 above.

In his document entitled vendor requirement, Mr. Gonzalez assumes that the vendors will use the garage space. It has already been demonstrated that there simply is inadequate space in the Riggs place garage area to accommodate a vehicle if one is already parked in the garage or if a van or truck is used.

6. It can be expected that more than one delivery per day will be made especially if an event were to be held at the site.

Mr. Gonzalez states that only morning pastry will be delivered each

day. That simply belies his other request. If for example, he is having a wedding at his site there will be a need for flowers, candles and other decorative items. Other items that may be used for the wedding such as a canopy or flower arbor etc. In addition there may be a harp or violin or small musical ensemble for inside entertainment.

7. Employees will most likely not take public transportation. It is simply naive to assume that employees will all take public transportation.

8. The plan contains sufficient major errors in fact with regard to traffic flow.
The driving directions are inaccurate in that R street is a one way street running from east to west. The driving directions given in the package for driving directions from Virginia. If one were to turn right onto R street from 18th street, one could end up in a head on collision as R street is running east to West at that point and is a one way street. A car turning on R street from 18th would be heading East. With regard to the driving directions for Richmond, there is no indication what street one is to turn on to from R street.

9.The Sept 26 DOT letter.

This letter fails to address any of the concerns that would be expected by a government agency that has been asked to review a transportation plan that encompasses the area of town in question.
It has not mentioned the bus stop in front of the house. It has not taken into consideration any of the height and size dimensions of trucks, vans or entry way to the garage or garage areas, it has not addressed the sidewalk area adjacent to the garage area. it has not addressed the fact that the driving directions are inadequate. It has not addressed how cars will be handled that arrive for valet parking when there are only two valet parkers and up to 50 cars.
Its comparison to programs in parking programs in New York and Boston contain no information as to how the writer can conclude that they work beautifully.

In short, it is so arbitrary and capricious in its lack of facts or analysis of the actual facts of the site that it should be dismissed out of hand or redone to take in to account the above issues.

Sincerely,

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