

**TESTIMONY OF JOE MEHRA, P.E. PTOE, IN OPPOSITION TO THE 923-925 5<sup>th</sup> Street NW, Hotel, BZA Case No. 19722. (May 17, 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 Revised Comprehensive Transportation Review (CTR) study prepared by Gorove/Slade, dated May 4, 2018 and the response to my report submitted to BZA (response by Gorove/Slade is dated May 3, 2018) and DDOT Report dated May 11, 2018. Based on my review, I continue to 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 revised report.

**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. The report states, "it does not exceed the number of trips that would typically require additional vehicular study (25 trips in peak direction) per CTR guidelines. Thus, no additional vehicular study was required by DDOT and none conducted for this report." Gorove/Slade further states that based on the proposed trip generation for the development and the number of additional parking facilities within a half mile, the parking facilities will be able to meet any anticipated demand that the proposed hotel may generate. This implies that Gorove/Slade believes that if the number of trips exceeded 25, then a detailed vehicular study would be required.

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." Gorove/Slade states, "The hotel planned for this site was deemed to fall under a similar category as hotel sites found in the WMATA Development Related Ridership Survey (DRRS)." Based on this survey The WMATA DRSS noted an average of 42 percent auto mode share for hotel land uses. Gorove/Slade further reduced the mode split to 35%. It is interesting to note that the WMATA Survey includes 2 hotels (Crystal Gateway Marriott with 597 Rooms, 104 suites and 40,000 square feet of event space, weddings, etc.) and Embassy Suites by Hilton (has conference center and meeting rooms). These two hotels are NOT similar to the proposed hotel. The other two hotels in the WMATA survey are very similar to the proposed hotel. Therefore, MCV utilized data from the other two hotels only to estimate vehicular trip generation. Using WMATA data for the hotel use, the AM and PM peak hour vehicle trip generation exceed 25 vehicle trips and a full CTR study should be required and done. It is important to remember that this is a hotel use where guests come with suitcase(s) and stay overnight or multiple nights. It is cumbersome to drag a suitcase for a quarter mile or more from a metrorail station to the hotel. Hotel guests are more likely to drive, take taxi or Uber to make the

trips to and from the hotel.

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. A taxi or a trip via Uber also results in two trips versus one trip for a hotel with adjacent parking. The taxi/Uber drops the guest and leaves. 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, 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. Gorove/Slade contends "the MCV memorandum overstates the trips because all of the DDOT-surveyed hotels have on-site parking, as opposed to the proposed hotel, which does not." Gorove/Slade is implying that the trip generation of a hotel that has on-site parking is different from a hotel that does not have on-site parking. I agree with Gorove/Slade and I have shown above that a hotel with no on-site parking generates more vehicle trips than a hotel with on-site parking. 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 in their March 1 report. That graphic showed that the truck can access the loading dock without a back and forth maneuver (See Attached Exhibit circled in Red). The current report also includes AutoTURN movement for the same truck. The revised report shows that the truck cannot access the loading dock directly. It will have to make a "back and forth maneuver" to exit the loading dock (See Attached Exhibit circled in Red). Which graphic represents what a trucker will actually do in the Alley? 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. Please see the photographs of the activity along the Alley including the truck movements in and out of the Alley. The current activity levels are such that it takes several minutes before a truck can navigate the Alley. Further, at times, an assistant is required to guide the driver through the vehicle maze. As shown in the photos, the trucks are inches away from scraping the buildings. 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-foot wide. As shown in the photos, the trash truck needed an assistant and several back and forth maneuvers to fit inside the future loading dock.

Due to the nature of access to and from the loading dock, many delivery trucks, such as Fed-Ex and UPS will not go to the loading dock. They will pull up on 5<sup>th</sup> Street and use the guest loading area to make the deliveries and pick-ups. If the guest loading area is occupied, they will double park to make the deliveries. The only way to avoid deliveries being made off 5<sup>th</sup> Street is to provide an easily accessible loading dock for all trucks.

Another issue with the Gorove/Slade study is that it was stated at the BZA hearing that the hotel is estimated to generate 6 truck trips daily. The revised submission by Gorove/Slade now states that only two truck trips will be generated daily. It is hard to believe that a 153 room hotel with restaurant/bar/lounge will generate only two truck trips daily. Does Gorove/Slade have data from hotels to validate this number?

## **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 as provided by Gorove/Slade.

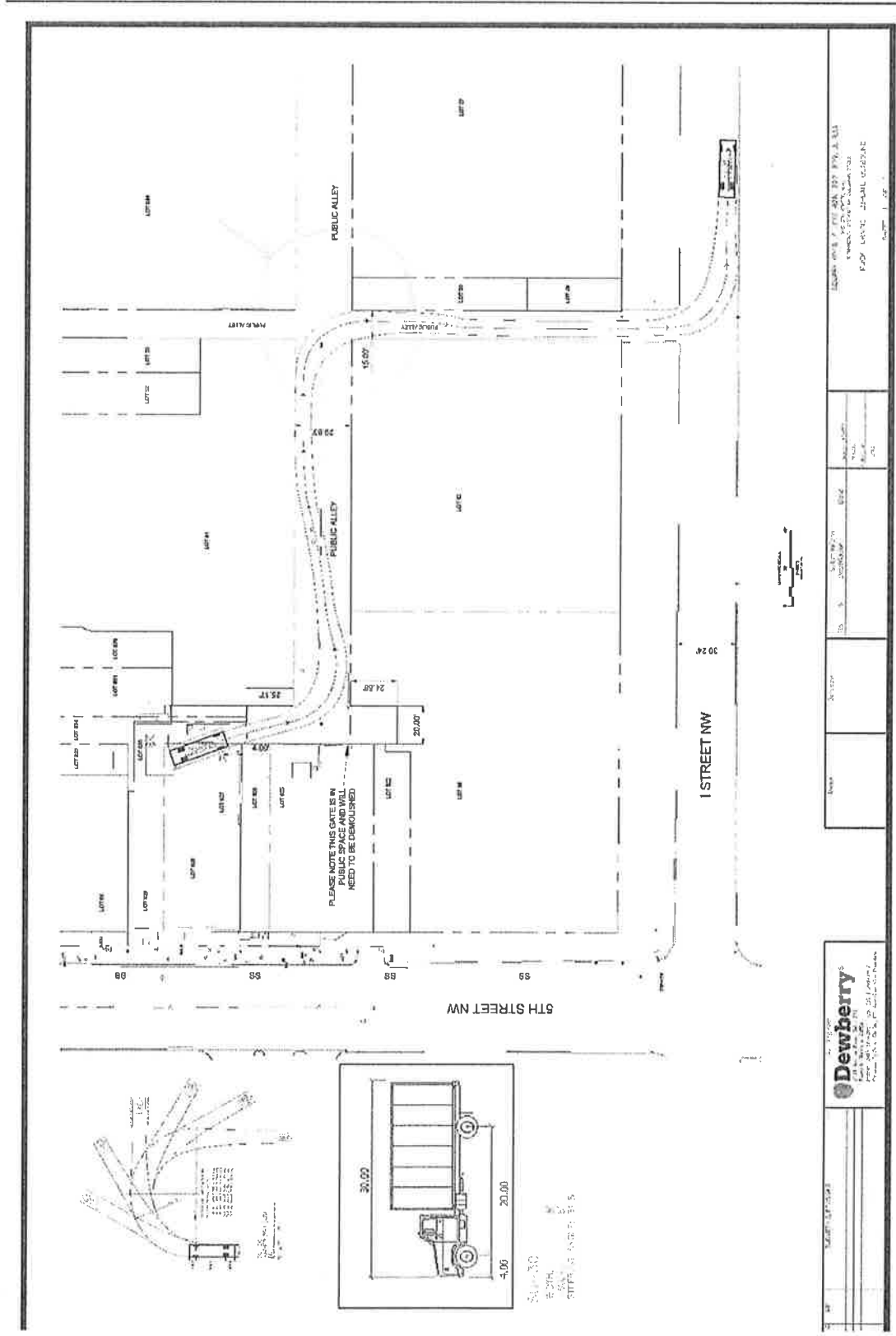
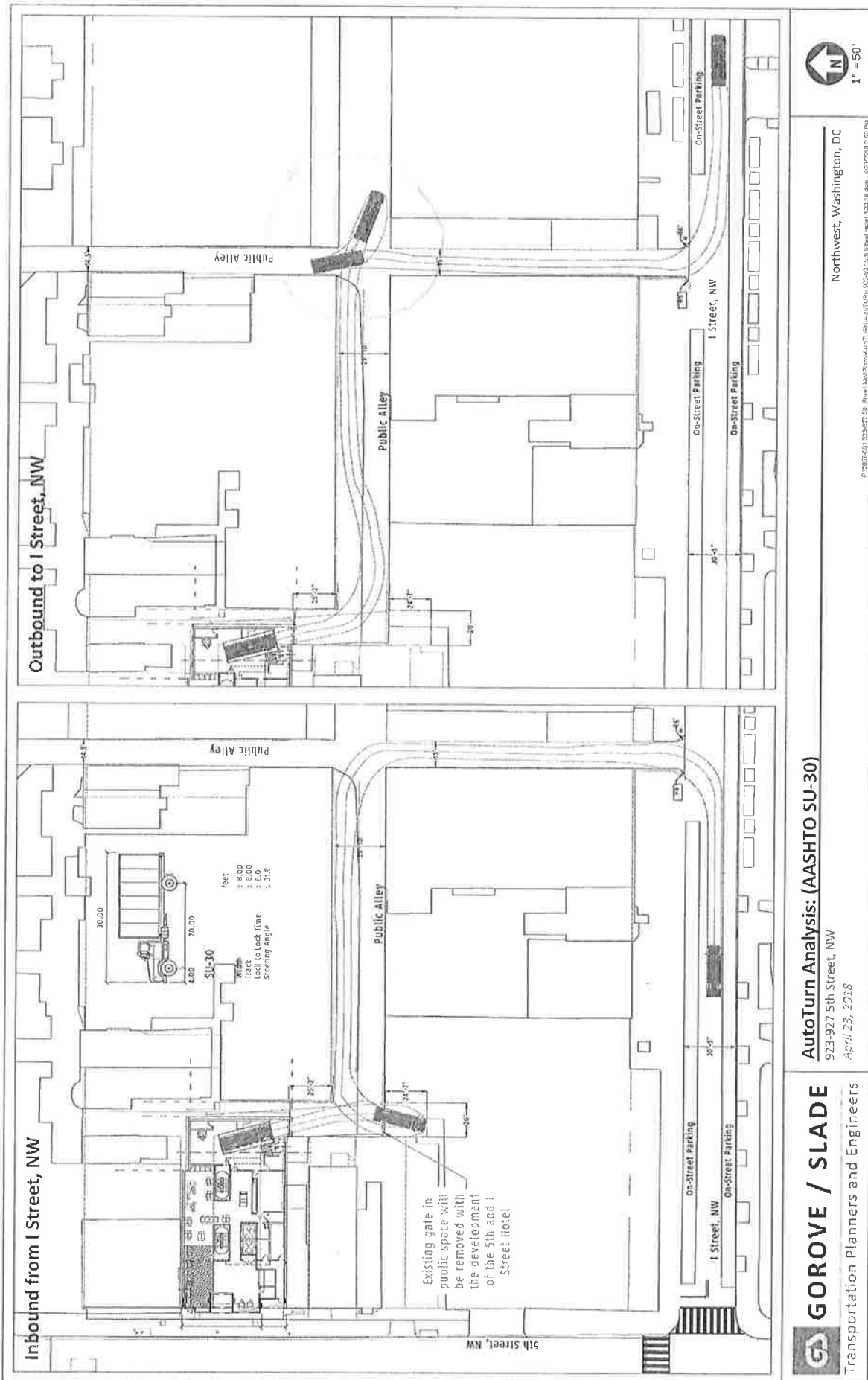


Figure 10: Outbound Truck Turning Maneuvers



Northwest, Washington, DC

PROJECT: 2022-01-27 On-Street, NW/275th Street, NW, AutoTurn Analysis for Street Hotel (AASHTO SU-30) 4/23/2018 2:52 PM

**AutoTurn Analysis: (AASHTO SU-30)**

923-927 5th Street, NW  
April 23, 2018



**GOROVE / SLADE**  
Transportation Planners and Engineers

**PHOTO   COMMENTS**

- A**     The driver had to come out to see how he could back into the loading dock.
- B**     No safety margin to protect the loading dock structure.  
       After the Bollards are installed, there may be no room for the truck to back in.
- C**     The driver is thinking "where and how do I back in?"
- D**     Two trash trucks + moving truck + vehicle blocked.
- E**     Trash truck blocking EW alley while unloading.
- F**     Trash truck backing and avoiding parked vehicles.
- G**     Ped/vehicle activity along NS alley.
- H**     Vehicle activities along alley.
- I**     Safety margin near bolstor.
- J**     Truck blocking access to "hotel loading dock",
- K**     Access blocked to the hotel loading dock.
- L**     Access blocked to all vehicles on EW alley to hotel.
- M**     Need an assistant to guide trucks through alley.
- N**     Ped/vehicle activity along NS alley - path to hotel
- O**     Inches away from scraping the building.
- P**     Truck backing into the loading dock area with assistant.
- Q**     Margin of error backing into the hotel loading dock.
- R**     Trash truck driver waiting to leave the area.
- S**     EW Alley activity on a slow day.
- T**     Access to hotel loading dock blocked with existing activity NS Alley.



112831



PHOTO A



11301



PHOTO B



113025



PHOTO C

30561 MAY 2

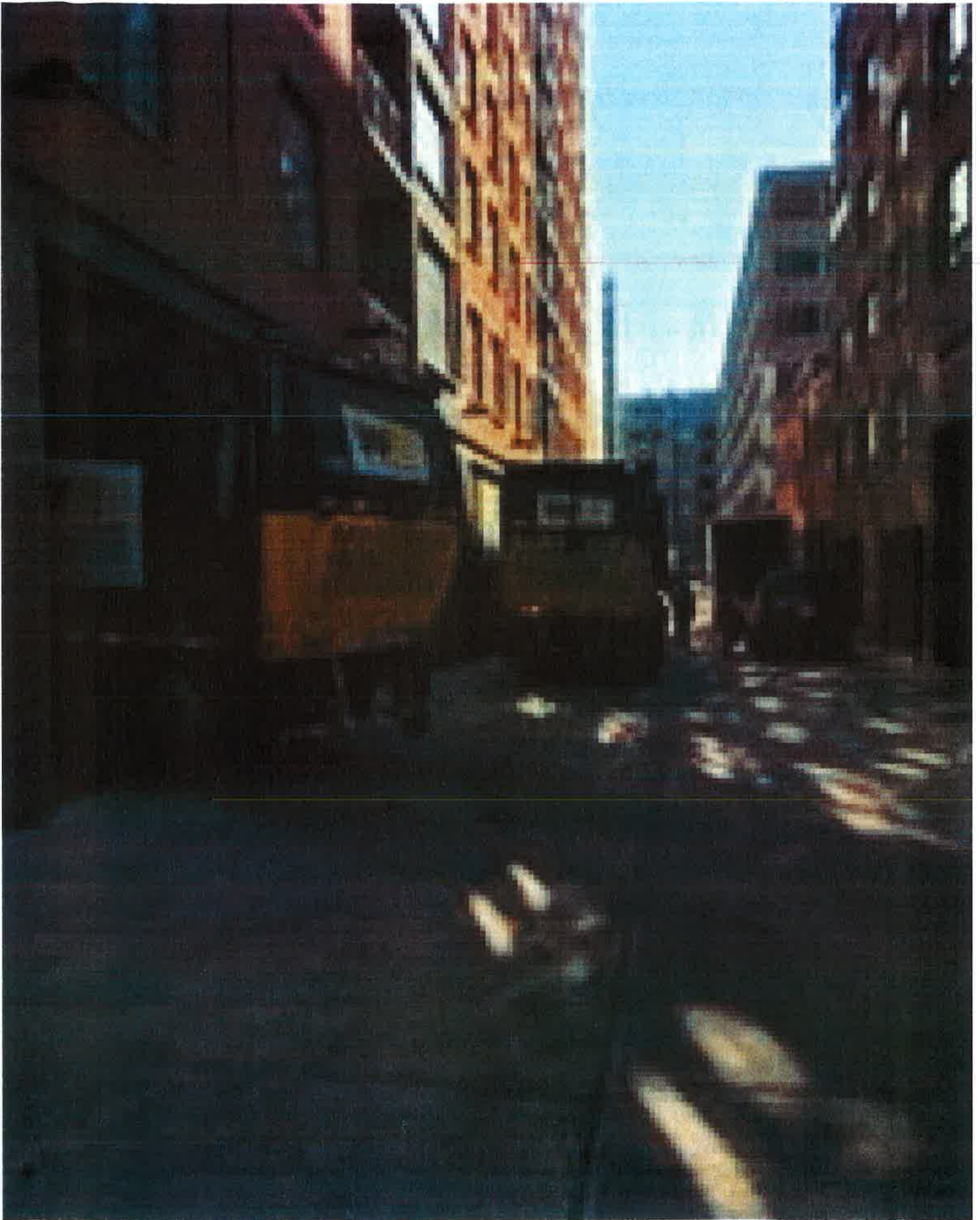


PHOTO D



30565 MAY 2

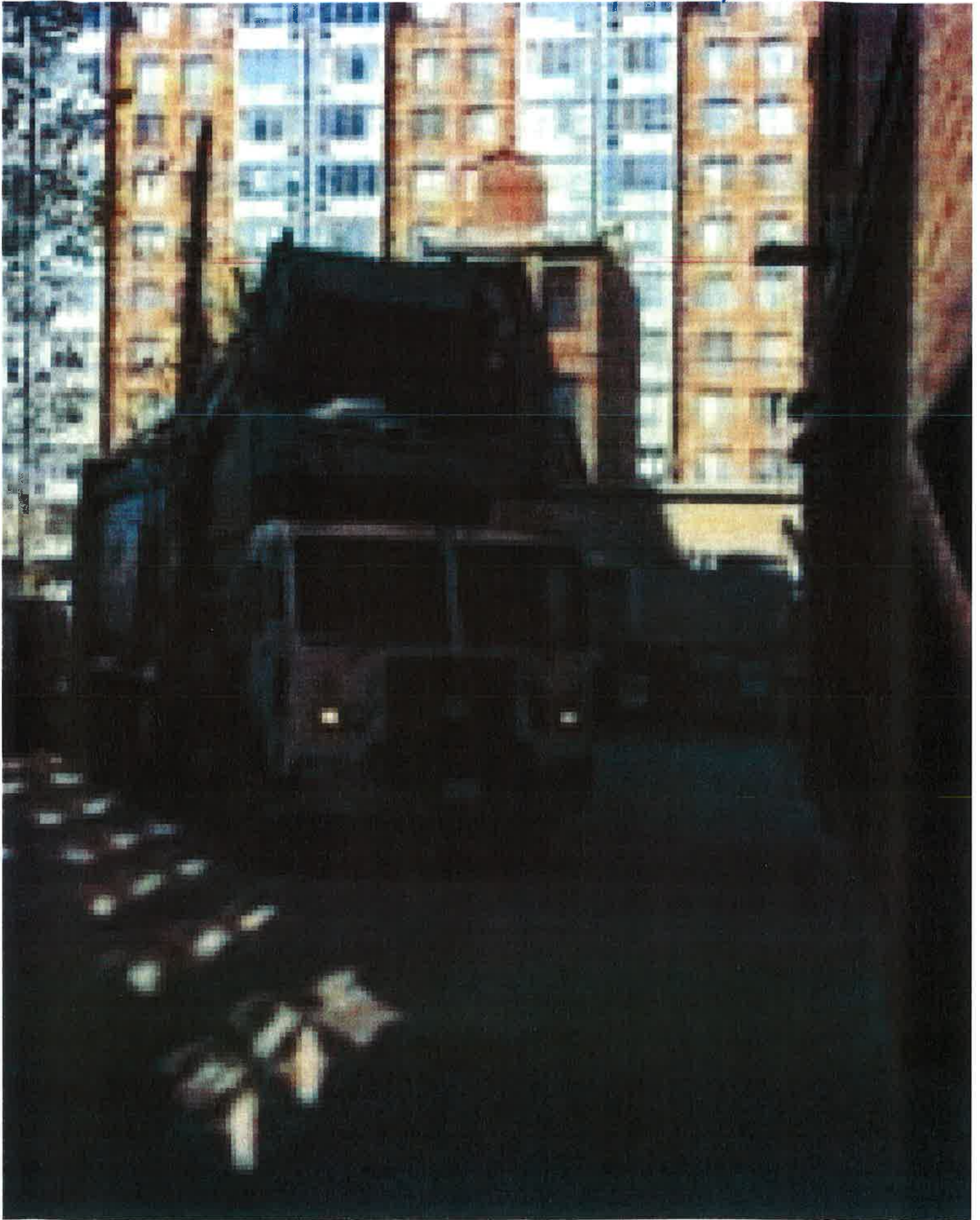


PHOTO E



085459 April 30



;PHOTO F



112303 MAY 1

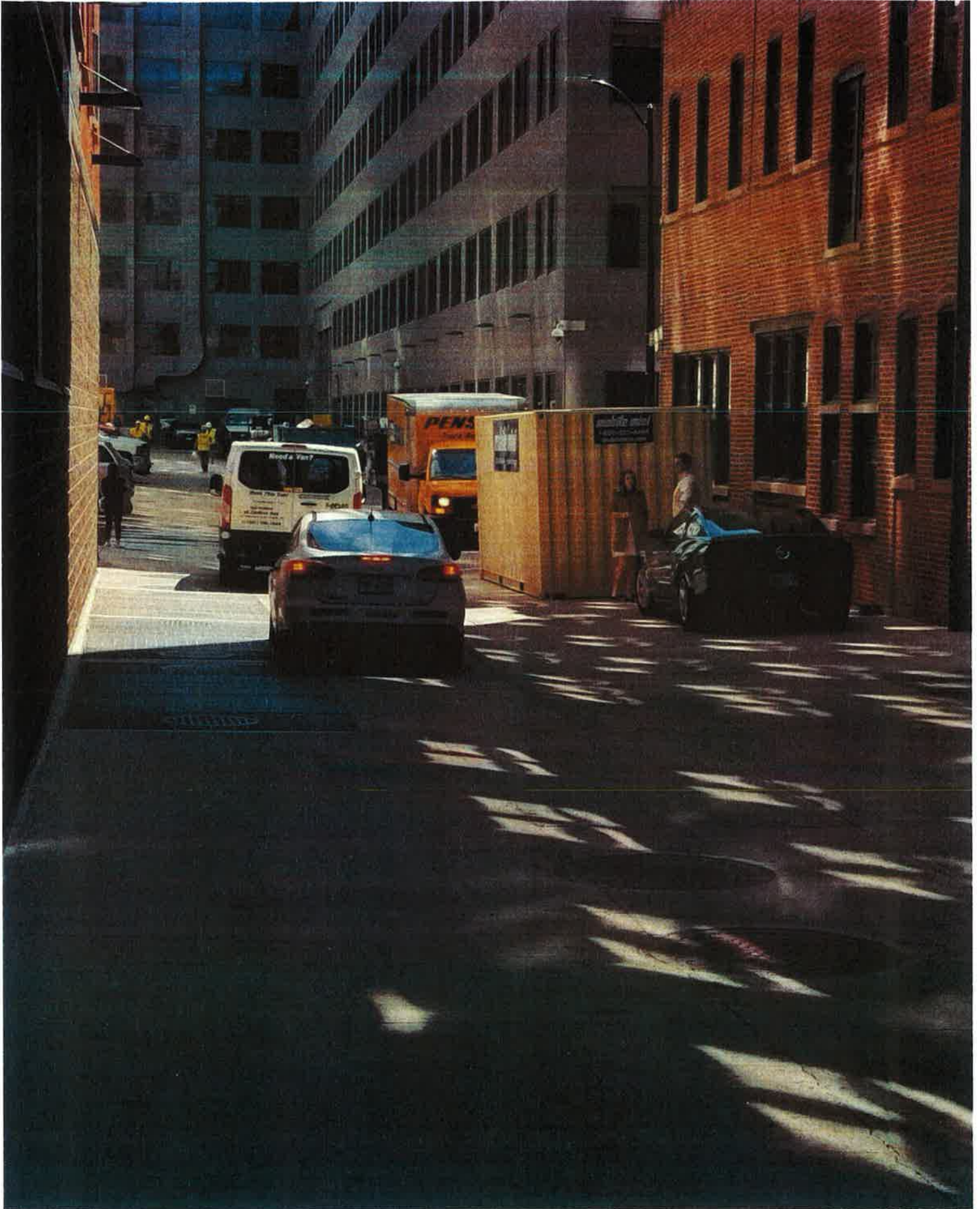


PHOTO G



111734 98442



PHOTO H



111759 MAY 2



PHOTO I



11819 MAY 2



PHOTO J



112157 MAY 2

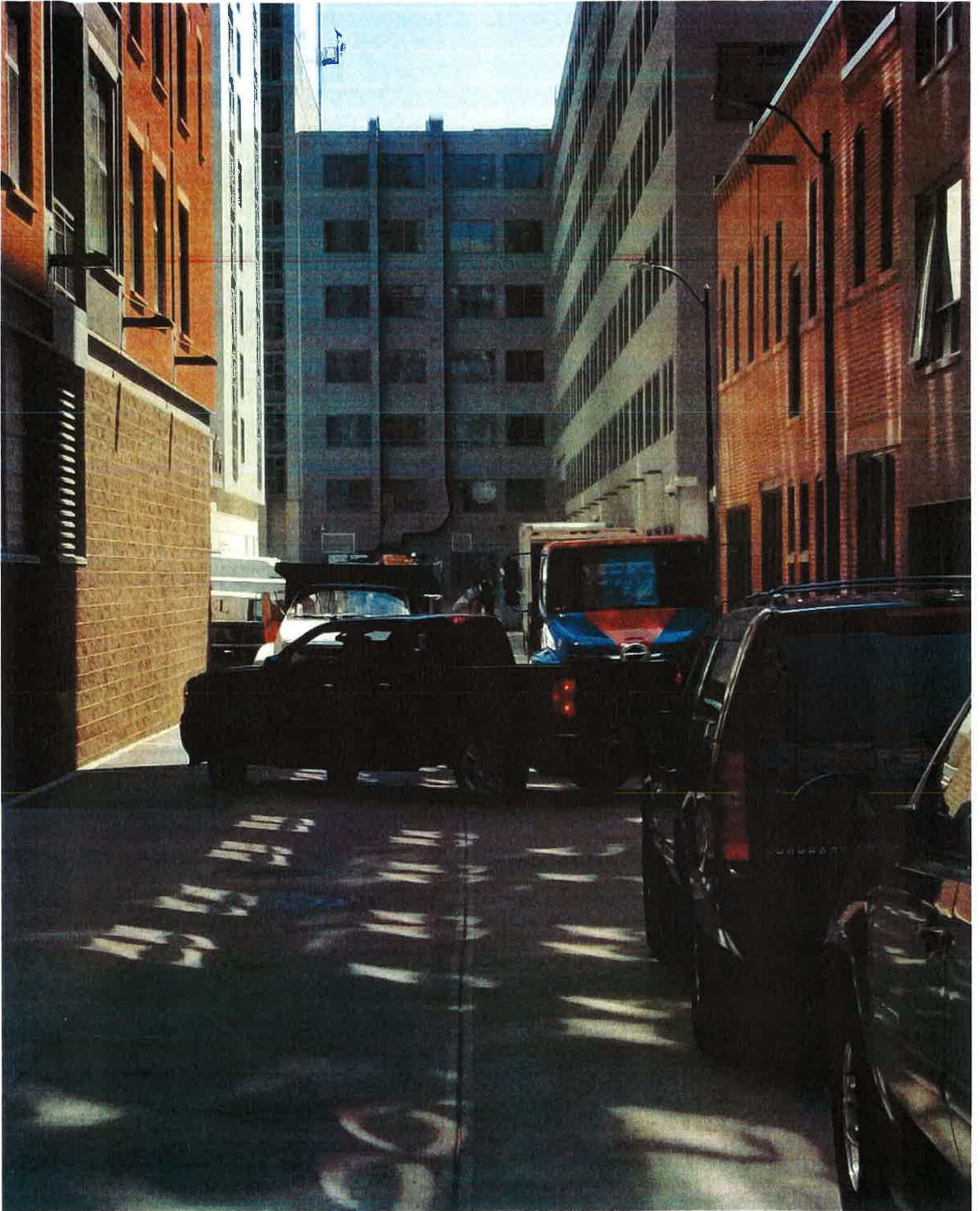


PHOTO K



112202 MAY 2



PHOTO L



112356 MAY 2



PHOTO M



120635 MAY 2

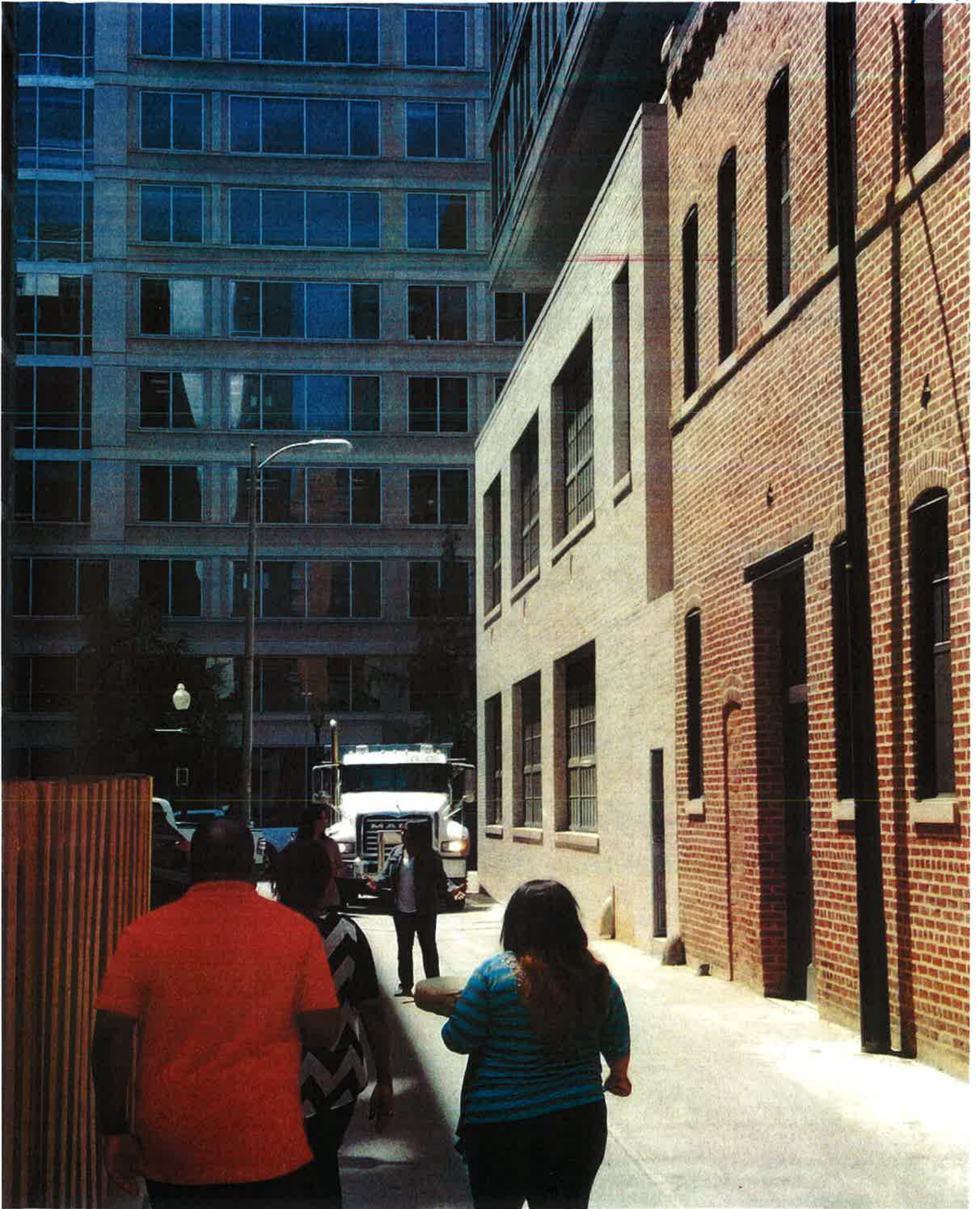


PHOTO N



122346 MAY 2

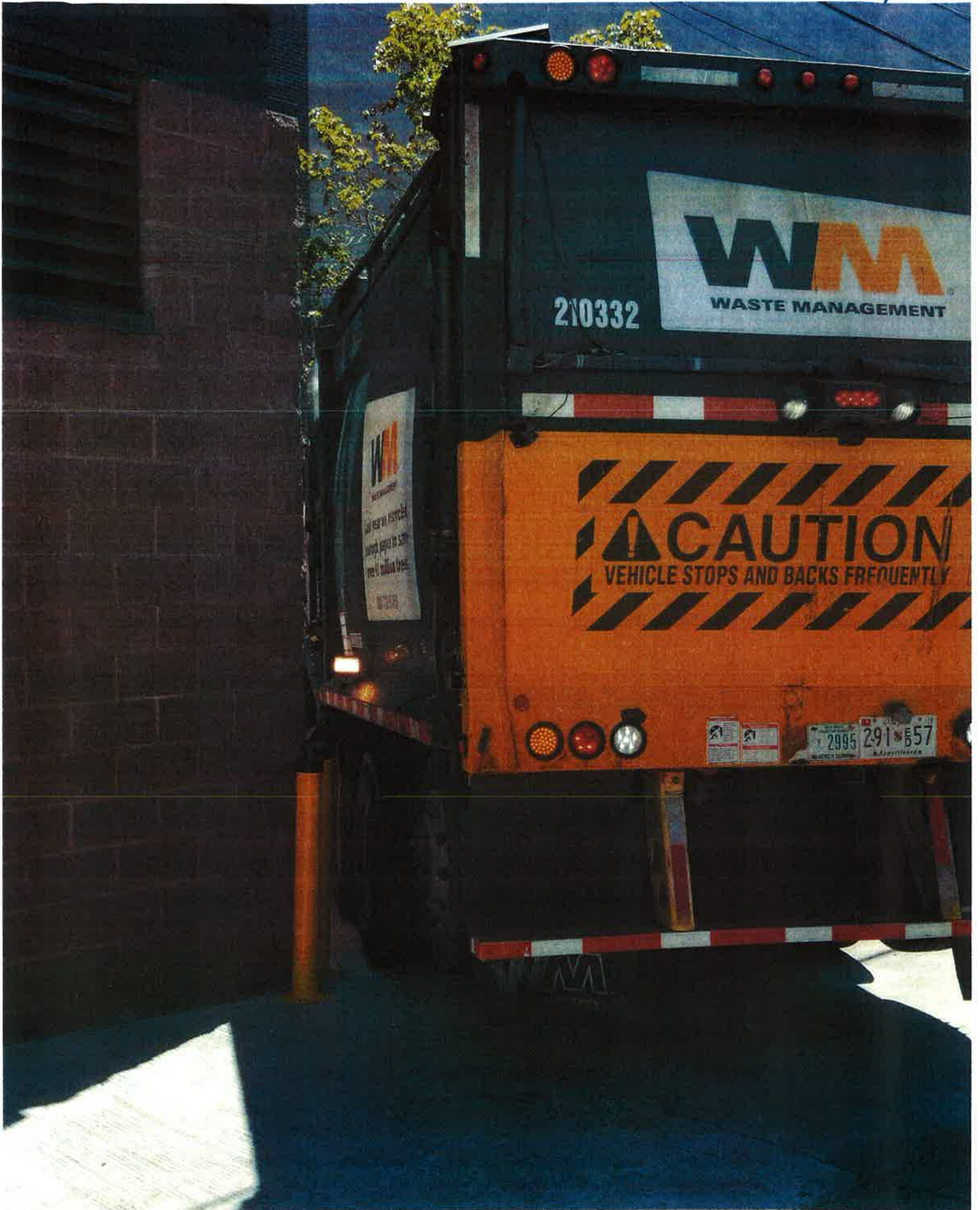


PHOTO 0



122419 MAY 2

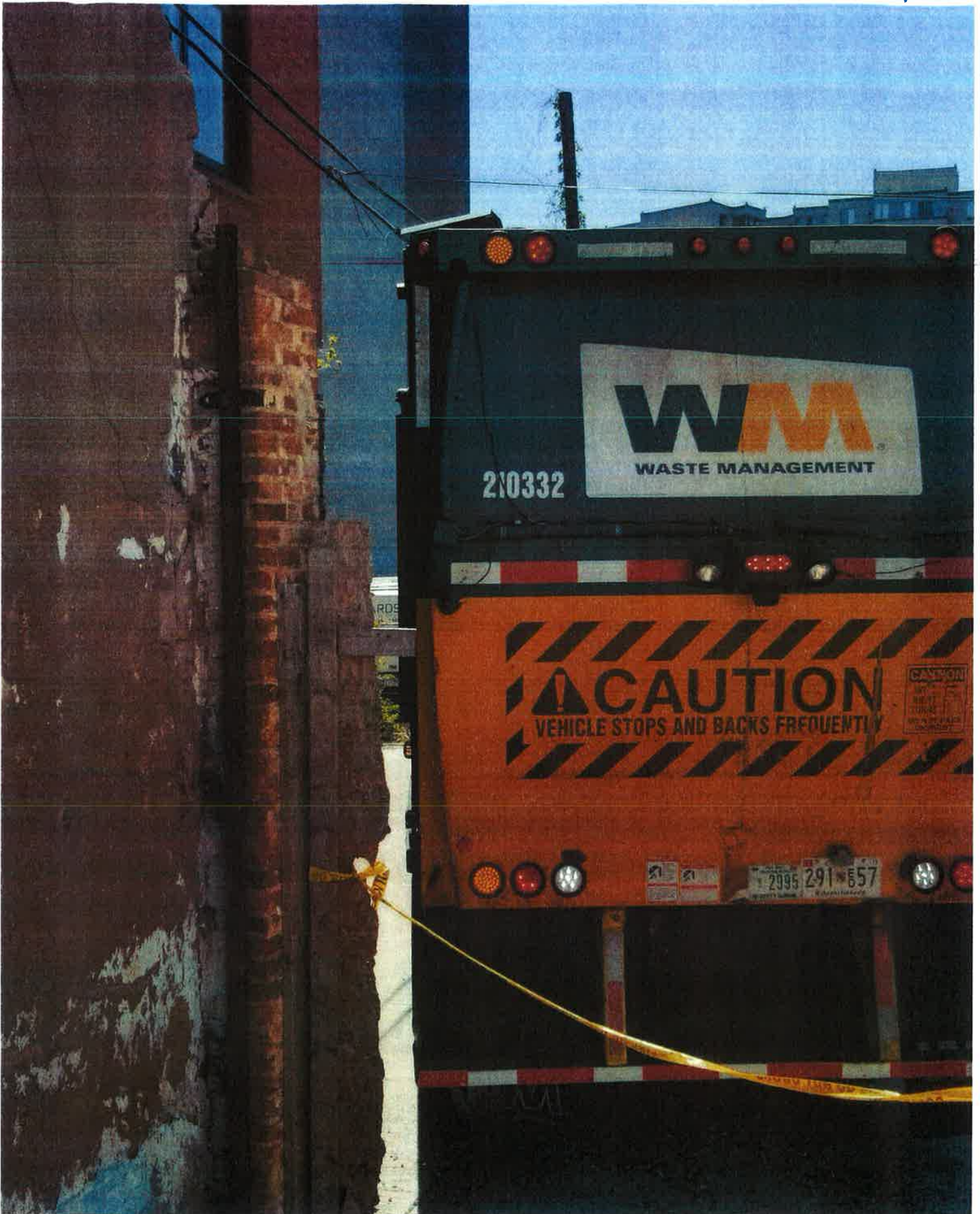


PHOTO P



122452 MAY 2

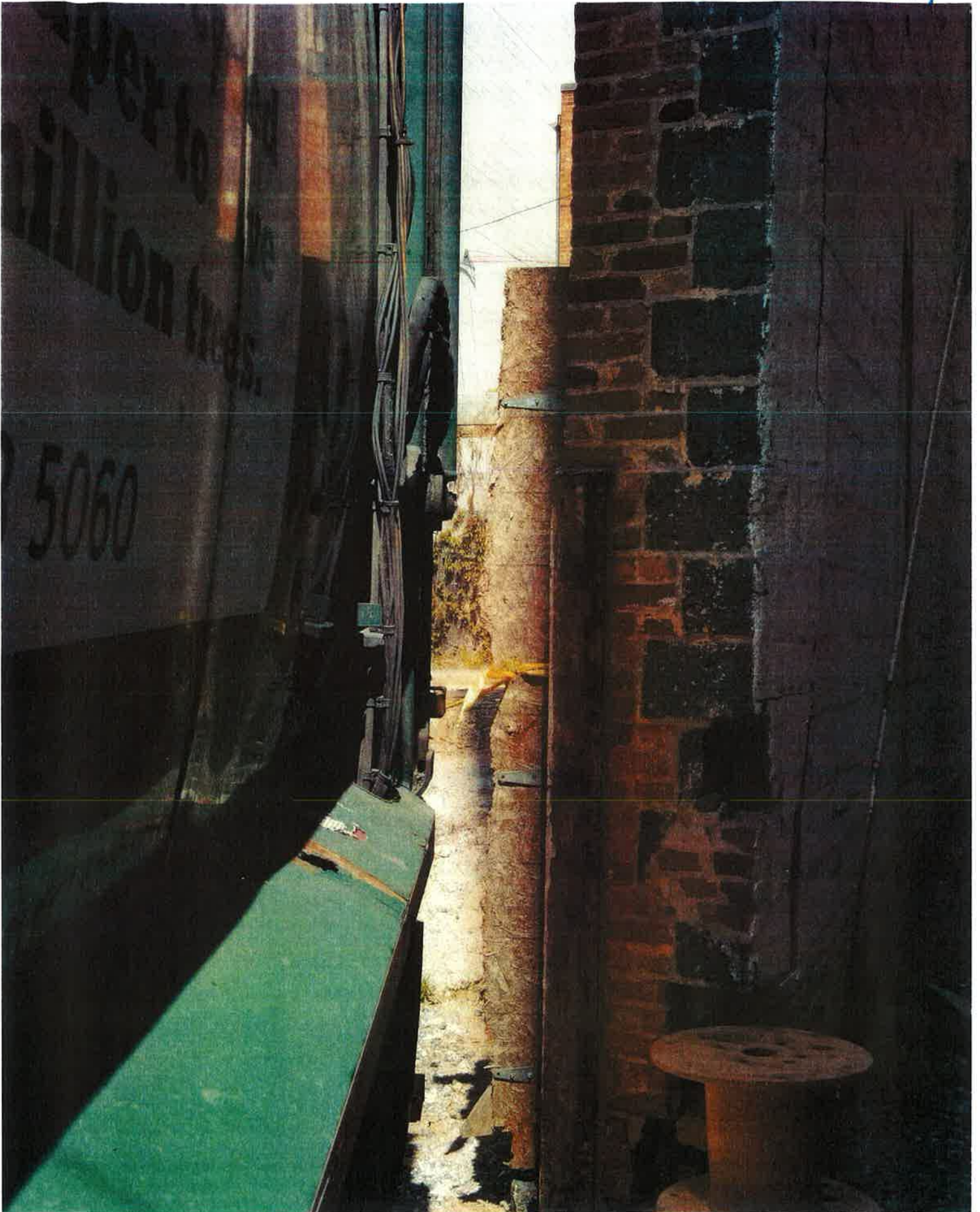


PHOTO Q



122542 MAY 2



PHOTO R



122547 May 2



PHOTO S



122631 MAY 2



PHOTO T