

Woodley Park Community Association
2929 Cathedral Avenue, Northwest
Washington, D.C. 20008

February 9, 1988

Mr. Lindsley Williams, Chairman
D.C. Zoning Commission
District Building, Room 11
1350 Pennsylvania Avenue NW
Washington, DC 20004

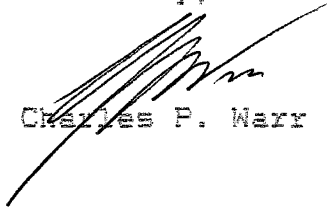
Re: Case 86-26
Transportation Reply
Comments

Dear Chairman Williams and Members of the Commission:

Attached are final reply comments from the Woodley Park Community Association (WPCA) on transportation related issues. We believe that these comments will assist the Commission in evaluating Metrorail and parking issues raised in oral testimony at the hearings. We also draw the Commission's attention to the fact that no expert transportation testimony was put forward by parties in opposition.

Since WPCA did not have the opportunity to respond to testimony in opposition at the hearings, all of which followed our own direct testimony, we ask that the attached comments be made a part of the record in this case.

Sincerely,


Charles P. Warr

1988 FEB 10 PM 12:07
ZONING SECRETARIAT,
DISTRICT OF COLUMBIA


ZONING COMMISSION
District of Columbia

Case 86-26

ZONING COMMISSION
District of Columbia
Exhibit 386

CASE NO. 86-26
EXHIBIT NO. 386

Charles Warr, President
Howard Friedman, Vice President
Carol Chamberlain, Secretary
Charles Lupton, Treasurer

* Misleading "Wilkes, Artis" Testimony on Metrorail

The written testimony dated January 28, 1988 submitted by Wilkes, Artis, Hedrick and Lane on behalf of unknown clients loosely describes "...underutilized Metro stations in Ward 3.." (Wilkes, Artis at 4). No expert transportation testimony was presented to show underutilization, however, and no WMATA report concluding underutilization is quoted. The only expert transportation testimony from the parties before the Commission is that of Dr. Everett Carter, and the transportation testimony from petitioners based on Dr. Carter's work. Not only did Dr. Carter's report not conclude that the Metrorail stations within the ambit of his study were underutilized, but OP has specifically concluded the opposite for the Woodley Park/Zoo station, "...the policy is that the hotels, convention facilities and existing medium and high density housing constitute the economic development envelope for this Metrorail station", (Connecticut Avenue Corridor Study at 67).

Wilkes, Artis (at 4) refers to "...projected levels (of Metrorail ridership) for 1990 according to a November 1987 study", and footnotes a "WMATA study of Metrorail Ridership, November 3, 1987. (see Exhibit 4)." A careful reading of this testimony with its Exhibits, however, reveals that there is no 1987 WMATA study of the type implied. Reference is made to a 1974-revised study done for WMATA by a consultant, but this study is not included in Exhibit 4. The WMATA Office of Planning has recently informed us that this 1974-revised study is no longer used as a basis for planning by WMATA, and the WMATA Office of Planning staff does not specifically recall a time when it was so used. Exhibit 4 is a table which has apparently been constructed by Wilkes, Artis - not by WMATA. Thus there is no properly established expert basis for comparing the figures given in the column of Exhibit 4 labeled "Projected Ridership for 1990" with present actual ridership. Indeed, WMATA indicates that the 1974-revised study would indicate a system-wide ridership of about 1.2 million, whereas present ridership is about 0.5 million.

The column of Exhibit 4 labeled "Actual Ridership as of 11/3/87" is simply the sum of entering and exiting passengers on a particular November Tuesday. The figure given for the Woodley Park/Zoo station is 11,899, and is confirmed by the attached official WMATA count titled "Quarterly Metrorail Ridership Statistics for Tuesday November 3, 1987". This is not, however, a peak day for the Woodley Park/Zoo station. On March 21, 1987 7,171 passengers entered the Woodley Park/Zoo station. On the basis of equal numbers entering and exiting, the farecard gate count in the same terms as the "Actual Ridership" column of Exhibit 4 would be 14,342 or 92% of the corresponding "Projected Ridership for 1990" figure. METRORAIL RIDERSHIP IN WOODLEY PARK IS RIGHT ON SCHEDULE, even by the optimistic standards of 1974, and we expect to break our previous record again this March.

* Hotel Parking Regulations for Residential Zones

During the course of reviewing applicable area parking requirements, it has come to the attention of WPCA that existing regulations relating to hotel parking in residential zones contain a serious omission. While parking spaces are required for function room or exhibit space in all commercial, SP, Waterfront, and Industrial zones (except C-4 and C-5 zones) there is no such allocation requirement applicable to the only residential zones where hotel uses exist: R-5-B, R-5-C or R-5-D zones (see 11 DCMR Section 2101.1).

We believe this omission is so contrary to sound policy, given the Commission's consistent recognition of the negative impacts of hotel use in residential zones, that it is explicable only as an unintended oversight in recent revisions of the hotel parking requirements.

It is undisputed that the operations of the Sheraton and Shoreham, with the magnitude of convention participation that exists, place a very great burden in a number of respects on the community. Regarding parking, there is no reason to exempt hotel/convention centers which are located in residential zones from the requirements, which are applicable to all other hotels, for providing adequate parking for their convention as well as hotel use on site. We believe that the parking requirements for hotels should be applied uniformly to hotels in all zones.

QUARTERLY METRORAIL RIDERSHIP STATISTICS

TUESDAY NOVEMBER 3, 1987

STATION	MEZZ NO	FARE	PATRONS IN	PATRONS OUT	STUDENTS	AVG FARE
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Silver Spring-South	30	15,792	12,045	12,105	93	1.30
North	31	2,941	2,606	2,177	17	1.35
STATION TOTAL		18,733	14,651	14,282	110	1.31
Smithsonian-Mall	54	3,372	3,396	3,421	44	.99
12th & Independence	55	5,948	5,354	5,327	11	1.12
** STATION TOTAL **		9,320	8,750	8,748	55	1.07
Stadium-Armory Hospital	62	1,063	1,140	1,117	10	.95
Stadium	63	2,460	2,850	2,789	164	.88
** STATION TOTAL **		3,523	3,990	3,906	174	.90
Takoma	29	6,510	5,839	5,594	149	1.16
Tenleytown	10	5,555	5,905	5,914	746	.94
Twinbrook	16	6,609	4,071	4,155	0	1.59
Union Station-AMTRAK(N)	25	5,989	6,263	6,071	101	.99
1st & Mass(S)	24	8,518	9,087	8,320	137	1.02
** STATION Total **		14,507	15,350	14,391	238	1.01
Van Ness-UDC	9	7,267	7,560	7,380	152	.98
Vienna	103	12,655	6,793	6,851	0	1.85
Virginia Square-GMU	98	2,300	2,389	2,420	0	.95
West Falls Church	101	6,917	4,504	4,697	0	1.47
White Flint	15	5,935	3,872	3,848	0	1.54
Woodley Park-Zoo	7	5,671	5,793	6,106	107	.93
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*** T O T A L ***		525,013	468,467	467,529	4,918	1.12