

MEMORANDUM

TO: District of Columbia Board of Zoning Adjustment
FROM: Stephen Cochran, Case Manager
JL Joel Lawson, Associate Director Development Review
DATE: July 12, 2019
SUBJECT: BZA Case 20075 - request for a special exception from the parking requirements of Subtitle C § 703.1 for an existing hotel at 1050 31st Street, NW

I. RECOMMENDATION

The Office of Planning (OP) recommends **approval** of the following special exception pursuant to Subtitle C § 703.2:

- C § 703.1, parking (20 spaces required; 0 spaces proposed);

The recommendation is subject to the following conditions intended to mitigate any possible impacts of the requested parking reduction:

- No vehicles shall enter or exit the building except through a head-in / head out movement¹;
- The applicant shall maintain the existing TDM measures and shall implement all proposed TDM measures as described on pages 19 and 20 of, Appendix A – the Comprehensive Transportation Report dated June 10, 2019 (Exhibit 23) and in the applicant’s letter dated July 3, 2019 (Exhibit 38), including the provision of seven off-site attendant parking spaces for the life of the project ².

II. LOCATION AND SITE DESCRIPTION

Address:	1050 31 st Street, NW
Applicant:	CTF Georgetown Hotel, LLC
Legal Description:	Square 1189, Lot 90)
Ward / ANC:	2 / 2E
Zone:	MU-12
Historic:	Old Georgetown Historic District

¹ The applicant has indicated that if the requested relief is granted, the hotel intends to provide three attendant parking spaces in the remaining portions of former garage drive aisles. If the requested relief is approved, any attendant spaces would not serve required parking. In anticipation of this possibility OP recommends that approval of parking relief be conditioned on a requirement that any vehicular use of space within the building employ head-in / head-out movements.

² This TDM-related condition is required by Subtitle C § 703.4. The applicant’s proposal also includes providing 7 off-site attendant spaces at one or more nearby parking garages for the life of the project, and notes that it has signed a contract securing up to 26 off-site “overflow” spaces at a nearby garage should the need arise.

Lot Characteristics:	Rectangular 9396 square foot lot with frontage on west side of 31 st Street, NW.
Existing Development:	5-story hotel with 49 rooms and restaurant
Adjacent Properties:	<u>North</u> : C & O Canal: <u>South</u> , across Waters Alley (public): Two-story row houses <u>East</u> , across 31 st Street: Two-story commercial building <u>West</u> : Enclosed Pepco facility adjoined to mixed use residential and retail building.
Surrounding Neighborhood:	Mix of two-to-five-story rowhouses, apartment buildings, hotels and commercial structures.
Proposed Development:	The below-grade modifications, which eliminated the 24 previous parking spaces, have already been completed under an erroneously-approved building permit for which a C of O has not been issued. Since the original filing the applicant has revised the architectural plans to eliminate the attendant (valet) spaces previously shown on Exhibit 13, Sheet 2.

III. ZONING REQUIREMENTS and RELIEF REQUESTED

With the hotel's having approximately 43,503 square feet of gross floor area, inclusive of habitable penthouse space, the 2016 Zoning Regulations would require 20 on-site parking spaces to meet the requirement of 0.5 spaces per 1000 square feet of lodging space greater than 3,0000 square feet.

The applicant has requested a special exception from the requirements, under the general special exception criteria of Subtitle X, Chapter 9 and the specific parking reduction criteria in Subtitle C § 703.2.

IV. ANALYSIS

*703.2 The Board of Zoning Adjustment may grant a full or partial reduction in number of required parking spaces, subject to the general special exception requirements of Subtitle X, and the applicant's demonstration of **at least one** (1) of the following [emphasis added]:*

(a) Due to the physical constraints of the property, the required parking spaces cannot be provided either on the lot or within six hundred feet (600 ft.) of the lot in accordance with Subtitle C § 701.8;

As the below-grade modifications have been constructed in accordance with the issued building permit there is no opportunity to provide the required parking on-site. The applicant has explored the availability of parking spaces within 600 feet and has demonstrated that while Georgetown is essentially built-out, there is sufficient commercial parking space to accommodate the hotel's needs. However, the space is privately owned.

(b) The use or structure is particularly well served by mass transit, shared vehicle, or bicycle facilities;

The applicant has demonstrated that while this part of Georgetown is not proximate to a Metrorail stop, it is well-served by busses, the DC Circulator connecting to two Metro stations and has several bikeshare stations. The location has a walkscore of 96 and a bikescore of 87.

(c) Land use or transportation characteristics of the neighborhood minimize the need for required parking spaces;

The applicant has referenced the location's walkscore and bikescore ratings and noted that the physical character of Georgetown is conducive to walking.

(d) Amount of traffic congestion existing or which the parking for the building or structure would reasonably be expected to create in the neighborhood;

The applicant has not suggested the application meets this criterion but has noted the plentiful supply of commercial off-street parking.

(e) The nature of the use or structure or the number of residents, employees, guests, customers, or clients who would reasonably be expected to use the proposed building or structure at one time would generate demand for less parking than the minimum parking standards;

The applicant has not suggested the application meets this criterion.

(f) All or a significant proportion of dwelling units are dedicated as affordable housing units;

This is not applicable.

(g) Quantity of existing public, commercial, or private parking, other than onstreet parking, on the property or in the neighborhood, that can reasonably be expected to be available when the building or structure is in use;

Figure 7 of the Comprehensive Transportation Review notes the location of several hundred private or commercial off-street parking spaces within four blocks of the site (Exhibit 23, Appendix A, page 14).

(h) The property does not have access to an open public alley, resulting in the only means by which a motor vehicle could access the lot is from an improved public street and either:

(1) A curb cut permit for the property has been denied by the District Department of Transportation; or Subtitle C-40

(2) Any driveway that could access an improved public street from the property would violate any regulation of this chapter, of the parking provisions of any other subtitle in the Zoning Regulations, or of Chapters 6 or 11 of Title 24 DCMR.

While there is an alley adjacent to the building, the existing structure was built to enable parking access from a curb cut on 31st Street. Due to existing changes in the grade of the site, the elevation of the still-existing parking ramp, and the building's recent below-grade modifications, it would not be possible to provide access to parking from the alley.

(i) The presence of healthy and mature canopy trees on or directly adjacent to the property;
or

This is not applicable.

(j) The nature or location of a historic resource precludes the provision of parking spaces; or providing the required parking would result in significant architectural or structural difficulty in maintaining the integrity and appearance of the historic resource.

This is not applicable.

703.3 Any reduction in the required number of parking spaces shall be only for the amount that the applicant is physically unable to provide, and shall be proportionate to the reduction in parking demand demonstrated by the applicant.

Due to the recent building modifications, the applicant is no longer able to provide any zoning-compliant parking on the site.

The applicant has submitted a transportation demand management (TDM) plan (Exhibit 23) noting that it is already employing TDM measures including a SmartBenefits plan for employees and the provision of 5 on-site bicycles for hotel guests. The applicant lists 12 other TDM measures it would implement if the requested relief is granted (Exhibit 23 Appendix A, pages 19-20). The TDM does not directly demonstrate that the 20-space parking reduction would be proportionate to the reduction in parking demand resulting from the applicant's proposed TDM plan. However, the applicant's situation is unusual in that the parking relief is being requested for an existing building in which the physical ability to provide parking has already been eliminated due to the execution of a previously issued building permit.

703.4 Any request for a reduction in the minimum required parking shall include a transportation demand management plan approved by the District Department of Transportation, the implementation of which shall be a condition of the Board of Zoning Adjustment's approval.

OP has consulted with the District Department of Transportation (DDOT) about this application. DDOT will be filing a separate report and has indicated to OP that it does not object to the requested special exception or to either condition OP is recommending.

V. COMMENTS OF OTHER DISTRICT AGENCIES

The District Department of Transportation (DDOT) has filed a report (Exhibit 40) stating it has no objection to the special request exception, provided the applicant implements the TDM plan (Exhibit 23), and expressing a preference that no more than four parking spaces be provided. There were no other reports from District agencies in the record.

VI. COMMUNITY COMMENTS TO DATE

The file did not contain an ANC 2E report or comments from members of the public at the time OP completed this report.

Figure 1: Location Map

