

**BEFORE THE DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT**

BZA Case No. 21320

**Application of Washington Georgetown Properties, LLC
3401 K Street NW (Square 1183, Lot 813)**

Hearing Date: July 23, 2025

Prehearing Statement of the Applicant

EXECUTIVE SUMMARY

Washington Georgetown Properties, LLC, an affiliate of the citizenM hotel brand, seeks special exception relief to allow a full reduction in required on-site parking for a new seven-story, 230-room hotel at 3401 K Street NW. Aside from the requested relief, the Project complies with all MU-13 zoning standards and will adaptively reuse a historic warehouse to activate the Georgetown waterfront with a high-quality hospitality use. The site is well-situated to take advantage of Georgetown's walkable, mixed-use environment and nearby transportation options. On-site parking is infeasible due to the building's historic status and physical constraints; however, more than 1,700 off-street spaces are located within walking distance. The hotel is also expected to generate minimal parking demand given citizenM's guest profile of frequent, independent travelers who prioritize walkability and transit access. To accommodate alternative modes of travel at this location, the Applicant is providing 13 long-term and 14 short-term bicycle parking spaces, both of which exceed the minimum required, and proposes a robust Transportation Demand Management plan. In addition, the Applicant will commit to securing off-site parking spaces and proposes an enforceable condition to memorialize this commitment. Finally, the Applicant continues to engage with ANC 2E to address community concerns and ensure continued coordination.

I. Overview and Nature of Relief Sought

This Prehearing Statement is submitted on behalf of Washington Georgetown Properties, LLC (the “Applicant”), the owner of the property located at 3401 K Street NW¹ (Square 1183, Lot 813)² (the “Property”) in support of its application (the “Application”) for special exception relief pursuant to Subtitle C § 703.2 and Subtitle X § 901.2 of the District of Columbia Zoning Regulations (Title 11, DCMR). The Applicant requests relief from the minimum off-street parking requirements to allow a full reduction in connection with the development of a new seven-story hotel containing approximately 230 guest rooms, a penthouse, and ground-floor retail use (the “Project”).

The Property is located within the MU-13 zone, which is intended to foster vibrant, mixed-use development in walkable, transit-accessible neighborhoods. While the Applicant is requesting relief from the minimum parking requirement, the proposed hotel fully complies with all other applicable development standards of the zone. The Project will transform a long-underutilized site into a high-quality hospitality destination that activates the Georgetown waterfront and contributes meaningfully to the area’s vitality and pedestrian experience.

This Prehearing Statement updates and supplements the Applicant’s Preliminary Statement (*see* [Exhibit 7](#)) and provides the Board of Zoning Adjustment (“BZA” or “Board”) with additional detail regarding the lodging use, associated parking demand, community engagement efforts, and justifications for the Application, which is scheduled for consideration on July 23, 2025.

II. Jurisdiction of the Board

The Board has jurisdiction to grant the requested special exception relief pursuant to Subtitle X § 901.2 and Subtitle C § 703.2 of the Zoning Regulations.

III. Application Updates

In accordance with Subtitle Y § 300.14, a copy of the Applicant’s Transportation Statement, prepared by its traffic expert and previously submitted to DDOT on June 6, 2025, is attached as **Exhibit A**. The Transportation Statement includes detailed information about nearby off-street parking and finds that, given the hotel’s guest profile, proximity to transit and other transportation options, surrounding parking availability, and the Projects proposed Transportation Demand Management (“TDM”) plan, the Project is not expected to adversely impact parking or traffic.

¹ Although the D.C. Office of Tax and Revenue associates the square and lot with 3401 Water Street NW, the Property is identified as 3401 K Street NW for permitting and zoning purposes.

² The Applicant is in the process of converting Lot 813 from an assessment and taxation lot to a record lot, which may involve minor adjustments to its boundaries and dimensions. In any event, the proposed development will fully comply with all applicable zoning requirements, except for the relief requested herein.

In addition, this Prehearing Submission provides updates on the Applicant's public outreach and engagement with the affected Advisory Neighborhood Commission ("ANC"), summarized in Section IV below.

Finally, this Prehearing Statement reiterates the arguments set forth in the Preliminary Statement submitted in support of the Application (Ex. 7).

IV. Community Outreach and Proposed Conditions

As discussed in the Applicant's Preliminary Statement, the Property is located within the boundaries of ANC 2E05, which is the "affected" ANC pursuant to Subtitle Y § 101.8. Commissioner Mimsy Lindner represents Single Member District ("SMD") 2E05.

Before and since filing the original application, the Applicant has worked closely with the ANC and the surrounding community on the Project. Prior to filing, the Applicant's team contacted Commissioner Lindner on April 17, 2025, to discuss the requested relief. Commissioner Lindner expressed her support for the Project and encouraged the Applicant to continue engaging with the ANC to address any questions regarding where guests may be directed if they seek parking.

The Applicant met again with Commissioner Lindner and ANC 2E Chair Commissioner Gwendolyn Lohse on May 22, 2025. At that meeting, the Commissioners offered suggestions for certain conditions to be included in any final order approving the Application to address potential concerns. In response to those concerns and that request, the Applicant proposes a set of enforceable conditions (the "Proposed Conditions") for inclusion in a final order approving the Application, which are listed below:

- 1. Off-Site Parking Agreement.** Prior to issuance of the final certificate of occupancy for the lodging use, the Applicant shall enter into one or more contracts with a commercial parking operator or comparable entity for no fewer than 15 off-site parking spaces, which may be located more than 600 feet from the Property and may include valet parking. If the contract is terminated, the Applicant shall use best efforts to secure a new agreement that maintains the required number of off-site spaces within a reasonable timeframe. So long as the Applicant provides regular updates to the ANC on the status of the new agreement until such time as it has entered into the new agreement, the Applicant shall be deemed in compliance with this condition.
- 2. Ongoing Outreach and Coordination.** The Applicant shall make itself available at least once per year to meet at a duly-noticed, regularly scheduled meeting of the affected ANC to provide updates to the community.

- 3. Implementation of TDM Plan.** The Applicant shall implement the Transportation Demand Management Plan on pages __ in the DDOT Report in Exhibit __.

The Proposed Conditions are intended to ensure that off-site parking is available to accommodate expected demand from employees who require parking and the limited number of guests who may arrive in a personal car. In connection with the first condition, the Applicant is finalizing a memorandum of understanding with a local parking operator to secure the 15 required parking spaces within one or both of two identified garages, each within walking distance of the Property. As reflected in the second condition, the Applicant will also commit to attending an ANC meeting annually to provide community updates. Finally, the Applicant commits to complying with the TDM plan, as finally approved by DDOT.

The Applicant is continuing its work with the ANC and is scheduled to present its request for special exception relief to the full ANC at its regularly scheduled, duly noticed public meeting on June 30, 2025. The Applicant will continue coordinating with the ANC based on feedback received at that meeting and will supplement the record as necessary no later than 21 days prior to the public hearing, in accordance with Subtitle Y § 300.8(l).

V. Background on the Application

A. Description of the Property and Neighborhood Context

The Property consists of approximately 20,320 square feet of land in the Georgetown neighborhood of Northwest Washington, D.C., just south of the Chesapeake & Ohio Canal ("C&O Canal") and the Chesapeake & Ohio Canal National Historical Park. Located within Square 1183, the site is generally bounded by M Street, NW to the north, Water Street, NW to the south, the Francis Scott Key Bridge to the west, and 34th Street, NW to the east. More precisely, the Property fronts the C&O Canal to the north, Water Street to the south, the Key Bridge overpass and private property to the west, and 34th Street and additional private property to the east. A notable grade change exists between Water Street and the C&O Canal.

Uniquely situated at the southwest edge of the Georgetown neighborhood, the Property lies at the terminus of K/Water Street, beneath the Key Bridge and the Whitehurst Freeway overpass. The location offers convenient access to the M Street commercial corridor, which is known for its shops, bars, and restaurants, as well as the Georgetown Waterfront, which features public open space, dining options, and recreational trails along the Potomac River.

The Property is located within the Georgetown Historic District and is improved with a two-story warehouse building constructed in or around the 1930s or 1940s. The building is considered a contributing structure to the historic district. As such, the Property is subject to review by both the Old Georgetown Board and the Commission of Fine Arts.

The Project is located within an area that is highly accessible to pedestrians and cyclists and is also well served by both public transportation and off-street parking. According to www.walkscore.com, the Property has a Walk Score of 95 (Walker's Paradise), a Bike Score of 87 (Very Bikeable), and a Transit Score of 76 (Excellent Transit). In addition, the Applicant's Transportation Statement identifies more than 1,700 parking spaces that are located within a 10-minute walk of the Property. The Property also offers convenient access to Capital Bikeshare (CaBi), with eight stations within a half-mile radius, including the nearest station on the south side of K Street, just east of 34th Street. Public transit options include four Metrobus routes (A58, C91, D80, and D82), which provide connections to major destinations such as Farragut West, Rosslyn, Dupont Circle, Howard University, Tenleytown, and Foggy Bottom. The Property is also located just over one-half mile from the Roslyn Metrorail Station.

B. Zoning

The Property is zoned MU-13, which provides for mixed-use developments that permit a broad range of commercial, institutional, and multiple dwelling residential development at varying densities and is intended to provide for the orderly development and use of land and to preserve and enhance existing commercial nodes and surroundings by providing an appropriate scale of development and range of shopping and service opportunities. 11-G DCMR §§ 101.1, 101.3. More specifically, the MU-13 zone is intended to permit medium-density mixed-use development generally in the vicinity of the waterfront. 11-G DCMR § 101.20.

C. Overview of Hotel Project, Prior Discretionary Approvals, and Ongoing Construction

As shown on the architectural plans marked as [Exhibit 5](#) in the case record, the Project will be a seven-story hotel, plus penthouse, consisting of approximately 230 guestrooms.³ The design thoughtfully incorporates and preserves the existing two-story historic warehouse building, which will contain the hotel's primary lobby, ground-floor retail, commercial adjunct uses such as a restaurant and bar, back-of-house operations, mechanical space, and loading facilities. The second floor of the warehouse will include additional guest rooms along with back-of-house space, mechanical areas, and a bicycle room. A new five-story addition, plus penthouse, will be constructed above the existing structure, and will house the remainder of the hotel's guestrooms. The penthouse level will be dedicated to mechanical space and screened rooftop equipment.

³ The Board previously reviewed a different development proposal for the Property. In BZA Order No. 20242 (effective June 12, 2020), the Board approved a seven-story residential project, including a special exception from parking location requirements and area variances from parking and driveway design standards. That project was never constructed, and the former owner, IDI Water Street L.C., conveyed the Property to the Applicant in November 2021. Except for the parking relief requested with this application, the proposed hotel is permitted as a matter of right.

The Project has been reviewed and approved by the Old Georgetown Board,⁴ and building permits have been issued. Construction of the hotel is currently underway, with completion and delivery anticipated in the first quarter of 2026.

The Applicant has also secured approval from the Public Space Committee for a series of improvements within the abutting public space, including enhanced landscaping of the public right-of-way and expanding the sidewalk along K Street (DDOT #402898), including construction of a curb extension at the northwest corner of the Water Street/34th Street intersection. In addition, given the hotel's proximity to the C&O Canal Towpath and the Capital Crescent Trail, the hotel is providing 13 long-term and 14 short-term bicycle parking, both of which exceed the minimum number required. These upgrades and accommodations will enrich the pedestrian experience along the Property's frontage and foster a safer and more accessible environment along Water Street.

D. citizenM Hotel Brand and Guest Profile

The Applicant, an entity affiliated with citizenM, will operate the hotel on the Property. citizenM is an international hotel brand with 36 locations in major urban centers, including Paris, New York, and two in the District located at 550 School Street SW (Capitol Hill) and 1222 First Street NE (NoMa). The brand prioritizes central locations near transit, landmarks, and business hubs, offering affordable luxury designed for modern travelers. Targeting "mobile citizens," citizenM caters to frequent, independent travelers who value design, efficiency, and convenience over traditional hotel amenities.

citizenM hotels offer a streamlined, tech-enabled experience tailored to urban settings. Guestrooms are compact and app-controlled, and the brand emphasizes minimal staffing, limited amenities, and contactless check-in. Locations without on-site parking clearly communicate this in advance, encouraging guests to plan accordingly. This efficient model generates low parking demand and integrates seamlessly into dense, walkable neighborhoods like Georgetown.

E. Proximate Off-Street Parking Resources

The surrounding area offers substantial off-street parking options. Based on available data, approximately 1,776 parking spaces are located within walking distance of the Property and may be used by hotel guests and employees. The Property is situated in a part of Georgetown with convenient access to public parking facilities beyond on-street spaces, including multiple public lots and garages that are **located within 0.25 miles**:

1. **Flour Mill Garage (1000 Potomac Street NW):** 5-minute walk; 170 spaces; hours – Mon–Thu: 7:00 AM–10:00 PM, Fri: 7:00 AM–12:00 AM, Sat: 10:00 AM–12:00 AM, Sun: 10:00 AM–10:00 PM.

⁴ See Record for OG 22-069 (HPA 22-070), available at: <https://www.cfa.gov/records-research/project-search/og-22-069-1>.

2. **3290 M Street NW Parking Lot:** 5–7-minute walk; 38 spaces; hours – Mon–Thu: 8:30 AM–11:00 PM, Fri: 8:30 AM–2:00 AM, Sat: 9:00 AM–2:00 AM, Sun: 10:00 AM–12:00 AM.
3. **3307 M Street NW Parking Garage:** 5–6-minute walk; approx. 125 spaces; hours – Mon–Wed: 7:00 AM–7:00 PM, Thu–Fri: 7:00 AM–8:00 PM, Sat: 9:00 AM–8:00 PM, Sun: 9:00 AM–7:00 PM.
4. **Waterfront Center Garage (3205 Water Street NW):** 6-minute walk; approx. 275 spaces; hours – Mon–Thu: 6:30 AM–9:00 PM, Fri: 6:30 AM–11:00 PM, Sat: 8:30 AM–11:00 PM, Sun: 8:30 AM–10:00 PM.
5. **Georgetown Park Parking Garage (1080 Wisconsin Avenue NW):** 8–10-minute walk; 660 spaces; hours – Mon–Sun: open 24/7.
6. **3333 M Street NW Parking Garage:** 5–7-minute walk; approx. 88 spaces; hours – Mon–Sun: open 24/7.
7. **Crystal Parking Lot (3601 M Street NW):** 8–10-minute walk; approx. 30 spaces; hours – Mon–Sun: open 24/7.

The total number of spaces in the parking facilities listed above is approximately 1,386, with an additional 390 spaces available in two nearby garages **located slightly beyond 0.25 miles** from the Property:

1. **Millennium Parking Garage (3177 K Street NW):** 7–8-minute walk; 340 spaces; hours – Mon–Sun: open 24/7.
2. **1403 Wisconsin Avenue NW Parking Garage:** 13-minute walk; approx. 50 spaces; hours – Mon–Sun: 9:00 AM–7:00 PM.

VI. Special Exception Relief

A. Parking Requirement Summary and Requested Relief

The Applicant requests special exception relief pursuant to Subtitle C § 703.2 and Subtitle X § 901.2 for a full reduction in the minimum number of on-site parking spaces required under Subtitle C § 701.5, to allow the development to proceed without providing on-site parking. The following outlines the applicable minimum parking requirement and the basis for the requested relief.

Under Subtitle C § 701.5, lodging use requires 0.5 spaces per 1,000 square feet (“sq. ft.”) of gross floor area (GFA) in excess of 3,000 sq. ft., and retail use requires 1.33 spaces per 1,000 sq. ft. above the same threshold. Where multiple uses exist on a lot, the initial 3,000 sq. ft. exemption must be prorated among them. 11-C DCMR § 701.6. The Project includes approximately 79,308 sq. ft. of GFA, with 2,636 sq. ft. allocated to retail.

Applying the prorated exemption and applicable parking ratios, the required parking for the Project is calculated below:

- **Lodging Use:** Lodging GFA = 76,672 sq. ft.; prorated exemption = $3,000 \times (76,672 \div 79,308) = 2,901$ sq. ft.; net lodging GFA = $76,672 - 2,901 = 73,771$ sq. ft.; required parking = $73,771 \times 0.5 \div 1,000 = 36.9 \rightarrow 37$ spaces
- **Retail Use:** Retail GFA = 2,636 sq. ft.; prorated exemption = $3,000 \times (2,636 \div 79,308) = 99$ sq. ft.; net retail GFA = $2,636 - 99 = 2,537$ sq. ft.; required parking = $2,537 \times 1.33 \div 1,000 = 3.37 \rightarrow 3$ spaces
- **Total Parking Required:** 37 (lodging) + 3 (retail) = 40 spaces

However, the parking requirement is adjusted based on the existence of the two-story warehouse building on the Property that was constructed prior to 1958. According to the Zoning Administrator, the Project is entitled to a parking credit of 13 spaces, consistent with the Zoning Regulations in effect at that time, which required one parking space per 2,400 square feet of warehouse use. Based on the warehouse's floor area of 31,217 square feet, this results in a credit of 13 spaces ($31,217 \div 2,400 = 13$). **Accordingly, the Project's minimum parking requirement is reduced from 40 to 27 spaces.**

Although the Zoning Regulations allow a 50% parking reduction for properties within 0.25 miles of a Priority Corridor Network Metrobus route and not eligible for the Residential Parking Permit (RPP) program, the Property falls just outside the required distance—approximately 0.03 miles, or 158.4 feet—from the nearest qualifying route. As a result, despite being ineligible for RPP, the Property does not qualify for the automatic reduction under Subtitle C § 702.1(c). However, if the Property were located just slightly closer, it would be eligible for the automatic reduction and, as such, would only require 14 on-site parking spaces. This location just outside the eligible area results in a materially different zoning outcome, even though the Property is functionally similar in terms of transit access and parking context.

Similarly, the Property narrowly misses eligibility for the automatic 50% parking reduction permitted under Subtitle C § 702.1(a), which applies to sites within 0.5 miles of a Metrorail station. The Property is located approximately 0.55 miles from the Rosslyn Metrorail station, about a 10-minute walk over the Key Bridge, but it remains outside the qualifying radius. As with Subtitle C § 702.1(c), this marginal distance materially affects the applicable parking requirement, resulting in 27 required spaces instead of 14, even though the Property is well served by transit and is functionally comparable to nearby sites that do qualify.

During the permitting process, the Applicant proposed to meet the parking requirement by providing 27 spaces off-site, as permitted under Subtitle C § 701.8(b). The Zoning Administrator confirmed that locating the required parking within 600 feet of the Property would satisfy that provision, allowing the Project to proceed as a matter of right.

However, due to recent changes in the immediate area, the previously identified off-site parking is no longer available. **As a result, the Applicant proposes no on-site parking, necessitating its request for special exception relief to allow a full reduction.**

B. Burden of Proof

Pursuant to D.C. Code § 6-641.07(g)(2) and Subtitle X § 901.2, the Board is authorized to grant a special exception if it finds that the requested relief is in harmony with the general purpose and intent of the Zoning Regulations and Map, and will not tend to adversely affect the use of neighboring property, subject to any specific conditions set forth in the regulations. The stated purposes of the Zoning Regulations are set forth in D.C. Code § 6-641.02:

Zoning maps and regulations, and amendments thereto, shall not be inconsistent with the comprehensive plan for the national capital, and zoning regulations shall be designed to lessen congestion in the street, to secure safety from fire, panic, and other dangers, to promote health and the general welfare, to provide adequate light and air, to prevent the undue concentration of population and the overcrowding of land, and to promote such distribution of population and of the uses of land as would tend to create conditions favorable to health, safety, transportation, prosperity, protection of property, civic activity, and recreational, educational, and cultural opportunities, and as would tend to further economy and efficiency in the supply of public services. Such regulations shall be made with reasonable consideration, among other things, of the character of the respective districts and their suitability for the uses provided in the regulations, and with a view to encouraging stability of districts and of land values therein.

Relief granted through a special exception is presumed appropriate, reasonable, and compatible with other uses in the same zoning classification, provided the application satisfies the specific requirements for the relief requested. In reviewing an application for special exception relief, “[t]he Board’s discretion . . . is limited to a determination of whether the exception sought meets the requirements of the regulation.” *First Baptist Church of Washington v. District of Columbia Bd. of Zoning Adjustment*, 423 A.2d 695, 706 (D.C. 1981) (quoting *Stewart v. District of Columbia Bd. of Zoning Adjustment*, 305 A.2d 516, 518 (D.C. 1973)). If the applicant meets its burden, the Board must ordinarily grant the application. *Id.*

C. Justification and Compliance with Criteria Under Subtitle C § 703

The provisions regarding requests for special exception relief from minimum parking requirements are set forth in Subtitle C § 703. Subtitle C § 703.1 explains that this “section provides flexibility from the minimum required number of parking spaces when providing the required number of spaces would be: (a) impractical due to the shape or configuration of the site; (b) unnecessary due to a lack for demand for parking or the site’s

proximity to transit options; or (c) contrary to other District of Columbia regulations.” 11-C DCMR § 703.1. As discussed throughout this statement and demonstrated below, the citizenM hotel brand model, coupled with the Property's convenient access to transit options, generates less demand for parking than is required for the Project.

1. Compliance with Subtitle C § 703.2

Pursuant to Subtitle C § 703.2, the Board may grant a full or partial reduction in the number of required parking spaces as a special exception, under Subtitle X § 901.2, upon the applicant's demonstration to the Board's satisfaction of at least one of the criteria set forth in subparagraphs (a) through (j), which are listed below:

- (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;*
- (b) The use or structure is particularly well served by mass transit, shared vehicle, or bicycle facilities;*
- (c) Land use or transportation characteristics of the neighborhood minimize the need for required parking spaces;*
- (d) Amount of traffic congestion existing or which the parking for the building or structure would reasonably be expected to create in the neighborhood;*
- (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;*
- (f) All or a significant proportion of dwelling units are dedicated as affordable housing units;*
- (g) Quantity of existing public, commercial, or private parking, other than on-street parking, on the property or in the neighborhood, that can reasonably be expected to be available when the building or structure is in use;*
- (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 Public Space Committee; or*

(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;

- (i) The presence of healthy and mature canopy trees on or directly adjacent to the property; or*
- (j) The nature or location of an Historic Resource precludes the provision of the number of parking spaces required by this chapter; or providing the required number of parking spaces would result in significant architectural or structural difficulty in maintaining the integrity and appearance of the Historic Resource.*

The Applicant's request satisfies the criteria set forth in Subtitle C §§ 703.2(c), 703.2(e), 703.2(g), and 703.2(j), as discussed below:

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

As discussed above (see Section V.A), the Property's location is advantageous for pedestrians, cyclists, and public transit users, and the land use and transportation characteristics of Georgetown further reduce the need for the 27 required parking spaces. As noted in the Transportation Statement, the Property "is located in an area that readily accommodates and facilitates walking," and "[s]idewalks are present along all walking routes to nearby bus stops ... and connect the site to restaurants and shopping along M Street, as well as to the Georgetown Waterfront." See p. 3. Hotel guests, who are already unlikely to rely on personal vehicles based on the Applicant's target demographic, will not need a car to access a wide range of destinations located within close proximity to the Property.

Additionally, as noted above, the Property narrowly misses eligibility for the automatic 50% parking reduction allowed under Subtitle C § 702.1(a), due to its location just outside the half-mile radius of the Rosslyn Metrorail station. It also narrowly misses eligibility under Subtitle C § 702.1(c), as it is located approximately 160 feet from a qualifying Priority Corridor Network Metrobus route. Had the Property been eligible under either provision, the parking requirement would have been reduced from 27 to 14 spaces. These marginal shortfalls notwithstanding, the Property is well served by transit, and the surrounding land use and transportation context supports a reduced need for on-site 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 will operate a hotel on the Property consistent with citizenM's established model of compact, transit-accessible urban locations (*see* Section II.E). The brand caters to independent, frequent travelers who prioritize comfort, efficiency, and convenience over traditional full-service accommodations. The hotel will feature compact guestrooms for short stays, no large event space, and limited food and beverage service—features that significantly reduce parking demand.

As noted in the Applicant's Transportation Statement (Ex. A), citizenM's hotel guests "are typically business travelers and do not expect or rely on citizenM hotels for on-site vehicle parking [and] would be able to utilize these resources without the need of a car." *See* p. 4. This behavior reflects the brand's intentional design and operational model, which minimizes reliance on private vehicles. The Transportation Statement further concludes that, due to the hotel's proximity to transit and other transportation options, along with its location in the walkable, mixed-use neighborhood of Georgetown, "the number of guests who drive a personal vehicle to the hotel is expected to be relatively low." *See* p. 14.

In addition, the hotel's operations are designed for minimal on-site staffing and rely on app-based check-in, in-room automation, and contactless service. Accordingly, the Applicant expects no more than 19 full-time equivalent staff, with up to five on-site per shift. Even during shift changes, on-site parking demand is expected to remain minimal.

These attributes of the hotel, combined with the Applicant's target guests who prefer centrally located, transit-served areas like the District, reduce the need for on-site parking. Taking into account both guest behavior and limited staffing needs, the Project is expected to generate significantly less parking demand than required under the Zoning Regulations, consistent with Subtitle C § 703.2(e).

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

As detailed above (*see* Section V.E) and in the Applicant's Transportation Statement, the surrounding area offers a substantial supply of public and commercial off-street parking that can reasonably be expected to be available when the Project is in use by hotel guests and employees. Approximately 1,386 such spaces are located within a 10-minute walk of the Property, including several large garages such as the Georgetown Park Garage (660 spaces), Waterfront Center Garage (275 spaces), and Flour Mill Garage (170 spaces). These facilities, all within 0.25 miles of the Property, provide convenient alternatives to on-street parking. An additional 390 off-street spaces are available in garages slightly beyond the 0.25-mile radius, including the Millennium Parking Garage and the garage at 1403 Wisconsin Avenue NW. In total, the neighborhood includes approximately 1,776 accessible off-street spaces.

To further supplement this supply, and as set forth in the Applicant's Proposed Conditions, the Applicant is committing to contract with one or more nearby commercial parking operators or similar entities for at least 15 off-site parking spaces. These dedicated spaces will be available to hotel guests and employees, and the Applicant will actively direct users to both the contracted spaces and other public parking options in the immediate area. This commitment helps to ensure that off-street parking will be reasonably available in the event it is needed for the Project, in accordance with Subtitle C § 703.2(g).

- *(j) The nature or location of an Historic Resource precludes the provision of the number of parking spaces required by this chapter; or providing the required number of parking spaces would result in significant architectural or structural difficulty in maintaining the integrity and appearance of the Historic Resource.*

A Historic Resource is defined as a historic landmark or a building, structure, object, or feature, and its site, that contributes to the character of a historic district, as determined under the Historic Landmark and Historic District Protection Act of 1978. *See* 11-B DCMR § 100.2. The Property qualifies as a Historic Resource because the existing two-story warehouse is a contributing building to the Georgetown Historic District.

The location and configuration of the contributing building preclude the provision of the required number of parking spaces due to architectural and structural constraints. The warehouse occupies most of the lot, leaving little to no room for exterior surface parking. As a result, any parking would need to be located within the existing building. However, guidance from the Historic Preservation Office and the Old Georgetown Board requires that the warehouse façade remain intact, which limits the ability to create new openings for vehicular access.

Even if access were feasible, the building's limited width and interior structural columns prevent the installation of compliant drive aisles and parking spaces. Excavation below the existing slab is not a viable alternative due to subsurface rock and the risk of undermining the warehouse itself, as well as nearby infrastructure including the Key Bridge and the Whitehurst Freeway. In addition, introducing parking at the ground level would negatively affect the public realm and the hotel's operations. Given these conditions, the Property cannot accommodate the number of parking spaces required under the Zoning Regulations.

2. Compliance with Subtitle C §§ 703.3 and 703.4

Any reduction in the required number of parking spaces under Subtitle C § 703.2 must also satisfy the criteria set forth in Subtitle C § 703.3. The Application's compliance with the applicable criteria in §§ 703.3(a) through (c) is addressed below:

- *(a) Proportionate to the reduction in parking demand demonstrated by the applicant;*

As discussed above, citizenM's target audience and business model are not vehicle-dependent. The brand targets frequent, independent travelers and operates in compact, transit-accessible locations with limited on-site services and no large event spaces, resulting in consistently low parking demand. Accordingly, the proposed reduction is proportionate to the actual demand demonstrated by the Applicant.

- *(b) Limited to the number of spaces that the applicant demonstrates cannot reasonably be provided on the site as proposed to be developed in the application; and*

The location and configuration of the existing warehouse, a contributing building to the Georgetown Historic District, prevent the provision of the required number of parking spaces. The warehouse occupies most of the Property, leaving no room for surface parking, and internal parking is not feasible due to preservation requirements from the Historic Preservation Office and Old Georgetown Board, which prohibit alterations to the historic façade. Even if access were possible, the building's narrow width and structural columns preclude compliant drive aisles and parking spaces. Subsurface excavation is also infeasible due to subsurface rock and the risk of damage to the warehouse, the Key Bridge, and the adjacent Whitehurst Freeway. Ground-level parking would further disrupt the public realm and interfere with hotel operations. Given these constraints, the Applicant cannot reasonably provide the required parking on-site.

- *(c) Limited to relief from the minimum number of parking spaces required by this section and shall not provide relief from the location, access, size or layout, screening, or other requirements of this chapter.*

The requested relief is limited to the number of parking spaces required under this section. This Application does not seek relief from any other parking-related requirements, including location, access, size or layout, or screening standards.

Additionally, pursuant to Subtitle C § 703.4, any request for a reduction of more than four parking spaces must include a TDM plan approved by the DDOT, the implementation of which will be a condition of Board's approval. As discussed above in Section III and summarized in the Applicant's Transportation Statement (Ex. A), the Applicant has worked closely with DDOT to develop a TDM plan that is commensurate with the Project and appropriate for the scope of the requested relief. The plan is designed to minimize any adverse impacts on the surrounding transportation network resulting from the Project's lack of on-site parking.

3. Compliance with General Special Exception Standards of Subtitle X § 901.2

As required under Subtitle C § 703.2, an applicant seeking special exception relief to allow a full reduction in minimum parking must also demonstrate compliance with the general special exception standards set forth in Subtitle X § 901.2.

Here, the requested relief is in harmony with the general purpose and intent of the Zoning Regulations and Zoning Map, and specifically with the objectives of Subtitle C § 703. As outlined in § 703.1, relief from minimum parking requirements is appropriate where compliance is unnecessary due to low demand, proximity to transit, or other contextual factors. This Project presents such a case, as it is expected to generate substantially less parking demand than required under zoning based on its guest profile and is located in a highly walkable, transit-accessible area. The Project also supports the goals of the MU-13 zone, which promotes medium-density mixed-use development in the Georgetown waterfront area. As discussed above, the hotel will contribute positively to the character and vitality of the neighborhood.

The requested relief will not adversely affect neighboring properties. As demonstrated by operational experience at citizenM's other District hotels, neither of which provide dedicated on-site parking, the Project is not expected to generate significant demand. Multiple nearby public garages and lots are available to accommodate guest and employee parking needs. In addition, the Applicant has developed a TDM plan in close coordination with DDOT and shared it with the affected ANC. The TDM plan and other proposed conditions are structured to be enforceable by the Board, ensuring the Applicant remains accountable for managing transportation impacts both at the outset and over the long term. These commitments provide continued oversight and reinforce that the requested relief is appropriate and will not negatively impact the use or enjoyment of adjacent or nearby properties now or in the foreseeable future.

Finally, as discussed above, the Application satisfies the three specific criteria enumerated in Subtitle C § 703.2, which relate to (i) the anticipated low parking demand based on the nature of the use, (ii) the availability of off-site parking in the surrounding area, and (iii) the presence of a Historic Resource on the Property that limits the ability to provide on-site parking.

VII. Witnesses

The individuals listed below will testify on behalf of the Applicant during its direct presentation at the public hearing scheduled for July 23, 2025:

- **Joseph Addeo**, Director Investment Management at citizenM Hotels
Representative of Washington Georgetown Properties LLC (the Applicant)
- **Jami L. Milanovich, P.E.**, Principal, Wells + Associates
Applicant's Transportation Expert; resume included at [Exhibit 12](#)
- **Andrew Harman**, Associate, Baskervill
Project Architect and Proffered Expert; resume attached with [Exhibit B](#)

VIII. Exhibits

- Exhibit A: Applicant's Transportation Statement
- Exhibit B: Outlines of Witness Testimony and Resume for Andrew Hartman

IX. Conclusion

For the reasons discussed above, the Applicant requests special exception relief pursuant to Subtitle C § 703.2 to allow a full reduction in the required parking and proceed without providing on-site spaces. This request is supported by the land use and transportation characteristics of Georgetown, the Project's modest expected parking demand, and the availability of substantial nearby off-street parking. In addition, the location of the existing historic resource creates challenges for providing any parking on-site. The requested relief satisfies all applicable criteria under Subtitle C § 703 and Subtitle X § 901.2, and the Board's approval will allow for the adaptive reuse of a Historic Resource into a high-quality hotel consistent with citizenM's brand that contributes to the vitality of the Georgetown waterfront.