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MEMORANDUM



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RE: citizenM Hotel, 3401 K (Water) Street NW

Transportation Statement

BZA Case No.: 21320; BLRA No.: 23-00464

DATE: June 6, 2025

INTRODUCTION

A new citizenM hotel currently is permitted and under construction at 3401 K (Water) Street NW. As shown on Figure 1, the subject site is bordered by K (Water) Street on the south, 34th Street on the east, the Chesapeake and Ohio (C&O) Canal on the north, and the Key Bridge overpass and private property on the west and north. The site is located in Square 1183, Lot 0813 and is zoned MU-13.

Construction of the hotel includes the renovation and expansion of an existing 31,217 SF warehouse building that was constructed in the 1930s or 1940s. The existing building is a contributing building to the Georgetown Historic District. Upon completion of the renovation/expansion, the project will include a 76,672 SF (230 keys) hotel plus 2,636 SF of retail space on the ground floor. The new hotel will provide 230 guest rooms with ground floor retail. One curb cut is proposed along K (Water) Street to provide access to the hotel's loading berth. No vehicular parking is proposed.

The Applicant, Washington Georgetown Properties, LLC, is seeking special exception relief from minimum number of vehicle parking spaces prescribed in the District of Columbia Zoning Regulations of 2016 (ZR16), Subtitle C, §701.5. The Applicant originally intended to provide off-site parking in accordance with Subtitle C, §701.8(b), which allows required parking spaces to be located on another lot, provided it is within 600 feet of the use and meets certain other conditions. However, given changes in the area, they have now decided to pursue a special exception to reduce the number of parking spaces in accordance with Subtitle C, §703.2 and Subtitle X, § 901.2.

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The purpose of this Transportation Statement is to evaluate the transportation elements of the proposed project, including bicycle, pedestrian, parking, and loading. In particular, a detailed parking analysis is included in support of the requested parking relief. This Transportation Statement was scoped with the District Department of Transportation (DDOT). A copy of the agreed upon scope is included in Attachment A.

TRANSPORTATION NETWORK

Transit Services/Facilities

Overview. The site is located approximately one mile from both the Foggy Bottom-GWU and the Rosslyn Metro Stations. Both metro stations provide access to the Blue, Orange, and Silver Lines.

The site is served by a number of Metrobus Routes, including the following:

- 38B, which stops 400 feet from the site at the intersection of 34th Street and M Street,
- G2, which stops at the intersection of Prospect Street and 36th Street,
- Routes 31 and 33, which stop at the intersection of Wisconsin Avenue and M Street.

Route 31 is a Priority Bus Route. The site is within ¼ mile of Routes 3B and G2, while Routes 31 and 33 are just beyond ¼ mile of the site. Public transportation options are shown on Figure 2.

The Washington Metropolitan Area Transit Authority (WMATA) has embarked on an initiative to improve bus service in the metropolitan Washington, DC region. The goal of WMATA's Better Bus plan is to create fast, frequent, and reliable bus service that is easier to understand. The proposed network plan replaces Routes 38B, G2, 31, and 33 with Routes A58, C91, D80, and D82. The new bus network is scheduled to take effect June 29, 2025. A summary of the new bus route is provided in Table 1.

Table 1
Summary of Bus Routes

Route	Nearest Stop (Current)	Similar New Route	Key Destinations (under new route)
38B	34 th /M	A58	Farragut West Metro (Orange, Silver, and Blue Lines) Rosslyn Metro (Orange, Silver, and Blue Lines)
G2	36 th /Prospect	C91	Dupont Circle Metro (Red Line) Howard University
31	Wisconsin/M	D80	Tenleytown - AU Metro (Red Line)
33		D82	Foggy Bottom – GWU Metro (Orange, Silver, and Blue Lines)

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MoveDC 2021. *MoveDC* is the City's long-range transportation plan that establishes goals, policies, strategies, and metrics to guide the City's investment in transportation facilities and programs over the next 25 years. *MoveDC* establishes seven goals in the area of safety, equity, mobility, project delivery, management and operations, sustainability, and enjoyable spaces. These goals are supported by 18 policies and 41 strategies established in the plan to help achieve the goals.

MoveDC provides a Transportation Needs Map, which evaluates areas of the City for walking, biking, transit, and vehicles and ranks areas based on the greatest need for transit improvements, access to jobs and services, and safer streets. Based on the *MoveDC* Transportation Needs Map, the site is located in an area with a moderate need of transportation facilities. The ranking is indicative of an area nearly one mile from the nearest Metro Station but within approximately $\frac{1}{4}$ mile of a priority bus line.

MoveDC also identifies a transit priority network that includes "streets where infrastructure should be developed to help transit vehicles move more efficiently, improving travel times and reliability for passengers. Transit priority infrastructure could include dedicated transit lanes, better transit stops and/or special treatments for buses at intersections." Within the vicinity of the site, M Street, Key Bridge, Whitehurst Freeway, and Wisconsin Avenue are all identified as part of the Transit Priority Network.

Pedestrian Facilities

Overview. The subject site is located in an area that readily accommodates and facilitates walking, though accessibility is challenging due to the topography of the area. Sidewalks are present along all walking routes to nearby bus stops. Sidewalks also connect the site to restaurants and shopping along M Street, as well as to the Georgetown Waterfront, which offers additional dining, retail, and recreational options.

A few sidewalk gaps are present within $\frac{1}{4}$ mile radius of the project:

- The north and south side of K (Water) Street, between 34th Street and the Capital Crescent Trail (including along a portion of the site frontage);
- The south side of M Street, between Whitehurst Freeway and MacArthur Boulevard; and
- The west side of 33rd Street between K (Water) Street and the C & O Canal Towpath.

Sidewalk widths along K (Water) Street are constrained in areas due to the proximity of historical buildings to the roadway and the presence of the Whitehurst Freeway piers. Similarly, sidewalks along 33rd Street and Potomac Street are narrow due to the proximity of historic buildings to the street. Sidewalk widths along these streets range from approximately four to five feet.

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In conjunction with the proposed redevelopment, the sidewalk along the K (Water) Street frontage will be completed and widened to eight feet. In front of the entrance to the hotel, a curb extension will be constructed between two existing Whitehurst Freeway piers thereby widening the sidewalk to 16 feet at the hotel entrance.

The sidewalk on 34th Street will be reconstructed to provide a six foot sidewalk with a six foot buffer. The 34th Street sidewalk will turn east at the terminus of 34th Street to connect to the steps leading to the C & O Towpath. A curb extension also will be constructed on the northwest corner of the K (Water) Street/34th Street intersection with a new ADA compliant curb ramp and new crosswalk across 34th Street. An existing crosswalk crossing K (Water) Street east of 34th Street will remain. ADA compliant ramps are present on both sides of the crosswalk.

The $\frac{1}{4}$ mile walk shed is shown on Figure 3, which shows existing sidewalks, proposed sidewalks, and locations where sidewalk gaps are present. Nearby bus stops also are shown.

As shown on Figure 4, the hotel is located in a dense area within walking distance of many services and amenities, including restaurants, coffee shops, food markets, convenience stores, entertainment venues, and other services. Hotel guests, who are typically business travelers and do not expect or rely on citizenM hotels for on-site vehicle parking, would be able to utilize these resources without the need of a car.

MoveDC 2021. *MoveDC* is a 25-year vision for the District's Transportation Infrastructure. Priorities outlined in *moveDC* have been incorporated in the District of Columbia Transportation Improvement Program (DC STIP). *MoveDC* provides infrastructure and policy recommendations for all modes of transportation, including pedestrians.

According to the pedestrian component of *moveDC*, several opportunities for improvement exist within the District, including:

- Enhancing accessibility, which includes evaluating and improving uncontrolled crosswalks on high-speed multi-lane roadways and improving signalized intersections with high pedestrian crash rates;
- Improving the pedestrian network outside of downtown, which includes providing pedestrian facility enhancements where sidewalks are lacking;
- Making priority investments, which includes prioritizing pedestrian needs in critical locations near schools, transit stations, and high hazard locations;
- Promoting enforcement, which includes enforcement policy changes; and
- Improving intersection designs, which includes closing gaps in the pedestrian network and improvement in intersection lighting, crosswalks, signage, refuge islands, and pedestrian signalization/phasing.

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The subject site is identified by the *moveDC* Pedestrian Friendliness Index (PFI) as having a high PFI, which is indicative of an area with few sidewalk gaps, a connected street grid with small blocks, and buildings set close to the street.

Bicycle Facilities

Overview. Within $\frac{1}{2}$ mile of the subject site, a protected bike lane is present on K (Water) Street between 30th Street and the Capital Crescent Trail. Striped bike lanes are present along Thomas Jefferson Street, Wisconsin Avenue between K (Water) Street and M Street. Striped bike lanes also are present along 33rd and 34th Street between M Street and Wisconsin Avenue. Two off-road trails, the Capital Crescent Trail and the C & O Canal Towpath, are located in close proximity of the proposed hotel. The C & O Towpath can be accessed immediately adjacent to the hotel via an existing staircase northwest of the site. The trailhead for the Capital Crescent Trail is located at the end of K (Water) Street, approximately 500 feet west of the hotel.

Eight Capital Bikeshare (CaBi) stations are located within $\frac{1}{2}$ mile of the site. The nearest station is located on the south side of K (Water) Street, just east of 34th Street. The station includes 19 docks. Additionally, the Trek store on M Street near the Key Bridge (an approximate 5-minute walk) offers traditional bicycle rentals.

The $\frac{1}{2}$ mile bike shed is shown on Figure 5.

MoveDC 2021. According to the bicycle component of *moveDC*, several opportunities for improvement exist within the District, including:

- Improving the cycling experience on bridges and approaches to bridges;
- Minimizing barriers such as complex intersections, security barriers, freeway ramps, and driveways;
- Expanding investment in the bicycle network beyond downtown; and
- Improving safety by educating all road users and increasing public awareness.

Within $\frac{1}{2}$ mile of the subject site, *MoveDC's Bicycle Priority Network* includes a planned but not yet funded on-street bike facility on M Street, west of 29th Street, and K Street, east of 30th Street.

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Safety Evaluation

According to *Vision Zero DC*, the rate of traffic fatalities (per 100,000 residents) decreased from 2017 to 2019; however, since 2019 the rate of traffic fatalities has increased each year. Zero fatal crashes occurred since January 1, 2020 within $\frac{1}{4}$ mile of the project. Two vehicle crashes and two crashes involving pedestrians with major injuries occurred within $\frac{1}{4}$ mile of the site. The pedestrian crashes occurred at M Street/Potomac Avenue (2020) and M Street/34th Street (2021).

Thirty-four vehicular crashes resulting in minor injuries occurred within the $\frac{1}{4}$ mile radius. The vast majority of the vehicle collisions occurred on M Street. Two occurred at the 34th Street/K (Water) Street intersection (one in 2020 and one in 2022). Four were on the Key Bridge or Whitehurst Freeway. Fourteen pedestrian collisions with minor injuries occurred within the $\frac{1}{4}$ mile radius. One occurred on K (Water) Street at 34th Street (2021), three occurred along M Street, the remaining ten occurred on streets north of M Street.

The goal of Vision Zero is no fatalities and no serious injuries on the transportation system. In order to achieve the Vision Zero goal, the *Vision Zero 2022 Update* focuses on a Safe System approach to reducing crashes. The Safe System approach includes focus on safe streets, safe people, safe speeds, safe vehicles, and post-crash care. Each component of the Safe System approach is described below:

- The Safe Streets initiative includes the design, construction, operation, and maintenance of the District's roadways.
- The Safe Speeds initiative includes self-enforcing streets, which are streets where the design of the street results in appropriate speeds, automated traffic enforcement, context-sensitive speed limits, and in person speed enforcement.
- The Safe People initiative focuses on education and outreach, enforcement, and legislative rules to ensure all users are traveling safely.
- The Safe Vehicles initiative focuses on both the District's fleet of vehicles and private vehicle safety. The District requires inspections and registration of all District vehicles and has increased fees to register vehicles according to size and weight.
- The Post-Crash Care initiative seeks to enhance the ability for those involved in crashes to survive "through quick and efficient access to emergency medical care, while creating a safe work environment for those first responders."

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Improvements and strategies proposed by the Applicant are expected to further the Vision Zero goals, as indicated below:

- Construction of the missing sidewalk along the property's K (Water) Street frontage and
- Construction of a curb extension on the northwest corner of the K (Water) Street/34th Street intersection, which improves pedestrian visibility and shortens the crossing distance across 34th Street, and
- No provided parking, which results in a reduction of vehicular traffic, particularly unfamiliar drivers.

SITE CHARACTERISTICS

Overview

The proposed citizenM hotel will include 230 guest rooms with 2,636 SF of retail space on the ground floor. citizenM hotels are uniquely designed for mobile citizens (the “M” in the brand name actually stands for “mobile”). Of the 17 citizenM hotels in the United States, only one is not located in the urban core of a major city. Because the urban locations offer walkability and access to public transportation, only four of the hotels (including the suburban location) provide on-site parking. The two existing citizenM hotels in the District, located at 1222 1st Street NE and 550 School Street SW) do not have parking. Hotels are designed with compact rooms that cater to single business travelers rather than families. The urban location coupled with the target demographic results in fewer guests arriving in personal vehicles.

Further, citizenM hotels offer limited services. Only a small bar and coffee station are provided in lieu of full food and beverage services. Additionally, check-in/check-out is contactless and handled via touch screen terminals or through the app. As a result, the number of employees at the hotel is significantly fewer than traditional hotels.

Site Access

One previously approved 12-foot-wide curb cut on K (Water Street) will provide access to the loading for the hotel. Two spaces for hotel loading and unloading will be provided in front of the hotel on K (Water) Street. The site circulation plan is shown on Figures 6A and 6B.

Vehicular Parking

The minimum number of required parking spaces is prescribed by Subtitle C, §701.1 of ZR16 and is summarized in Table 2 along with DDOT's preferred maximum parking ratio.

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According to the Zoning Administrator, the project is entitled to a parking credit based on the existence of the two-story warehouse building which was constructed prior to 1958. The Zoning Administrator determined that based on the Zoning Regulations in effect in 1958, one parking space for each 2,400 GFA of warehouse use was required, which results in a parking credit of 13 spaces. A copy of the letter from the Zoning Administrator is included in Attachment B.

Table 2
Vehicle Parking Requirements

Component	Required		Proposed
	Minimum [†]	DDOT Preferred Maximum (½ to 1 mi from Metro)	
Lodging (76,672 SF)	0.5 per 1,000 SF > 3kSF = $0.5 * (76,672 - 2,901) / 1,000$ = 37 spaces	≤ 1.2 * 37 spaces ≤ 44 spaces	0
Retail (2,636 SF)	1.33 per 1,000 SF > 3,000 SF = $1.33 * (2,636 - 99) / 1,000$ = 3 spaces	≤ 1.6 spaces/1,000 SF ≤ 1.6 * 2,636 / 1,000 SF ≤ 4 spaces	0
Subtotal	40 spaces	48 spaces	0
Credit	1.0 per 2,400 SF = $31,217 / 2,400$ = 13 Spaces	---	---
Total	27 spaces	48 spaces	0

[†]In accordance with §701.6, the exempted 3,000 SF was split proportionally between the two uses. Specifically, the 2,901 SF (lodging) and 99 SF (retail) subtracted from the GFA represent the exempted 3,000 SF proportionally split between the two uses.

§702.1 allows for a 50 percent reduction in parking for sites within ¼ mile of a Priority Corridor Network Metrobus Route as long as the property is on a street that does not allow participation in the Residential Parking Permit program, or the property is otherwise exempted from the Residential Parking Permit program. The site is located 0.28 miles from a Priority Bus Route stop at the Wisconsin Avenue/M Street intersection, which precludes use of the reduction. Accordingly, a minimum of 27 parking spaces are required, as shown in Table 2.

No parking is proposed in conjunction with the project. As such, the Applicant is seeking special exception relief from the minimum parking requirements of ZR16.

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Bicycle Parking

In accordance with Subtitle C, §802.1 of ZR16, the Applicant is required to provide short-term and long-term bicycle parking for the hotel. Long-term bicycle parking must be located on the first level below grade or on the ground floor of the building. Short-term bicycle parking is intended for use by visitors to the site and should be located within 120 feet of main entrances to the building. The required bicycle parking for the project is summarized in Table 3. As shown in Table 3, the hotel will provide five more long-term bike spaces than required and 11 more short-term bike spaces than required.

Table 3
Bicycle Parking Requirements

Component	Required		Proposed	
	Long-term	Short-term	Long-term	Short-term
Lodging (76,672 SF)	1 sp per 10 kSF = 76.672/10 = 8 spaces	1 sp per 40 kSF = 76.672/40 = 2 spaces	13 spaces	14 spaces
Retail (2,636 SF)	1 sp per 10 kSF = 2.636/10 = 0 spaces	1 sp per 40 kSF = 2.636/3.5 = 1 space		
Total	8 spaces	3 spaces	13 spaces	14 spaces

The long-term bicycle parking will be located on the second level of the building. Due to the change in grade on the property, the bike room can be accessed at grade, as shown on Figure 6B.

The long-term bicycle storage room will accommodate non-traditional sized bikes, such as cargo, tandem, and children's bikes, with at least two spaces designed for cargo or tandem bikes. All spaces (12 more than required by ZR16) will be equipped with electrical outlets to charge electric bikes and scooters.

Per §806.4, non-residential uses that require long-term bicycle parking spaces and occupy more than 25,000 SF of GFA provide a minimum of two showers. An additional two showers are required for every 50,000 SF of GFA above the initial 25,000 SF up to a total of six showers. Therefore, four showers are required for the proposed project, and four will be provided in the hotel locker rooms on the 2nd floor.

Per §806.5, non-residential uses that require long-term bicycle parking are required to provide lockers in the amount of 0.6 times the minimum number of required long-term bicycle spaces. Therefore, five lockers are required. At least five lockers will be provided in the locker rooms on the 2nd floor of the hotel.

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Loading

Required loading is prescribed by Subtitle C, §901.1 of ZR16 and is summarized in Table 4. According to the Zoning Administrator, the Project is entitled to a loading credit of one berth based on the existence of the two-story warehouse building, which was constructed prior to 1958. Therefore, the proposed project is only required to provide one loading berth.

Table 4
Loading Requirements

Use	ZR16 Requirement	Calculation	Proposed
Lodging (76,672 SF)	> 50,000 to 100,000 SF	2 Loading Berths No Service/Delivery Spaces	1 Berth
Retail	< 5,000 SF	None	None
Credit		1 Berth	---
Total		1 Berth	1 Berth

A copy of the letter from the Zoning Administrator is included in Attachment B. The proposed 12'x30' loading berth is shown on Figure 6A.

The hotel is subject to a Loading Management Plan that was approved in conjunction with the project's public space approvals. A copy of the Loading Management Plan is included in Attachment C.

Curbside Management

The subject site has frontage on K (Water) Street and 34th Street. The curb lanes along both frontages currently are blocked due to construction of the hotel. Upon completion of the hotel, two short-term hotel loading/unloading spaces will be provided along the K (Water) Street frontage between 34th Street and the hotel entrance, and five metered parking spaces will be provided along the remainder of the K (Water) Street frontage. No parking will be permitted along the 34th Street frontage. The curbside uses are shown on Figure 7.

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Trip Generation

In order to develop trip generation estimates for the proposed project, the Institute of Transportation Engineers' *Trip Generation Manual* (11th Edition) was used. Land Use Codes 310, Hotel, and 822, Retail, were used for the proposed project with rooms and square footage as the independent variables.

Mode splits were taken from hotel data provided by DDOT for three hotels in the District (a copy of the data is included in Attachment D). The mode splits reflect the hotel's proximity to transit, including Route 38, which stops just 600 feet from the site and Route 31, which is a Priority Bus Route and stops just over $\frac{1}{4}$ mile from the hotel. The bicycle and pedestrian mode splits reflect the proximity of the hotel to nearby restaurants, coffee shops, and shopping, as well as the Capital Crescent Trail and the C & O Canal Towpath. Retail mode splits were assumed based on the small size of the retail component (i.e. it is not destination retail), and the fact that the retail is anticipated to draw largely from hotel guests and other people already in the area for other purposes. The mode splits used in the trip generation analysis are summarized in Table 5A.

Table 5A
Anticipated Mode Splits

Mode	Hotel		Retail	
	AM	PM	AM	PM
Auto	42%	42%	25%	25%
Transit	8%	8%	5%	5%
Bike	1%	1%	5%	5%
Pedestrian	49%	49%	65%	65%

The data provided by DDOT indicates average vehicle occupancies of 1.75 and 2.10 people per vehicle during the AM and PM peak hours, respectively. Because the citizenM hotel caters to single business travelers, a conservative average vehicle occupancy of 1.2 was used for this analysis. The anticipated peak hour trip generation for the hotel is shown in Table 5B.

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Table 5B

Proposed Trip Generation

User	AM PEAK HOUR			PM PEAK HOUR		
	IN	OUT	TOTAL	IN	OUT	TOTAL
Hotel (230 Rooms)						
Baseline Trips¹	60	48	108	72	70	142
Person Trips²	73	57	130	87	83	170
Auto³	31	24	55	36	35	71
Transit³	6	4	10	7	7	14
Bike³	-	1	1	1	-	1
Pedestrian³	36	28	64	43	41	84
Vehicle Trips⁴	26	20	46	30	29	59
Retail (2,636 SF)						
Baseline Trips⁵	4	2	6	15	15	30
Person Trips⁶	7	4	11	28	27	55
Auto⁷	2	1	3	7	7	14
Transit⁷	-	-	-	2	1	3
Bike⁷	-	-	-	1	2	3
Pedestrian⁷	5	3	8	18	17	35
Vehicle Trips⁸	1	1	2	4	4	8
Total						
Baseline Trips¹	64	50	114	87	85	172
Person Trips²	80	61	141	115	110	225
Auto³	33	25	58	43	42	85
Transit³	6	4	10	9	8	17
Bike³	-	1	1	2	2	4
Pedestrian³	41	31	72	61	58	119
Vehicle Trips⁴	27	21	48	34	33	67

¹ Baseline trips calculated using ITE Trip Generation Manual, 11th Ed.

² Total Person Trips calculated by applying an assumed AVO of 1.2, which is substantially lower than the AVO recommended in DDOT's CTR Guidelines and the AVOs derived from DDOT provided hotel data, to reflect the nature of the citizenM hotel.

³ Mode splits taken from hotel data provided by DDOT.

⁴ Vehicle Trips calculated by applying AVO of 1.2.

⁵ Baseline trips calculated using ITE Trip Generation Manual, 11th Ed.

⁶ Total Person Trips calculated by applying AVO of 1.82, per DDOT's CTR Guidelines

⁷ Mode splits were assumed and reflect the small size of the retail component (i.e. not destination retail).

⁸ Vehicle Trips calculated by applying AVO of 1.82 in accordance with DDOT's CTR Guidelines.

Prior to the construction of the hotel, the existing building was occupied by a Go-Puff retailer and a bar/entertainment venue. As such, not all trips generated by the hotel will be new trips to the roadway network. The estimated pre-construction trip generation is shown in Table 5C.

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Table 5C

Pre-construction Trip Generation

User	AM PEAK HOUR			PM PEAK HOUR		
	IN	OUT	TOTAL	IN	OUT	TOTAL
Drinking Place (27,000 SF)						
Baseline Trips¹	15	7	22	204	105	309
Person Trips²	26	20	46	331	318	649
Auto (40%/30%)³	10	8	18	99	95	194
Transit (10%/15%)³	3	2	5	50	48	98
Bike (5%/0%)³	1	1	2	-	-	-
Ped (45%/55%)³	12	9	21	182	175	357
Vehicle Trips⁴	5	4	9	48	57	92
Retail (4,000 SF)						
Baseline Trips⁵	6	3	9	21	20	41
Person Trips⁶	10	7	17	38	37	75
Auto (25%/25%)⁷	2	2	4	10	9	19
Transit (5%/5%)⁷	1	-	1	2	2	4
Bike (5%/5%)⁷	1	-	1	1	2	3
Ped (65%/65%)⁷	6	5	11	25	24	49
Vehicle Trips⁸	1	1	2	5	5	10
Total						
Baseline Trips¹	21	10	31	225	125	350
Person Trips²	36	27	63	369	355	724
Auto³	12	10	22	109	104	213
Transit³	4	2	6	52	50	102
Bike³	2	1	3	1	2	3
Pedestrian³	18	14	32	207	199	406
Vehicle Trips⁴	6	5	11	52	50	102

¹ Baseline trips calculated using ITE Trip Generation Manual, 11th Ed.

² Total Person Trips calculated by applying an assumed AVO of 1.2, which is substantially lower than the AVO recommended in DDOT's CTR Guidelines and the AVOs derived from DDOT provided hotel data, to reflect the nature of the citizenM hotel.

³ Mode splits based on proximity to several bus routes and the assumption that the majority of patrons expecting to consume alcohol will chose not to drive, though some would use rideshare.

⁴ Vehicle Trips calculated by applying AVO of 1.2.

⁵ Baseline trips calculated using ITE Trip Generation Manual, 11th Ed.

⁶ Total Person Trips calculated by applying AVO of 1.82, per DDOT's CTR Guidelines

⁶ Mode splits were assumed and reflect the small size of the retail component (i.e. not destination retail).

⁷ Vehicle Trips calculated by applying AVO of 1.82 in accordance with DDOT's CTR Guidelines.

The number of net new trips generated by the proposed redevelopment is shown in Table 5D.

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Table 5D

Net Trip Generation

User	AM PEAK HOUR			PM PEAK HOUR		
	IN	OUT	TOTAL	IN	OUT	TOTAL
Hotel (230 rooms, 2,636 SF of ground floor retail)						
Baseline Trips¹	43	40	83	(138)	(40)	(178)
Person Trips²	44	34	78	(254)	(245)	(499)
Auto³	20	15	36	(66)	(62)	(128)
Transit³	2	2	4	(43)	(42)	(85)
Bike³	(2)	-	(2)	1	-	1
Pedestrian³	23	17	40	(146)	(141)	(287)
Vehicle Trips⁴	21	16	37	(18)	(17)	(35)

¹ Baseline trips calculated using ITE Trip Generation Manual, 11th Ed.
² Total Person Trips calculated by applying an assumed AVO of 1.2, which is substantially lower than the AVO recommended in DDOT's CTR Guidelines and the AVOs derived from DDOT provided hotel data, to reflect the nature of the citizenM hotel.
³ Mode splits taken from hotel data provided by DDOT.
⁴ Vehicle Trips calculated by applying AVO of 1.2.
⁵ Baseline trips calculated using ITE Trip Generation Manual, 11th Ed.

The proposed redevelopment is expected to generate an estimated 37 more AM peak hour vehicle trips than the prior uses (21 additional trips in, 16 additional trips out) and 35 **fewer** PM peak hour vehicle trips (18 fewer trips in, 17 fewer trips out).

PARKING ASSESSMENT

As discussed previously, the number of guests who drive a personal vehicle to the hotel is expected to be relatively low. Likewise, the number of employees on-site also is minimal since limited services will be provided.

Despite the anticipated low parking demand, a parking assessment was conducted to ensure parking is available for guests and employees who do park. The parking assessment also examined whether on-street parking in the area would be impacted by the hotel. Therefore, in conjunction with the proposed parking relief, an inventory of off-street parking facilities within walking distance of the hotel was compiled as well as an inventory of on-street parking restrictions and on-street parking utilization in the vicinity of the hotel.

Off-Site Garage and Surface Lot Parking Inventory

Off-site parking garages and surface lots are a viable option for hotel employees and visitors. As shown in Table 6, nine garages and surface lots are located within approximately ¼ mile of the site. Eight of them are within a 10-minute walk of the hotel. Eight of the nine parking facilities provide a daily parking option (conducive to hotel guests who may drive a personal vehicle), and

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eight of the nine provide a monthly parking option (conducive to employees who may drive to the hotel). In total, there are over 1,700 off-street parking spaces within an approximate $\frac{1}{4}$ mile radius of the site. Figure 8 shows the locations of the available off-street parking.

Table 6

Off-site Parking Availability

Location	Total Spaces	Daily Parking Option	Monthly Parking Option	Hours	Estimated Walk Time
1000 Potomac Street Flour Mill Garage ²	170	Yes	Yes	M-TH, 7A-10P F, 7A-12A SA, 10A-12A SU, 10A-10P	5 min
3307 M Street Garage ¹	125	Yes	Yes	M-W, 7A-7P TH-F, 7A-8P SA, 9A-8P SU, 9A-7P	5-6 min
3290 M Street Parking Lot	38	Yes	No	M-TH, 8:30A-11P F, 8:30A-2A SA, 9A-2A SU, 10A-12A	5-7 min
3333 M Street	88	No	Yes	M-SU, 24 hrs	5-7 min
3213 Water Street Waterfront Center Garage ²	275	Yes	Yes	M-TH, 6:30A-9P F, 6:30A-11P SA, 8:30A-11P SU, 8:30A-10P	6 min
3177 K Street ^{2,3} Millenium Garage	340	Yes	Yes	M-SU, 24 hrs	7-8 min
1092 Wisconsin Avenue Georgetown Park	660	Yes	Yes	M-SU, 24 hrs	8-10 min
3601 M Street Crystal Parking Lot ²	30	Yes	Yes	M-SU, 24 hrs	8-10 min
1403 Wisconsin Avenue ³	50	Yes	Yes	M-SU, 24 hrs	13 min
Total Space	1776				

¹ Garage currently does not have monthly parking available.

² Garage currently has monthly parking available.

³ Located just outside $\frac{1}{4}$ mile

On-Street Parking Inventory

To assess the potential impact to on-street parking in the neighborhood, a detailed parking inventory was conducted for all streets within approximately two blocks of the subject site. Figure 9 shows the on-street parking restrictions on each block.

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MEMORANDUM

The surveyed area includes approximately 87 total on-street parking spaces, including a mix of commercial loading zones, pickup/drop-off zones, metered parking, and residential permit parking (RPP) spaces. The block-by-block parking details are summarized in Table 7.

Table 7
On-Street Parking Inventory

Segment	Street	From	To	Side of Street	Restriction	No. of Spaces
A1	M St	34th St	Key Bridge	N	Commercial Loading Zone 7AM-3PM M-F/ No Parking 3PM-7PM M-F	2
A2	M St	34th St	Key Bridge	N	2hr Metered Parking 7AM-3PM M-F/ 2hr Metered Parking 7AM-6:30PM SA/ No Time Limit Parking 6:30PM-10PM M-SA	4
A3	M St	34th St	Key Bridge	N	No Stopping Anytime	-
B1	M St	Bank Alley	34th St	N	2hr Metered Parking 9:30AM-4PM M-F/ 2hr Metered Parking 7AM-6:30PM SA/ 3.5hr Metered Parking 6:30PM-10PM M-SA	5
B2	M St	33rd St	Bank Alley	N	Commercial Loading Zone 7AM-4PM M-F	6
B3	M St	Bank Alley	33rd St	S	Commercial Loading Zone 7AM-4PM M-F	4
B4	M St	Bank Alley	33rd St	S	2hr Metered Parking 9:30AM-4PM M-F/ 2hr Metered Parking 7AM-6:30PM SA/ 3.5hr Metered Parking 6:30PM-10PM M-SA Commercial Loading Zone 7AM-3PM M-F	13
C	34th St	Prospect St	M St	E	No Standing or Parking 4pm-6:30pm M-F	7
D1	33rd St	M St	Alley	W	2hr Metered Parking 9:30AM-4PM M-F/ 2hr Metered Parking 7AM-6:30PM SA/ 3.5hr Metered Parking 6:30PM-10PM M-SA	3
D2	33rd St	Alley	C&O Towpath	W	2hr Metered Parking 9:30AM-4PM M-F/ 2hr Metered Parking 7AM-6:30PM SA/ 3.5hr Metered Parking 6:30PM-10PM M-SA	2
E	33rd St	C&O Towpath	Water St	W	2hr Parking Limit in Zone 2 7am-8:30pm M-F, Zone 2 Permit Holders Excepted	7
F1	Water St	33rd St	34th St	N	4hr Metered Parking 7AM-8:30PM M-SA/ No Time Limit 6:30PM-10PM	14
F2	Water St	34th St	33rd St	S	4hr Metered Parking 7AM-8:30PM M-SA/ No Time Limit 6:30PM-10PM	20

Approximately 70 percent of the on-street parking spaces are metered spaces with time limits during the day and evenings and, therefore, are not conducive to hotel employee or guest parking. Approximately eight percent of the spaces are limited to two-hour parking during the day and evening except for Zone 2 RPP holders and, as such, also are not conducive to hotel employee or guest parking. Approximately 14 percent of the on-street spaces are commercial

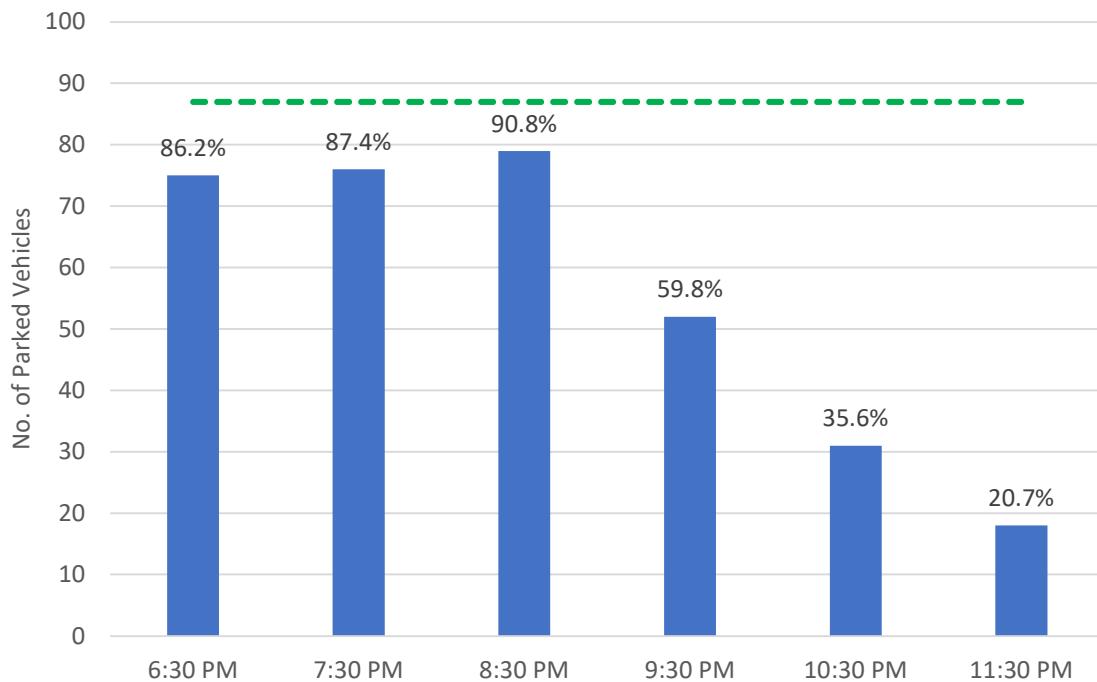
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MEMORANDUM

loading zones during the day and would not be available for employees. Since the commercial loading zones take effect at 7:00 AM, they also would not be desirable for hotel guests.

Given the on-street parking restrictions in place in the area around the hotel, on-street parking is not a desirable or practical option for hotel guests or employees, particularly when an abundance of off-street parking is available within walking distance. As a result, the hotel would not have a significant impact on the on-street parking in the area.

Despite the expectation that on-street parking would not be used in any substantial manner by hotel employees or guests, an on-street parking utilization study was conducted in the vicinity of the hotel. Parking occupancy counts were conducted on Thursday, April 17, 2025 at hourly intervals from 6:30 PM to 11:30 PM. Block-by-block parking occupancy counts are included in Attachment E. The overall parking occupancy for the study area is shown below.



As shown, on-street parking is approaching but below capacity in the evening hours until 8:30 PM. After 8:30 PM, the parking utilization declines significantly.

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TRANSPORTATION MANAGEMENT PLAN

Traffic and parking congestion can be solved in one of two ways: 1) increase supply or 2) decrease demand. Increasing supply requires building new roads, widening existing roads, building more parking spaces, or operating additional transit service. These solutions are often infeasible in constrained conditions in urban environments and, where feasible, can be expensive, time consuming, and in many instances, unacceptable to businesses, government agencies, and/or the general public. The demand for travel and parking can be influenced by TDM plans. Typical TDM measures include incentives to use transit or other non-auto modes of transportation, bicycle and pedestrian amenities, parking management, alternative work schedules, telecommuting, and better management of existing resources. TDM plans are most effective when tailored to a specific project or user group. The proposed TDM strategies for the project is provided below and supersedes the previously approved TDM Plan required in conjunction with the Environmental Impact Screening Form (EISF). A copy of the new TDM Plan also is included in Attachment F.

- The Applicant will identify a Transportation Coordinator for the hotel once the building has opened. The Transportation Coordinator will act as a point of contact with DDOT, goDCgo, and Zoning Enforcement and will provide their contact information to goDCgo.
- The Transportation Coordinator will conduct an annual commuter survey of building employees on-site, and report TDM activities and data collection efforts to goDCgo once per year.
- The Transportation Coordinator will conduct an annual survey of hotel guests to determine their mode of travel to the hotel. Guests who respond that they arrive by personal vehicle will be asked to indicate where they parked (on-street or off-street). Results of the survey will be provided to the ANC and DDOT.
- The Transportation Coordinator will develop, distribute, and market various transportation alternatives and options to the hotel and retail employees, including promoting transportation events (i.e., Bike to Work Day, National Walking Day, Car Free Day) in internal newsletters or communications.
- The Transportation Coordinator will subscribe to goDCgo's hospitality newsletter and receive TDM training from goDCgo to learn about the transportation conditions for this project and available options for implementing the TDM Plan.
- Customer-facing staff will be provided training by goDCgo (either in-person or webinar) to learn of the non-automotive options for traveling to the property.
- citizenM's Hotel Ambassadors will provide guests with local knowledge while on property. They also will provide guests with goDCgo's *Get Around Guide* by making it available on the property website or as a link in reservation confirmations. Printed copies will be available at the hotel.

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- A copy of the Loading Management Plan will be provided to the Transportation Coordinator so that they are aware of the commitment.
- The hotel will provide 13 long-term bicycle spaces, five more than is required by ZR16. The hotel also will provide 14 short-term bicycle spaces, which is 11 more than required by ZR16.
- The long-term bicycle storage room will accommodate non-traditional sized bikes, such as cargo, tandem, and children's bikes, with at least two spaces designed for cargo or tandem bikes. All spaces (12 more than required by ZR16) will be equipped with electrical outlets to charge electric bikes and scooters. There will be no fee for employees to use the bicycle storage room.
- The hotel will provide at least four showers (two in each locker room) and a minimum of six lockers (in each locker room), in accordance with ZR16.
- The hotel will participate in the Capital Bikeshare Corporate Membership program and offer discounted annual memberships to employees.
- The hotel will offer SmartBenefits to its employees. SmartBenefits allow pre-tax funds to be deducted from an employee's paycheck to pay for transit services.
- "Getting here" information will be posted in a visible and prominent location on the hotel's website with a focus on non-automotive travel modes. Also, links will be provided to goDCgo.com, CommuterConnections.com, transit agencies around the metropolitan area, and instructions for guests and employees discouraging the use of on-street parking, especially in Residential Permit Parking (RPP) zones.
- The hotel's website will specifically indicate that no parking is provided on-site. Information regarding parking options in the vicinity of the hotel also will be provided. .
- Employees who wish to carpool will be provided with detailed carpooling information and will be referred to carpool matching services sponsored by the Metropolitan Washington Council of Governments (MWCOG) or other comparable service if MWCOG does not offer this in the future.
- The Transportation Coordinator will demonstrate to goDCgo that the hotel and any retail tenant with 20 or more employees are in compliance with the DC Commuter Benefits Law, which requires participation in one of the three transportation benefits outlined in the law (employee-paid pre-tax benefit, employer-paid direct benefit, or shuttle service), as well as any other commuter benefits related laws that may be implemented in the future.
- The Transportation Coordinator will demonstrate to goDCgo that the hotel and any retail tenant with 20 or more employees are in compliance with the DC Parking Cash-Out Law, which requires employers who provide parking benefits to also offer a clean air transportation fringe benefit in exchange for parking or to pay a clean air compliance fee.

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- Following the issuance of a Certificate of Occupancy for the Project, the Transportation Coordinator will submit documentation summarizing compliance with the transportation and TDM conditions of the Order (including, if made available, any written confirmation from the Office of the Zoning Administrator) to the Office of Zoning for inclusion in the IZIS case record of the case.
- Following the issuance of a Certificate of Occupancy for the Project, the Transportation Coordinator will submit a letter to the Zoning Administrator, DDOT, and goDCgo every five (5) years (as measured from the final Certificate of Occupancy for the Project) summarizing continued substantial compliance with the transportation and TDM conditions in the Order, unless no longer applicable as confirmed by DDOT. If such letter is not submitted on a timely basis, the building shall have sixty (60) days from date of notice from the Zoning Administrator, DDOT, or goDCgo to prepare and submit such letter.

CONCLUSIONS AND RECOMMENDATIONS

This memorandum provides an evaluation of the transportation elements of the proposed redevelopment. Below is a summary of the findings of the evaluation.

- The citizenM hotel currently under construction at 3401 K (Water) Street will include 230 guest rooms with 2,636 SF of ground floor retail. No parking is proposed in conjunction with the project. The Applicant is requesting special exception relief from minimum number of vehicle parking spaces prescribed by ZR16, Subtitle C, §701.5. Relief in the amount of 27 spaces is requested.
- citizenM hotels cater to single business travelers. As a result, most guests do not arrive in a personal vehicle that needs to be parked. Because the hotel provides limited services, the number of employees at the hotel is significantly fewer than traditional hotels, resulting in a lower employee parking demand.
- The project entails the renovation of an existing two-story building contributing to the Georgetown Historic District. Prior to construction of the hotel, the building operated with a Go-Puff retailer and a bar/entertainment venue and provided no parking.
- The project is expected to generate 37 more vehicle trips during the AM peak hour than the previous uses in the building and 35 **fewer** vehicle trips during the PM peak hour.
- The hotel is located within $\frac{1}{4}$ mile of two Metrobus routes (one of which is just 400 feet from the hotel). A Priority Metrobus route is located 0.28 miles from the hotel.
- Numerous restaurants, shops, and entertainment venues are located within walking distance of the hotel. Hotel guests would be able to utilize these amenities without the need of a car.

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MEMORANDUM

- Nine off-street parking facilities are located within an approximate $\frac{1}{4}$ mile radius of the site, providing a total of 1,776 parking spaces. Eight of the facilities are within a 10-minute walk of the site.
- The on-street parking within an approximate two block radius of the site is predominantly metered parking with time limitations during the daytime and evening hours, making it an unattractive option for hotel guests and employees. The remainder of the parking in the area also has limited practicality for hotel guests due to the restrictions in place.
- The Applicant will implement a Transportation Demand Management Plan to encourage and incentivize non-auto modes of travel.
- Given the amount of off-street parking within walking distance of the hotel, the hotel's guest demographic, and the proximity of the hotel to several Metrobus routes, the hotel is not expected to have an adverse impact on parking or traffic. The proposed TDM plan will help ensure that impacts are minimized.

S:\Projects - s drive\9000-9499\9415 3401 Water St NW\Documents\Report\Transportation Statement_3401 Water Street citizenM Hotel.docx

FIGURES

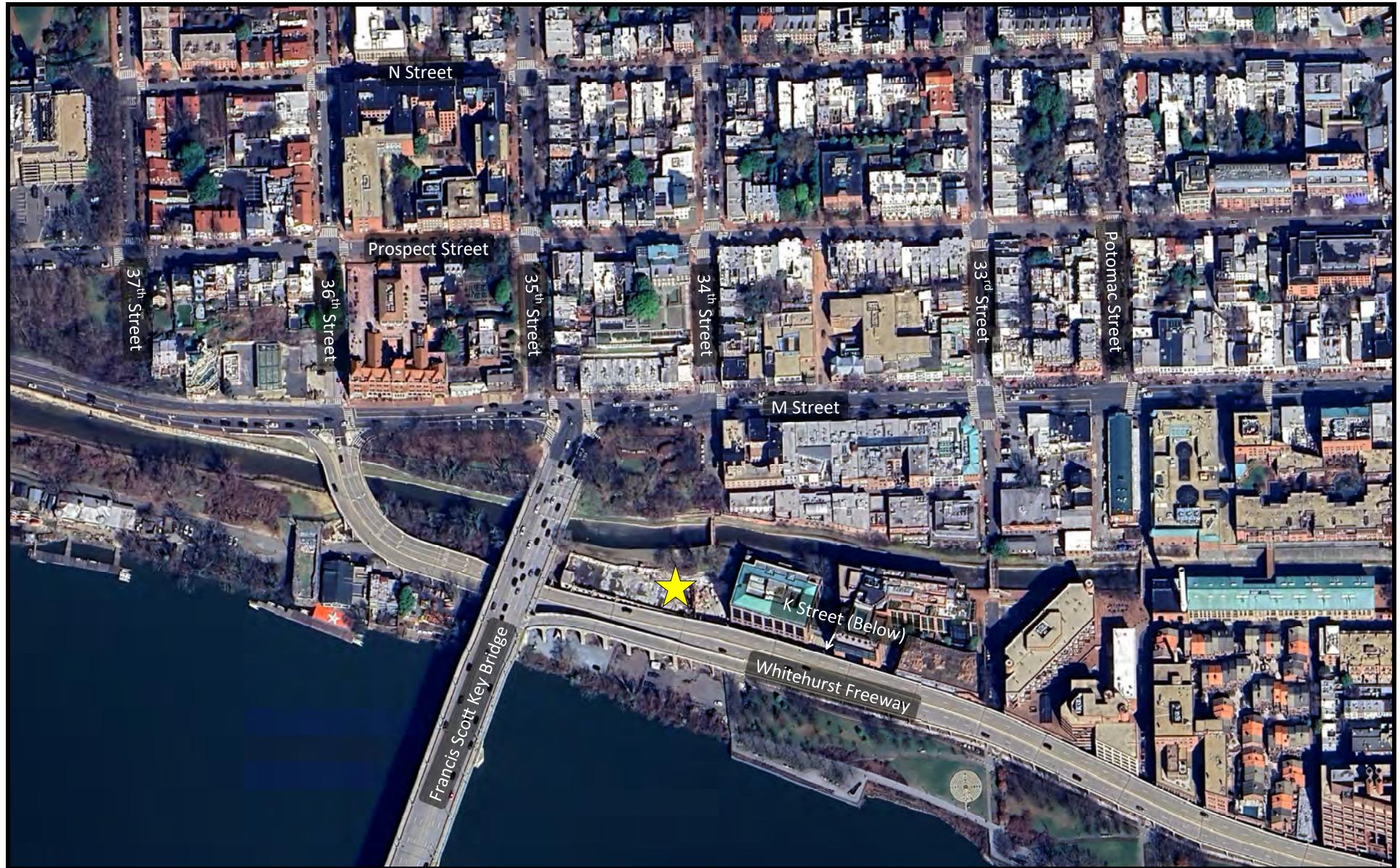


Figure 1
Site Location



NORTH

3401 K Street NW
Washington, DC





Figure 2
Multi Modal Transportation Options



3401 K Street NW
Washington, DC



Figure 3
Quarter Mile Walk Shed



**3401 K Street NW
Washington, DC**



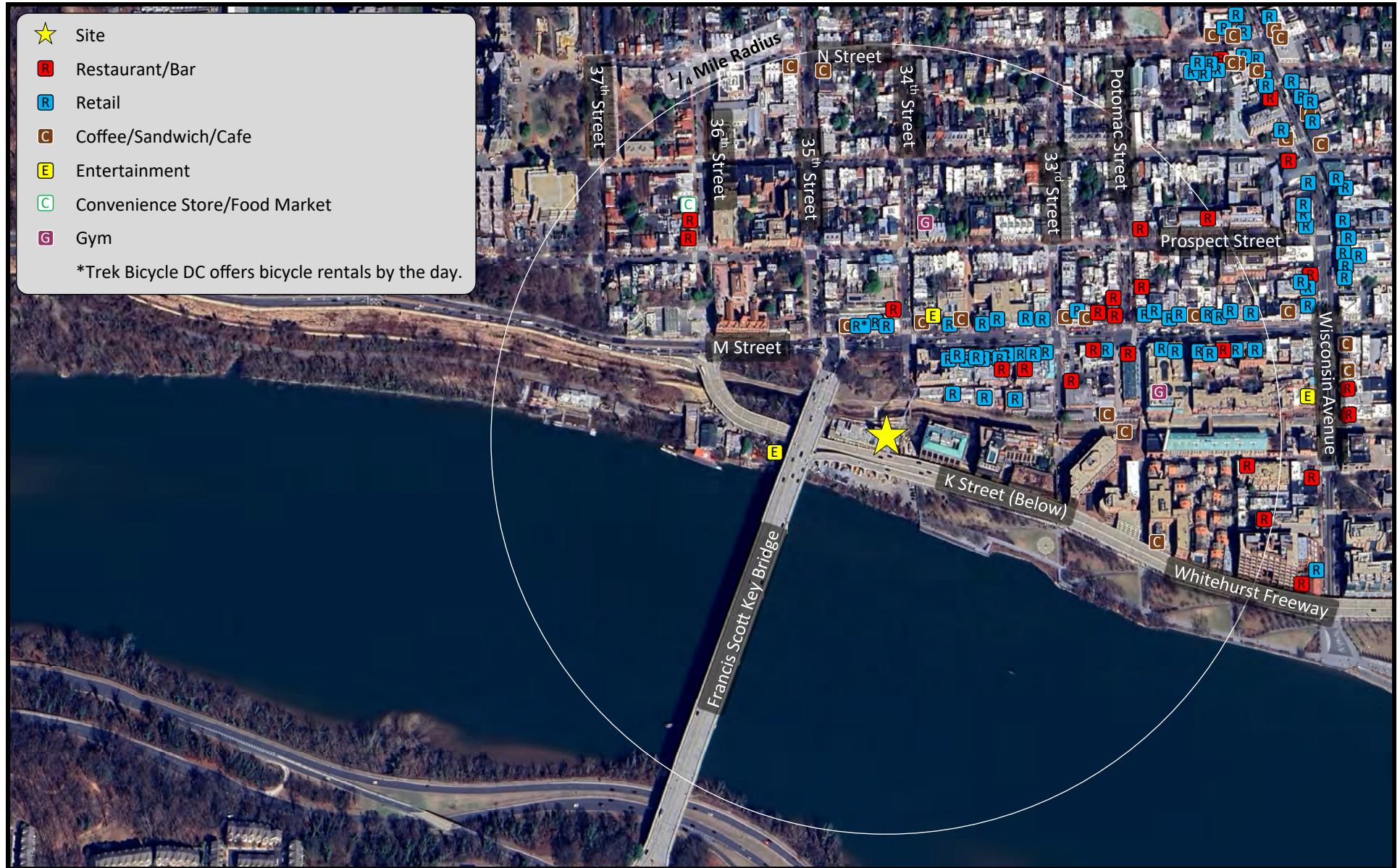


Figure 4
Nearby Amenities



**3401 K Street NW
Washington, DC**



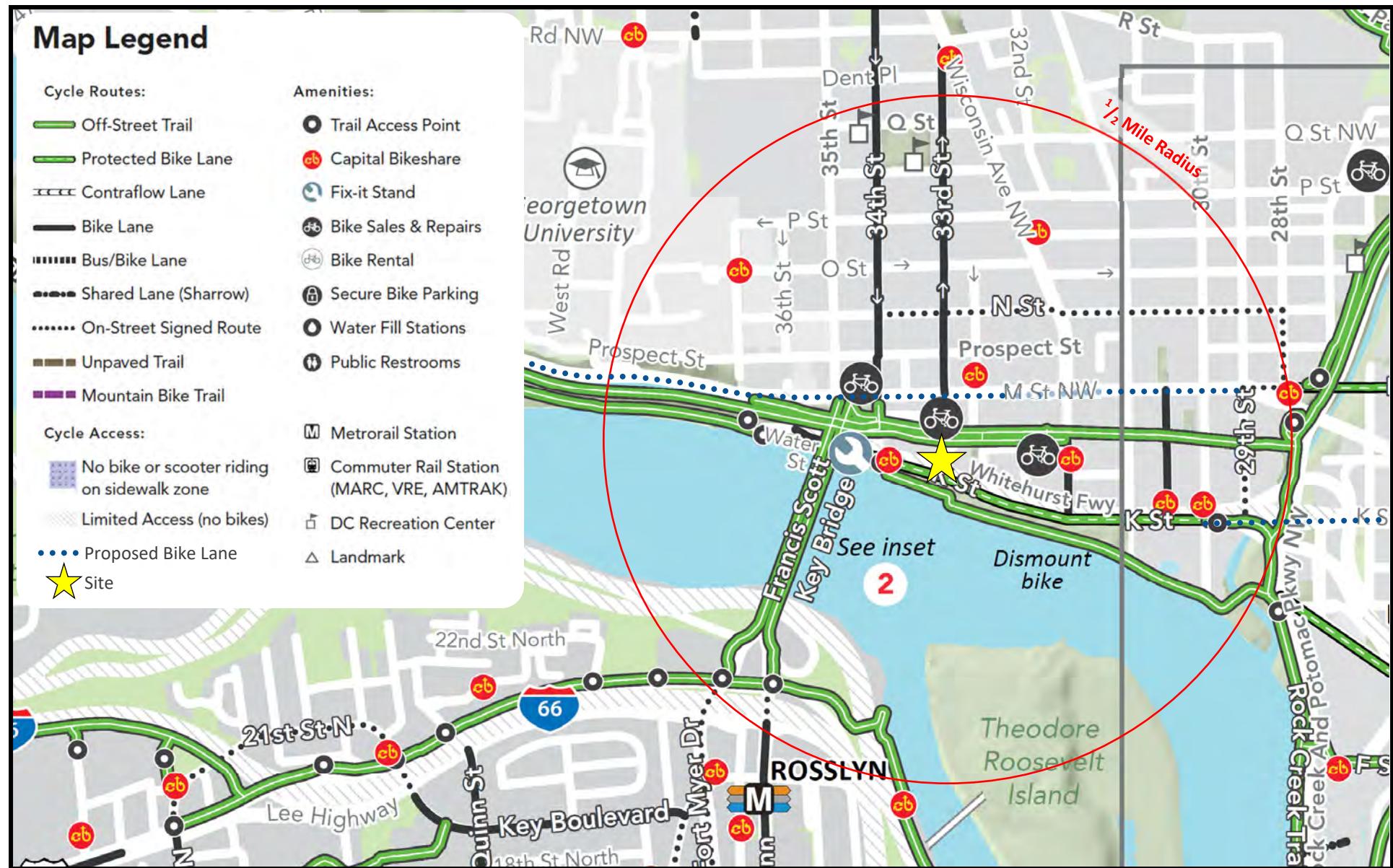


Figure 5
Half Mile Bike Shed



3401 K Street NW
Washington, DC

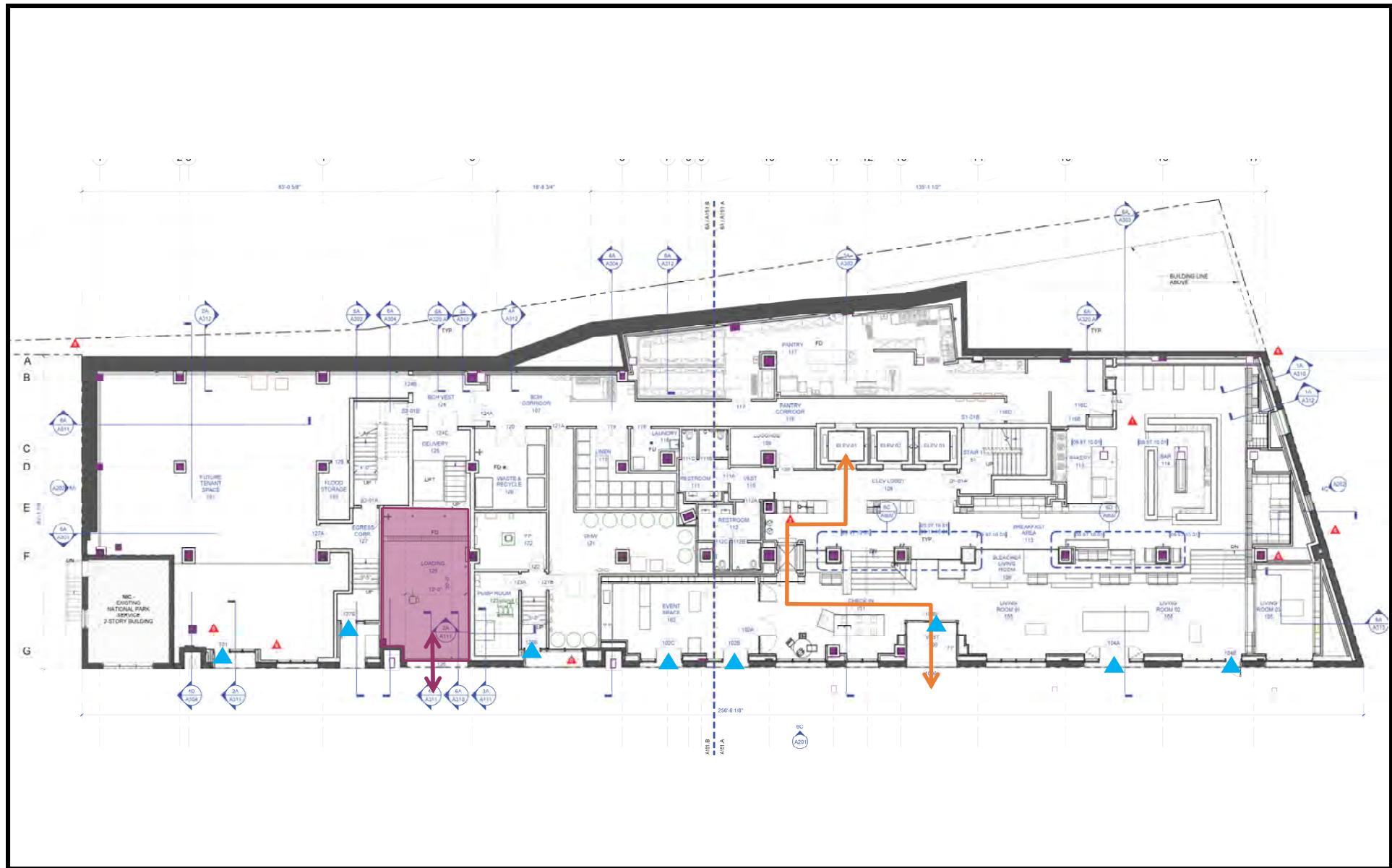


Figure 6A



A blue arrow pointing upwards, indicating the cardinal direction North.

3401 K Street NW
Washington, DC



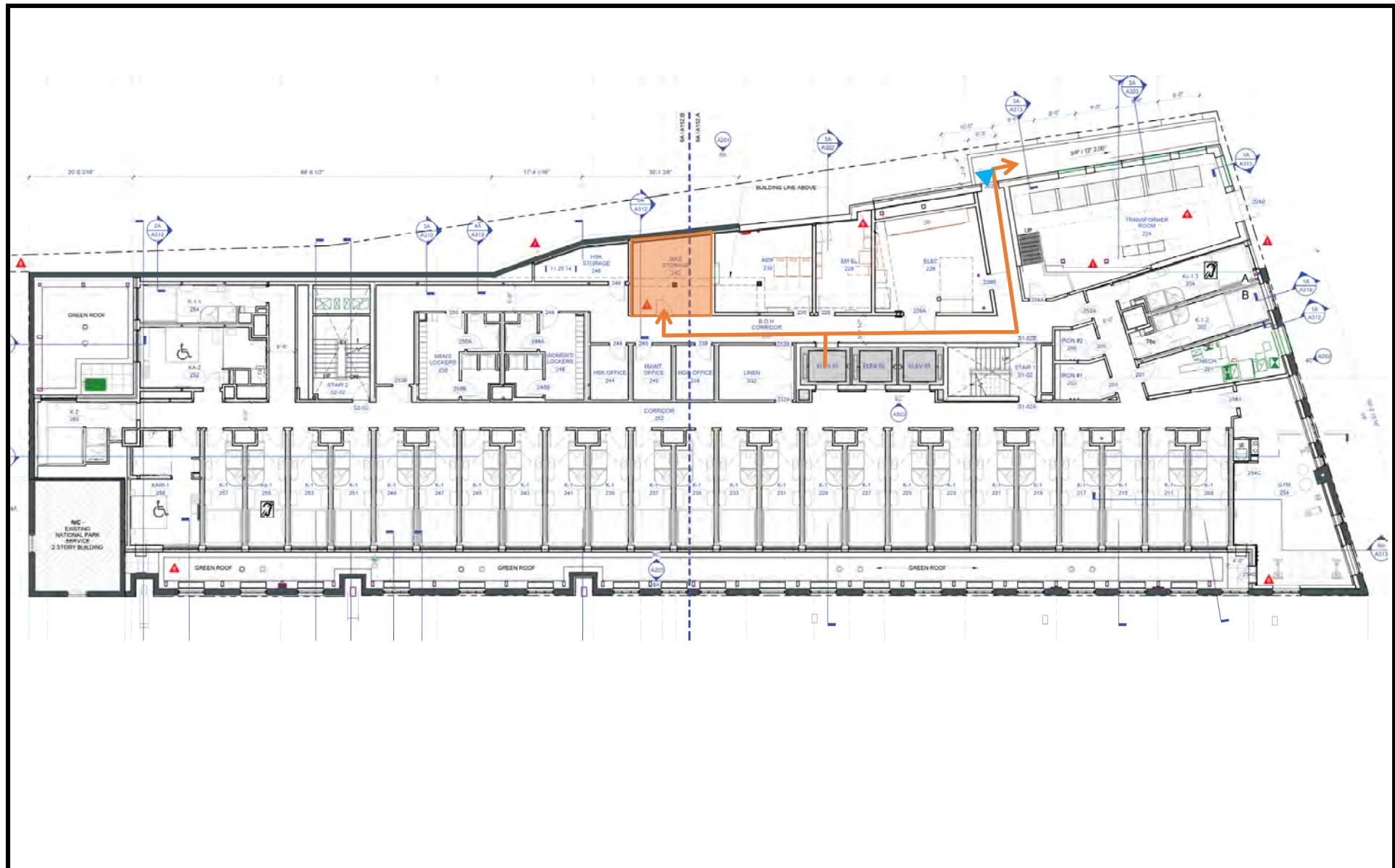


Figure 6B
Site Circulation—Second Floor

▲ Pedestrian Access

↔ Bicycle Access

■ Bicycle Storage



NORTH

3401 K Street NW
Washington, DC



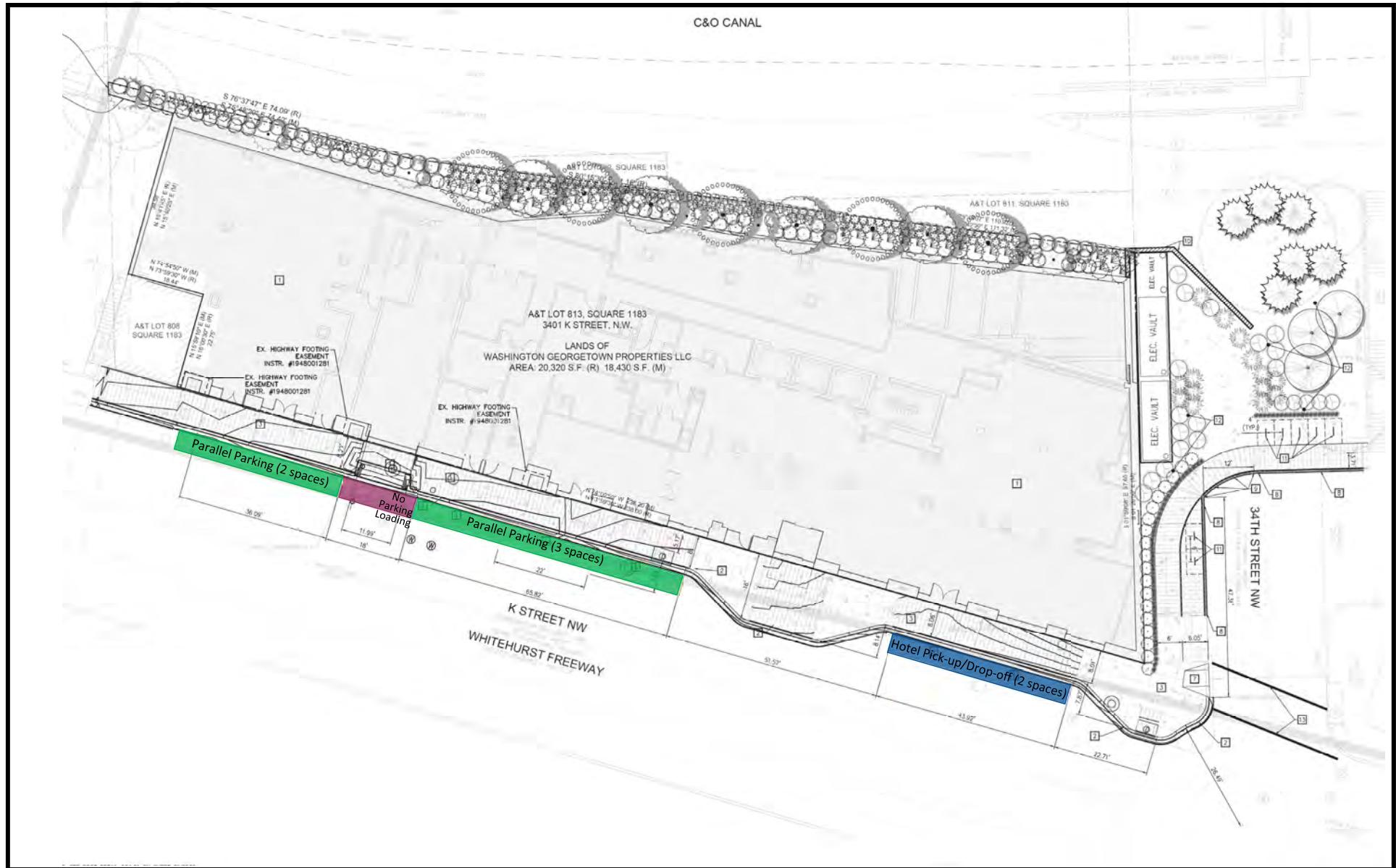
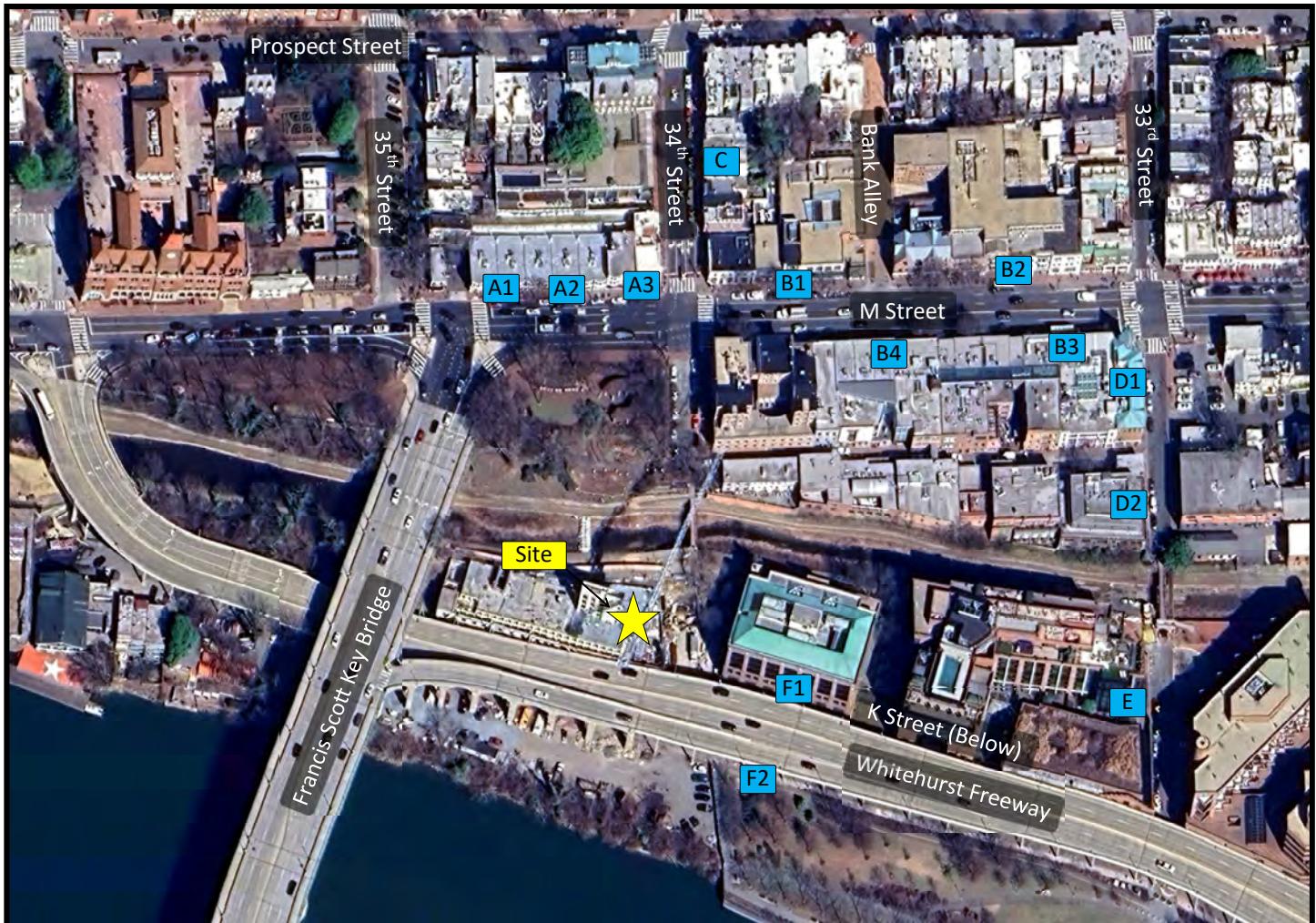


Figure 7
Curbside Management Plan



3401 K Street NW
Washington, DC



- A1 Loading Zone 2hr Permit or Pay to Load Commercial Vehicles Only Zone 24593 7AM-3PM Mon-Fri/No Parking 3PM-7PM Mon-Fri
- A2 2hr Parking 7AM-3PM Mon-Fri/7AM-6:30PM Sat/No Time Limit Parking 6:30PM-10PM Mon-Sat
- A3 No Stopping Anytime
- B1 2hr Parking 9:30AM-4PM Mon-Fri 7AM-6:30PM Saturday/3.5hr Parking 6:30PM-10PM Mon-Sat
- B2 Loading Zone 30min Permit or Pay to Load Commercial Vehicles Only Zone 25013 7AM-4PM Mon-Fri
- B3 Loading Zone 30min Permit or Pay to Load Commercial Vehicles Only Zone 25014 7AM-4PM Mon-Fri
- B4 2hr Parking 9:30AM-4PM Mon-Fri 7AM-6:30PM Saturday/3.5hr Parking 6:30PM-10PM Mon-Sat/Loading Zone 2hr Permit or Pay to Load Commercial Vehicles Only Zone 24592 7AM-3PM Mon-Fri
- C No Standing or Parking 4pm-6:30pm Mon-Fri
- D1 2hr Parking 9:30AM-4PM Mon-Fri 7AM-6:30PM Saturday/3.5hr Parking 6:30PM-10PM Mon-Sat
- D2 2hr Parking 9:30AM-4PM Mon-Fri 7AM-6:30PM Saturday/3.5hr Parking 6:30PM-10PM Mon-Sat
- E 2hr Parking Limit in Zone 2 7am-8:30pm Mon-Fri Zone 2 Permit Holders Excepted
- F1 4hr Parking 7AM-8:30PM Mon-Sat No Time Limit 6:30PM-10PM Zone 21875
- F2 4hr Parking 7AM-8:30PM Mon-Sat No Time Limit 6:30PM-10PM Zone 21876

Figure 8

On-Street Parking Restrictions

NORTH

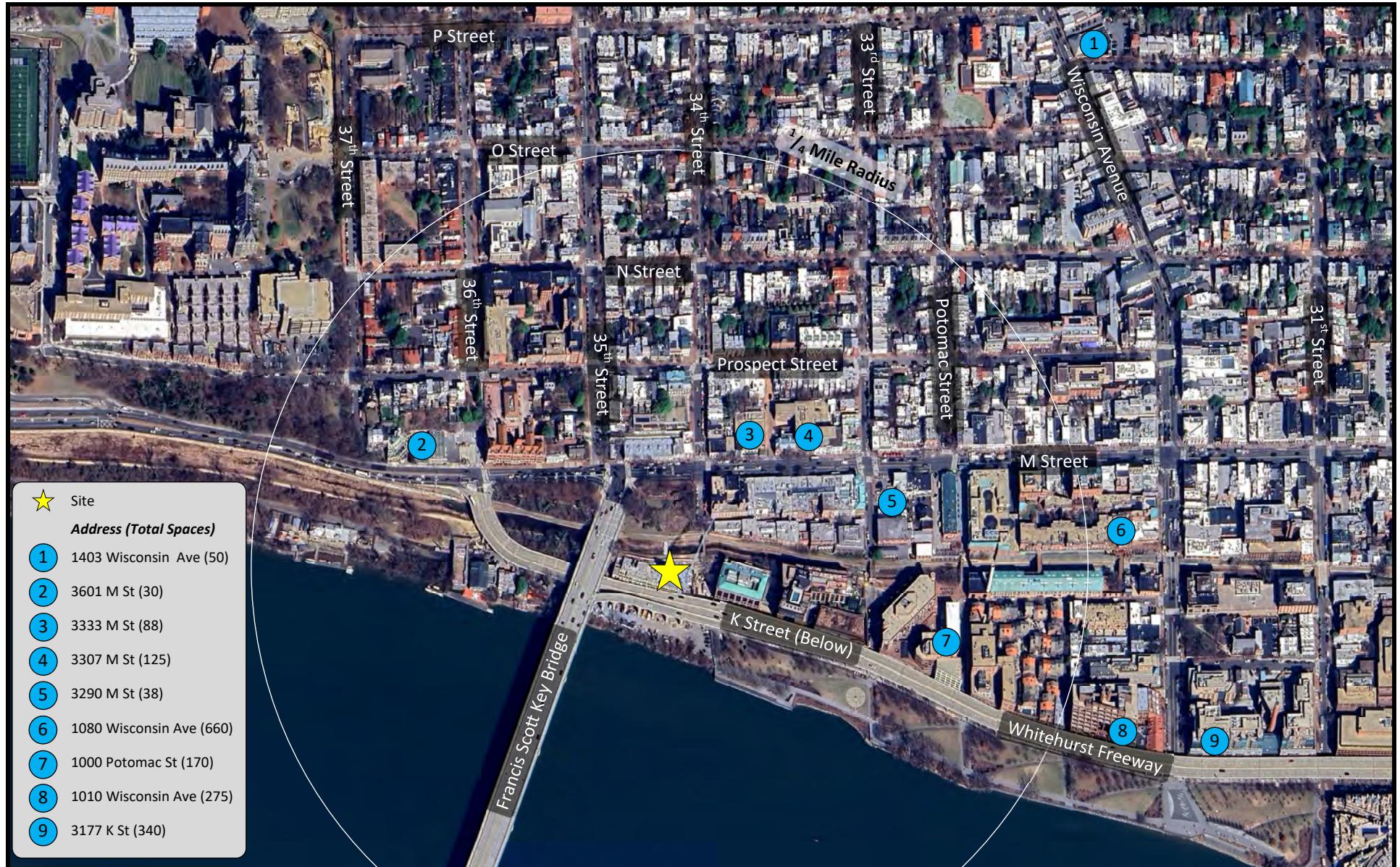


Figure 9
Off-Street Parking Locations



3401 K Street NW
Washington, DC

3401 K (Water) Street
BZA Case No. 21320
June 2025

**ATTACHMENT A
DDOT SCOPE DOCUMENT**

District Department of Transportation (DDOT) Comprehensive Transportation Review (CTR) Scoping Form

d.

The purpose of the Comprehensive Transportation Review (CTR) study is to evaluate potential impacts to the transportation network that can be expected to result from an approved action by the Zoning Commission (ZC), Board of Zoning Adjustment (BZA), Public Space Committee (PSC), a Federal or District agency, or an operational change to the transportation network. The Scoping Form accompanies the *Guidance for Comprehensive Transportation Review* and provides the Applicant an opportunity to propose a scope of work to evaluate the potential transportation impacts of the project.

Directions: The *CTR Scoping Form* contains study elements that an Applicant is expected to complete to determine the scope of the analysis. An Applicant should fill out this *Scoping Form* with a proposed scope of analysis commensurate with the requested action and submit to DDOT in Word format for review and concurrence. Accordingly, not all elements and figures identified in the *Scoping Form* are required for every action, and there may be situations where additional analyses and figures may be necessary. The Applicant should fill out as many sections as possible and leave blank any sections that are not relevant to their project. Once a completed *Scoping Form* is submitted, DDOT will provide feedback on the initial proposed scope. DDOT's turnaround times are four (4) weeks for CTRs with a Traffic Impact Analysis (TIA) and three (3) weeks for all other lower tier studies. After the *Scoping Form* has been finalized and agreed to by DDOT, the Applicant is required to expand upon the elements outlined in this *Form* within the study and comply with all CTR requirements not specifically addressed in this *Form*.

Scoping Information		
Date(s) Scoping Form Submitted to DDOT: 4/17/25		
DDOT Case Manager: Erkin Ozberk		
Date(s) Scoping Form Comments Returned to Applicant: 5/7/25		
Date Scoping Form Finalized: 6/6/25		
Project Overview		Proposed Development Program
Project Name: CitizenM Hotel – Water Street		Use(s)
Case Type & No. (ZC, BZA, PSC, etc.): BZA – Parking Relief		Residential (dwelling units):
Applicant/Developer Name: Washington Georgetown Properties, LLC		Retail (square feet): 2,636 SF
Transportation Consultant and Contact Info: Wells + Associates – Jami Milanovich; jlmilanovich@wellsandassociates.com; 202.556.1113		Office (square feet):
Land Use Counsel and Contact Info: Holland & Knight – Christy Shiker, christine.shiker@hklaw.com		Hotel (rooms): 76,672 SF (228-230 rooms)
Site Street Address: 3401 K Street NW		Other:
Site Square & Lot: Square 1183, Lot 813		# of Vehicle Parking Spaces: None
Current Zoning and/or Overlay District: MU-13		# of Carshare spaces: N/A
Estimated Date of Hearing: TBD		# of Electric Vehicle Stations: N/A
ANC/SMD No. & SMD Commissioner Name: 2E-05, Mimsy Linder		Bicycle Parking Facilities
OP Small Area Plan (if applicable): NA		Long-term / Short-Term spaces: 13 LT/14ST
DDOT Livability Study (if applicable): NA		Showers / Lockers (non-residential): 6 showers, 6 lockers
Within ½ Mile of Metrorail or ¼ mile of Priority Bus/Streetcar?: The site is located just beyond ¼ mile (0.28 miles) of Route 31, which is a Priority Transit Route.		Loading Berths/Spaces: 1 12'x30' berth

Documents to be Submitted to DDOT: Any action requiring a CTR or some other evaluation of on-site or off-site transportation facilities must submit one of the following documents to DDOT. It must be appropriately scoped for the specific action proposed and document all relevant site operations and transportation analyses.

- CTR Study** (100 or more total peak hour person trips OR 25 or more peak hour vehicle trips in peak direction, or as deemed necessary by DDOT)
 - TIA Component of CTR Study Triggered** (25 or more peak hour vehicle trips in peak direction, or as deemed necessary by DDOT)
- Transportation Statement** (limited scope based on specifics of project OR if Low Impact Development Exemption from CTR and TIA is requested)
- Standalone TIA** (project proposes a change to roadway capacity, operations, or directionality, has a site access challenge, or as deemed necessary by DDOT)
- Other, specify:** _____
- Include PDF of report with appendices, traffic analysis files, and traffic counts in DDOT spreadsheet format (total size of all digital files under 15 MB, if possible)

Existing Site and Description of Action: *Describe the type(s) of regulatory approval(s) being requested and any background information on the project relevant to the requested action such as the existing uses, amount of vehicle parking, and other notable proposed changes on-site. Also note any other needed regulatory approvals outside of the zoning action discussed in this Form (e.g., Surveyor's Order for alley closure).*

A new citizenM hotel currently is permitted and under construction on the northwest corner of the K Street/34th Street NW intersection. The construction includes the renovation and expansion of an existing 31,217 SF building that was constructed prior to 1958. Upon completion of the renovation/expansion, the project will include a 76,672 SF (~~230228~~ keys) hotel plus 2,636 SF of retail space on the ground floor. citizenM hotels provide smaller rooms than conventional hotels and cater to single business travelers rather than families. As a result, most guests are expected to arrive without a car. Therefore, no vehicular parking is proposed. A curb cut is proposed on K Street to provide access the hotel's loading berth. The developer of the hotel intended to provide off-site parking in accordance with Subtitle C, Section 701.8(b) of the Zoning Regulations. However, given changes in the area, they have now decided to pursue a special exception to reduce the number of parking spaces in accordance with Subtitle C, §703.

Prior Related Action(s), Conditions, and Commitments: *Note any prior approvals by ZC, BZA, or PSC (e.g., Campus Master Plan, First Stage PUD, student/faculty cap, etc.) for the site and list all relevant conditions and proffers still in effect from the previous approval and status of completion. Attach a copy of the Decision section from the previous Zoning Order if still in effect.*

N/A

Section 1: SITE DESIGN

DDOT reviews the site plan to evaluate consistency with DDOT's standards, policies, and approach to access as documented in the most recent Design and Engineering Manual (DEM). If the proposal for use of public space is found to be inconsistent with the agency approach, DDOT will note this regardless of its relevance to the action. It is DDOT's position that issues regarding public space be addressed at the earliest possible opportunity to ensure the highest quality project design and to minimize project delays and the need to re-design a site in the future.

CATEGORY & GUIDELINES	APPLICANT PROPOSAL	DDOT COMMENTS																				
<p>Site Access and Connectivity</p> <p>Show site access points for all modes. Include proposed curb cut locations, curb cuts to be closed, access controls (e.g., right-in/out, signalized), sight distances and sight triangles from access points and new intersections, driveway widths and spacing, on- and off-site parking locations, inter-parcel connections, public/private status of driveways, alleys, and streets, and whether easements, dedications, or ROW closures are proposed.</p> <p><i>See Section 1.1 of the CTR Guidelines for more detailed guidance.</i></p>	<p>One 12' wide curb cut on Water Street will provide access to the loading for the hotel. The proposed curb cut was previously approved.</p> <p><input checked="" type="checkbox"/> <i>Scoping Graphic: Project Location Map (See Figure 1)</i></p> <p><input checked="" type="checkbox"/> <i>Scoping Graphic: Site Circulation Plan (See Figures 2A and 2B)</i></p> <p><input checked="" type="checkbox"/> <i>Scoping Graphic: Plat for Site's Square and Lot from Office of the Surveyor (if official plat not available, provide copy from SURDOCS) (See Figure 3)</i></p>	<p>DDOT 5/7/2025: Please note the TOPS permit number for approved permits referenced in the Transportation Statement.</p> <p>W+A 5/8/25: Noted.</p>																				
<p>Loading</p> <p>Discuss and show the quantity and sizes of loading berths/delivery spaces, trash storage locations, on- and off-site loading locations, turnaround design, nearby commercial loading zones, and anticipated demand, operations, and routing of delivery and trash vehicles. Identify the sizes of trucks anticipated to serve the site and design vehicles to be used in truck turning diagrams. Provide truck turning diagrams in the body of the report not the appendix. Include a Loading Management Plan (LMP) if zoning relief, back-in loading, or curbside loading is proposed.</p> <p><i>See Section 1.2 of the CTR Guidelines for more detailed guidance. A template LMP is provided in Appendix E.</i></p>	<p>The loading requirements of ZR16 §901.1 are summarized in the table below:</p> <table border="1"> <thead> <tr> <th>Use</th> <th>ZR16 Requirement</th> <th>Calculation</th> <th>Proposed</th> </tr> </thead> <tbody> <tr> <td>Lodging (76,672 SF)</td> <td>> 50,000 to 100,000 SF</td> <td>2 Loading Berths No Service/Delivery Spaces</td> <td>1 Berth</td> </tr> <tr> <td>Retail</td> <td>< 5,000 SF</td> <td>None</td> <td>None</td> </tr> <tr> <td>Credit[†]</td> <td></td> <td>1 Berth</td> <td>---</td> </tr> <tr> <td>Total</td> <td></td> <td>1 Berth</td> <td>1 Berth</td> </tr> </tbody> </table> <p>[†] Per the ZA, the project has a loading berth credit based on prior uses and zoning regulations in effect. Therefore, the proposed project is only required to provide one loading berth (the ZA's ruling is attached).</p> <p><input checked="" type="checkbox"/> <i>Scoping Graphic: Location of loading area with internal building routing (see Figure 2A)</i></p> <p><input type="checkbox"/> <i>Scoping Graphic: Truck Turning Diagrams (to/from the site, alley, truck routes)</i></p>	Use	ZR16 Requirement	Calculation	Proposed	Lodging (76,672 SF)	> 50,000 to 100,000 SF	2 Loading Berths No Service/Delivery Spaces	1 Berth	Retail	< 5,000 SF	None	None	Credit [†]		1 Berth	---	Total		1 Berth	1 Berth	<p>DDOT 5/7/2025: Concur.</p>
Use	ZR16 Requirement	Calculation	Proposed																			
Lodging (76,672 SF)	> 50,000 to 100,000 SF	2 Loading Berths No Service/Delivery Spaces	1 Berth																			
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Credit [†]		1 Berth	---																			
Total		1 Berth	1 Berth																			

<h3>Vehicle Parking</h3> <p>Identify all off-street parking locations (on- and off-site) and justify the amount of on-site vehicle parking, including a comparison to the number of spaces required by ZR16 and DDOT's Preferred Maximum rates (Figure 10). Provide parking calculations and parking ratios by land use, including any eligible ZR16 vehicle parking reductions (i.e., within $\frac{1}{4}$ mile of Priority Bus Route, within $\frac{1}{2}$ mile of Metrorail Station, providing carshare spaces, located within a D zone, etc.). Confirm whether ZR16 TDM Measures will be required per Subtitle C § 707.3 for providing more than double the required amount of parking.</p> <p><i>See Section 1.3 of the CTR Guidelines for more detailed guidance.</i></p>	<p>Minimum parking requirements per ZR16 Subtitle C, Section 701.1 are presented in the table below along with DDOT's preferred parking ratio.</p> <table border="1" data-bbox="570 146 1446 587"> <thead> <tr> <th rowspan="2">Component</th><th colspan="2">Required</th><th rowspan="2">Proposed</th></tr> <tr> <th>Minimum[†]</th><th>Maximum ($\frac{1}{2}$ to 1 mi from Metro)</th></tr> </thead> <tbody> <tr> <td>Lodging (76,672 SF)</td><td>0.5 per 1,000 SF > 3kSF $= 0.5 * (76,672 - 2,901) / 1,000$ $= 37$ spaces</td><td>$\leq 1.2 * 37$ spaces ≤ 44 spaces</td><td>0</td></tr> <tr> <td>Retail (2,636 SF)</td><td>1.33 per 1,000 SF > 3,000 SF $= 1.33 * (2,636 - 99) / 1,000$ $= 3$ spaces</td><td>≤ 1.6 spaces/1,000 SF $\leq 1.6 * 2,636 / 1,000$ SF ≤ 4 spaces</td><td>0</td></tr> <tr> <td>Credit[‡]</td><td>13 Spaces</td><td>---</td><td>---</td></tr> <tr> <td>Total</td><td>27 spaces</td><td>48 spaces</td><td>0</td></tr> </tbody> </table> <p>[†] In accordance with §701.6, the exempted 3,000 SF was split proportionally between the two uses.</p> <p>[‡] Per the ZA, the project has a 13-space credit based on prior uses and zoning regulations in effect. Therefore, the proposed project is only required to provide 27 spaces (the ZA's ruling is attached).</p>	Component	Required		Proposed	Minimum [†]	Maximum ($\frac{1}{2}$ to 1 mi from Metro)	Lodging (76,672 SF)	0.5 per 1,000 SF > 3kSF $= 0.5 * (76,672 - 2,901) / 1,000$ $= 37$ spaces	$\leq 1.2 * 37$ spaces ≤ 44 spaces	0	Retail (2,636 SF)	1.33 per 1,000 SF > 3,000 SF $= 1.33 * (2,636 - 99) / 1,000$ $= 3$ spaces	≤ 1.6 spaces/1,000 SF $\leq 1.6 * 2,636 / 1,000$ SF ≤ 4 spaces	0	Credit [‡]	13 Spaces	---	---	Total	27 spaces	48 spaces	0	<p>DDOT 5/7/2025: Please attach/reference the ZA letter with the Transportation Statement.</p> <p>W+A 5/8/25: Noted, the letter from the ZA will be included in the Transportation Statement.</p>
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<h3>Bicycle Parking</h3> <p>Identify the locations of proposed bicycle parking and justify the amount of long- and short-term spaces proposed. Provide a calculation of the number of spaces required by ZR16, as well as showers and lockers for non-residential uses, and ensure they are designed appropriately into the project.</p> <p><i>See Section 1.4 and Appendix F of the CTR Guidelines, and the latest DDOT Bike Parking Guide, for more detailed design guidance.</i></p>	<p>The required and proposed long-term and short-term bike parking is shown in the table below.</p> <table border="1" data-bbox="570 767 1446 1011"> <thead> <tr> <th rowspan="2">Component</th><th colspan="2">Required</th><th colspan="2">Proposed</th></tr> <tr> <th>Long-term</th><th>Short-term</th><th>Long-term</th><th>Short-term</th></tr> </thead> <tbody> <tr> <td>Lodging (76,672 SF)</td><td>1 sp per 10 kSF $= 76,672 / 10$ $= 8$ spaces</td><td>1 sp per 40 kSF $= 76,672 / 40$ $= 2$ spaces</td><td rowspan="2">13 spaces</td><td rowspan="2">14 spaces</td></tr> <tr> <td>Retail (2,636 SF)</td><td>1 sp per 10 kSF $= 2,636 / 10$ $= 0$ spaces</td><td>1 sp per 40 kSF $= 2,636 / 3.5$ $= 1$ space</td></tr> <tr> <td>Total</td><td>8 spaces</td><td>3 spaces</td><td>13 spaces</td><td>14 spaces</td></tr> </tbody> </table> <p>Per §806.4, non-residential uses that require long-term bicycle parking spaces and occupy more than 25 kSF of GFA must provide a minimum of two showers. An additional two showers are required for every 50k SF of GFA above the initial 25 kSF up to a total of six showers. Therefore, four showers are required for the proposed project, and four will be provided in the hotel locker rooms on the 2nd floor.</p> <p>Per §806.5, non-residential uses that require long-term bicycle parking are required to provide lockers in the amount of 0.6 times the minimum number of required long-term bicycle spaces. Therefore, 5 lockers are required. At least five lockers will be provided in the locker rooms on the 2nd floor of the hotel.</p> <p><input checked="" type="checkbox"/> <i>Scoping Graphic: Locations of internal bicycle parking spaces, routing to these spaces, and related support facilities including locker rooms, showers, storage areas, and service repair rooms – figure showing location of bicycle parking will be provided in the Transportation Statement (see Figures 2A-2B)</i></p>	Component	Required		Proposed		Long-term	Short-term	Long-term	Short-term	Lodging (76,672 SF)	1 sp per 10 kSF $= 76,672 / 10$ $= 8$ spaces	1 sp per 40 kSF $= 76,672 / 40$ $= 2$ spaces	13 spaces	14 spaces	Retail (2,636 SF)	1 sp per 10 kSF $= 2,636 / 10$ $= 0$ spaces	1 sp per 40 kSF $= 2,636 / 3.5$ $= 1$ space	Total	8 spaces	3 spaces	13 spaces	14 spaces	<p>DDOT 5/7/2025: Concur.</p>
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<h3>Streetscape and Public Realm</h3> <p>Provide a conceptual layout of the streetscape and public realm including at minimum: curb cuts, vaults, sidewalk widths, street trees, grade changes, building projections, short-term bicycle</p>	<p>Streetscape improvements, which have previously been approved, are shown on Figure 2A.</p>	<p>DDOT 5/7/2025: Concur (but, Figure 7).</p>																						

<p>parking, and any existing bus stops. Also provide the permit tracking numbers and PSC hearing date, if known, for any approved public space designs. Note any non-compliant public space elements requiring a DCRA code modification or PSC approval.</p> <p><i>See Section 1.5 of the CTR Guidelines for more detailed guidance. A summary of public space best practices and DDOT standards are also documented in the DEM, Public Realm Design Manual, and corridor Streetscape Guidelines (if applicable).</i></p>	<p><input checked="" type="checkbox"/> <i>Scoping Graphic: Preliminary Public Space Concept</i></p>	
<p>Sustainable Transportation Elements</p> <p>Identify all sustainable transportation elements, such as electric vehicle (EV) charging stations and carshare spaces proposed to be included in the project. Electrical conduit should be installed in parking garage so that additional EV stations can be provided later. DDOT recommends 1 per 50 vehicle spaces be served by an EV station. Note that District regulations for EV infrastructure is fast evolving and additional requirements may go into effect.</p> <p><i>See Section 1.6 of the CTR Guidelines for more detailed guidance.</i></p>	<p>No vehicle parking, and therefore, no electric vehicle charging stations are proposed.</p>	<p>DDOT 5/7/2025: Concur.</p>
<p>Heritage, Special, and Street Trees</p> <p>Heritage Trees are defined as having a circumference of 100 inches or more. They are protected by District law and must be preserved if deemed non-hazardous by Urban Forestry Division (UFD). Special Trees are between 44 inches and 99.99 inches in circumference and may be removed with a permit. Note whether there are existing Heritage Trees on-site or in adjacent public space. The presence of Heritage Trees will impact site design since they may not be cut down. Conduct an inventory of existing and missing street trees within a 2-block radius of the site. Provide a screenshot from UFD's map of existing and missing street trees.</p> <p><i>See Section 1.7 of the CTR Guidelines for more detailed guidance.</i></p>	<p>See Figure 4 for UFD's street tree map. The Applicant coordinated with UFD during the public space process and the UFD arborist designated all trees for removal.</p>	<p>DDOT 5/7/2025: Concur.</p>

Section 2: MULTI-MODAL TRIP GENERATION

CATEGORY & GUIDELINES	APPLICANT PROPOSAL	DDOT COMMENTS																																	
<p>Mode Split Provide mode split assumptions with sources and justification. Adjustments to mode split assumptions may be made, as appropriate, if the number of vehicle parking spaces proposed is significantly lower or higher than expected for the context of the neighborhood.</p> <p>The agreed upon mode split assumptions may not be revised between scoping and CTR submission without amending the scoping form and receiving DDOT concurrence.</p> <p><i>See Section 2.1 of the CTR Guidelines for acceptable data sources and methodologies.</i></p>	<p>Mode splits for the hotels were derived from data provided by DDOT for three hotels in the District. Retail mode splits were assumed based on the small size of the retail component (i.e. it is not destination retail), and the fact that the retail is anticipated to draw largely from hotel guests and other people already in the area for other purposes.</p> <table border="1"> <thead> <tr> <th rowspan="3">Mode</th> <th colspan="4">Mode Split</th> </tr><tr> <th colspan="2">Hotel</th> <th colspan="2">Retail</th> </tr><tr> <th>AM</th> <th>PM</th> <th>AM</th> <th>PM</th> </tr> </thead> <tbody> <tr> <td>Auto</td> <td>5042%</td> <td>42%</td> <td>25%</td> <td>25%</td> </tr> <tr> <td>Transit</td> <td>48%</td> <td>8%</td> <td>5%</td> <td>5%</td> </tr> <tr> <td>Bike</td> <td>01%</td> <td>1%</td> <td>5%</td> <td>5%</td> </tr> <tr> <td>Pedestrian</td> <td>4649%</td> <td>49%</td> <td>65%</td> <td>65%</td> </tr> </tbody> </table> <p><input checked="" type="checkbox"/> <i>Scoping Table: Mode Split Assumptions by Land Use</i></p>	Mode	Mode Split				Hotel		Retail		AM	PM	AM	PM	Auto	5042%	42%	25%	25%	Transit	48%	8%	5%	5%	Bike	01%	1%	5%	5%	Pedestrian	4649%	49%	65%	65%	<p>DDOT 5/7/2025: Please provide the hotel data in the scoping attachments. Given the constrained area of the site, 50%/42% auto mode split for the Hotel portion may be over-represented.</p> <p>W+A 5/8/25: The hotel data is attached. Based on your feedback, we've updated the mode splits in the AM peak hour to match the mode splits in the PM peak hour. This adjustment reflects a slightly higher transit percentage to account for the proximity to several bus routes, including Route 38, which stops just 600 feet from the site and Route 31, which is a Priority Bus Route and stops just over $\frac{1}{4}$ mile from the site. The AM bike and pedestrian mode shares also increased slightly to account for the proximity to nearby restaurants, coffee shops, and shopping as well as the Capital Crescent Trail, C&O Canal Towpath and Capital Bikeshare Stations.</p> <p>DDOT 6/6/2025: Concur.</p>
Mode	Mode Split																																		
	Hotel		Retail																																
	AM	PM	AM	PM																															
Auto	5042%	42%	25%	25%																															
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Trip Calculations

Provide site-generated person trip estimates, utilizing the most recent version of ITE *Trip Generation Manual* or another agreed upon methodology such as manual doorway or driveway counts at similar facilities. Estimates must be provided by mode, type of trip, land use, and development phase during weekday AM and PM commuter peaks, Saturday mid-day peak, and daily totals. CTR must also include existing site trip generation based on observed counts. Include estimates for the transit, bicycle, walk, and automobile modes.

The agreed upon trip generation methodology may not be revised between scoping and CTR submission without amending the scoping form and receiving DDOT concurrence. Consult the DDOT Case Manager if site plan, development program, land uses, or density changes significantly.

See Section 2.2 of the CTR Guidelines for guidance on auto occupancy rates, acceptable trip reductions, and other methodologies.

The proposed trip generation is summarized in the table below.

Land Use	LUC	Size	Units	AM Peak Hour			PM Peak Hour		
				IN	OUT	TOTAL	IN	OUT	TOTAL
Proposed Development									
Hotel									
Baseline Trips ¹	310	230	rooms	60	48	108	72	70	142
Person Trips ²	AVO = 1.2	1.2		73	57	130	87	83	170
<i>Auto</i> ³	42%	42%		31	24	55	36	35	71
<i>Transit</i> ³	8%	8%		6	4	10	7	7	14
<i>Bike</i> ³	1%	1%		-	1	1	1	-	1
<i>Pedestrian</i> ³	49%	49%		36	28	64	43	41	84
Vehicle Trips⁴	AVO = 1.2	1.2		26	26	46	30	29	59
Retail									
Baseline Trips ⁵	822	2,636	ksf	4	2	6	15	15	30
Person Trips ⁶	AVO = 1.82			7	4	11	28	27	55
<i>Auto</i> ⁷	25%	25%		2	1	3	7	7	14
<i>Transit</i> ⁷	5%	5%		-	-	-	2	1	3
<i>Bike</i> ⁷	5%	5%		-	-	-	1	2	3
<i>Pedestrian</i> ⁷	65%	65%		5	3	8	18	17	35
Vehicle Trips⁸	AVO = 1.82			1	1	2	4	4	8
Total Proposed Trips									
Baseline Trips ¹				64	50	114	87	85	172
Person Trips ²				80	61	141	115	110	225
<i>Auto</i> ³				33	25	58	43	42	85
<i>Transit</i> ³				6	4	10	9	8	17
<i>Bike</i> ³				-	1	1	2	2	4
<i>Pedestrian</i> ³				41	31	72	61	58	119
Vehicle Trips				27	21	48	34	33	67

Notes:

¹ Baseline trips calculated using ITE *Trip Generation Manual*, 11th Ed.

² Total Person Trips calculated by applying an assumed AVO of 1.2, which is substantially lower than the AVO recommended in DDOT's CTR Guidelines and the AVOs derived from DDOT provided hotel data, to reflect the nature of the citizenM hotel.

³ Mode splits taken from hotel data provided by DDOT.

⁴ Vehicle Trips calculated by applying AVO of 1.2.

⁴ Baseline trips calculated using ITE *Trip Generation Manual*, 11th Ed.

⁵ Total Person Trips calculated by applying AVO of 1.82, per DDOT's CTR Guidelines

⁶ Mode splits were assumed and reflect the small size of the retail component (i.e. not destination retail).

⁷ Vehicle Trips calculated by applying AVO of 1.82 in accordance with DDOT's CTR Guidelines.

DDOT 5/7/2025: Provide a justification for the 50% auto mode split applied to the existing “drinking place” land use (highlighted in yellow).

Factors including scarce parking, proximity to public transit/bicycle facilities, and modal choice of driving to alcoholic establishments overestimate the auto mode split.

Please update existing use and net trip generation, if necessary.

W+A 5/8/25: Based on proximity to several bus routes, including Route 38, which stops just 600 feet from the site and Route 31, which is a Priority Bus Route and stops just over ¼ mile from the site, we have increased the AM transit mode split to 10% and the PM to 15%. We agree that patrons consuming alcohol are less likely to drive. The AM transit mode share is slightly lower because the trips in the AM would constitute trips made by employees. We also have increased the bike mode split to 5% in the AM based on the proximity to Capital Bikeshare Stations and the nearby Capital Crescent Trail and C&O Canal Trail and the assumption that some employees would bike to work. The pedestrian mode split was increased to 55% in the PM peak to account for patrons who choose not to drive because they will be consuming alcohol. We retained a 30% auto mode split to account for those arriving by a rideshare vehicle and those who drive themselves.

Also note that the number of rooms (“keys”) has been updated from 228 to 230 based on the latest plans. This change has been made throughout the document

DDOT 6/6/2025: Concur.

Prior to the construction of the hotel, the existing building was occupied by a Go-Puff retailer and a bar/entertainment venue. The estimated “existing” (before construction of the hotel) trip generation is shown in the following table.

Land Use	LUC	Size	Units	AM Peak Hour			PM Peak Hour		
				IN	OUT	TOTAL	IN	OUT	TOTAL
Existing Development									
Drinking Place									
Baseline Trips ¹	975	27.2	kSF	15	7	22	204	105	309
Person Trips ²	AVO = 2.1	2.1	2.1	26	20	46	331	318	649
AM	PM								
<i>Auto</i> ³	40%	30%		10	8	18	99	95	194
<i>Transit</i> ³	10%	15%		3	2	5	50	48	98
<i>Bike</i> ³	5%	0%		1	1	2	-	-	-
<i>Pedestrian</i> ³	45%	55%		12	9	21	182	175	357
Vehicle Trips⁴	AVO = 2.1	2.1	2.1	5	4	9	47	45	92
Retail									
Baseline Trips ⁵	822	4.0	ksf	6	3	9	21	20	41
Person Trips ⁶	AVO = 1.82			10	7	17	38	37	75
AM	PM								
<i>Auto</i> ⁷	25%	25%		2	2	4	10	9	19
<i>Transit</i> ⁷	5%	5%		1	-	1	2	2	4
<i>Bike</i> ⁷	5%	5%		1	-	1	1	2	3
<i>Pedestrian</i> ⁷	65%	65%		6	5	11	25	24	49
Vehicle Trips⁸	AVO = 1.82			1	1	2	5	5	10
Total Proposed Trips									
Baseline Trips ¹				21	10	31	225	125	350
Person Trips ²				36	27	63	369	355	724
<i>Auto</i> ³				12	10	22	109	104	102
<i>Transit</i> ³				4	2	6	52	50	102
<i>Bike</i> ³				2	1	3	1	2	3
<i>Pedestrian</i> ³				18	14	32	207	199	406
Vehicle Trips				6	5	11	52	50	102

Notes:

¹ Baseline trips calculated using [ITE Trip Generation Manual](#), 11th Ed.² Total Person Trips calculated by applying an assumed AVO of 1.2, which is substantially lower than the AVO recommended in DDOT's CTR Guidelines and the AVOs derived from DDOT provided hotel data, to reflect the nature of the citizenM hotel.³ Mode splits taken from hotel data provided by DDOT.⁴ Vehicle Trips calculated by applying AVO of 1.2.⁴ Baseline trips calculated using [ITE Trip Generation Manual](#), 11th Ed.⁵ Total Person Trips calculated by applying AVO of 1.82, per DDOT's CTR Guidelines⁶ Mode splits were assumed and reflect the small size of the retail component (i.e. not destination retail).⁷ Vehicle Trips calculated by applying AVO of 1.82 in accordance with DDOT's CTR Guidelines.

The proposed hotel would generate 41 more AM peak hour trips than the prior uses (23 additional trips in, 18 additional trips out) and 98 fewer PM peak hour trips (50 fewer trips in, 48 fewer trips out). The net change in trip generation is shown in the table below.

Component	Net Change in Peak Hour Trip Generation					
	AM Peak Hour			PM Peak Hour		
	IN	OUT	TOTAL	IN	OUT	TOTAL
Baseline Trips ¹	43	40	83	(138)	(40)	(178)
Person Trips ²	44	34	78	(254)	(245)	(499)
Auto ³	20	15	36	(66)	(62)	(128)
Transit ³	2	2	4	(43)	(42)	(85)
Bike ³	(2)	-	(2)	1	-	1
Pedestrian ³	23	17	40	(146)	(141)	(287)
Vehicle Trips	21	16	37	(18)	(17)	(35)

Scoping Table: Multi-Modal Trip Gen Summary (with mode split and applicable reductions, as appropriate)

Section 3: MULTI-MODAL NETWORK EVALUATION

A multi-modal network evaluation is required in the CTR or Transportation Statement if the project generates 100 or more total person trips (combined inbound and outbound) OR 25 or more vehicle trips in the peak direction (highest of inbound or outbound) during any peak hour period. Existing site traffic, pass-by, TDM, internal capture or other reductions may not be taken in the calculation to determine if the project meets these thresholds. However, the reductions may be applied in the analysis, as appropriate, if a study is triggered. Multi-modal analyses in this section are required in all CTRs, unless otherwise specified. A Transportation Statement may only require some of the following sections depending on the specifics of the project and zoning action.

Requirement for a CTR may be waived if site is within ½ mile from Metrorail or ¼ mile from Priority Transit, total vehicle parking supply is below the max amount for its distance to transit (see Figure 10), site has a maximum of 100 parking spaces, a Baseline TDM Plan is implemented, site access and loading design are acceptable, an off-site safety or non-auto improvement is constructed, and long-term bike parking requirements are exceeded. Additional criteria may be found in the Low Impact Development Exemption section of the *CTR Guidelines*.

CATEGORY & GUIDELINES	APPLICANT PROPOSAL	DDOT COMMENTS
Strategic Planning Elements List any relevant planning efforts and demonstrate how the proposed action is consistent with District-wide planning documents, as well as localized studies. Note in any recommendations from these documents relevant to the development proposal. <i>See Section 3.1 of CTR Guidelines for a list of strategic planning documents. Details on additional relevant plans and studies may be provided by the DDOT Case Manager.</i>	The following documents will be reviewed and any relevant recommendations from each will be included in the Transportation Statement: <ul style="list-style-type: none"> • Move DC • DDOT Vision Zero Action Plan • DC Comprehensive Plan • Capital Bikeshare Development Plan • WMATA Better Bus Network Plan 	DDOT 5/7/2025: Concur.
Pedestrian Network Evaluate the condition of the existing pedestrian network and forecast the project's impact. Evaluation must include, at a minimum, critical walking routes, sidewalk widths, network completeness, and whether facilities meet DDOT and ADA standards. Study area will include, at a minimum, all roadway segments and multi-use trails within a ¼ mile radius from the site, with a focus on connectivity to Metrorail, transit stops,	The ¼ mile walk shed will be provided in the Transportation Statement.	DDOT 5/7/2025: Please include all pedestrian facilities as described at left within ¼-mile walkshed. W+A 5/8/25: Noted.

<p>schools, and activity centers, and other neighborhood amenities.</p> <p><i>See Section 3.2 of the CTR Guidelines for more detailed guidance.</i></p>	<p><input type="checkbox"/> <i>Scoping Graphic: Pedestrian Study Area with Walking Routes to Transit, Schools, Activity Centers, and Neighborhood Amenities</i></p>	
<p>Bicycle Network</p> <p>Evaluate the condition of the existing bicycle network and forecast the project's impact, including to Capital Bikeshare (CaBi). Evaluation must include, at a minimum, bicycle network completeness, types of facilities, and adequacy of CaBi locations and availability. Study area will include, at a minimum, all roadway segments and multi-use trails within a $\frac{1}{2}$ mile radius from the site, with a focus on connectivity to Metrorail, transit stops, schools, major activity centers, and other bicycle trails or facilities. Look for opportunities to convert traditional bike lanes to protected bike lanes.</p> <p><i>See Section 3.3 of the CTR Guidelines for more detailed guidance.</i></p>	<p>The $\frac{1}{2}$ mile bike shed will be provided in the Transportation Statement.</p> <p><input type="checkbox"/> <i>Scoping Graphic: Bicycle Study Area with Bicycling Routes to Transit, Schools, Activity Centers, and Other Bicycle Facilities and Trails</i></p>	<p>DDOT 5/7/2025: Please include all bike facilities as described at left within $\frac{1}{2}$-mile bikeshed.</p> <p>W+A 5/8/25: Noted</p>
<p>Transit Network</p> <p>Evaluate, at a minimum, existing transit stop locations, adjacent bus routes and Metro headways, planned transit improvements, and an assessment of existing transit stop conditions (e.g., ADA compliance, bus shelters, benches, wayfinding, etc.). Study area is 1.0 mile for Metrorail stations and $\frac{1}{2}$ mile for Streetcar, Circulator, and buses.</p> <p><i>See Section 3.4 of the CTR Guidelines for more detailed guidance.</i></p>	<p>The site is served by a number of Metrobus routes, including:</p> <ul style="list-style-type: none"> ○ Route 38B, which provide access to the Farragut Square Metro Station and stops at the 34th Street/M Street intersection within 600 feet of the site, ○ Route G2, which stops within $\frac{1}{4}$ mile of the site at Prospect Street/36th Street intersection, ○ Route 31, which is a Priority Transit Route and stops just beyond $\frac{1}{4}$ mile of the site at the Wisconsin Avenue/M Street intersection, and ○ Route 33, which stops at the Wisconsin Avenue/M Street intersection. <p>Multi-modal transportation options, including transit stops and bus routes within the vicinity of the site will be included in the Transportation Statement.</p> <p><input type="checkbox"/> <i>Scoping Graphic: Transit Study Area with Adjacent Routes and Stations</i></p> <p><input checked="" type="checkbox"/> <i>Scoping Graphic: Screenshots from DDOT Transit Maps Showing Where the Site Falls within Buffers from Metrorail and Priority Transit (See Figures 5 and 6)</i></p>	<p>DDOT 5/7/2025: Please reference new WMATA better bus routes and numbers going into effect in June.</p> <p>W+A 5/8/25: Noted.</p>
<p>Safety Analysis</p> <p>Qualitatively evaluate safety conditions at intersections and along blocks within the vehicle study area using professional expertise. This might identify geometric design issues, missing critical signage or restrictions, or unforeseen pedestrian desire lines, for example. Perform a review of DDOT Vision Action Plan. Note whether any study intersections have been identified by DDOT as high crash locations, if any safety studies have been previously conducted, and discuss the recommendations.</p> <p><i>See Section 3.5 of the CTR Guidelines for more detailed guidance.</i></p>	<p>DDOT's Vision Zero Action Plan will be reviewed. Any high crash locations (as identified by DDOT) in the vicinity of the site will be noted.</p>	<p>DDOT 5/7/2025: Concur.</p>
<p>Curbside Management</p> <p>Propose a preliminary curbside management plan that is consistent with current DDOT policies and practices. Curbside signage / restrictions reset with new development and the Applicant is responsible for installing meters if required. The curbside management plan must delineate existing and</p>	<p>The approved curbside uses are shown on Figure 7.</p> <p><input type="checkbox"/> <i>Scoping Graphic: Existing Curbside Designations (minimum 2 block radius of site)</i></p>	<p>DDOT 5/7/2025: Concur.</p>

<p>proposed on-street parking designations/restrictions, including but not limited to pick-up/drop-off zones, loading zones, multi-space meters, RPP, and net change in number of on-street spaces as a result of the proposal.</p> <p><i>See Section 3.6 of the CTR Guidelines for more detailed guidance.</i></p>		
<p>Pick-Up and Drop-Off Plan</p> <p>Required for all new and existing schools and daycares with 20 or more students. May also be required for churches, hotels, or any other use expected to have significant pick-up/drop-off operations, as necessary. The plan will identify pick-up/drop-off locations and demonstrate adequate circulation so that the flow of bicycles and vehicles on adjacent street is not impeded and queueing does not occur through the pedestrian realm.</p> <p><i>See Section 3.6.4 of the CTR Guidelines for more detailed guidance.</i></p>	<p>See curbside management plan on Figure 7.</p>	<p>DDOT 5/7/2025: Concur.</p>
<p>On-Street Parking Occupancy Study</p> <p>This analysis is required if relief from 5 or more on-site vehicle parking spaces is being requested. It may also be required as part of a zoning or permitting case if DDOT has concerns about site-generated vehicles parking in adjacent residential neighborhoods.</p> <p><i>See Section 3.6.5 of the CTR Guidelines for more detailed guidance on study periods and analysis requirements.</i></p>	<p>On-street parking occupancy counts will be conducted from 6:30 PM to 11:30 PM on the following roadway segments:</p> <ul style="list-style-type: none"> A. M Street NW between Key Bridge and 34th Street (<i>north side only/metered parking</i>) B. M Street NW between 34th Street and 33rd Street (<i>both sides/metered until 10 PM</i>) C. 34th Street NW between M Street and Prospect Street (<i>east side only, No Standing or Parking 4:00-6:30PM</i>) D. 33rd Street NW between M Street and the C & O Canal (<i>west side only/metered until 10 PM</i>) E. 33rd Street NW between the C & O Canal and Water Street (<i>west side only/RPP – 2 hours 7:00AM – 8:30 PM, except Zone 2 Permit Holders</i>) F. Water Street NW between the Capital Crescent Trail head and 33rd Street <ul style="list-style-type: none"> 1. Parking on both sides between 33rd and 34th Street 2. Parking along south side from approximately Key Bridge to Capital Crescent Trail Head <p>The parking study area is shown on Figure 11. The times of the study were selected to coincide with when hotel guests would be returning to the hotel for the night, and when hotel guests would most likely impact the on-street parking given the parking restrictions in the study area.</p> <p><input checked="" type="checkbox"/> <i>Scoping Graphic: Study Area and Block Faces (see Figure 8)</i></p>	<p>DDOT 5/7/2025: What day(s) of the week are proposed for the counts? Both a weekday and Saturday are recommended given the location.</p> <p>Also note any off-street garages with public parking hours and rates within the study area.</p> <p>W+A 5/8/25: Based on our phone conversation on 5/8, a Saturday on-street parking analysis will not be included since: 1) the parking restrictions currently in place are not conducive to hotel guest or employee parking and 2) a Saturday analysis likely would show a higher rate of parking in the area than the weekday analysis.</p> <p>DDOT 6/6/2025: Concur.</p>
<p>Parking Garage/Drive-Thru Queuing Analysis</p> <p>If site contains 150 or more vehicle parking spaces AND direct access to a public street OR site contains a drive-thru, evaluate on-site vehicle queuing demand and provide analysis demonstrating parking entrance/ramps or drive aisle can properly process vehicles without queuing onto public streets.</p> <p><i>See Section 1.3.4 of CTR Guidelines for more detailed guidance.</i></p>	<p>N/A</p>	<p>DDOT 5/7/2025: Concur.</p>

Motorcoaches Propose methodology for data collection and analysis. Describe and show the parking locations, anticipated demand, existing areas on- and off-site for loading and unloading (and desired loading times restrictions, if any), and potential routes to and from designated truck routes. If on-street motorcoach parking is proposed, a plan for installation of signage and meters is required, subject to DDOT approval. This section is typically only required for uses that generate significant tourist activity (hotels, museums, cruises, concerts, etc.). <i>See Section 3.7 of the CTR Guidelines for more detailed guidance.</i>	N/A	. DDOT 5/7/2025: Concur.
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Section 4: TRAFFIC IMPACT ANALYSIS (TIA)

The TIA component of a CTR is required when a development generates 25 or more vehicle trips in the peak direction (higher of either inbound or outbound vehicles) during any of the critical peak hour periods, after mode split is applied. Existing site traffic, pass-by, TDM, internal capture or other reductions may not be applied when calculating whether a TIA is required. However, trip reductions may be used in the multi-modal trip generation summary and assignment of trips within the TIA, as appropriate and agreed to by DDOT. A standalone TIA may also be required if the project proposes a change to roadway capacity, operations, or directionality; has a site access challenge; or as otherwise deemed necessary by DDOT.

CATEGORY & GUIDELINES	APPLICANT PROPOSAL	DDOT COMMENTS
TIA Study Area and Data Collection Identify study intersections commensurate with the impact of the proposed project and the travel demand it will generate. Study area must include all major signalized and unsignalized intersections, intersections expected to realize large numbers of new traffic, and intersections that may experience changing traffic patterns. <i>See Sections 4.1 and 4.2 of the CTR Guidelines for more detailed guidance on study intersection selection and TMC count periods.</i>	N/A <input type="checkbox"/> <i>Scoping Graphic: Proposed Study Intersections</i> <input type="checkbox"/> <i>Will provide hard copies of TMCs in CTR appendix and electronic copies in DDOT spreadsheet format at time of submission.</i>	DDOT 5/7/2025: Concur.
TIA Study Scenarios Propose an appropriate set of scenarios to analyze. These commonly include Existing, Background (No Build), Total Future, and Future with Mitigation. Note the anticipated build-out year and project phasing. <i>See Section 4.3 of CTR Guidelines for guidance on study scenarios.</i>	N/A	DDOT 5/7/2025: Concur.
TIA Methodology Propose an appropriate methodology for the capacity analysis including the type of software program to be used. Per DEM 38.3.5.1, HCM methodology will be used to determine Level of Service (LOS), v/c, and vehicle queue lengths. LOS must be reported by intersection approach and v/c by lane group. DDOT prefers Synchro 9 or newer software for capacity and queueing analyses.	N/A <input type="checkbox"/> <i>Will provide copies of Synchro, SimTraffic, and other analysis software printouts in study appendix and electronic copies of analysis files at time of CTR submission.</i>	DDOT 5/7/2025: Concur.

<p>See Section 4.4 of the CTR Guidelines for more detailed guidance. DDOT's required standard Synchro and SimTraffic inputs/settings are provided in Appendix H.</p>		
<p>Transportation Network Improvements List and map all roadway, transit, bicycle, and pedestrian projects funded by DDOT or WMATA, or proffered by others, in the vicinity of the study area and expected to open for public use prior to the proposal's anticipated build-out year. Review the STIP, CLRP, and proffers/commitments for other nearby developments.</p> <p><i>See Section 4.5 of the CTR Guidelines for more detailed guidance.</i></p>	<p>N/A</p> <p><input type="checkbox"/> <i>Scoping Graphic: Locations of Background Transportation Network Improvements and Anticipated Completion Years</i></p>	<p>DDOT 5/7/2025: Concur.</p>
<p>Background Development / Local Growth List and map developments to be analyzed as local background growth. This will include known matter-of-right and zoning-approved developments within ¼ mile of site and others more than ¼ mile from site if their traffic is distributed through study intersections. Document the portions of developments anticipated to open by the projected build-out year.</p> <p><i>See Section 4.6.1 of the CTR Guidelines for more detailed guidance.</i></p>	<p>N/A</p> <p><input type="checkbox"/> <i>Scoping Graphic: Background Development Projects Near Study Area</i></p> <p><input type="checkbox"/> <i>Scoping Table: Completion Amounts/Portions Occupied of Background Developments</i></p>	<p>DDOT 5/7/2025: Concur.</p>
<p>Regional Traffic Growth Propose a methodology to account for growth in regional travel demand passing through the study area. An appropriate methodology could include reviewing historic AADT traffic counts, MWCOG model growth rates, data from other planning studies, or recently conducted nearby CTRs. These sources should only be used as a guide.</p> <p>Generally, maximum annually compounding growth rates of 0.5% in peak direction and 2.0% in non-peak direction are acceptable. Adjustments to the rates may be necessary depending on the amount of traffic assumed from local background developments or if there were recent changes to the transportation network.</p> <p><i>See Section 4.6.2 of the CTR Guidelines for more detailed guidance.</i></p>	<p>N/A</p> <p><input type="checkbox"/> <i>Scoping Table and Graphic: Projected Regional Growth Assumptions (dependent on methodology), Show Growth rates by Road, Direction, and Time of Day</i></p>	<p>DDOT 5/7/2025: Concur.</p>

<p>Trip Distribution</p> <p>Provide sources and justification for proposed percentage distribution of site-generated trips. Additionally, document proposed pass-by distributions and the re-routing of existing or future vehicles based on any changes to the transportation network. Percentage distributions must be shown turning at intersections throughout the transportation network and at site driveways and garage entrances to ensure appropriate routing assumptions.</p> <p>The agreed upon trip distribution methodology may not be revised between scoping and CTR submission without amending this scoping form and receiving concurrence by DDOT Case Manager.</p> <p><i>See Section 4.7 of the CTR Guidelines for more detailed guidance.</i></p>	<p>N/A</p> <p><input type="checkbox"/> <i>Scoping Graphic(s): Percentage Distribution by Land Use, Direction, Time of Day (must be shown turning at intersections and driveways)</i></p>	<p>DDOT 5/7/2025: Concur.</p>
<h2>Section 5: MITIGATION</h2> <p>The completed CTR must detail all proposed mitigations. The purpose of discussing mitigation at the scoping stage is to highlight DDOT's Significant Impact Policy, DDOT's approach to mitigation, and to give the Applicant an opportunity to gain initial feedback on potential mitigations that are under consideration. Any mitigation strategies discussed and included in the <i>Scoping Form</i> are considered non-binding until formally evaluated in the study and committed to in documentation submitted as part of the case record.</p>		

CATEGORY & GUIDELINES	APPLICANT PROPOSAL	DDOT COMMENTS
DDOT Significant Impact Policy <p>DDOT has two primary impact mitigation tests for development projects: 1) off-street vehicle parking supply, and 2) capacity impacts at intersections.</p> <p><i>See Section 5.1 of the CTR Guidelines for detailed policies and metrics for each of the two impact tests.</i></p>	<input checked="" type="checkbox"/> <i>The Applicant acknowledges DDOT's Significant Impact Policy in Section 5.1 of the CTR Guidelines.</i> <input checked="" type="checkbox"/> <i>The study will comply with all other policies in the CTR Guidelines not explicitly documented in the Applicant Proposal or DDOT Comments columns.</i> <input checked="" type="checkbox"/> <i>The study will include all of the required graphics, tables, and deliverables for the relevant sections determined during scoping, as shown in Figure 7 of the CTR Guidelines.</i>	DDOT 5/7/2025: Concur.
DDOT's Approach to Mitigation <p>DDOT's approach to mitigation prioritizes (in order of preference) optimal site design, reducing vehicle parking, implementing TDM strategies, making non-automotive network improvements, and making a monetary contribution to DDOT's Mitigation Fund for non-auto improvements, before considering options that increase roadway capacity or alter roadway operations.</p> <p><i>See Section 5.2 and Figure 18 of the CTR Guidelines for more detailed guidance on mitigation selection.</i></p>	<input checked="" type="checkbox"/> <i>The Applicant acknowledges DDOT's approach to mitigation in Section 5.2 of the CTR Guidelines.</i>	DDOT 5/7/2025: Concur.
Transportation Demand Management (TDM) <p>A TDM Plan is typically required to offset site-generated impacts to the transportation network or in situations where a site provides more parking than DDOT determines is practical for the use and surrounding context. Document all existing TDM strategies being implemented on-site (even outside of a formal TDM Plan) and those being proposed and committed to by the Applicant. Elements of the TDM Plan included in CTR must be broken down by land use and user.</p> <p><i>See Section 5.3 of the CTR Guidelines for more detailed guidance. Sample TDM plans by land use and tier can be found in Appendix C.</i></p>	<input checked="" type="checkbox"/> <i>The study will include at least a Baseline TDM Plan. The TDM plan will increase to depending on the parking supply and other impacts identified in the study.</i>	DDOT 5/7/2025: The 2023 TDM Plan will need to be enhanced to reflect the parking relief request with potential to impact both guests and staff. The Applicant should expand the nearby Bikeshare station at 34 th and Water by eight (8) docks. W+A 5/8/25: Noted.
Performance Monitoring Plan (PMP) <p>DDOT may require a PMP in situations where anticipated vehicle trips are large in magnitude, unpredictable, or necessitate a vehicle trip cap. Typically, this is required for campus plans, schools, or large developments expected to have a significant amount of single occupancy vehicle trips. Document any existing performance monitoring Plans in effect and any proposed changes.</p> <p><i>See Section 5.4 of the CTR Guidelines for more detailed guidance. Sample PMPs can be found in Appendix D.</i></p>	N/A	DDOT 5/7/2025: Concur.

<p>Roadway Operational and Geometric Changes</p> <p>Describe all proposed roadway operational and geometric changes in CTR with supporting analysis and warrants in the study appendix. Detail must be provided on any ROW implications of proposed mitigations. Note any preliminary ideas being considered.</p> <p><i>See Section 5.7 of the CTR Guidelines for more detailed guidance.</i></p>	N/A	DDOT 5/7/2025: Concur.
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Section 6: ADDITIONAL TOPICS FOR DISCUSSION DURING SCOPING

CATEGORY & GUIDELINES	APPLICANT PROPOSAL	DDOT COMMENTS
<p>ANC Discussions and Feedback</p> <p>Provide an update on the status of Community Benefits Agreement (CBA), any on-going ANC discussions/meetings, and any concerns expressed by the community. DDOT can provide ideas and a feasibility check for transportation items to be included in the CBA.</p>	No discussions have taken place with the ANC yet. The Applicant anticipates meeting with the ANC and SMD in the coming weeks.	DDOT 5/7/2025: Concur.
<p>Miscellaneous Items for Discussion</p> <p>Any relevant on-going conversations with DOEE, SHPO, DMPED, GSA, NPS, neighboring jurisdictions, Historic Preservation, etc.?</p> <p>Seeking direction on other types of analyses such as traffic calming, TOPP, TMP, IMR/IR, etc.?</p> <p>Anything unusual proposed not covered under other sections, such as air-rights, right-of-way actions, removal from Highway Plan, removal of BRLs, or construction under or close to a bridge?</p>		DDOT 5/7/2025: Concur.

3401 K (Water) Street
BZA Case No. 21320
June 2025

ATTACHMENT B
ZONING ADMINISTRATOR'S LETTER

From: [LeGrant, Matt \(DCRA\)](#)
To: [Dettman, Shane L \(WAS - X75169\)](#)
Cc: [Glasgow, Norman M \(WAS - X72460\)](#)
Subject: Confirmation | 3401 Water Street NW
Date: Thursday, October 14, 2021 11:32:36 AM
Attachments: [ZA Mtg Info 818 911.pdf](#)
[3401 Water Street NW Off-Site Parking Agreement DRAFT.pdf](#)
[3401 Water Street NW Off-Site Parking Declaration of Covenants.pdf](#)

[External email]

Shane Dettman and Norman Glasgow:

By means of this email I confirm that I am in agreement with the analysis and the conclusions as per the below email and the attachments, and specifically that:

- This response email is regarding our meetings of August 18 and September 9, 2021, regarding a potential development project located at 3401 Water Street, NW (Square 1183 Lot 0813) (the “Property”).
- The Property is zoned MU-13, and is currently improved with a two-story, mixed-use building containing commercial and retail uses. The existing building was constructed prior to the 1958 Zoning Regulations for warehouse and office use. The Property is located within the Georgetown Historic District.
- Your client is evaluating acquisition of the Property, and, if acquired, will seek to renovate and expand the existing building for lodging (hotel) and ground-floor retail use (the “Project”).
- As we discussed at our meeting, in June 2020 the current owner of the Property obtained approval from the Board of Zoning Adjustment (“BZA,” “Board”) for special exception and variance relief to construct a 7-story residential building. See BZA Application No. 20242. However, should your client acquire the Property, construction of the Project would proceed as a matter-of-right in accordance with the development parameters and requirements of the current MU-13 zone, and would not rely upon the relief granted by the BZA.
- The purpose of our meetings was to confirm where the building height measuring point (“BHMP”) would be located for the Project. We also reviewed schematic plans for the Project to determine general compliance with the primary development standards of the MU-13 zone. In addition to reviewing the schematic plans for general zoning compliance, we also specifically discussed: (i) computation of minimum parking and loading, including the availability of a parking and loading credits; (ii) aspects of the Project’s off-site parking agreement; (iii) applicable rear yard requirements; and (iv) how to characterize a proposed architectural false façade along the south side of the Project.

Building Height Measuring Point

- In regards to BHMP, we discussed the prior ruling I issued to the current Property owner for the aforementioned residential development that obtained BZA approval.

In that prior ruling, I determined that the BHMP can be located at the elevation of a terrace constructed at the northeast corner of the existing building on the Property, which is situated at Elevation 31.75'. The placement of the BHMP at this location is in accordance with Subtitle B, Section 307.3 of the Zoning Regulations which states "*[i]n those zones in which the height of the building is limited to sixty feet (60 ft.), in the case of a building located upon a terrace, the height of the building may be measured from the top of the terrace to the highest point of the roof or parapet, but the allowance for terrace height shall not exceed five feet (5 ft.).*" At our meeting we reviewed a section diagram from the approved BZA plans, which is included on Sheet 1 of the attached plans and drawings (the "Drawings").

- Consistent with my prior ruling, the section diagram shows the BHMP located at Elevation 31.75 feet. I inquired whether the BZA, during its review of the residential project, raised any questions or concerns with the BHMP. Following our meeting, you reviewed the hearing transcript for the BZA application and confirmed that the BHMP shown on the approved BZA plans was specifically discussed and no concerns were raised by the Board. A relevant excerpt from the hearing transcript is included on Sheets 2 - 4 of the Drawings.
- Consistent with my prior ruling, I confirmed that the BHMP for your client's proposed matter-of-right Project may be located at the level of a terrace at the northeast corner of the existing building on the Property, and specifically at Elevation 31.75', as permitted under Subtitle B, Section 307.3 and shown on the plans previously approved by the BZA.

Loading Credit

- Based on the proposed building program, the Project generates a loading requirement of 2 berths. We discussed whether the Project was entitled to a loading credit since the existing building was constructed prior to 1958 and does not contain any loading berths. See Sheet 5 of the Drawings.
- The existing building on the Property, which contains approximately 31,217 GFA, was constructed prior to 1949 for warehouse and office use. Sheets 6 and 7 of the Drawings show certificate of occupancy information for the existing building immediately before and after adoption of ZR58, which both show that the existing building was being used for warehouse and office uses when ZR58 was adopted. There is no known information that loading was ever provided when the building was constructed, and the building currently does not provide any loading. When initially adopted, ZR58 required 1 loading berth for warehouse structures containing 2,000 – 20,000 GFA, and 2 loading berths for warehouse structures containing 20,000 – 100,000 GFA. Further, ZR58 required 1 loading berth for office use containing 10,000 – 50,000 GFA.
- Based on the above circumstances, I agreed that the Project is entitled to a loading berth credit of 1 berth, and thus the Project need only provide 1 berth to meet its loading requirement under the current Zoning Regulations (ZR16).

Parking Credit / Off-site Parking

- Based on the proposed building program, the Project generates a minimum parking

requirement of 35 spaces under ZR16.

- Similar to our discussion regarding loading, since the existing building is a pre-1958 structure the Project is entitled to a parking credit. When initially adopted, ZR58 required 1 parking space for each 2,400 GFA of warehouse use, and 1 parking space for each 600 GFA of office use. Applying the more conservative warehouse use requirement to the approximately 31,217 GFA of the existing building results in a parking credit of 13 spaces (31,217 / 2,400 = 13).
- I agreed that the Project need only provide 22 parking spaces (35 spaces (current ZR16 requirement) - 13 spaces (ZR58 parking credit) = 22 spaces required) to meet its minimum parking requirement under the current Zoning Regulations (ZR16).
- We discussed at our meeting, and at prior meetings, that the minimum parking requirement for the Project will be satisfied offsite, as permitted under 11-C DCMR 701.8. The offsite parking location will be under separate ownership than the Property. As such, a written agreement will be established as required under 11-C DCMR 701.8(c), which requires the written agreement to be between *“owner of the parking area and the owner of the use for which the parking spaces are required (the use).”* We have discussed that the offsite parking garage will be managed by a third party parking operator. Thus, the required parking agreement will be between your client, including its successors and assigns, and the third party parking operator, which will be authorized to enter into the parking agreement by the owner of the offsite parking location. We discussed at our meetings, that the parking agreement will stipulate that the responsibility to maintain the required number of offsite parking spaces will rest solely with my client, and its successors and assigns. At any time should the currently anticipated offsite parking location become unavailable, your client will bear full responsibility to identify and secure an alternative offsite parking location in accordance with the [then in effect] conditions of 11-C DCMR 701.8, or risk an enforcement action for non-compliance with the minimum parking requirement under the Zoning Regulations.
- Upon discussion, I agreed that so long as the parking agreement for the Project clearly articulates the conditions described above, and satisfies all other requirements under 11-C DCMR 701.8, that the Project would be compliant with the minimum parking requirement.
- Per my request, draft copies of the off-site parking covenant required by DCRA and the off-site parking agreement for the Project are attached.

Rear Yard

- Pursuant to 11-C DCMR 505.1, a rear yard is only required on the Property for residential uses, which shall be established no lower than the first level of residential use. Since your client proposes to redevelop the Property with a hotel use, a rear yard need not be provided for the project. Notwithstanding, to the extent your client opts for a residential use instead we discussed the manner in which the rear yard shall be measured given the shape of the Property. For this part of our discussion, we reviewed Sheets 8 - 10 of the Drawings.

As discussed above, the BHMP is located near the northeastern corner of the Property at Elevation 31.75'. See Sheet 8 of the Drawings. Based on this location, the rear of the Property for purposes of zoning is the west side of the Property. As shown on Sheet 8 of Drawings, the Property has more than one rear lot line that are generally parallel with the front lot line. Pursuant to Subtitle B, Section 318.5, “[w]here there is more than one (1) rear lot line generally parallel to the front lot line but separated by a lot line generally perpendicular to the rear lot lines, then the rear yard setback shall be measured from the rear lot line more distant from the front lot line, and measured across the full width of the property to where it intersects both side lot lines.”

- Accordingly, I agreed that should a rear yard be required, it shall be measured from the far west rear lot line in the northwest corner of the Property. As shown on the Level 1 plan on Sheet 9 of the Drawings, measured from the far west rear lot line the rear yard depth would be approximately 16'-1", which would exceed the minimum required rear yard for the MU-13 zone.

Architectural False Façade

- At our meeting we discussed an architectural false façade proposed along the south side of the Project, facing Water Street and the elevated Whitehurst Freeway. This architectural feature will be created by retaining the façade of the second floor along the south side of the existing building, and locating the new addition above the existing first floor behind the retained façade. This is shown in the section drawing on Sheet 11 of the Drawings. Within the false façade, the original punched window openings of the existing building will be restored. The openings would not have any glazing.
- We evaluated the space between the false façade and the face of the building for whether it should be considered an open court, closed court, or court niche. We also discussed whether the false façade itself was akin to an extended parapet.
- I agreed that the false façade can be treated as an extended parapet, and that the space between the false façade and the face of the new construction can be considered an open court that opens onto Water Street. As shown in the section drawing on Sheet 11 of the Drawings, the height of the open court is approximately 17 feet, resulting in a minimum open court width of approximately 3'-6". As shown on the Level 1 drawing on Sheet 9 of the Drawings, the width of the open court along Water Street is approximately 238'-4".

General Review of Schematic Project Plans

- We next reviewed the schematic plans and tabulations for the Project shown on Sheets 9 - 12 of the Drawings (the “Schematic Plans”). As shown on the Schematic Plans, your client will renovate and expand the existing two-story building for hotel and retail purposes. The first floor of the existing building and second floor southern façade will be retained. Above the first floor, a new six-floor plus penthouse addition will be constructed. As shown on the Schematic Plans, the first floor of the Project will generally contain the hotel lobby, commercial adjunct (restaurant/bar), back of house / mechanical space, and loading. It will also contain retail space. The second floor will contain hotel guest rooms and back of house / mechanical space.

Floors 3 – 7 will contain hotel guest rooms. Finally, the proposed penthouse will be devoted to penthouse mechanical space and screened mechanical equipment.

- As permitted in the MU-13 zone, the proposed hotel will have a maximum height of 60'-0" (not including penthouse), as measured from the BHMP (Elevation 31.75'), and a maximum density of 3.71 FAR (approximately 75,294 sq. ft. of gross floor area ("GFA")), of which no more than 0.54 FAR (10,929 GFA) will be devoted to retail and hotel commercial adjunct space. The Project' s penthouse (mechanical space) will have a maximum height of 18'-6". As currently proposed, the Project does not contain penthouse habitable space.
- A zoning tabulation for the Schematic Plans is shown on Sheet 12 of the Drawings. The tabulation shows that the Schematic Plans comply with the following development standards of the MU-13 zone:
 - **Height:** Permitted: 60 ft., Provided: 60 ft. (as measured from BHMP @ 31.75 ft.)
 - **Height (Penthouse):** Permitted: 12 ft. (habitable), 18'-6" (mechanical), Provided: 18'-6"
 - **Density:** Permitted: 4.0 FAR (2.0 FAR non-res max.), Provided: 3.71 FAR (max. approximately 0.54 FAR nonresidential (retail and hotel commercial adjunct))
 - **Lot Occupancy:** Permitted: 75%, Provided: 54% (new construction)
 - **Rear Yard:** Required: N/A, Provided: 16'-1
 - **Side Yard:** Required: 8 ft. (min, if provided), Provided: 8 ft. (min.)
 - **Open Court:** Required: 12'-6", Provided: 238'-4"
 - **Green Area Ratio (GAR):** Required: 0.3, Provided: 0.61
 - **Vehicle Parking:** Required: 35 spaces, Provided: 22 spaces (min.) * *Qualifies for parking credit of 13 spaces as discussed above* ** *To be provided offsite per 11-C DCMR 701.8 as discussed above*
 - **Loading:** Required: 2 berths @ 30 ft., Provided: 1 berths @ 30 ft. * *Qualifies for one berth loading credit as discussed below*
- **Upon review, I agreed that the Schematic Plans appeared to comply with the above-described MU-13 development standards.**

Please let me know if you have any further questions.

DISCLAIMER: This email is issued in reliance upon, and therefore limited to, the questions asked, and the documents submitted in support of the request for a determination. The determinations reached in this email are made based on the information supplied, and the laws, regulations, and policy in effect as of the date of this email. Changes in the applicable laws, regulations, or policy, or new information or evidence, may result in a different determination. This email is NOT a "final writing", as used in Section Y-302.5 of the Zoning Regulations (Title 11 of the District of Columbia Municipal Regulations), nor a final decision of the Zoning Administrator that may be appealed under Section Y-302.1 of the Zoning Regulations, but instead is an advisory statement of how the Zoning Administrator would rule on an application if reviewed as of the date of this email based on the information submitted for the Zoning Administrator's review. Therefore this email does NOT vest an application for zoning or other DCRA approval process (including any vesting provisions established under the Zoning Regulations unless specified otherwise therein), which may only occur as part of the review of an application submitted to DCRA.

Matthew Le Grant

Zoning Administrator

Office of the Zoning Administrator

Dept of Consumer and Regulatory Affairs

1100 4th St SW - Washington, DC 20024

www.dcra.dc.gov

Phone: Desk 202 442-4652 – Mobile 202-497-1742

3401 K (Water) Street
BZA Case No. 21320
June 2025

**ATTACHMENT C
LOADING MANAGEMENT PLAN**

MEMORANDUM

To: Kelsey Bridges
Cc: Craig Kinnon, CitizenM
Andrew Hartman, Baskerville
Geoffrey Griffis, CityPartners

DDOT - PSD

From: Ryan Brannan, PE
Bowman

Date: 03/10/2023
Subject: 3401 K St N.W. – Loading Management Plan

Proposed Loading Management Plan

The primary loading facilities are planned along the southern frontage of the site to be accessed from K St N.W. The proposed development plans show one 30' berth to serve the site, which is per the zoning requirement. The loading berth will be only used by the hotel citizenM, hotel services and food vendors. There will be an estimated 21 deliveries throughout the week. Usage for the loading area will be managed via a dock manager provided the hotel. Back in loading will be required due to the fact that the site is a designated historical building and the structural column locations do not allow for a turnaround point within the building.

The goals of this plan are to maintain a safe environment for all users of the site, loading dock, streets, and nearby intersections; minimize undesirable impacts to pedestrians and to building tenants; reduce conflicts between truck traffic using the loading facilities and other street users; and ensure smooth operation of the loading facilities through appropriate levels of management and scheduled operations. The components of the loading management plan that will be implemented for the life of the project are as follows:

- A loading dock manager will be designated by the building management who will be on duty during delivery hours. The dock manager will be responsible for coordinating with vendors to schedule deliveries and will work with the community and neighbors to resolve any conflicts should they arise.
- The dock manager will schedule deliveries using the berth such that the dock's capacity is not exceeded. In the event that an unscheduled delivery vehicle arrives while the dock is full, that driver will be directed to return at a later time when the berth will be available so as not to compromise safety or impede K St N.W. functionality.
- The dock manager will monitor inbound and outbound truck maneuvers and will ensure that trucks accessing the loading dock do not block vehicular, or pedestrian traffic along K St N.W. except during those times when a truck is actively entering or exiting a loading berth. Bike traffic is expected to be in the protected bike lanes on the south side of K St NW and would not be impacted.
- Service vehicle/truck traffic interfacing with K St N.W. traffic will be monitored during peak periods and management measures will be taken if necessary to reduce conflicts between truck and vehicular movements.

- Trucks using the loading dock will not be allowed to idle and must follow all District guidelines for heavy vehicle operation including but not limited to DCMR 20 – Chapter 9, Section 900 (Engine Idling), the goDCgo Motorcoach Operators Guide, and the primary access routes shown on the DDOT Truck and Bus Route Map (godcgo.com/freight). The dock manager will also distribute flyer materials, such as the MWCOG Turn Your Engine Off brochure and others from DDOT and goDCgo, to drivers as needed to encourage compliance with idling laws. The dock manager will also post these materials and other relevant notices in a prominent location within the loading area.
- The dock manager will be responsible for disseminating suggested truck routing maps to the building's tenants and to drivers from delivery services that frequently utilize the development's loading dock as well as notifying all drivers of any access or egress restrictions.

3401 K (Water) Street
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ATTACHMENT D
DDOT HOTEL MODE SPLIT DATA

HOTEL TRIP GENERATION DATA
Provided by the District Department of Transportation

Building Name	Address	Description		Land Use Program				Travel Behavior				
		Primary Use	Hotel Rooms	Parking Spaces: Commercial Only		Parking Spaces: Mixed/Shared [Private]		Parking Spaces: Total	Commercial Parking (with share of mixed)	Date of count	AM Peak Hour	PM Peak Hour
Mandarin Oriental (now Salamander)	1330 Maryland Avenue SW	Hotel	397	50	120	170	170	6/16/2015	7:45-8:45 AM	5:45-6:45 PM		
Courtyard Marriott (now Generator)	1900 Connecticut Avenue NW	Hotel	147	70	0	70	70	6/9/2015	7:45-8:45 AM	5:45-6:45 PM		
Dupont Circle Hotel	1500 New Hampshire Avenue NW	Hotel	327	65	0	65	65	6/10/2015	8:15-9:15 AM	6:00-7:00 PM		
Average			290	62	40	102	102					

Travel Behavior											
AM Peak - Total Person Trips			AM Peak - Auto Drive Person Trips			AM Peak - Auto Pax Person Trips			AM Peak - Transit Person Trips		
420	156	93	19	151	1	37%	22%	5%	36%	0%	156
189	47	28	4	110	0	25%	15%	2%	58%	0%	47
551	143	137	28	242	1	26%	25%	5%	44%	0%	143
	115	86				29%	21%	4%	46%	0%	

AM AVO
PM AVO

1.75
2.10

AM Mode Splits
Auto 50%
Transit 4%
Walk 46%
Bike 0%

PM Mode Splits
Auto 42%
Transit 8%
Walk 49%
Bike 1%

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ATTACHMENT E
ON-STREET PARKING UTILIZATION DATA

Parking Study

Project ID: 25-270012
 City: Washington, DC

Date: 4/17/2025
 Day: Thursday

Segment	Street	From	To	Side of the Street	Restriction	Measurement (ft.)	No of Spaces	6:30 PM	7:30 PM	8:30 PM	9:30 PM	10:30 PM	11:30 PM
A1	M St NW	34th St NW	Francis Scott Key Bridge	N	Loading Zone 2hr Permit or Pay to Load Commercial Vehicles Only Zone 24593 7AM-3PM Mon-Fri/No Parking 3PM-7PM Mon-Fri	48'	2	0	0	0	0	0	0
A2	M St NW	34th St NW	Francis Scott Key Bridge	N	2hr Parking 7AM-3PM Mon-Fri/7AM-6:30PM Sat/No Time Limit Parking 6:30PM-10PM Mon-Sat	69'	4	2	3	5	1	0	0
A3	M St NW	34th St NW	Francis Scott Key Bridge	N	No Stopping Anytime	23'	-	1	1	1	0	0	0
B1	M St NW	Bank Alley NW	34th St NW	N	2hr Parking 9:30AM-4PM Mon-Fri 7AM-6:30PM Saturday/3.5hr Parking 6:30PM-10PM Mon-Sat	97'	5	5	5	6	3	3	3
B2	M St NW	33rd St NW	Bank Alley NW	N	Loading Zone 30min Permit or Pay to Load Commercial Vehicles Only Zone 25013 7AM-4PM Mon-Fri	114'	6	3	1	6	1	2	0
B3	M St NW	Bank Alley NW	33rd St NW	S	Loading Zone 30min Permit or Pay to Load Commercial Vehicles Only Zone 25014 7AM-4PM Mon-Fri	76'	4	3	4	0	0	0	0
B4	M St NW	Bank Alley NW	33rd St NW	S	2hr Parking 9:30AM-4PM Mon-Fri 7AM-6:30PM Saturday/3.5hr Parking 6:30PM-10PM Mon-Sat/Loading Zone 2hr Permit or Pay to Load Commercial Vehicles Only Zone 24592 7AM-3PM Mon-Fri	263'	13	12	11	15	12	9	0
C	34th St NW	Prospect St NW	M St NW	E	No Standing or Parking 4pm-6:30pm Mon-Fri	135'	7	2	2	3	2	1	1
D1	33rd St NW	M St NW	Alley	W	2hr Parking 9:30AM-4PM Mon-Fri 7AM-6:30PM Saturday/3.5hr Parking 6:30PM-10PM Mon-Sat	60'	3	5	5	4	4	1	0
D2	33rd St NW	Alley	Chesapeake and Ohio Canal Towpath	W	2hr Parking 9:30AM-4PM Mon-Fri 7AM-6:30PM Saturday/3.5hr Parking 6:30PM-10PM Mon-Sat	46'	2	4	4	0	3	0	0
E	33rd St NW	Chesapeake and Ohio Canal Towpath	Water St NW	W	2hr Parking Limit in Zone 2 7am-8:30pm Mon-Fri Zone 2 Permit Holders Excepted	132'	7	7	8	7	7	8	7
F1	Water St NW	33rd St NW	34th St NW	N	4hr Parking 7AM-8:30PM Mon-Sat No Time Limit 6:30PM-10PM Zone 21875	274'	14	12	14	14	8	4	3
F2	Water St NW	34th St NW	33rd St NW	S	4hr Parking 7AM-8:30PM Mon-Sat No Time Limit 6:30PM-10PM Zone 21876	390'	20	19	18	18	11	3	4
F3	Capital Crescent Trail	3501 Water St NW	Bridge	N	Private Parking Space		8	8	6	0	0	0	3

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ATTACHMENT F
TRANSPORTATION DEMAND MANAGEMENT PLAN



citizenM HOTEL TRANSPORTATION MANAGEMENT PLAN

Traffic and parking congestion can be solved in one of two ways: 1) increase supply or 2) decrease demand. Increasing supply requires building new roads, widening existing roads, building more parking spaces, or operating additional transit service. These solutions are often infeasible in constrained conditions in urban environments and, where feasible, can be expensive, time consuming, and in many instances, unacceptable to businesses, government agencies, and/or the general public. The demand for travel and parking can be influenced by TDM plans. Typical TDM measures include incentives to use transit or other non-auto modes of transportation, bicycle and pedestrian amenities, parking management, alternative work schedules, telecommuting, and better management of existing resources. TDM plans are most effective when tailored to a specific project or user group. The proposed TDM strategies for the project is provided below and supersedes the previously approved TDM Plan required in conjunction with the Environmental Impact Screening Form (EISF). A copy of the new TDM Plan also is included in Attachment F.

- The Applicant will identify a Transportation Coordinator for the hotel once the building has opened. The Transportation Coordinator will act as a point of contact with DDOT, goDCgo, and Zoning Enforcement and will provide their contact information to goDCgo.
- The Transportation Coordinator will conduct an annual commuter survey of building employees on-site, and report TDM activities and data collection efforts to goDCgo once per year.
- The Transportation Coordinator will conduct an annual survey of hotel guests to determine their mode of travel to the hotel. Guests who respond that they arrive by personal vehicle will be asked to indicate where they parked (on-street or off-street). Results of the survey will be provided to the ANC and DDOT.
- The Transportation Coordinator will develop, distribute, and market various transportation alternatives and options to the hotel and retail employees, including promoting transportation events (i.e., Bike to Work Day, National Walking Day, Car Free Day) in internal newsletters or communications.
- The Transportation Coordinator will subscribe to goDCgo's hospitality newsletter and receive TDM training from goDCgo to learn about the transportation conditions for this project and available options for implementing the TDM Plan.
- Customer-facing staff will be provided training by goDCgo (either in-person or webinar) to learn of the non-automotive options for traveling to the property.
- citizenM's Hotel Ambassadors will provide guests with local knowledge while on property. They also will provide guests with goDCgo's *Get Around Guide* by making it available on

the property website or as a link in reservation confirmations. Printed copies will be available at the hotel.

- A copy of the Loading Management Plan will be provided to the Transportation Coordinator so that they are aware of the commitment.
- The hotel will provide 13 long-term bicycle spaces, five more than is required by ZR16. The hotel also will provide 14 short-term bicycle spaces, which is 11 more than required by ZR16.
- The long-term bicycle storage room will accommodate non-traditional sized bikes, such as cargo, tandem, and children's bikes, with at least two spaces designed for cargo or tandem bikes. All spaces (12 more than required by ZR16) will be equipped with electrical outlets to charge electric bikes and scooters. There will be no fee for employees to use the bicycle storage room.
- The hotel will provide at least four showers (two in each locker room) and a minimum of six lockers (in each locker room), in accordance with ZR16.
- The hotel will participate in the Capital Bikeshare Corporate Membership program and offer discounted annual memberships to employees.
- The hotel will offer SmartBenefits to its employees. SmartBenefits allow pre-tax funds to be deducted from an employees paycheck to pay for transit services.
- "Getting here" information will be posted in a visible and prominent location on the hotel's website with a focus on non-automotive travel modes. Also, links will be provided to goDCgo.com, CommuterConnections.com, transit agencies around the metropolitan area, and instructions for guests and employees discouraging the use of on-street parking, especially in Residential Permit Parking (RPP) zones.
- The hotel's website will specifically indicate that no parking is provided on-site. Information regarding parking options in the vicinity of the hotel also will be provided. .
- Employees who wish to carpool will be provided with detailed carpooling information and will be referred to carpool matching services sponsored by the Metropolitan Washington Council of Governments (MWCOG) or other comparable service if MWCOG does not offer this in the future.
- The Transportation Coordinator will demonstrate to goDCgo that the hotel and any retail tenant with 20 or more employees are in compliance with the DC Commuter Benefits Law, which requires participation in one of the three transportation benefits outlined in the law (employee-paid pre-tax benefit, employer-paid direct benefit, or shuttle service), as well as any other commuter benefits related laws that may be implemented in the future.
- The Transportation Coordinator will demonstrate to goDCgo that the hotel and any retail tenant with 20 or more employees are in compliance with the DC Parking Cash-Out Law, which requires employers who provide parking benefits to also offer a clean air transportation fringe benefit in exchange for parking or to pay a clean air compliance fee.

- Following the issuance of a Certificate of Occupancy for the Project, the Transportation Coordinator will submit documentation summarizing compliance with the transportation and TDM conditions of the Order (including, if made available, any written confirmation from the Office of the Zoning Administrator) to the Office of Zoning for inclusion in the IZIS case record of the case.
- Following the issuance of a Certificate of Occupancy for the Project, the Transportation Coordinator will submit a letter to the Zoning Administrator, DDOT, and goDCgo every five (5) years (as measured from the final Certificate of Occupancy for the Project) summarizing continued substantial compliance with the transportation and TDM conditions in the Order, unless no longer applicable as confirmed by DDOT. If such letter is not submitted on a timely basis, the building shall have sixty (60) days from date of notice from the Zoning Administrator, DDOT, or goDCgo to prepare and submit such letter.