



MEMORANDUM

TO: District of Columbia Board of Zoning Adjustment
FROM: Karen Thomas, Case Manager
 Joel Lawson, Associate Director Development Review
DATE: July 9, 2025

SUBJECT: BZA Case 20320, 3401 K Street, N.W., to permit redevelopment of the property into a seven-story, plus penthouse hotel.

I. OFFICE OF PLANNING RECOMMENDATION

OP recommends **approval** of the following special exception relief:

- Minimum Parking Requirement: Pursuant to Subtitle C § 703.2 and X § 901.2 (**Required:** 27 spaces : **Proposed:** none).

II. LOCATION AND SITE DESCRIPTION

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|----------------------|---|
| Address | 3401 K Street/ Water Street, N.W. |
| Applicant | Washington Georgetown Properties LLC |
| Legal Description | Square 1183, Lot 813 |
| Ward, ANC | Ward 2, ANC 2E |
| Zone | MU-13 -provides for medium density mixed-use developments that permit a broad range of commercial, institutional, and multiple dwelling residential development, generally in the vicinity of the waterfront. |
| Historic Districts | Georgetown; and Chesapeake and Ohio Canal National Historical Park. The Property is subject to review by the Old Georgetown Board and the Commission of Fine Arts. |
| Lot Characteristics | Generally rectangular lot with no directly adjacent developable lots, and with a steep slope upwards from south to north. |
| Existing Development | A two-story commercial/warehouse building with no off-street parking constructed in or around the 1930s and 1940s and is a contributing building to the Georgetown historic district. |
| Adjacent Properties | North: C & O Canal and towpath. South: Across Water Street and the Whitehurst Freeway, the Potomac River East: Across 34 th Street NW, office and residential buildings West: Across 35 th Street and the Key Bridge, National Park Service parkland |

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| Surrounding Neighborhood Character | Mixture of residential, commercial and office uses |
| Proposed Development | 7-story plus penthouse mixed-use hotel with 230 guestrooms, retail space and no on-site parking. |

III. ZONING REQUIREMENTS and RELIEF REQUESTED

| Zone: MU-13 | Regulation | Existing | Proposed | Relief |
|--------------------------|---|----------------------------|--|-------------------------|
| Height G § 503.1 | 60-foot max. | 25.5 feet | 60 feet | None Required |
| Lot Width | None Prescribed | 257 feet | 257 feet | None Required |
| Lot Area | None Prescribed | 20,320 sq.ft. | 20,320 sq.ft. | None Required |
| Floor Area Ratio G § 502 | 4.00 max. | 1.56 | 3.90 Total (0.59 Non-residential use) | None Required |
| Lot Occupancy G § 504 | 75% max. | 78% 75% for Lodging use | N/A for lodging use | None Required |
| Rear Yard G § 505 | 12-foot min. residential us N/A for Lodging | None | None | None Required |
| Side Yard G § 506 | 8-foot min. if provided | 8ft to 6 feet | No change | None Required |
| Parking C § 701 | Lodging Use : 0.5 sp./1000 sf in excess of 3,000 sq.ft. GFA = 40 (27 with parking credit) | None | None | Relief Requested |
| Loading C § 901 | 1 space@12 feet x 30 feet | None | 1 space@12 feet x 30 feet | None Required |

IV. OFFICE OF PLANNING ANALYSIS

a. Special Exception Relief from Subtitle C § 703.2

703.2 *The Board of Zoning Adjustment may grant a full or partial reduction in the number of required parking spaces, as a special exception pursuant to Subtitle X, Chapter 9, and subject to the applicant's demonstration to the Board's satisfaction of at least one (1) of the following:*

Notwithstanding items (a) ... (d) ... (f) ... (h) ... and (i), the Applicant cites that the request satisfies criteria (e), (g) and (h) of C § 702.3 reviewed as follows:

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

This hotel's business model targets visitors who primarily would not be driving to the site. Specifically, the rooms are small and clientele are anticipated to be overnight business travelers rather than families who may stay longer, and customers would be advised that on-site parking is not provided.

Therefore, in this case the nature of the rooms, the guest and length of stay projected for the proposed hotel use would result in a reduced need for on-site parking.

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

The Applicant stated that there are well over 1,700 off-site commercial spaces that would be available for customers to the hotel, should they consider driving to the location. This would more than satisfy the required spaces that cannot be provided on-site for the reasons provided by the applicant.

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

The subject property is a long narrow lot, with a width of 40 feet, 2 inches at its narrowest. Due to the narrowness of the lot, the applicant would only be able to design one double-loaded aisle, possible only if area variance relief was granted to the minimum required two-way drive aisle width ([See OP Report BZA 20242](#)). Due to the size of the lot and the historic nature of the structure, construction of a below-grade garage would not be probable due to its location within the floodplain and the existence of bedrock below the building, which would make excavation difficult. Space on the lot is unavailable for at-grade parking.

Further, as a historic structure, the need to retain existing interior columns wherever possible limits the options to modify the façade for larger openings into the building for vehicular access. The applicant proposes to preserve the existing façade as may be required by the Old Georgetown Board (OGB) (based on prior determinations of other development options since 2020).

Therefore, provision of the required number of spaces would result in significant architectural and structural difficulty in maintaining the integrity of the historic resource.

b. Special Exception Standards of X § 901.2

a. Relief is in Harmony with the General Purpose and Intent of the Zoning Regulations and Zoning Map

The site is within an area which has a variety of transportation options including the Wisconsin Avenue corridor which is well served by public transportation and pedestrian options. The Georgetown commercial district has several public and private options which serve the busy commercial district. It is also well served by at least 1,700 identified parking spaces within walking distance of the subject location. Therefore, relief from the regulations would in no way harm the intent.

b. Will not affect adversely the use of neighboring property

The use of neighboring property would not be adversely affected since it abuts the pedestrian-oriented C&O Canal which supports bike and pedestrian movement.

c. Will meet the specified special conditions

The specified criteria under Subtitle 703.2 (e) (g) and (j) have been satisfied as discussed by the applicant and above.

IV. OTHER DISTRICT AGENCIES

No other District agency comments were submitted to the record as of the date of the filing of this report. OP has not been contacted by DDOT to date regarding its recommendation

V. ADVISORY NEIGHBORHOOD COMMISSION

A report from ANC 2E is not on the record to date.

VI. COMMUNITY COMMENTS TO DATE

At Exhibit 24 is a letter in support.

Attachment: Location Map

LOCATION MAP

