



Washington Georgetown Properties LLC

BZA Application No. 21320

3401 K Street NW (Lot 813 in Square 1183)

*BZA Public Hearing
July 23, 2025*

Holland & Knight



Overview of Subject Property, BZA Application and Zoning Relief Requested

- Ongoing construction of new seven-story, 230-room hotel at 3401 K St. NW.
- Request for **special exception** approval pursuant to Subtitle C § 703.2 and Subtitle X § 901.2 to allow a full reduction in the minimum number of required on-site vehicle parking spaces (**27 spaces required; 0 spaces proposed**).
- Summary of justifications for relief:
 - Land use and transportation characteristics of Georgetown
 - Nature of citizenM hotel brand
 - Quantity of nearby public parking facilities
 - Site constraints and need to preserve existing warehouse (Historic Resource)

Agency Reviews and ANC Support

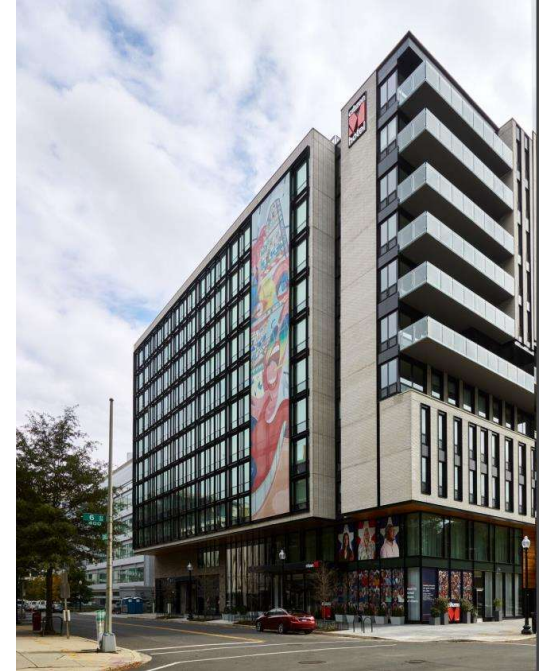
- **Office of Planning** (Ex. 25) – recommends approval
- **DDOT** (Ex. 27) – no objection to approval, w/ conditions:
 - Implementation of TDM and LMP
 - Applicant funds and installs 8-dock CaBi plate at nearest station, subject to DDOT approval, if 17 off-site parking spaces are not secured
- **ANC 2E** (Ex. 26) – supports application w/ conditions to cover:
 - Off-site parking
 - Ongoing outreach and coordination
 - Future change in principal use
 - TDM and construction management plan

citizenM Hotel Brand and Ongoing Development at 3401 K Street, NW

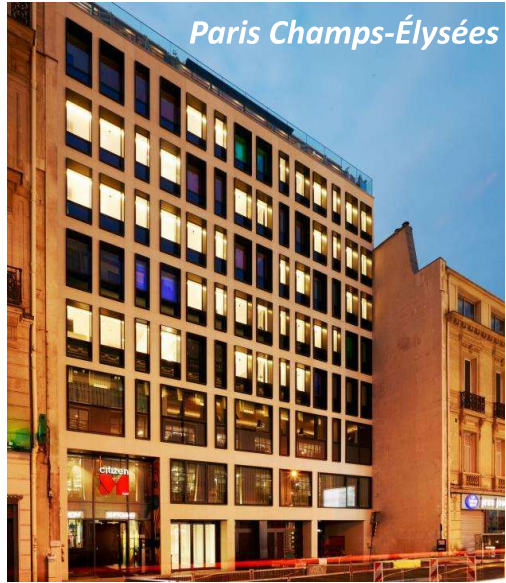
- Operates in major urban centers and central business districts worldwide.
- Established footprint in Washington, DC.
- Targets “*mobile citizens*” – modern, frequent travelers who value design, convenience, walkability, and transit access; not automobile-dependent.
- Compact, tech-friendly guestrooms.
- Streamlined services, limited food and beverage service, no large event space.



NoMa: 1222 First St., NE



Capitol: 550 School St., SW



citizenM Hotel Brand and Ongoing Development at 3401 K Street, NW



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Parking

The project is required to provide a minimum of 27 vehicle parking spaces

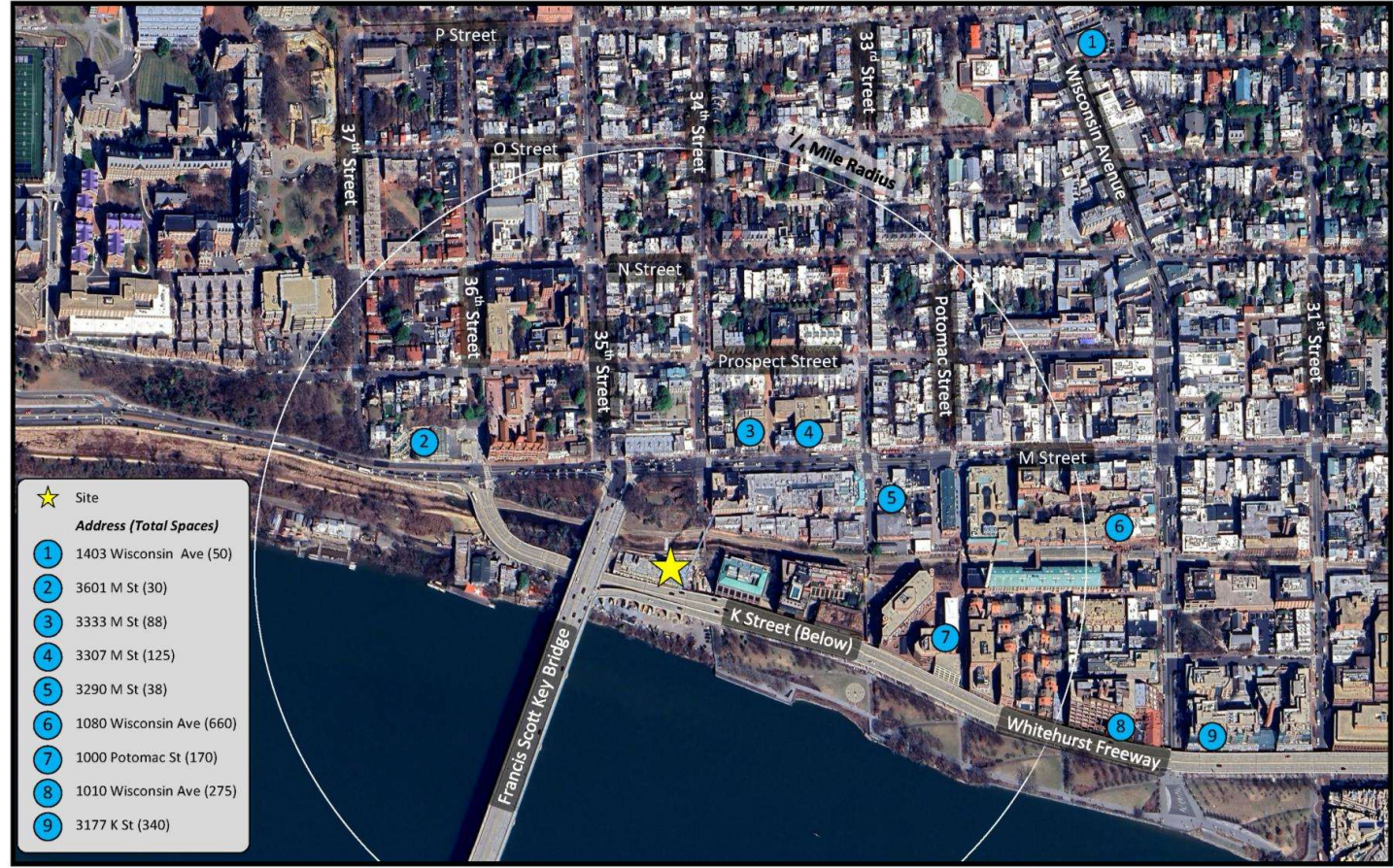
The project is just over ½ mile from the Rosslyn Metro Station and just over ¼ mile from a Metrobus Priority Route.

The Applicant is requesting full relief from the parking requirement.

The Applicant has agreed to secure a minimum of 17 spaces in off-site garages near the project

There are over 1,700 off-street parking spaces within an approximate 10-minute walk of the project.

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Proposed TDM Plan Highlights

citizenM Hotel Ambassadors will provide guests with local knowledge while on the property, including information regarding non-auto transportation options.

The hotel's website will include "Getting Here" information, focusing on non-auto modes of transportation.

The hotel's website will specifically indicate that no parking is provided on site, and information regarding off-street parking options in the vicinity of the site will be provided.

The hotel will provide 13 long-term bicycle spaces (5 more than required) and 14 short-term bicycle spaces (11 more than required).

Proposed TDM Plan Highlights

All long-term bicycle spaces will be equipped with outlets so that employees who ride electric bikes to work can charge bikes while on-site.

The hotel will provide discounted Capital Bikeshare memberships to employees.

The hotel will participate in SmartBenefits, which allows employees to use pre-tax dollars for transit funds.

The hotel will conduct an annual survey of hotel guests.

Proposed Loading Management Plan Highlights

A dock manager will be appointed and will be responsible for scheduling deliveries.

Hotel deliveries must use the loading dock.

The dock manager will ensure that the trucks using the loading berth do not block the sidewalk.

Trucks are not permitted to idle.

Transportation Considerations: Conclusion

- The Applicant agrees to DDOT's proposed conditions stated in its report dated July 11, 2025 (Ex. 27)
- With the implementation of the TDM Plan, provision for offsite parking, and the implementation of the loading management plan, *the project is not expected to have an adverse impact on the surrounding area.*

Request for Special Exception Relief

Subtitle C § 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...**

Relief granted through a special exception **is presumed appropriate, reasonable, and compatible** with other uses in the same zoning classification, **provided the application satisfies the specific requirements for the relief requested.** In reviewing an application for special exception relief, “[t]he Board’s discretion . . . is limited to a determination of whether the exception sought meets the requirements of the regulation.”

First Baptist Church of Washington v. District of Columbia Bd. of Zoning Adjustment, 423 A.2d 695, 706 (D.C. 1981) (quoting Stewart v. District of Columbia Bd. of Zoning Adjustment, 305 A.2d 516, 518 (D.C. 1973)).

Justifications for Special Exception Relief

Subtitle C § 703.2: "...at least one (1) of the criteria in Subtitle C § 703.2(a)-(j)"

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

- **Walkability and Connectivity.** Property is highly walkable and transit-accessible; sidewalks connect to bus stops, M Street, and Georgetown Waterfront.
- **Guest Transportation Behavior.** Hotel guests unlikely to drive due to location and needs.
- **Strong Transit Access Despite Reduction Ineligibility.** Property narrowly misses automatic 50% min. parking reduction under Subtitle C §§ 702.1(a) and (c), but public transit still readily accessible and supports reduced parking.

Justifications for Special Exception Relief

Subtitle C § 703.2: "...at least one (1) of the criteria in Subtitle C § 703.2(a)-(j)"

(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.

- **Transit-Oriented Guest Profile.** citizenM caters to “*mobile citizens*” = solo, business-focused travelers who prioritize location and do not rely on cars.
- **Low On-Site Demand.** Small guestrooms and lack of event space result in limited parking needs.
- **Expectation Management.** Website will note absence of on-site parking to discourage car arrivals.

Justifications for Special Exception Relief

Subtitle C § 703.2: "...at least one (1) of the criteria in Subtitle C § 703.2(a)-(j)"

(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.

- **Abundant Parking Nearby.** There are approximately 1,386 public parking spaces within 0.25 miles of the Property, including garages like the Flour Mill, Waterfront Center, and Georgetown Park.
- **Additional Options Just Beyond.** An additional 390 spaces are located just beyond 0.25 miles, such as the Millenium Garage and 1403 Wisconsin Avenue.
- **Total Parking Supply.** In total, about **1,776 public parking spaces** are available within walking distance, demonstrating that off-street parking is sufficient to support the Project.

Justifications for Special Exception Relief

Subtitle C § 703.2: "...at least one (1) of the criteria in Subtitle C § 703.2(a)-(j)"

(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.

- **Historic Designation.** Existing warehouse is a contributing building in the Georgetown Historic District.
- **Preservation Limits.** Façade of Historic Resource must be preserved, and its site coverage restricts internal and external parking options.
- **Physical Constraints.** Narrow width, structural columns, underlying rock, and adjacent infrastructure (Key Bridge, Whitehurst Freeway, and C&O Canal) make excavation or compliant parking unfeasible.

Justifications for Special Exception Relief

Subtitle C § 703.3: "Any reduction in the required number of parking space shall be..."

- (a) Proportionate to the reduction in parking demand demonstrated by the applicant;*
 - (b) Limited to the number of spaces that the applicant demonstrates cannot reasonably be provided on the site as proposed to be developed in the application; and*
 - (c) Limited to relief from the minimum number of parking spaces required by this section and shall not provide relief from the location access, size or layout, screening, or other requirements of this chapter.*
- **Proportionate to Demand.** citizenM targets independent, transit-oriented travelers and operates compact hotels without event spaces -> consistently low parking demand that justifies full reduction.
 - **Limited to Spaces that Cannot Reasonably be Provided On-Site.** Historic façade cannot be materially altered; building's full site coverage and physical constraints (e.g., subsurface rock) prevent compliant parking. Nearby infrastructure (e.g., Key Bridge, Whitehurst Freeway) further limits on-site parking potential.
 - **Limited to Relief from the Minimum Number.** Relief limited to number of parking spaces only; no other parking standards are affected.

Justifications for Special Exception Relief

Subtitle C § 703.4: "...shall include a transportation demand management plan..."

- *"Any request for a reduction of more than four (4) spaces from the required number of parking spaces **shall include a transportation demand management plan** approved by the District Department of Transportation, the implementation of which shall be a condition of the Board of Zoning Adjustment's approval."*
- Applicant's Transportation Statement (Ex. 19A) includes a DDOT-approved TDM plan; proposed conditions will reference the plan to ensure implementation.

WELLS + ASSOCIATES

MEMORANDUM

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 supersede 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.



Request for Special Exception Relief

Subtitle C § 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...

Subtitle X § 901.2(a)-(c)	Justification
<i>Will be in harmony with the general purposes and intent of ZR16 and Zoning Maps</i>	<ul style="list-style-type: none">• Special exception pursuant to Subtitle C § 703 “provides flexibility” when required parking would be “impractical” or “unnecessary due to lack of demand”• Hotel supports goals of MU-13 zone, which promotes medium density mixed-use development in Georgetown waterfront
<i>Will not tend to affect adversely the use of neighboring property</i>	<ul style="list-style-type: none">• Applicant will make 17 off-site parking spaces available for guests and employees• Adequate parking supply in nearby garage facilities• Low demand; cM hotel brand's target demographic does not expect parking
<i>Will meet such special conditions as may be specified by ZR16</i>	<ul style="list-style-type: none">• Request complies with conditions set forth in Subtitle C §§ 703.2-703.4

Proposed Conditions

1. **Off-Site Parking Agreement.** Prior to issuance of the final certificate of occupancy for the lodging use, the Applicant shall enter into one or more contracts with a commercial parking operator or comparable entity for no fewer than seventeen (17) off-site parking spaces, which may be located more than 600 feet from the Property. These spaces will be made available to Applicant staff and customers. If the contract is terminated, the Applicant shall secure a new contract that maintains the required number of off-site spaces within forty-five (45) calendar days. The site requires a minimum of 27 parking spaces based on (i) the square footage of the lodging use and (ii) a parking credit for the existing warehouse, a Historic Resource that required 13 parking spaces under the 1958 Zoning Regulations. However, special exception approval would reduce the minimum on-site parking requirement to zero (0) spaces. Such a reduction is justified given (a) the Applicant's hotel operations and guest profile; (b) the quantity of existing public parking surrounding the Property; and (c) the need to preserve the existing warehouse. With no on-site parking, however, 17 spaces must be secured off-site by contract to ensure availability.

Proposed Conditions

2. **Ongoing Outreach and Coordination.** Once every six (6) months for the first two (2) years after the effective date of the BZA order, and annually thereafter, the Applicant will make themselves available to the ANC and (a) send a summary of whether the spaces are or are not being used and if more spaces are needed, how much more monthly; and (b) share if hotel visitors arriving by vehicle are causing congestion on the public road due to actions like double parking and how the Applicant will apply its staff to resolve the issues. If needed, the Applicant will attend a duly-noticed, regularly scheduled meeting of the affected ANC.

3. **Change in Principal Use.** In the event that the Applicant or future owners of the Property operating the Property as a lodging use desires to sell the Property to a new owner who will be using the Property for non-lodging use, the Applicant or future Property owner shall be required to obtain new special exception approval for parking, if necessary, because of the change in the principal use, consistent with Subtitle A § 304.10(d) of the Zoning Regulations. This condition is intended to prevent the BZA's approval from running with the land as it pertains to another non-lodging principal use or user. The Applicant or future owner will notify any prospective purchaser that this provision exists.

4. **Transportation Management Plan and Construction Management Plan.** The Applicant and ANC 2E will develop a mutually agreed upon Transportation Management plan, as approved by DDOT, and a construction management plan.

Proposed Conditions

5. **Implementation of TDM Plan.** The Applicant shall implement the Transportation Demand Management plan on pages F-1 through F-3 in the Applicant's Transportation Statement marked as Exhibit 19A in the case record. The plan does not request use of public space for private loading, which will occur within the loading dock on the Applicant's property, as set forth in the Loading Management Plan. The approved public drop-off/pick-up (PUDO) zone will require the use of only two spaces in the public space.

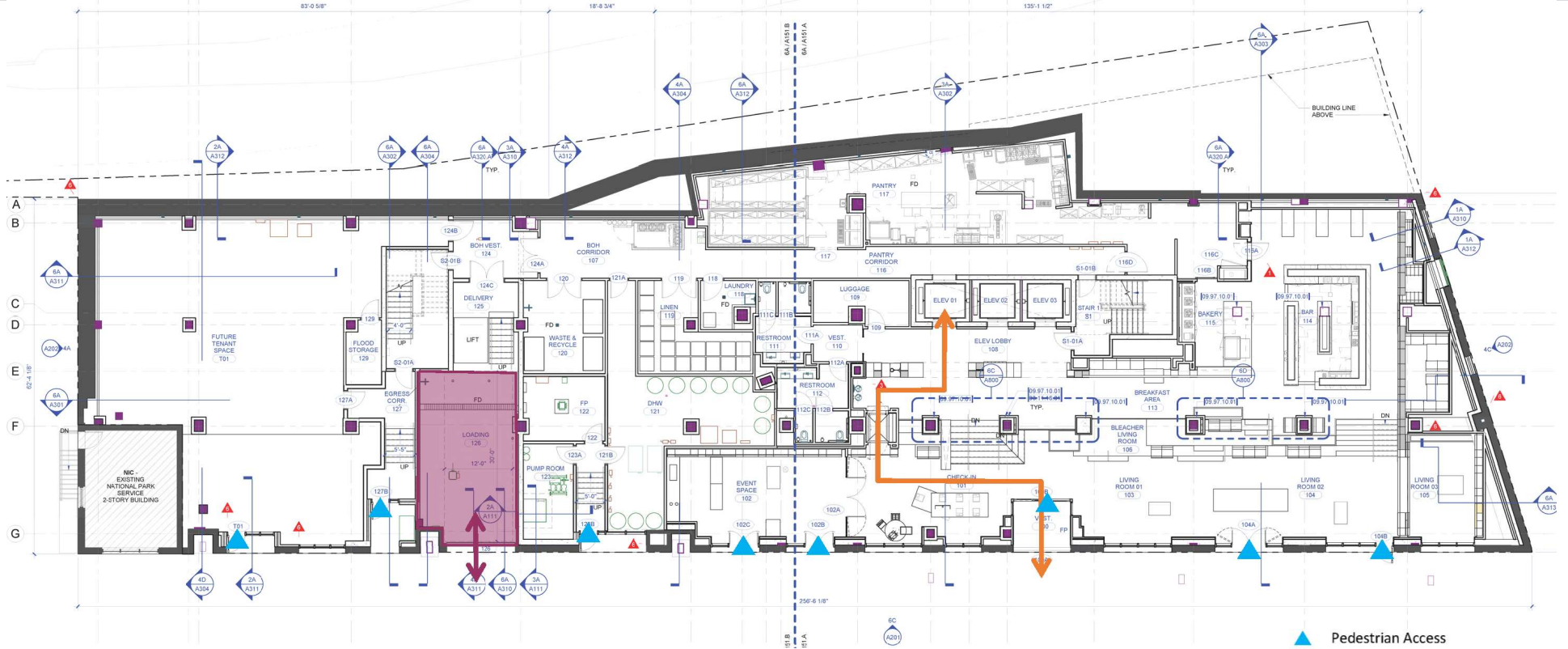
6. **Implementation of Loading Management Plan.** The Applicant shall implement the Loading Management Plan on pages C-1 and C-2 in the Applicant's Transportation Statement marked as Exhibit 19A in the case record. The TDM Plan is required by DDOT in connection with the requested parking relief and is intended to promote non-automobile travel, helping to reduce impacts on the surrounding transportation network. The Loading Management Plan supports safe and efficient use of the site by minimizing conflicts with pedestrians and vehicles and by actively managing operations. The primary loading facilities are located along the southern frontage of the site and will be accessed from K Street NW, with activities managed to avoid adverse impacts on the surrounding public space.

Questions

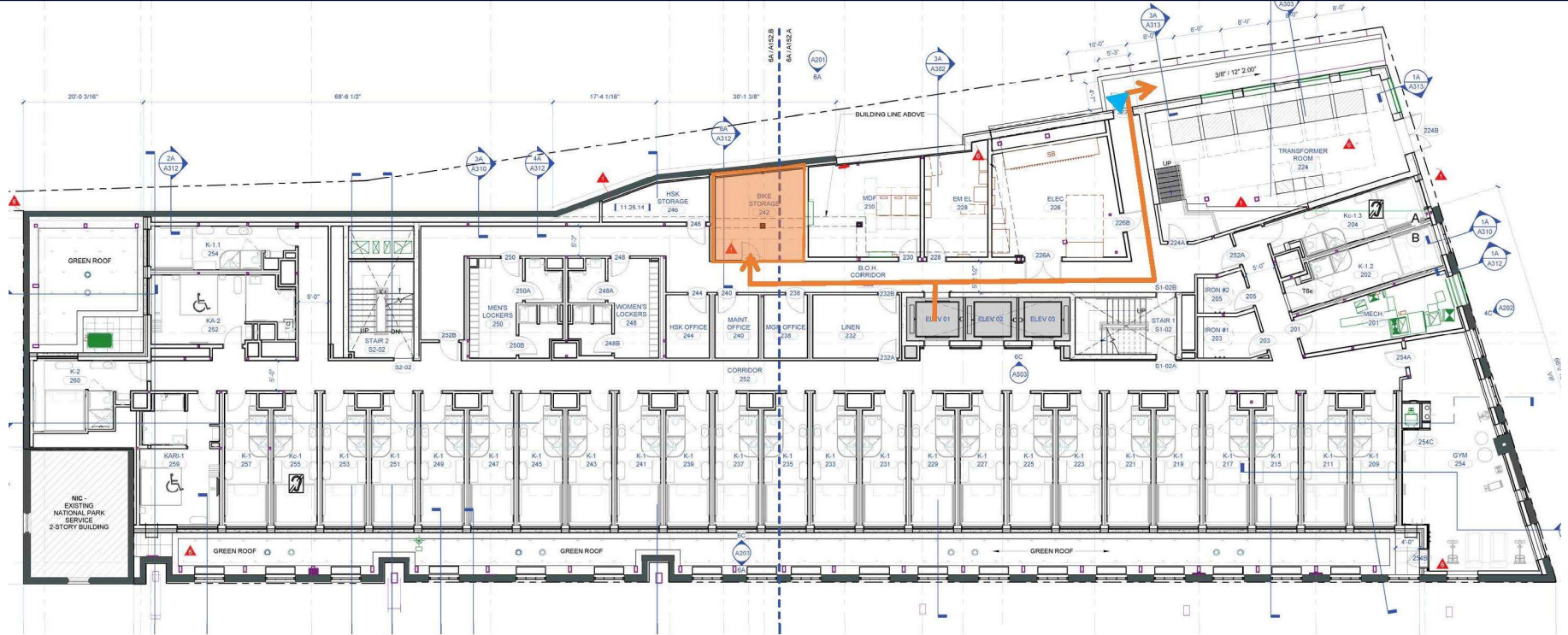
(Thank You!)



Site Circulation



Site Circulation



- Pedestrian Access
- Bicycle Access
- Loading Access
- Loading Dock

Curbside Management

