

**MEMORANDUM**

**TO:** District of Columbia Board of Zoning Adjustment  
**FROM:** Maxine Brown-Roberts, Project Manager  
*JL* Joel Lawson, Associate Director Development Review  
**DATE:** January 28, 2022

**SUBJECT:** BZA 20622 – Storage Facility within an existing building at 3222 M Street, NW

**I. OFFICE OF PLANNING RECOMMENDATION**

Jamestown Premier Georgetown Park Corporation (“Applicant”) proposes a self-storage establishment in existing vacant retail space in the Georgetown Park Mall at 3222 M Street, NW, a use permitted by special exception. The Office of Planning {“OP”} recommends **approval** of the requested special exception:

- Self-storage establishment facility use in MU-Use Group C, pursuant to Subtitle U § 508.1(j) and Subtitle X § 901.2.

**II. LOCATION AND SITE DESCRIPTION**

Applicant	Jamestown Premier Georgetown Park Corporation represented by Holland & Knight LLP
Address	3222 M Street, NW
Legal Description	Square 1200, Lots 866, 867, and 868
Ward/ANC	2/2E
Lot Characteristics	The property is irregularly shaped with frontage along M Street, NW and Wisconsin Avenue, NW, and the C&O Canal.
Zoning	MU-12 - intended for moderate-density mixed use development MU-13- intended for medium density mixed use development
Existing Development	The property is developed with the Georgetown Park Mall with specialty retail, service, and restaurant uses and below grade parking and loading.
Historic District	Georgetown Historic District
Adjacent Properties	The property is generally bounded by M Street, NW to the north, Wisconsin Avenue to the east, the C&O Canal to the south and Potomac Street, NE to the west.
Surrounding Neighborhood Character	The surrounding community consists of a mix of residential, retail, and service uses.

### Site Location



### III. APPLICATION-IN-BRIEF

Subtitle B § 100 defines a Self-Storage Establishment as:

*A building devoted to the storing of personal property (property other than real property) that:*

- (a) Consists of a building partitioned into one (1) or more enclosed and lockable storage units at least one of which does not exceed four hundred square feet (400 sq. ft.) in area, for lease on an individual basis; and*
- (b) Is leased on an individual basis to persons or businesses to store personal property on a self-service basis in which the lessee has control over the access and use of the self-storage space.*

The proposal is to convert approximately 7,985 square feet of below grade space into a self-storage facility which would have up to 130 self-storage units available for lease to members of the public. The units would range in sizes of between 20 and 50 square feet and are intended for the storage of small household or seasonal recreational items. Unlike larger storage facilities which serve a large area and store large pieces of furniture and large appliances, this facility would serve and benefit mainly residents of the nearby surrounding areas.

The storage area would be accessed from M Street, NW and/or Wisconsin Avenue, NW. The main entrance, a loading dock access from M Street would allow entrance to the facility through elevators from the loading dock down to the below grade facility. Access to the loading dock would be between 7:00 am and 7:00 pm daily and users would be only allowed to use this loading area after contacting the on-site security. Users could also access the facility from Wisconsin Avenue into the first level of the underground parking garage and the users would park in any available parking space and then access their unit. Wayfinding signage would be installed to facilitate easy access

and direct users to the appropriate elevators. Additionally, users would also be provided with operational instructions upon leasing a storage unit.

The zoning regulations list “self-storage facility” within the Production Distribution and Repair use group. As such, although this is a commercial establishment, it is permitted in the MU-12 and MU-13 zones only by special exception, pursuant to the requirements of Subtitle U § 508.1(j) and Subtitle X § 901.2.

**V. ZONING REQUIREMENTS AND RELIEF REQUESTED**

<b>MU-12/MU-13 Zone</b>	<b>Regulation</b>	<b>Proposed</b>	<b>Relief</b>
Subtitle U § 508.1(j)	Self-storage establishment facility use	Self-storage facility	<b>Special Exception</b>

**VI. OFFICE OF PLANNING ANALYSIS**

**Special Exception**

**508 SPECIAL EXCEPTION USES (MU-USE GROUP C)**

Unless specifically prohibited by Subtitle U § 509, the following uses shall be permitted in MU-Use Group C if approved by the Board of Zoning Adjustment as a special exception under Subtitle X, Chapter 9, subject to the following conditions:

- (j) *Production, distribution, and repair uses, subject to the following conditions:*
  - (1) *The facility shall be designed to enhance the visual and recreational opportunities offered by the waterfront;*

The facility would be in an enclosed, unused space internal to the mall and below grade, and no new construction is proposed. The facility would not be visible from or face onto the waterfront or canal.

- (2) *The use shall comply with the standards of external effects and shall have no adverse effects on other uses on the same or adjoining properties;*

The self-storage area would be located within the designated below-grade space, with access and egress points located to prevent adverse effects upon other uses within the mall and around the property. No temporary loading/unloading would be allowed from M Street or Wisconsin Avenue to affect traffic movements along these streets. The Applicant states that wayfinding signage would be installed to direct tenants to the appropriate elevators. Additionally, tenants would also be provided with operational instructions upon leasing a unit.

- (3) *The use shall not result in dangerous or otherwise objectionable traffic conditions;*

The storage units would only be allowed to be accessed from the at-grade loading dock off M Street or the first level of the underground parking garage from Wisconsin Avenue. Both areas have adequate space for on-site parking and allow drop-off/pick-up activities to be in close proximity to

the elevators designated for the self-storage facility. Having easy access to the facility should discourage tenants from parking on M Street or Wisconsin Avenue and should not negatively impact surrounding vehicle or pedestrian traffic.

- (4) *There shall be adequate off-street parking for trucks and other service vehicles; and*

The mall is served by an extensive underground parking garage with approximately 642 spaces, which the Applicant states is more than the number required for the mall users including this new use. Based on the types of household items that the units would accommodate, most users should only require a standard sized vehicles to move items into and out of their storage units and which can be easily accommodated in the loading area or the parking garage. In instances where a truck comes to the site it could be easily accommodated in the loading dock.

- (5) *There shall be no outdoor storage of materials;*

The proposed facility would not have direct access to an outdoor area. The Applicant states that no storage would be allowed outside of the storage units and the designated storage area.

**General Special Exception criteria under Subtitle X § 901.2.**

- (i) *Will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps*

The stated intentions of the MU Zones are, among other things, to “Provide for a varied mix of residential, employment, retail, service, and other related uses at appropriate densities and scale throughout the city” and to “Preserve and enhance existing commercial nodes and surroundings by providing an appropriate scale of development and range of shopping and service opportunities; The proposed facility would support the needs of area residents, as it would provide additional storage space in closer proximity to their dwellings. The users of the self-storage facility would also support the retail and service establishments at the Mall and around the property, thereby preserving and enhancing the vitality of the Georgetown commercial area. Therefore, the proposed self-storage facility is in general harmony with the Zoning Regulations.

- (ii) *Will not tend to adversely affect the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps;*

The proposed self-storage facility should not affect the use of neighboring properties as the use would be confined to an existing below grade location in the Mall. No standing of vehicles would be allowed along M Street or Wisconsin Avenue, so there should be minimal potential for conflicts with pedestrians at the street level along M Street and Wisconsin Avenue.

Within the Mall, the facility would be in an area that receives no daylight and has been a less desirable for other types of uses. The location and access to the area would limit any potential disturbances to other uses within the Mall as access to the facility would only be via the shared loading dock or via the first level of the underground parking garage.

(iii) *Will meet such special conditions as may be specified in this title.*

As demonstrated above, the proposed storage facility would satisfy the special conditions of Subtitle U § 508.1(j).

## **VII. COMMENTS OF OTHER DISTRICT AGENCIES**

The Department of Transportation (DDOT) submitted their comments at Exhibit 29, which states that the proposal would not have an adverse impact on the District's transportation network.

## **VII. ANC COMMENTS**

The property is within ANC-2E. At its January 6, 2022, meeting the ANC voted to recommend approval of the proposal (Exhibit 25).

## **VIII. COMMUNITY COMMENTS**

To date, there are no letters from community members.