

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

Application of
CTF Georgetown Hotel LLC

BZA Application No:
ANC 2E05

STATEMENT OF THE APPLICANT

This application is made by CTF Georgetown Hotel LLC (the “**Applicant**”) to the Board of Zoning Adjustment (“**Board**”) for special exception relief from the Zoning Regulations to reduce the number of required parking spaces as part of interior renovations to the existing hotel (the “**Project**”) at 1050 31st Street NW (Square 1189, Lot 90) (the “**Property**”). The application requests relief pursuant to Subtitle C § 703.2 of the Zoning Regulations in order to provide seven (7) valet spaces parking spaces where twenty (20) are required. The Project will conform to the Zoning Regulations in all other respects.

I. JURISDICTION OF THE BOARD

The Board has jurisdiction to grant the relief requested pursuant to Subtitle X § 901.1 of the Zoning Regulations.

II. DESCRIPTION OF THE PROPERTY, SURROUNDING AREA, AND PROJECT

The Property is located in the Georgetown neighborhood, on the south side of the C & O Canal National Historic Park (the “**C & O Canal**”), and is within the Georgetown Historic District. The Property is located in Square 1189, which is bounded by the C & O Canal to the north, 31st Street NW to the east, South Street NW to the south, and Wisconsin Avenue NW to the west, and is bisected by Waters Alley running east-west immediately south of the Property. The Property consists of approximately 9,396 square feet of land area and is zoned MU-12, as shown on the zoning map attached as Exhibit A. The Property is currently improved with a five-story

building devoted to a hotel (the “**Hotel**”) owned by the Applicant, and operated by the Rosewood Hotels and Resorts, an affiliate of the Applicant.

The surrounding area is characterized by a mix of office, retail, hotel, residential, educational uses, among others. The Property is located one (1) block or approximately 0.1 miles walking distance from the nearest bus stop, with access to the 30-series Metrobus routes, as well as both the Yellow (Georgetown-Union Station) and Blue (Dupont Circle-Rosslyn) DC Circulator routes.

The existing building was originally constructed in the 1960s and was acquired by the Applicant in 2016. The Applicant received permits from the Department of Consumer and Regulatory Affairs (“**DCRA**”) in 2018 for interior renovations to the building to improve hotel operations, among other things, and conducted renovations pursuant to the permits.¹ The Project maintained the existing room count of 49 rooms but included substantial reconfiguration of the two below-grade levels of the building, as shown on the floor plans (the “**Plans**”) attached as Exhibit B. This redesign was necessary in order to resolve significant inefficiencies in the hotel’s operations. Specifically, the Project: (a) relocated restrooms for the hotel restaurant from the current ground floor location; (b) increased significantly the amount of kitchen preparation and storage areas available to the restaurant; (c) added a housekeeping support area to improve facilities services; improved and enlarged break areas and locker facilities to adequately accommodate all employees; (d) provided sufficient space for centralized hotel offices within the building in lieu of the dispersed and inefficient office space previously located in commercial

¹ The Project consists primarily of interior renovations, with minor adjustments also made to screening for rooftop mechanical equipment. The Commission of Fine Arts delegated review of these changes to staff, which approved the proposed screening in December 2018.

townhomes south of the Hotel; and (e) provided much-needed additional storage space for the Hotel.

While the building previously provided 24 standard parking spaces prior to commencement of the renovations, the DCRA-issued permits allowed elimination of all standard parking on the site based on an erroneous interpretation of the Zoning Regulations. The Applicant completed the work under the permit and Applicant applied for a conditional Certificate of Occupancy for the Hotel, but DCRA indicated that the application would be denied due to the lack of required parking. Under the current Zoning Regulations, the Property is required to provide twenty (20) parking spaces.² However, DCRA takes the position that the number of parking spaces required when a building was constructed must be maintained and may not be reduced to the ZR-16 requirement unless the building undergoes a change in use or is demolished. Thus, since the building will continue to be dedicated to the existing hotel use, DCRA has determined that the 25 parking spaces required under the 1958 Zoning Regulations must continue to be provided.³

Under the circumstances, the Applicant proposes to request special exception relief under Subtitle C § 703 to provide the seven (7) valet parking spaces on the site in lieu of the twenty (20) standard spaces required. If necessary, the Applicant can also provide additional parking off-site within 600 feet of the Hotel, as is permitted under Subtitle C § 701.8(b). The off-site parking spaces, if needed, would be provided at the parking garage located on Lot 842 in Square 1190, just

² Under Subtitle C § 701.5, lodging uses are required to provide 0.5 parking spaces for each 1,000 square feet of gross floor area (“GFA”) in excess of 3,000 square feet. The existing building has approximately 43,503 square feet of GFA (including habitable penthouse space per Subtitle C § 709.1(b)), resulting in a requirement of twenty (20) spaces.

³ While DCRA has determined that the Property remains subject to the 1958 Zoning Regulations parking requirement of 24 spaces, pursuant to Subtitle A § 102.4, an application to the Board for a modification to a building vested under the 1958 Zoning Regulations shall confirm with the 2016 Regulations. The Board’s recent decision in *Application No. 19952 of Atlantic Residential A, LLC* (heard and decided on April 10, 2019) reaffirmed that an application to the Board to modify an existing project is subject to the 2016 Zoning Regulations. Accordingly, the Applicant requests relief from the twenty (20)-space requirement provided under the current regulations.

east of the Property on Thomas Jefferson Street NW, as shown on Exhibit C. The Project meets the standard for relief under Subtitle C § 703.2, as outlined in detail below.

III. THE APPLICATION SATISFIES THE CRITERIA FOR THE REQUESTED RELIEF

As discussed above, the Applicant requests special exception relief pursuant to Subtitle C § 703.2 of the Zoning Regulations to permit the Hotel to provide seven (7) non-standard tandem spaces to satisfy the current parking requirement. Under Subtitle X § 901.2, in order to obtain special exception relief, an applicant must show that the requested relief will be in harmony with the intent and purpose of the Zoning Regulations and Zoning Maps and will not adversely affect neighboring properties. For special exception relief for parking under Subtitle C § 703.2, an applicant must demonstrate compliance with certain conditions for relief. The application meets both the specific conditions of Subtitle C § 703.2 and the general standards for special exception relief.

1. The Use and Structure Is Particularly Well Served by Mass Transit, Shared Vehicle, or Bicycle Facilities. (C § 703.2(b))

Although the Project is required under Subtitle C § 701.5 to provide twenty (20) parking spaces, given the Property's central location and how exceedingly well the Property is served by alternative modes of transportation, the proposed seven (7) tandem spaces will be sufficient to meet the needs of the hotel. The Applicant operated the Hotel for two (2) years prior to the renovation and determined that the actual parking demand is far lower than twenty (20) spaces. The Property is only one (1) block south of the 30-series Metrobus routes and the Georgetown-Union Station and Dupont Circle-Rosslyn DC Circulator routes along M Street NW, which provide immediate access to many locations within the city, including Downtown, Union Station, Dupont Circle, and Arlington National Cemetery across the river. In addition, the Property has

easy access to Capital Bikeshare, with a 19-dock station located at the corner of 31st and K Streets just south of the Property and a 15-dock station also located at the corner of Wisconsin Avenue and Waters Alley directly west of the Property, in addition to the full gamut of rideshare, carshare, and dockless bicycle and electric scooter rental services available within the City. Further, the Applicant will provide a robust Transportation Demand Management (“TDM”) Plan as part of its forthcoming Comprehensive Transportation Report (“CTR”).

Given the Property’s location and how well the site is served by public transit and other transportation options, a reduction in parking is merited.

2. Land Use or Transportation Characteristics of the Neighborhood Minimize the Need for Required Parking Spaces. (C § 703.2(c))

For similar reasons as discussed above, the characteristics of the Georgetown neighborhood in which the Property is located render the total number of required parking spaces unnecessary in this case. As noted above, the Property is only one (1) block south of the 30-series Metrobus and Georgetown-Union Station and Dupont Circle-Rosslyn DC Circulator routes. Indeed, the Property is so well served by mass transit and the land use patterns surrounding the Property are so conducive to serving the site’s needs that the Property has a Walk Score of 96, which is considered a “Walker’s Paradise” and indicates that daily errands do not require a car. The Property also has a high Bike Score (of 87). Moreover, the Property’s central location in historic Georgetown provides immediate access to the neighborhood’s surrounding amenities and popular attractions, further minimizing the anticipated demand for parking by hotel guests. The Property is located directly abutting the scenic C & O Canal, is only three (3) blocks north of the Georgetown Waterfront Park, and is only one (1) block south of the shopping district along M Street and that runs further up Wisconsin Avenue to the north. Given this positioning, the demand for parking at the Hotel is lower than that contemplated by the matter-of-right parking

requirements provided under the Zoning Regulations, and a reduction of this requirement is appropriate.

3. The Nature of the Use and the Number of Employees, Guests, and Customers Who Would Reasonably Be Expected to Use the Proposed Building at One Time Would Generate Demand for Less Parking than the Minimum Parking Standards. (C § 703.2(e))

Along same lines as the above-stated reasons, although the Zoning Regulations require twenty (20) parking spaces for the Hotel, based on the Applicant's experience, the use is not anticipated to create demand for all of the required spaces and any such demand will be more than adequately served by the seven (7) valet spaces. As noted above, the Applicant's transportation consultant will submit a CTR prior to the Board's hearing demonstrating that the proposed valet parking is sufficient to serve the Hotel's needs.

4. The Quantity of Existing Public, Commercial, and Private Parking, Other than On-Street Parking, on the Property and Within the Neighborhood, that Can Reasonably Be Expected to Be Available When the Building Is in Use Is Sufficient to Serve the Hotel (C § 703.2(g))

As with the above criteria, given the Hotel's size and central location, based on the Applicant's experience, the demand for parking at the Hotel is anticipated to be lower than the total twenty (20) spaces required. The CTR prepared by the Applicant's transportation consultant will provide further evidence demonstrating that the proposed parking is adequate to serve the hotel.

5. The Requested Reduction Is Consistent with the Number of Spaces the Applicant Can Provide Onsite. (C § 703.3)

The Applicant requests relief to provide seven (7) valet parking spaces where twenty (20) spaces are required. As shown on the Plans attached as Exhibit B, the two below-grade parking levels in the Hotel were remodeled to address fundamental operational inefficiencies associated with the Hotel's internal design and programming. Specifically, as shown on the Plans, pursuant

to the DCRA-approved permit, the P1 Level was substantially rearranged in order to relocate the seven (7) existing standard parking spaces on that level and to convert such spaces into tandem valet spaces, concentrating them along the south side of the building. This was required in order to accommodate several much-needed adjustments in the Hotel's interior design. First, the redesign of the P1 Level allows the Hotel to provide restrooms for the Hotel's restaurant and dining area (in the location of former parking space "07"), which was previously squeezed on the ground-floor level, while maintaining these restroom facilities in as close and convenient a location as possible for diners. In addition, the provision of additional kitchen preparation space (occupying former parking space "06") was needed for the restaurant and required immediate access to the service elevator within the building core. Likewise, additional refrigeration and dry goods storage space (located at former parking spaces "03", "04", and "05") was needed to meet the restaurant's significant demand for such space in order to achieve effective operations. Moreover, these adjustments needed to be accomplished while maintaining the restaurant's private meeting/dining space (along the east side of the building), adding a housekeeping service area for the hotel (adjacent to the building core), and improving and enlarging the employee break area (west side of the building).

On the P2 Level, two fundamental demands necessitated removal of the existing parking spaces. First, the Hotel requires significantly more storage space (occupying former parking spaces "16"–"22") than was previously available in the building in order to operate efficiently at the high level of service that this type of Hotel provides. Secondly, the existing parking area along the west side of the building (formerly parking spaces "08"–"15") was built out and adapted to accommodate additional space for staff and hotel administration. The Hotel's management offices were previously located in several commercial townhomes to the south of the Property on

31st Street and Waters Alley, which was a very inefficient and problematic arrangement from an operational standpoint. Thus, a more centralized office space was needed to improve daily business activities, administration, and the Hotel's overall operation. In addition, the previous employee locker room space on the P1 Level did not adequately serve Hotel staff and a much-expanded space, as now provided on the P2 Level, was needed to ensure adequate facilities to accommodate all of the Hotel's employees.

Given the numerous competing administrative needs and programmatic inefficiencies that the completed renovations were tasked with resolving, the seven (7) tandem spaces now provided are all that can reasonably be accommodated on-site.

6. The Requested Relief Will Include a Transportation Demand Management Plan Approved by the District Department of Transportation, the Implementation of Which Shall Be a Condition to the Board's Approval.

As stated above, the Applicant's transportation consultant will prepare a CTR that will include a TDM plan, which plan will be developed in coordination with the District Department of Transportation ("DDOT"). The CTR and TDM Plan will be submitted into the record prior to the Board's public hearing on this application.

7. The Relief Requested Is in Harmony with the Intent and Purpose of the Zoning Regulations and Zoning Maps and Will Not Adversely Affect Neighboring Properties.

The requested parking relief will allow the Applicant to maintain previously permitted improvements that are necessary to the Hotel's operations for the restaurant and the overall functioning of the use, which required substantial reconfiguration and reprogramming of the two below-grade levels of the building. The Applicant will continue to provide adequate parking to serve the Hotel via off-site parking nearby, as permitted under the Zoning Regulations, and by way of seven (7) valet parking spaces on-site. Given the central location of the hotel within the

Georgetown neighborhood and the availability of alternative modes of transportation, and in particular Metrobus and DC Circulator service one (1) block north of the Property, the requested relief will not result in any adverse effect on neighboring properties. Further, any potential impacts will be fully addressed in the Applicant's TDM plan, to be developed in coordination with DDOT.

IV. CONCLUSION

For all of the above reasons, the Applicant has satisfied the standards for the requested special exception relief in this case and requests approval for such relief.

Respectfully submitted,

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