

BZA Application No. 21303

Jamal Ahmed
1631 A Street, SE
September 24, 2025



Applicant:

Jamal Ahmed

Rasool Ahmed

Board of Zoning Adjustment

District of Columbia

Zoning Attorney

Sullivan & Barros, LLP

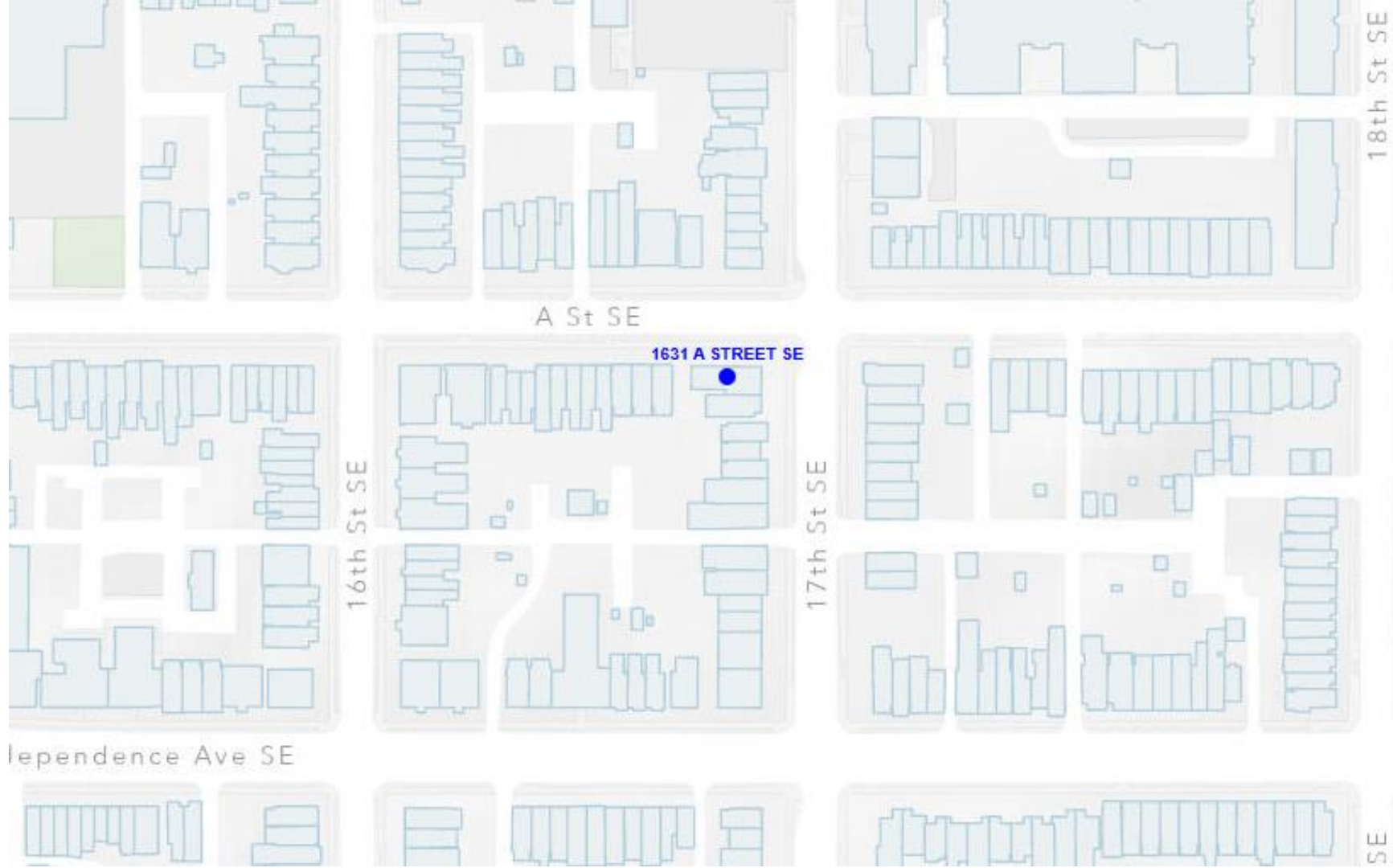
Alexandra Wilson

CASE NO. 21303

EXHIBIT NO. 41

Summary of the Case

- The property is currently improved with an existing four-unit, purpose-built apartment building. It has two stories and a basement level. The units were recently upgraded, moving laundry in-unit and modernizing the systems. During construction, the basement served as storage for tenant furniture etc., but once completed, the basement will be a vacant conditioned space. The basement level already has appropriate egress for living space and is conditioned, making it an appropriate place for two additional units, prompting this case.
- Subtitle U § 301.5 permits, as a matter of right, the expansion of purpose-built apartment buildings, so long as the Property has 900 square feet of land area per unit. The Property has 2,000 square feet of land area, less than 900 square feet of land area per unit currently, and as proposed with six total units. Accordingly, the Applicant must seek area variance relief from U § 301.5(b).
- There are currently no parking spaces on the property, and the addition of two new units will trigger a requirement for one parking space. As there is no physical way to provide parking on site, the Applicant also seeks parking relief pursuant to C § 703.2.
- The Office of Planning recommends approval– originally denial, but the Applicant submitted updated information about the unique aspects of the property and strengthened the original argument.
- ANC 7D voted in support of the application.
- DDOT has no objection.
- There are two letters of support from neighbors.



18th St SE

A St SE

1631 A STREET SE

16th St SE

17th St SE

Independence Ave SE

SE





Subj. Property
1631 A Street, SE



Subj. Property
1631 A Street, SE



Subj. Property
1631 A Street, SE



Subj. Property
1631 A Street, SE

Variance Test – Confluence of Factors

Existing Structure and Age

- Built in 1941 as a purpose-built apartment house with 4 large units (2 per floor).
- Became legally nonconforming under the 1958 Zoning Regulations.
- Same unit distribution on each level, no vertical integration.

Modernization of the Building

- Each unit is ~1,000 sq. ft., fully modernized with in-unit laundry.
- Upgrades include HVAC, electrical, and utility improvements.
- Basement-level space formerly had laundry and these systems.

Corner Lot & Security Challenges (considered in case 20289)

- Highly visible corner lot adjacent to Massachusetts Ave., East Capitol St., Independence Ave., and Metro.
- At-grade basement level with direct exposure to public realm.
- Vacancy has led to security problems (loitering, attempted entry).

Fixed Lot Size

- Lot falls short of 900 sq. ft. per unit requirement.
- No opportunity to expand: adjacent properties already developed, lot line adjustments infeasible.

Comparison with Other Corner Purpose-Built Apartment Buildings

- 1601 A Street (NW corner): No basement level; excavation required to create units.
- 131 17th Street (SE corner): Same issue—lowest level is below grade.
- 1600–1606 Independence Ave. (SW corner): Already supports 12 units, structurally distinct.

By contrast:

- Subject property's above-grade basement is immediately suitable for legal units.
- No excavation or underpinning required.
- Only scope: build kitchens and bedrooms within existing conditioned space.
- Egress windows and entrance already in place.

Variance Test – Practical Difficulty

Persistent Vacancy of Conditioned Space

- Basement is habitable, conditioned, and integrated into the building.
- No longer needed for laundry after unit upgrades.
- Remains vacant but incurs ongoing costs: HVAC, cleaning, pest management, and security.
- Corner-lot exposure makes vacancy a safety and nuisance risk.

Infeasibility of Combining with Upper Units

- Building's 1941 structure not designed for vertical integration.
- Would require demolition of slabs, reinforcement, rerouting of systems, and potential excavation.
- Prohibitively expensive and would displace tenants.
- Creates oversized units (~2,000 sq. ft.)

No Viable Accessory Use

- No other by right use available in this space.
- Would force owner to maintain large, vacant space for no functional purpose.
- Meanwhile, residential use is permitted by right, with land area as the only constraint.


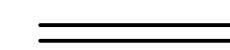
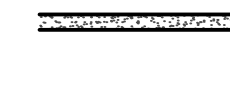

Variance Test – No Harm to Zone Plan nor Public Good

- The use itself is permitted in the RF-1 zone as a matter-of-right, this was purpose built as an apartment building, and the lowest level was an idle, vacant space. Maintaining conditioned vacant, unused space in an existing apartment building is a practical difficulty as described above.
- The 900 ft rule was not meant to prevent density where appropriate, but to prevent over concentration of density in traditional row house neighborhoods.
- In this case, the location so close to public transit and major thoroughfares facilitates this density without creating additional congestion or traffic. It is an appropriate location for multiple units of housing. It is unique relative even relative to other purpose-built corner lots on this same square.

Special Exception Criteria of C-703.2

<p>(a) Due to the physical constraints of the property, the required parking spaces cannot be provided either on the lot or within six hundred feet (600 ft.) of the lot in accordance with Subtitle C § 701.8;</p>	<p>The Property does not have access to any alley. The only way cars could access the Property is if curb cuts were created via 17th Street or A Street. DDOT does not permit curb cuts to one single space. Even if DDOT permitted that, there would be no room for parking on the site given the existing improvements, which have existed in their current configuration since 1941. The majority of the properties in the area are similarly situated with respect to access. Any nearby parking spaces within 600 feet are dedicated to the principal use on that respective lot.</p>
<p>(b) The use or structure is particularly well served by mass transit, shared vehicle, or bicycle facilities; (c) Land use or transportation characteristics of the neighborhood minimize the need for required parking spaces;</p>	<p>The Property is located two and a half blocks from the Stadium Armory Metro line. According to WalkScore.com, it has “excellent transit.” Additionally, the Property has a Walk Score of 81 and is considered a “Very Walkable”, as well as a BikeScore of 95—a “Biker’s Paradise.” This means that most errands can be accomplished on foot, and daily errands can be accomplished on a bike. This is further enforced by the Property’s location relative to coffee shops, bars/restaurants, parks, RFK Stadium, dog parks and other recreation.</p>
<p>Section C-703.3 Any reduction in the required number of parking spaces shall be only for the amount that the applicant is physically unable to provide, and shall be proportionate to the reduction in parking demand demonstrated by the applicant.</p>	<p>The reduction in the required number of parking spaces (one space) is only for the amount the Applicant is physically unable to provide. Regarding demand for parking, as discussed above, the Applicant anticipates that the transportation characteristics, size of the units, and amenities in the neighborhood will attract residents without cars.</p>

legend (see cover sheet for insulation rating)

-  EXISTING MASONRY WALL TO REMAIN
-  EXISTING INTERIOR WALL TO REMAIN
-  NEW 2"x4" WOOD OR 3-5/8" METAL STUD @ 16" O.C. WITH 1/2" GYPSUM BOARD ON EACH SIDE.
-  FIRE RATED WALL ASSEMBLIES EXISTING TO REMAIN MIN ONE HOUR AT UNITS SEPARATION / MIN TWO HOUR AT STAIRS AND CORRIDORS

window notes:

- * ALL BEDROOMS (I.E. SLEEPING ROOMS) SHALL HAVE AN EMERGENCY ESCAPE WINDOW (IBC 2015, 1009; IRC 2015, 310). HIS WINDOW SHALL HAVE A MINIMUM NET CLEAR OPENING OF 5.75 SQ. FT. WITH A MINIMUM CLEAR HEIGHT OF 24 INCHES AND A CLEAR WIDTH OF 20 INCHES. THE MAXIMUM HEIGHT OF THE CLEAR OPENING FROM THE FLOOR IS 44 INCHES (IBC 2015, SECTION 1009.3; IRC 2015, SECTION 310.1).
- WINDOWS IN R-2 UNITS SHALL HAVE GUARDS WHERE THE OPENING OF THE SILL PORTION OF AN OPERABLE WINDOW IS LOCATED MORE THAN 72 INCHES ABOVE FINISHED GRADE OR OTHER SURFACE BELOW AND THE LOWEST PART OF THE CLEAR OPENING OF THE WINDOW IS AT A HEIGHT LESS THAN 36 INCHES ABOVE THE FINISHED FLOOR OF THE ROOM. OPERABLE SECTIONS OF WINDOWS MUST NOT PERMIT OPENINGS THAT ALLOW THE PASSAGE OF A 4 INCHES DIAMETER SPHERE WHERE SUCH OPENINGS ARE LOCATED WITHIN 36 INCHES OF THE FLOOR [2017 DCBC 1015.8].

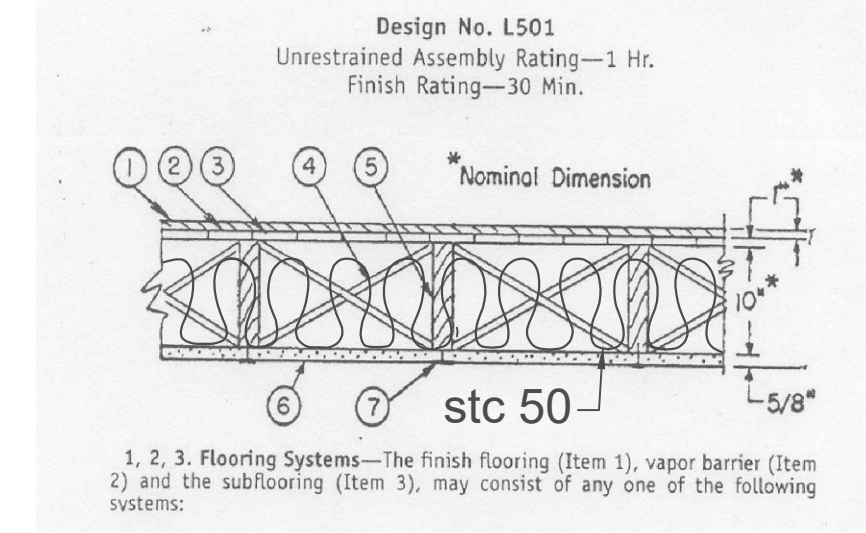
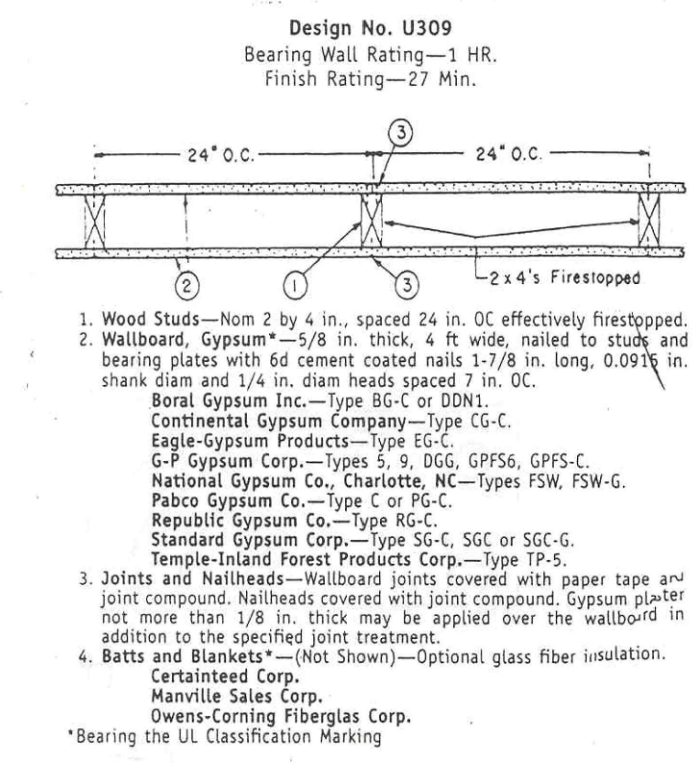
door notes:

- 2017 DCBC, 716.5.9 DOOR CLOSING FIRE DOORS SHALL BE LATCHING AND SELF-OR AUTOMATIC CLOSING IN ACCORDANCE WITH THIS SECTION.
- DOOR HARDWARE AT COMMON ENTRANCE DOORS ARE EQUIPPED WITH APPROVED PANIC HARDWARE / OCCUPANTS DO NOT HAVE TO USE A KEY OR HAVE SPECIAL KNOWLEDGE TO EXIT THE BUILDING. THE MAXIMUM EFFORT TO OPERATE DOORS SHALL NOT EXCEED 5 POUNDS WITH SUCH PULL OR PUSH EFFORT BEING APPLIED AT RIGHT ANGLES TO HINGED DOOR AND AT THE CENTER PLANE OF SLIDING OR FOLDING DOORS. WHEN FIRE DOORS ARE UTILIZED, THE MAXIMUM EFFORT TO OPERATE THE DOOR MAY BE INCREASED TO NOT EXCEED 15 POUNDS. [2017 DCBC 1010.3]

safety glazing notes:

- 2406.1 HUMAN IMPACT LOADS: INDIVIDUAL GLAZED AREAS INCLUDING MINIMUMS IN HAZARDOUS LOCATIONS AS DEFINED IN SECTIONS 2406.4 SHALL COMPLY WITH SECTIONS 2406.1.1 THROUGH 2406.1.4
- 2406.4.2 GLAZING ADJACENT TO DOORS - COMPLY
- 2406.4.3 GLAZING IN WINDOWS - COMPLY

FENESTRATION U-FACTOR	0.30	U-FACTOR
SKYLIGHT U-FACTOR	0.55	U-FACTOR
GLAZED FENESTRATION SHGC	0.40	SOLAR HEAT GAIN COEFFICIENT (SHGC)



1hr wall assembly

1hr floor assembly
existing to remain

**SECTION 803
WALL AND CEILING FINISHES**

803.1 General.

Interior wall and ceiling finish materials shall be classified for fire performance and smoke development in accordance with Section 803.1.1 or 803.1.2, except as shown in Sections 803.2 through 803.13. Materials tested in accordance with Section 803.1.2 shall not be required to be tested in accordance with Section 803.1.1.

803.1.1 Interior wall and ceiling finish materials.

Interior wall and ceiling finish materials shall be classified in accordance with ASTM E 84 or UL 723. Such interior finish materials shall be grouped in the following classes in accordance with their flame spread and smoke-developed indexes.

- Class A:—Flame spread index 0-25; smoke-developed index 0-450.
 - Class B:—Flame spread index 26-75; smoke-developed index 0-450.
 - Class C:—Flame spread index 76-200; smoke-developed index 0-450.
- Exception: Materials tested in accordance with Section 803.1.2.

**SECTION 804
INTERIOR FLOOR FINISHES**

804.1 General.

Interior floor finish and floor covering materials shall comply with sections 804.2 through 804.4.2.

Exception: Floor finishes and coverings of a traditional type, such as wood, vinyl, linoleum or terrazzo, and resilient floor covering materials that are not comprised of fibers.

804.2 Classification.

Interior floor finish and floor covering materials required by section 804.2 to be of class I or II materials shall be classified in accordance with NFPA 253. The classification referred to herein corresponds to the classification determined by NFPA 253 as follows: class I, 0.45 watts/cm2 or greater; Class II, 0.22 watts/cm2 or greater.

804.3 Testing and identification.

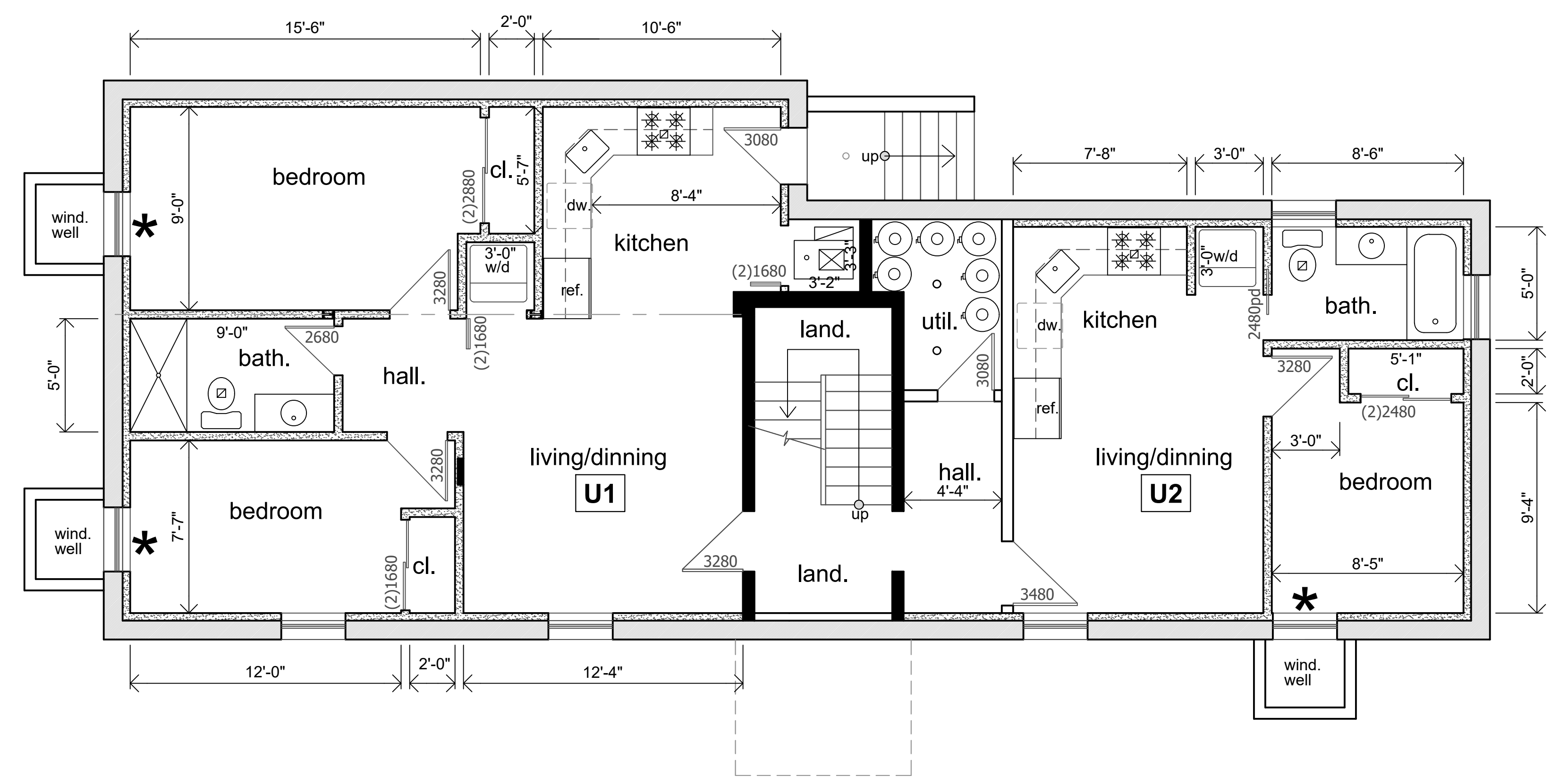
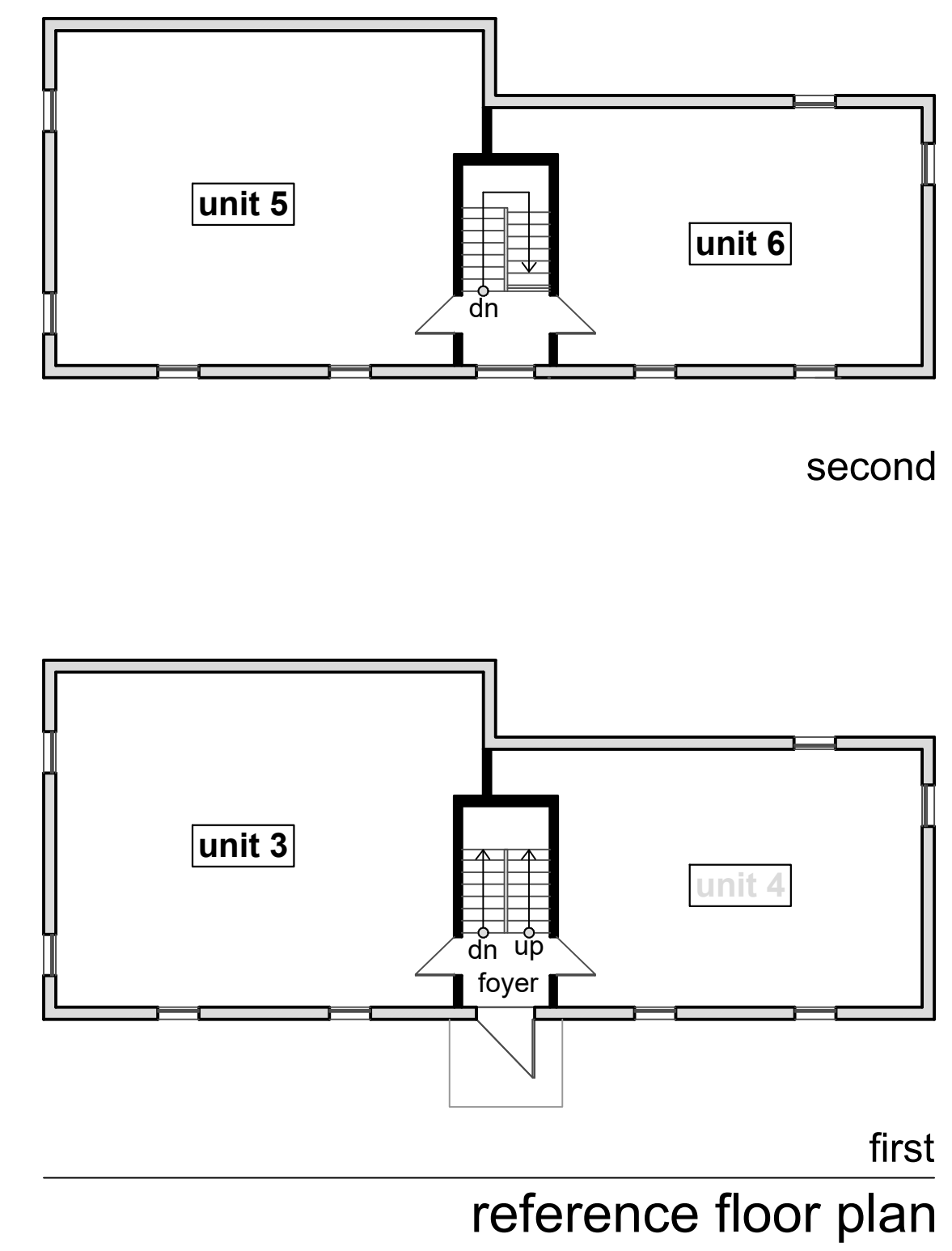
Interior floor finish and floor covering materials shall be tested by an agency in accordance with NFPA 253 and identified by a hang tag or other suitable method so as to identify the manufacturer or supplier and style, and shall indicate the interior floor finish or floor covering classification according to section 804.2. Carpet-type floor coverings shall be tested as proposed for use, including underlayment. Test reports confirming the information provided in the manufacturer's product identification shall be furnished to the building official upon request.

804.4 Interior floor finish requirements.

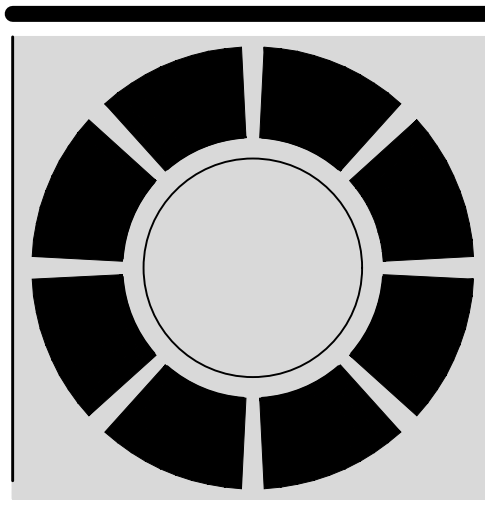
Interior floor covering materials shall comply with sections 804.4.1 and 804.4.2 and interior floor finish materials shall comply with section 804.4.2.

804.4.1 Test Requirement

In all occupancies, interior floor covering materials shall comply with the requirement of the DOC FF-1 "pill test" (CPSC 16 CFR part 1630) or with ASTM D 2859.



cellar
proposed floor plan



proposed floor plans
1631 A STREET SE, WASHINGTON, DC 20003

Mark	Date	Revision

SEPTEMBER 04, 2024

A001