

MEMORANDUM

TO: District of Columbia Board of Zoning Adjustment

FROM: Crystal Myers, Case Manager
JS for
 Joel Lawson, Associate Director Development Review

DATE: September 19, 2025

SUBJECT: BZA Case 21345: Request for area variance relief to construct multiple temporary primary structures on one record lot for use as swing space for Whittier Elementary School

I. OFFICE OF PLANNING RECOMMENDATION

The Office of Planning (OP) recommends **approval** of the following area variance relief pursuant to Subtitle X §1000:

- C § 302.2- Only one primary building or structure is permitted on a record lot in the R, RF, and RA zones

II. SITE DESCRIPTION

| | |
|------------------------------------|--|
| Address | 3 rd St. NW |
| Applicants | District of Columbia |
| Legal Description | Square 3269, Lots 65 |
| Ward, ANC | Ward 4; ANC 4B |
| Zone | R-1B |
| Historic Districts | None |
| Lot Characteristics | 283,200 sq.ft lot at the corner of Sheridan St. NW and 3 rd St. NW |
| Existing Use | vacant |
| Adjacent Properties | Coolidge High School, Ida B Wells Middle School, and Takoma Aquatic Center |
| Surrounding Neighborhood Character | The subject property is adjacent to school properties and public recreation spaces. The surrounding area is predominantly residential. |
| Proposed Development | The applicant would like to construct a temporary campus with multiple modular trailers on one lot |

III. LOCATION – Number 7



IV. ZONING REQUIREMENTS and RELIEF REQUESTED

| R-1B | Regulation | Proposed ¹ | Relief |
|------------------------------------|---|-------------------------------|--------------------------------|
| Floor are Ratio D § 4902 | 1.8 max | 0.16 | Conforms |
| Height D § 4904 | 60 ft max | 15 ft. | Conforms |
| Lot Occupancy D § 4910 | 60% max | 16% | Conforms |
| Parking C § 701 | 6 spaces min. | 6 spaces | Conforms |
| Bicycle Parking C § 804 and 805 | 29 spaces min | 30 spaces | Conforms |
| C § 302.2 | More than one principal building on a lot is not prohibited | Multiple buildings on one lot | Area Variance Requested |

V. OP ANALYSIS

Subtitle X Section 1000 AREA VARIANCE STANDARDS for having the proposed use near a property containing live performances

Exceptional Situation

¹ Information provided by the Applicant

The Applicant intends to construct multiple modular trailers on the subject property to serve as a “swing space” campus for Whittier Elementary School. This temporary campus would provide space for students while the school is undergoing renovation. Area variance relief is needed because the trailers are considered primary buildings thus there would be multiple primary buildings on this one lot.

The property is exceptional due to its large size and its close proximity to the Whittier School which is located in the same block on the other side of the street (shown in red on the above map). The unique aspects involved with constructing a temporary campus are also an exceptional situation in this case. Unlike having one large temporary structure, multiple small trailers are easier to quickly install and remove. Their size, which is limited by having a wood frame, makes them easier to transport on neighborhood residential roads.

Having multiple small trailers on the lot would allow them to with at least 20 ft of space between them. Space between the trailers would allow them to meet stormwater management requirements as well as fire and life safety requirements.

Strict application of the Regulations would result in a practical difficulty

If the Applicant were to strictly comply with the Regulations, they would need to construct a single large temporary structure rather than multiple smaller ones. However, doing this would have several practical difficulties for the project. Internally, the structure would lack access to natural light, resulting in a large, enclosed space that could negatively impact the quality of the learning environment. Externally, the size of the structure would make it difficult to meet stormwater management and life safety requirements.

Additionally, consolidating the trailers into one large structure through a meaningful connection would be impractical. Modifying the trailers to create such a connection would be costly, particularly due to the added expenses for lighting, heating, and enclosing the space. These costs would especially be difficult to justify given the temporary nature of the structure’s intended use.

There would be no substantial detriment to the Public Good

Granting area variance relief would not cause a substantial detriment to the public good. The proposal complies with the R-1B development standards so it should not unduly impact the neighboring properties. Furthermore, the property is appropriate for this type of use because it is adjacent to other schools and public recreation properties.

There would be no substantial impairment to the intent, purpose, and integrity of the Zone Plan

Granting area variance relief should not result in substantial impairment to the Zone Plan. Relief is primarily needed due to the temporary nature of the project. It would allow a permitted public school use to be built within the development standards of the R-1B zone. It would also help facilitate the District’s effort to modernize one of its public school facilities.

VI. OTHER DISTRICT AGENCIES

As of the writing of this report no other District agencies submitted comments to the record.

VII. ADVISORY NEIGHBORHOOD COMMISSION

ANC 4B filed a report in support of the variance in Exhibit 15.

VIII. COMMUNITY COMMENTS

There are no community comments in the record at the time of filing this report.