District of Columbia Office of Planning

MEMORANDUM

TO: District of Columbia Board of Zoning Adjustment

FROM: Philip Bradford, AICP, Development Review Specialist

MBR Maxine Brown-Roberts, Associate Director, Development Review

DATE: July 17, 2026

SUBJECT: BZA Case 21467: To permit six dwelling units in an existing, detached, four-story plus cellar building.

I. OFFICE OF PLANNING RECOMMENDATION

The Office of Planning (OP) recommends **approval** of the following use variance pursuant to Subtitle X § 1002:

- Matter-of-Right Uses, U § 201 (Permitted Use: Single-unit detached, semi-detached, or row building, Existing Use: single-unit detached dwelling, Proposed Use: 6 dwelling unit multi-family building)

II. LOCATION AND SITE DESCRIPTION

Address:	2201 R Street, NW
Applicants:	Paramount Estate LLC represented by Holland & Knight, LLP
Legal Description:	Square 2516, Lots 65 and 66
Ward / ANC:	Ward 2 / ANC 2D
Zone:	R-3
Lot Characteristics:	Lot 65: Irregular corner lot with 50 ft. of frontage along R Street NW, 97.5 ft. of frontage along 22nd Street, NW and a 5 ft. public alley along the north side of the property. Lot 66: Irregular lot, 25 ft. wide by 97.5 ft. deep with an 8 ft. public alley at the rear.
Existing Development:	Single unit detached, four story plus cellar building.
Adjacent Properties:	Single unit semi-detached and row dwellings.
Surrounding Neighborhood Character:	Low to moderate density residential in character primarily developed with single unit, row dwellings. A significant portion of the surrounding structures are used as a chancery.
Proposed Development:	The applicant proposes to renovate the existing building and create six (6) new residential units.

III. ZONING REQUIREMENTS and RELIEF REQUESTED

R-3 Zone	Regulation	Existing	Proposed	Relief
U § 201.1 Matter-of-Right Uses – Use Group C	Detached, semi-detached, or row building – 1 principal dwelling unit, plus accessory apartment permitted	Detached principal dwelling unit	Six (6) dwelling units	Use variance requested

IV. OP ANALYSIS

Background

The existing structure on the subject property was built in 1916 as a single unit dwelling. The property was used as a residence from approximately 1906 to 1945, when the property was purchased and used by the Embassy of Pakistan. The Embassy of Pakistan has since relocated to a new facility on International Court, NW leaving the structure vacant for nearly 20 years.

Given the size of the structure, 16,188 square feet, this is significantly larger than a typical single unit, detached dwelling, the applicant proposes to convert the single unit structure to a six (6) unit apartment house which is not permitted in the R-3 zone, thus requiring a use variance. The applicant also controls Lot 66 which is not subject to the requested variance, however the intent is to use this property for vehicular access and combine the lots via a separate application. There is an existing driveway easement allowing access from Lot 56 to Lot 65 and 66, which make up the subject property.

Subtitle X § 1002 Use Variance Review Standards

i. *Extraordinary or Exceptional Situation or Condition Resulting in Peculiar and Exceptional Practical Difficulties / Exceptional or Undue Hardship To the Property Owner*

a. *Extraordinary or Exceptional Situation*

The property has several extraordinary or exceptional situations that warrant granting a use variance. The existing structure spans Lots 65 and 66 and only has access through adjacent Lot 56 which is not subject to this application. The alley to the north of the propety is too narrow to allow for vehicular access. The siting and topography of the site is also unique as there is a significant grade change causing the structure to have been built at the southeast corner of the site with an unusually large amount of open space surrounding the structure.

The large square footage of the existing structure also presents an exceptional condition. With 16,188 square feet of building area and the existing configuration in Exhibit 9 showing upper floors configured for housing foreign diplomats in individual units, the structure itself lends itself to be used as a multi-family building rather than a very large single-unit dwelling that would have limited potential for buyers due to the size, and cost of rehabilitation as demonstrated by the applicant at Exhibit 14. Further exacerbating this situation is the fact that the structure is a contributing building in the Sheridan-Kalorama Historic District, which adds additional complexity and expense in meeting historic preservation standards. Regardless of whether the building is used as a single-unit residence or multi-unit building, the cost of rehabing a historic structure of this size will be significant and allowing additional dwelling units would allow the project to be more viable.

b. Exceptional Practical Difficulties / Exceptional or Undue Hardship

Given the property has sat vacant despite marketing efforts implies that there may not be a matter-of-right use in the R-3 zone that is viable for the subject property. The applicant notes that the property has been marketed significantly with no interest as evidenced in Exhibit 27 B, where no approved R-3 use such as a religious group residence, institutional, small health care facility, school, or chancery expressed any interest in obtaining the site. The applicant also does not have a path forward through a map amendment as the Comprehensive Plan policies and FLUM would not support a potential map amendment to a higher density zone that would allow 6-units as a matter-of-right, even though there are Residential Apartment zoned properties one block east of the subject property.

Adapting the existing building to a single-family structure would present a further challenge given the site and several issues noted above regarding access and topography, privacy and security would be inconsistent with expectations for a high-end single unit dwelling of this size. The applicant notes cost estimates based on construction costs of $350 – 500 per square feet resulting in a renovation cost of $5.6 to $8 million dollars. This would require a list price of $20 million in order to receive a reasonable return on investment, which is not viable in the current market.

ii. No Substantial Detriment to the Public Good

The record contains numerous letters of support from members of the public which note their desire to see the building no longer remain vacant and support additional housing that maintains the character of the neighborhood. The proposal would restore the existing building without any change to the size, bulk, or shape of the building, which would leave the general character of the square unchanged. Six residential units is relatively modest and given the adjacent uses are mostly chancery uses transitioning to higher density uses to the east with RA-2, RA-2/DC and MU-8B/DC zoning, a multi-unit dwelling would not be out of place in this context.

iii. No Substantial Impairment to the Intent, Purpose, and Integrity of the Zoning Regulations

The subject property is zoned Residential House (R), the purpose and intent of the zoning regulations for the broader R zones and the R-3 zone are provided below:

The R zones are intended to:

D § 101.2

(a) *Provide for the orderly development and use of land and structures in areas predominantly characterized by low- to moderate-density residential development;*

(b) *Recognize and reinforce the importance of neighborhood character, walkable neighborhoods, housing affordability, aging in place, preservation of housing stock, improvements to the overall environment, and low- and moderate-density housing to the overall housing mix and health of the city;*

(c) *Allow for limited compatible accessory and non-residential uses;*

(d) *Allow for the matter-of-right development of existing lots of record;*

(e) *Establish minimum lot area and lot width for the subdivision and creation of new lots of record; and*

(f) *Discourage multiple dwelling unit development.*

With the R-3 zone specifically intended to:

> *D § 101.8* *The purpose of the R-3 zone is to allow for row houses, while including areas within which row houses are mingled with detached houses, semi-detached houses, and groups of three (3) or more row houses.*

While the R zones are intended to provide for single unit detached, semi-detached and row homes and discourage multiple dwelling development, the size and location of the subject property are unique that allowing a six (6) unit dwelling in this location would not be inconsistent with the purpose and intent of the zone. Directly north of the subject property there are five (5) row houses that take up a similar amount of land area as the subject property. Had the subject property developed with row houses rather than a large detached single unit historic mansion, The property could in theory accommodate up to 8 units if developed with row homes meeting the R-3 lot width standards containing accessory apartments.

Additionally, while intended to range from low to moderate density, the location of the property is surrounded by chancery uses and quickly transitions to higher density Residential Apartment (RA), and Mixed Use (MU) zoning on the blocks to the east of the site. The specific block does not feel low-density or residential in character, therefore allowing a modest request of 6 dwelling units would be in keeping with the regulations.

V. OTHER DISTRICT AGENCIES

At the writing of this report, there are no comments in the record from any other District agencies.

VI. ADVISORY NEIGHBORHOOD COMMISSION

At Exhibit 26 is a report from ANC 2D.

VII. COMMUNITY COMMENTS

At Exhibits 16-22 are letters in support from the community.

Attachment: Location Map

Location Map: