Muriel Bowser
Mayor

Government of the District of Columbia
Fire and Emergency Medical Services Department

John A. Donnelly, Sr.
Fire and EMS Chief

FIRE PREVENTION DIVISION

MEMORANDUM

TO: Ramon Labrador
Office of Surveyor

FROM: Tony A. White, II
DCFEMS / Fire Marshal's Office

DATE: October 26, 2026

RE: 2325 Porter Street, NW

Thank you for the opportunity to comment on the proposed project at 2325 Porter Street NW, the proposed Rock Creek Club. After analysis of the documentation provided and a site visit on October 15, 2026.

Please note: all citations below are form the current Fire Code adopted in the District of Columbia, IFC 2015 edition including Appendix "D", the12H DCMR Fire Code Supplement of 2017, and an additional citation from the International Existing Building Code (IEBC) 2015 edition - under the jurisdiction of the District of Columbia Department of Buildings. Despite the subject property's historic nature and designation, The Office of the Fire Marshal does not expect IBEC 2015, Chapter 12 Historic Buildings, to have significant impact other than reinforcing the requirement for an automatic sprinkler system.

The Office of the Fire Marshal offers the following concerns and comments:

Frank D. Reeves Municipal Center
2000 14th Street, NW, Suite 500
Washington, DC 20009

phone: (202) 673–3320
facsimile: (202) 462–0807
website: fems.dc.gov

Board of Zoning Adjustment
District of Columbia
CASE NO. 21510
EXHIBIT NO. 130

Project Overview:

The proposal suggests the conversion of a current residential property to a new use as a private community center, pool, tennis courts and other related uses including food service operated on a membership basis. This change would be from an R-3 occupancy type to A-3.

In consultation with the District of Columbia Department of Buildings, it was determined that said change in occupancy type would trigger the use of current building code and the DC International Existing Building Code (IEBC 2015)

Code Application

IEBC 2015, 1012.2.1 Fire Sprinkler System states:

"Where a change in occupancy classification occurs or where there is a change of occupancy within a space where there is a different fire protection system threshold requirement in Chapter 9 of the International Building Code that requires an automatic fire sprinkler system to be provided based on the new occupancy in accordance with Chapter 9 of the International Building Code, such system shall be provided throughout the area where the change of occupancy occurs."

This code indicates that the main building would require a sprinkler system. Said system would include a Fire Department Connection (FDC) located at the front of the structure.

IFC 503.1.1 Buildings and facilities.

Approved fire apparatus access roads shall be provided for every facility, building or portion of a building, hereafter constructed or moved into or within the jurisdiction. The fire apparatus access road shall comply with the requirements of this section and shall extend to within 150 feet (45 720 mm) of all portions of the facility and all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building or facility.

Exceptions:

1. The fire code official is authorized to increase the dimension of 150 feet (45 720 mm) where any of the following conditions occur:

1.1. The building is equipped throughout with an approved automatic sprinkler system installed in accordance with Section 903.3.1.1, 903.3.1.2 or 903.3.1.3.

Comment: It is the recommendation of the reviewer that no exception to the distance be made for this project for the following reasons:

1.) This section applies to all structures on the property. As such properly reaching the structures in the rear: Gym, Pool House, Historic Colonnade, would be challenging even if the fire apparatus access road reached directly in front of the Main House. (Note: There is considerable equivocation on the various plans as regards names of these structures.)

2.) The plan submitted from Richardson & Associates "Schematic Design Plan Diagram" dated September 2026, and appears to be a landscape plan, indicates significant plantings along the entire perimeter of the property. This property being located in or along the boundaries of Rock Creek Park likely falls in a "Wildfire Risk Area" as defined in Chapter 2 of the IFC 2015. Since the purpose of the 150-foot requirement is to allow sufficient hose length available when pulled from apparatus parked on the access road to reach all structures, and since reaching that wildland interface would not necessarily be

covered in the 150-foot requirement for access but still might benefit from the 150-foot requirement, it is NOT prudent to increase the dimension.

IFC 507.1 Required water supply.

An approved water supply capable of supplying the required fire flow for fire protection shall be provided to premises upon which facilities, buildings or portions of buildings are hereafter constructed or moved into or within the jurisdiction.

IFC 507.5.1 Where required.

Where a portion of the facility or building hereafter constructed or moved into or within the jurisdiction is more than 400 feet (122 m) from a hydrant on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building, on-site fire hydrants and mains shall be provided where required by the fire code official.

Exceptions:

1.) For Group R-3 and Group U occupancies, the distance requirement shall be 600 feet (183 m).

2.) For buildings equipped throughout with an approved automatic sprinkler system installed in accordance with Section 903.3.1.1 or 903.3.1.2, the distance requirement shall be 600 feet (183 m).

Comment: It is considered by the reviewer that no fire apparatus access roads or water supplies are depicted or discussed in the submitted documents. This combined with the difficulties in measuring distances in the submitted documents leaves the reviewer unable to comment on or make recommendations as regards location or length of the required roads and reserves the right to comment on submitted proposals.

Appendix D: Fire Apparatus Access Roads

The entirety of Appendix "D" applies to this project (IFC-D101). Access roads require structure to support 75,000 pounds (IFC – D102.1). The width of the road(s) will be 26 feet based on the likelihood of the need for a hydrant to be located on one or more of the two required roads and the height of the building. The grade cannot exceed 10% and there will likely need to be a turnaround compliant with this section at the 150-foot level. (IFC-103 et seq., D-105

It is noted on the Richardson & Associates "Schematic Design Plan Diagram" that a gate is to be installed across the only depicted property access. (Noted not sufficient for a fire apparatus access road.) Any such gate will need to comply with the requirements for gates in Appendix "D" (IFC-103 et seq.)

Two fire apparatus access roads will be required based on the stated main building height of 33 feet declared on the "Notes and Computations" table of "Form 135 – Zoning Self-Cortication". The remoteness requirement will also need to be met. (IFC D-104 et seq) The requirement for 26-foot-wide access is also supported by aerial fire apparatus access road requirements as are the

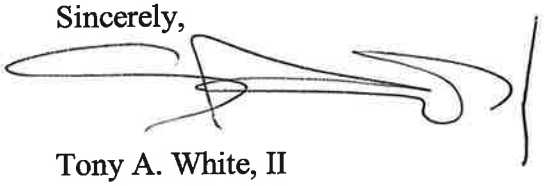
requirements for proximity to the main building (minimum of 15 feet and a maximum of 30 feet) and prohibition on overhead obstructions (IFC D-105 et seq.)

Conclusion:

The petitioner is reminded that the entirety of the fire code and building codes apply to this project and this review is not intended to be comprehensive. However, since attention to fire code, fire service access or operational requirements seems minimal, these comments are offered as beginning direction. It should also be considered that at the appropriate time the District of Columbia Department of Buildings (DOB) will do a comprehensive review of both fire and building codes as it is the DOBs jurisdiction to do the same.

Based on the documents provided thus far, The Office of the Fire Marshal has no further comments or concerns based on fire code or operational requirements.

Sincerely,



Tony A. White, II
BFC/ Assistant Fire Marshal
DC Fire – Fire Marshal's Office