District of Columbia
Office of Planning

MEMORANDUM

TO: District of Columbia Board of Zoning Adjustment

FROM: Michael Jurkovic, AICP, Development Review Specialist
MBR
Maxine Brown-Roberts, Associate Director Development Review

DATE: November 20, 2026

SUBJECT: BZA Case 21529, Request for area variance relief to permit a 4th story addition at 2529 I Street NW in the R-3/FB zone.

I. OFFICE OF PLANNING RECOMMENDATION

The Office of Planning (OP) recommends **approval** of the requested area variance relief:

- Subtitle D § 203.2, Maximum Number of Stories (3 stories max.; 3 existing; 4 proposed), pursuant to Subtitle X § 1002.

II. LOCATION AND SITE DESCRIPTION

Address	2529 I Street, NW
Applicant	Lerch, Early & Brewer, Chtd. On behalf of Amber Wason and Mihcael Schroeder
Legal Description	Square 0016, Lot 0871
Ward, ANC	Ward 2; ANC 2A
Zone	R-3/FB
Historic District	Foggy Bottom Historic District (Non-contributing structure)
Lot Characteristics	Rectangular, interior lot measuring 15.83 ft. x 72 ft. (1,139.76 sq. ft.)
Existing Development	3-story, single family row house
Adjacent Properties	Primarily 2 to 3 story single family row houses, with apartments and flats, some 4-story buildings exists included the immediately adjacent property to the west.
Surrounding Neighborhood Character	Moderate Density Residential neighborhood with higher density residential to the north and South bounded otherwise by Interstate-66 to the West.
Proposed Development	4th story addition to expand the existing single-family row house with an additional bedroom.

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III. ZONING REQUIREMENTS and RELIEF REQUESTED

Zone- R-3/FB	Regulation	Existing[1]	Proposed	Relief
Lot Width D § 201	20 ft.	15.83 ft.	No Change	Not Requested
Lot Area D § 201	2,000 sq. ft.	1,140 sq. ft.	No Change	Not Requested
Height D § 203	**40 ft. and 3 stories max.**	**27 ft. and 3 stories**	**38 ft. and 4 stories**	**Relief Requested**
Height G § 203	65 ft. max.	55 ft.	No Change	Not Requested
Rear Yard D § 207	20 ft. min.	29 ft.	No Change	Not Requested
Lot Occupancy D § 210	60% max.	57.8%	No Change	Not Requested
Pervious Surface § 210	20% min.	Not Provided	No Change	Not Requested
Parking C § 701	1 per principal dwelling.	1 space	No Change	Not Requested

IV. OFFICE OF PLANNING ANALYSIS

The applicant requests an area variance from Subtitle F § 203, which limits building height to three stories. At the front elevation the existing row dwelling is more than five feet above ground and therefore is considered a basement and counts towards the maximum number of stories. As a result, the proposed addition would create a fourth story for which the Board is authorized to grant the requested relief pursuant to X § 1000. The application must meet the three-part area variance test, which is analyzed below.

Area Variance Relief from Subtitle X § 1002

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 is encumbered by an exceptional condition due to the topography of the property and where the rear of the ground floor is underground due to a rise in elevation of almost 9 feet between the front and rear of the property. This exceptional situation is intensified by the small lot size well below the minimum requirements of the R-3/FB zone.

b. Strict Application of the Zoning Regulation Would Result in Exceptional Practical Difficulties

[1] Provided by the applicant

The exceptional situation results in practical difficulty with respect to the applicant's reasonable desire to expand the livable space for an additional bedroom through an addition that would otherwise still be below the matter-of-right height for the zone. The current ground floor is largely unable to accommodate a bedroom due to conflicts with building code in providing for adequate emergency egress without requiring travel through a garage.[2] Further, building code conflicts arise as the property does not have an alleyway to the rear as an excavation for an emergency escape to convert the office space must open into a public way or lead to a public way through a court.[3]

The applicant has further demonstrated the difficulties in alternative horizontal rear expansions for additional bedroom space as shown in the constraints plan at Exhibit #19. While to some extent additional livable space could be added by a rear addition, it would not provide a space fully capable of accommodating a bedroom but would also result in diminished light and air to other portions of the living areas. Further, the rear addition would likely cause greater light impact to the neighboring properties than the vertical addition proposed. In summary, the exceptional situation results in a building that is legally three stories with a ground level that is unable to accommodate a bedroom due to the elevation change at the rear of the property and the inability to accommodate a reasonable horizontal expansion due the small size of the lot.

ii. No Substantial Detriment to the Public Good

While the proposed addition would result in a four-story building due to the ground level legally counted as a story, the proposed addition would still be below the matter-of-right height and would mirror the existing fourth story building on the adjoining property to the west. Further, as shown on the applicant's rendering and shadow studies in Exhibit #11, adverse impacts due to shadows are not anticipated. Therefore, granting of the requested relief should not result in a substantial detriment to the public good.

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

The Foggy Bottom Residential House (R-3/FB) Zone's purpose and intent can be found at Subtitle D § 900.2. Based on the purpose and intent of the zone OP finds that granting of the requested relief should not impair the intent of the Zoning Regulations. While the proposal would result in an additional story past what the zone anticipates, it would remain within the matter-of-right height and would read as a 3-story plus cellar building. In summary, the overall intensity and scale of development proposed would be well within what is anticipated in a row form in the R-3/FB zone.

V. OTHER DISTRICT AGENCIES

DDOT has informed OP that they have no objection to the relief requested.

[2]Per the applicant, 2017 DC Residential Code (2015 IRC w/ DC Amendments): R311.1 - Means of Egress
[3] Per the applicant, 2017 DC Residential Code (2015 IRC w/ DC Amendments): R310.1 - Emergency Escape and Rescue

VI. HISTORIC PRESERVATION

The proposed addition was reviewed and approved by the Historic Preservation Review Board on February 28, 2026.

VII. ADVISORY NEIGHBORHOOD COMMISSION

ANC 2A has submitted a report in support at Exhibit #16.

VIII. COMMUNITY COMMENTS TO DATE

As of the writing of this report there are two letters of support in the record.

Attachment: Location Map

