

Burden of Proof **Special Exception Application**

To: **D.C. Board of Zoning Adjustment**
441 4th St NW, Suite 210S
Washington, DC 20001

For: **Sara Petrasso and Jonah Crane**
Applicant
643 Constitution Ave. NE
Washington, DC 20002

By: **Lacy Brittingham**
Lawlor Architects
740 7th St SE
Washington, DC 20003

Date: June 6, 2025

Subject: **BZA Application, Special Exception Relief**
643 Constitution Ave. NE (Square 0867, Lot 0092)

Sara Petrasso, owner of 643 Constitution Ave. NE, hereby applies for zoning relief to construct a rear two-story addition on the existing two-story residence as well as a two-story accessory structure, by authorization of Subtitle X, Chapter 9 per the provisions and requirements of Subtitle E, Section 5201. . The aspects of the proposed project that fall outside the current zoning regulations are as follows:

The proposed accessory structure at 515 square feet in footprint will exceed the maximum allowed area of 450 square feet. (11 DCMR Subtitle E, Section 5003.1)

The proposed lot occupancy of 61.0% for the existing house plus addition to the house plus the accessory structure, exceeds the allowed lot occupancy of 60% (11 DCMR Subtitle E, Section 210.1).

I. Summary

- A. This project qualifies as a Special Exception because it will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps and it will not tend to affect adversely, the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps.
- B. This special exception qualifies under 11 DCMR Subtitle E, Section 5201 because the proposed lot occupancy does not exceed 70% and the addition will not unduly affect the light and air available to neighboring properties; it will not have a substantially adverse effect on the use or enjoyment of any abutting or adjacent dwelling or property; and the proposed addition will be similar in character and style to the existing houses and additions to existing houses in the neighborhood.

II. Basis for Grant of Special Exception

A two-story structure is allowed by the Zoning Regulations in the RF-1 district, therefore, an addition to an existing two-story structure as well as a two-story accessory structure are in harmony with the intent and purpose of the Zoning Regulations and Zoning Maps. The residential use of the subject property is not changing with this application therefore, the use of the neighboring property will be no different than the existing condition in accordance with the Zoning Regulations and Zoning Maps. In addition, Subtitle E, Section 204.4 provides relief based on satisfying specific criteria under which additions may be permitted as follows:

- A. *The light and air available to neighboring properties shall not be unduly affected.*

The subject property is deep lot at 136.29' in length. The distance from the back of the house to the rear property line is generous at 73.6', so even with the proposed accessory structure, the rear yard between the house and the garage will be more than 43 feet. Additionally, the alley is extremely wide at 30'. Deep lots and a wide alley provide ample light and air in the middle of this block. The existing house has the dogleg form for both levels of the two-story house which increases light and air to the middle of the block. The dogleg will be retained on both levels with the proposed small addition in the dogleg at the back of the house. The subject property faces north, so shadows caused by the proposed accessory structure will fall primarily on the rear yard of the subject property. The existing alley lot structure adjacent to the proposed garage on the east side is already two stories. The owners of all three properties sharing property lines with the subject property have signed letters of support for the project. Therefore, due to all these factors, the light and air available to neighboring properties shall not be unduly affected.

B. The privacy of neighboring properties shall not be unduly compromised.

The property will remain a single-family residential use, so there will be no change from the existing condition. On both sides, the existing wood privacy fences will remain, in order to preserve the existing privacy from back yard to back yard. As previously mentioned, the owners of 641 Constitution Ave, 645 Constitution Ave. and 645 Rear Constitution Ave. have signed a letter of support for the project. Due to all these factors, the experience of neighboring properties will not be unduly compromised by the addition and the accessory structure proposed in this application.

C. The proposed construction, as viewed from the street, alley, and other public way, shall not substantially visually intrude upon the character, scale and pattern of houses along the street or alley frontage.

The proposed addition and accessory structure are in keeping with the two-story scale of the majority of the surrounding houses. The addition is designed in a style and vocabulary to match the existing style and vocabulary of the existing house. The accessory structure has been designed to meet the requirements of the Historic Preservation Office (HPO) and therefore is in keeping with the character of the historic neighborhood.

Please refer to the drawings for the size, scale and detail notes pertaining to the design of the proposed addition.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Lacy Brittingham', with a stylized, cursive script.

Lacy Brittingham AIA

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