

**From:** DC Department of Buildings <dob@dc.gov>  
**Sent:** Monday, September 8, 2025 11:26 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Re: FW: Request for Confirmation | Bridge District Parcel 5 | Elevator Vestibule  
**Attachments:** ZC\_25-07\_Elevator\_Vestibule\_Info.pdf

Good morning [REDACTED], I hope you are well.

I am writing to follow up on our prior discussions regarding the proposed mixed-use development at 633 Howard Road, SE (Square 5861, Lot 1070) (the “Property”), otherwise known as Parcel 5 of the Bridge District. The Property contains approximately 33,326 square feet of land area and is located in the Northern Howard Road (“NHR”) zone district. The Property is currently unimproved. My client, BD Parcel 5 LLC (an affiliate of Redbrick LMD), intends to build a mixed-use building (the “Parcel 5 Building”) containing approximately 299 residential dwelling units, approximately 8,476 square feet of ground floor retail, and approximately 160 vehicle parking spaces (the “Project”). The Project will have an overall floor area ratio of approximately 7.21, and will be constructed to a maximum height of 130 feet, plus a 20-foot penthouse that contains mechanical and habitable space. Pursuant to K-1005.1, the Project was submitted to the Zoning Commission for mandatory design review on May 16, 2025, and is scheduled for public hearing on September 8, 2025.

As we discussed on Friday, September 5, 2025, The proposed vestibule is adjacent to the southernmost elevator of the proposed building, which is the only elevator in the project that can access the pool deck due to a stair tower and vent shaft that run the full height of the building and emerge on the roof directly behind the other two elevators. The minimum size of the elevator vestibule is dictated by ICC A117.1, Section 304.3 of the International Construction Code. That provision requires a 5'-0" minimum turning space, which sets the minimum inside clear dimension from the elevator door at 5'-0". As shown in the attached roof plan and isometric drawings of the vestibule, because of the location of the elevator, the elevator door is slightly offset from the door to the pool deck. Moving the elevator door is not feasible based on elevator hoistway requirements. This makes the minimum area needed for the vestibule 45 square feet to meet the 5'-0" turning radius and accommodate the door offset. The proposed vestibule is 45 square feet. The height of the vestibule has also been minimized. Per ICC A117.1, objects cannot be located less than 6'-8" (80") overhead. This, however, is superseded by DC Building Code Section 1003.2, which requires 7'-6" minimum clearance. The proposed vestibule has an interior clear height of 7'-6". When we met, we asked whether accessibility / ADA requirements require enclosed space. You subsequently share that while the requirements do not address whether the space needs to be enclosed, in this instance, providing an exterior opening for an otherwise interior elevator shaft is problematic for two reasons. First, the elevator door that opens into the proposed vestibule would need additional weather protection to prevent rain/snow/moisture from entering the elevator shaft. Secondly, the elevator door is less effective than a solid wall or vestibule at managing thermal bridging. Thus, an exterior elevator door that is exposed to the elements may create an unintended thermal bridge into the elevator shaft, which may in turn cause condensation issues in spaces adjacent to the shaft. Both issues would create weaknesses in the building’s moisture management strategy, which is of particular concern in a mass timber wood building such as this.

Based on the above, I am writing to confirm that the proposed accessible elevator vestibule can be considered a part of the proposed elevator to which it is connected for this project. The proposed vestibule would qualify for the setback exemption under C-1504.4, and thus would not be impacted by the restriction on setback relief imposed under C-1506.2.

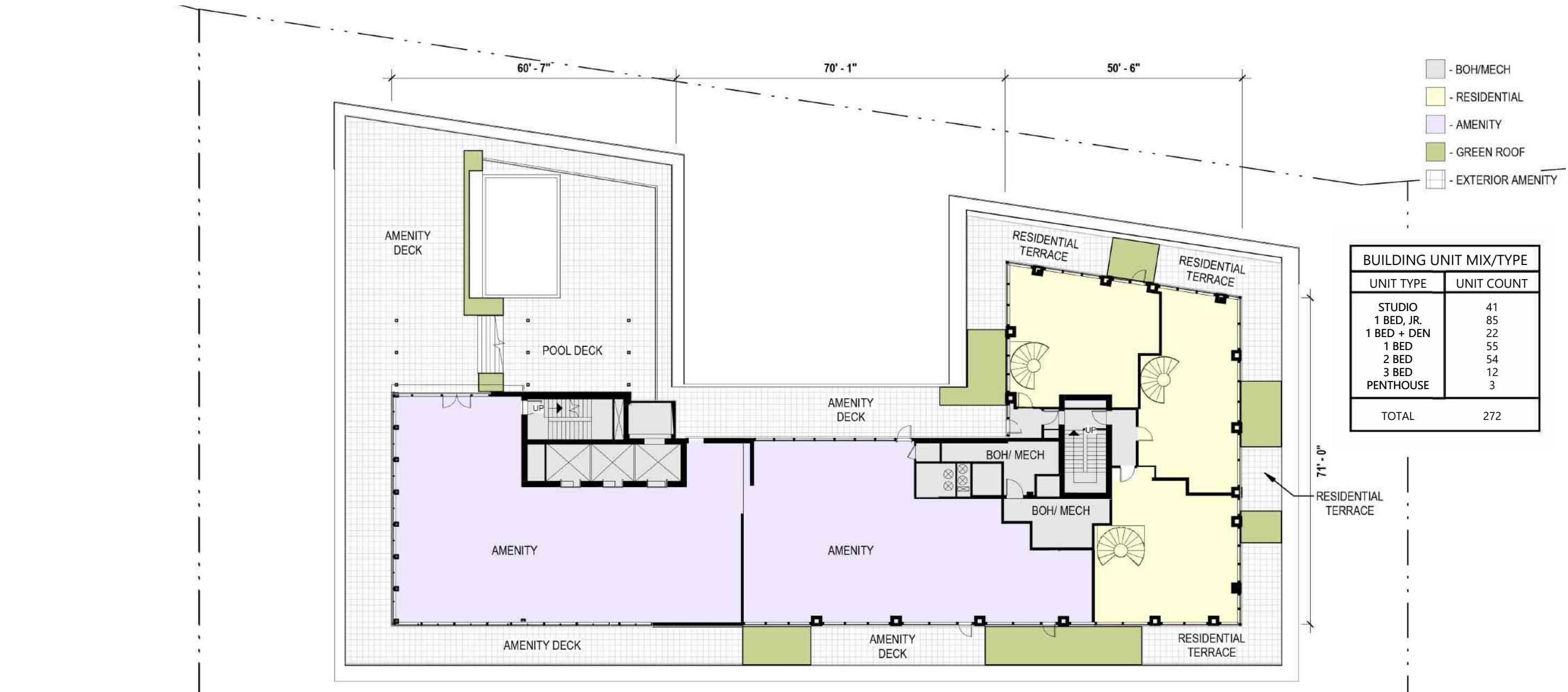
Please feel free to reach out should you have any additional questions.

Thank you,  
Elisa

**DISCLAIMER:** This email is issued in reliance upon, and therefore limited to, the questions asked, and the documents submitted in support of the request for a determination. The determinations reached in this email are made based on the information supplied, and the laws, regulations, and policy in effect as of the date of this email. Changes in the applicable laws, regulations, or policy, or new information or evidence, may result in a different determination. This email is **NOT** a “final writing”, as used in Section Y-302.5 of the Zoning Regulations (Title 11 of the District of Columbia Municipal Regulations), nor a final decision of the Zoning Administrator that may be appealed under Section Y-302.1 of the Zoning Regulations, but instead is an advisory statement of how the Zoning Administrator would rule on an application if reviewed as of the date of this email based on the information submitted for the Zoning Administrator’s review. Therefore this email does **NOT** vest an application for zoning or other DOB approval process (including any vesting provisions established under the Zoning Regulations unless specified otherwise therein), which may only occur as part of the review of an application submitted to DOB.

**Elisa Vitale, AICP** | Deputy Zoning Administrator  
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# FLOOR PLANS | PENTHOUSE | A2.08



# ZONING ANALYSIS | PENTHOUSE SETBACKS | A8.01

## BUILDING HEIGHT, PENTHOUSES, AND SETBACK

- (B.306.1)  
Zoning regulations and the Height Act both apply to height limitations.
- (B.306.5)  
Architectural embellishments may be erected to a greater height than prescribed by the limitations, provided it does not result in the appearance of a raised height building for more than 30% of each façade.
- (C.1504.1)  
The Penthouse shall be set back from the roof on which it is located, measured at a distance equal to its height from the edge of that roof.
- (C1504.2)  
Setback requirements shall not apply to:
  - Parapets no taller than 48"
  - Guardrails required by the building code for a roof deck.
- (C.1504.4)  
Open court setback requirements shall not apply to rooftop access stairwell or elevator.

## KEY PLAN

