

MEMORANDUM

To: Paul Stoddard, Planning & Zoning Director
From: Dave Brown
Subject: SUP 2025-00056
Date: December 2, 2025

This memo explains why I cannot support the staff recommendation of approval of SUP 2025-00056. My disagreement lies in the calculation of the minimum front yard requirements for this corner lot. The minimum is derived from the measurements of the front yards on the five developed corner lots in the contextual block face. Staff and I are in agreement on the contextual block face as well as the measurements of the yards in question. What is at issue is the methodology for determining the minimums for the two front yards required for this corner lot.

I start with the language of 3-406(a)(1), the front yard requirement for the R-5 zone, which does not distinguish between interior lots and corner lots. The requirement is that "the required front yard shall be within the range established by the front yards within the contextual block face." In interpreting the term "required front yard" in 3-406(a)(1), one must take note that 2-205 specifies that for a corner lot, "the two yards lying between the main building and the intersecting streets shall both be deemed to be front yards." Hence 3-406(a)(1) must be read to establish that each of the two front yards must be within the range established for each of those yards in the contextual block face, and thus, equal to or greater than the smallest of the front yards in those ranges.

While staff and I are in agreement on the foregoing, the Ordinance does not specify how the range (and thus, the minimum) is to be determined. The methodology employed by the staff, mirroring the illustration shown in the 2019 Staff Report when the conceptual block face became the established framework for front yard setback calculations, was to establish a range for each street facing the subject corner lot. This is shown in Exhibit 1, applying the staff methodology to this case. It shows that there are three corner lots with yards facing Howell, ranging from 7.8' to 50.4', as shown in green. It also shows that there are five corner lots with yards facing Commonwealth, ranging from 7.1' to 46.8', shown in pink. Looking at the minimums for both streets, staff concludes that the yard facing Howell must be at least 7.8' and the yard facing Commonwealth must be at least 7.1'. Staff thus finds no fault with the proposed yards of 12.7' on Howell and 8.8' on Commonwealth. [The interior lots in the conceptual block face are immaterial to finding the minimum in this instance, in that all of their front yards are above the minimum among the corner lots.]

My problem with this methodology is that it ignores the significant difference established in the Ordinance between the two front yards required for corner lots. Sections 2-205.1 and 2-205.2 establish that there are two distinct front yards at issue here: the front yard facing the main

entrance to the building, deemed "primary", and the "other front yard" where, whether there is a street-facing secondary entrance or not, it is deemed "secondary." Exhibit 2 is based upon respecting this corner lot front yard distinction that preceded enactment of the contextual block face in 2019.¹ In my methodology, apples are compared to apples (primary front yards), and oranges to oranges (secondary front yards). I show all the primary front yards in the block face in green and all the secondary front yards in pink. The shortest primary front yard is 18.2' at 4 East Bellefonte, and the shortest secondary front yard is 7.1' at 1 West Bellefonte. Hence, while the applicant remains free to designate the streets the primary and secondary yards at 2 West Howell will face (by deciding on the location of the main entrance to the dwelling), the primary front yard must be set back from the chosen street at least 18.2' and the secondary yard must be set back from the other street at least 7.1'. In this case the secondary front yard, at 8.8' is above the minimum, but the primary front yard, at 12.7', is more than 6' short of the minimum.

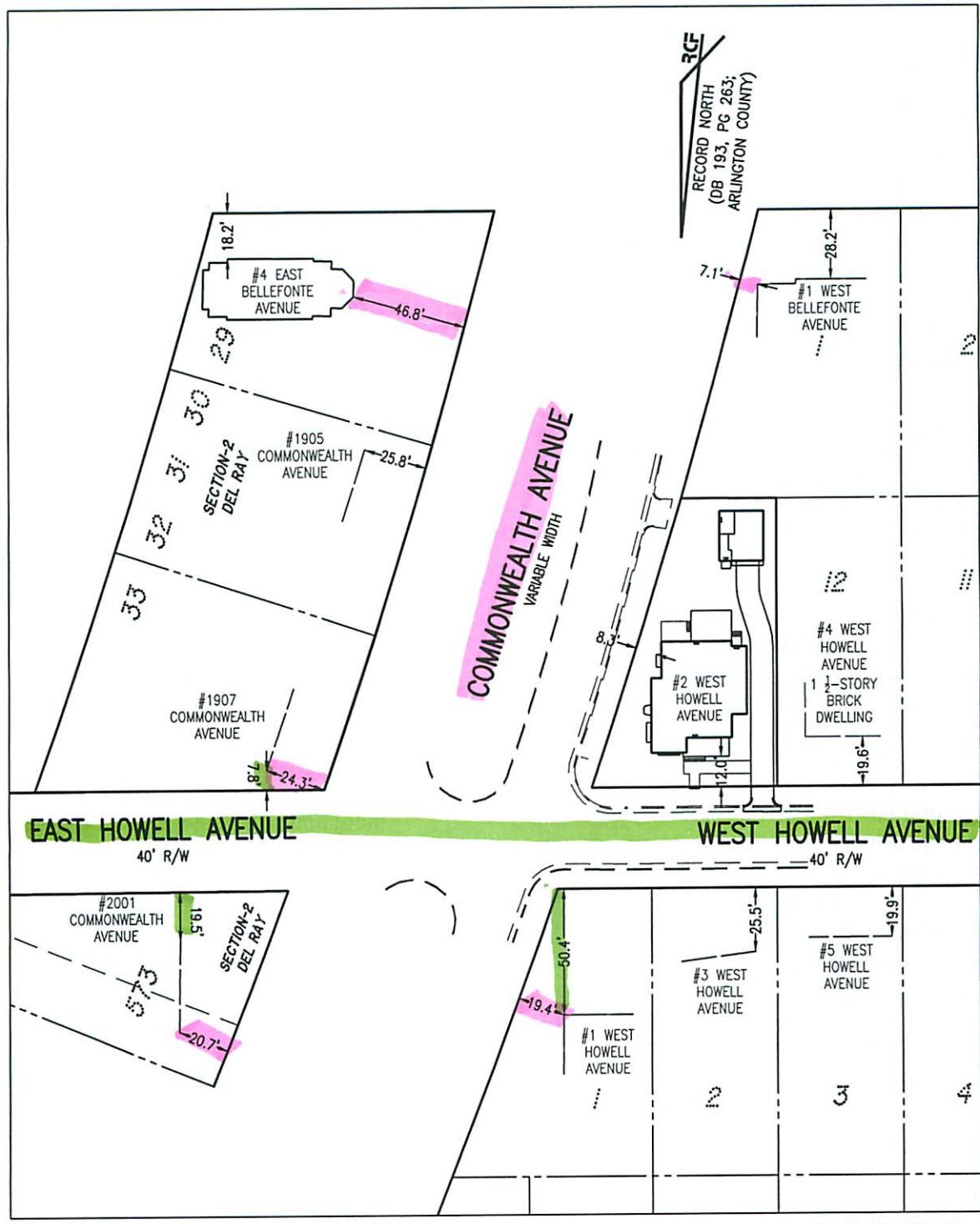
You responded to me that "the contextual block face analysis is completed without identifying a primary or secondary front yard," and that the "selection/designation of the primary front yard is left to the owner." But as is self-evident, my analysis of the contextual block face is completely independent of what the applicant has chosen as his primary front yard. The analysis looks only at what has already been chosen by the other corner lots in the contextual block face; they have made their choice evident by the selection of the street on which their main entrance now faces. Those choices must be viewed as a "done deal," and they are the ones that ought to drive the determination of the ranges to be used in this case for both the primary and secondary front yards minimums.

In choosing between a street-orientation methodology and my yard-orientation methodology, I want to stress that, in context, this issue is primarily one directed at infill construction in established neighborhoods, where houses on corner lots were built on the basis of a long-standing R-5 regime that required two 25' front yards, regardless of any abutting or nearby houses closer to the street. The new contextual block face methodology was intended to simplify the analysis, not permit new construction to significantly reduce front yard requirements. In this case, the staff's methodology would permit the house to have the two front yards combined equal to $7.8' + 7.1' = 14.9'$, which is considerably less than the historical minimum for even one front yard. While not quite that bad here, the staff methodology approves a two-front-yard combination of $8.8' + 12.7' = 21.5'$, still exceedingly confining of light and air to neighboring properties, especially in light of what is proposed: construction of a dwelling with maximum FAR (.45), near maximum height (29.3'), and the 3rd highest floor area in the 10-lot conceptual block face. By contrast, the combined front yards of the existing corner lot homes in the block face range from 32.1' to 69.8' and average 48.5'.

I have never been comfortable with substandard lot SUP requests that are at or near the maximum allowed development, because my view is that such SUP approvals must look beyond compliance with development standards for the zone to actual neighborhood compatibility. In this instance, that would be a close call, even if the proposed dwelling were set back to the proper 18.2' minimum. I do not find necessary to make a compatibility judgment in this case, however, because

¹ Elsewhere in the Ordinance, there are real differences between primary and secondary front yards. E.g., Section 7-202 (B) establishes that there are a number of obstructions allowed in the secondary, but not the primary, front yard, such as children's play equipment.

before getting to that analysis, I believe primary front yards should be compared to primary front yards only, not a mixture of primary and secondary yards, as staff has done with its street-orientation methodology, which is not dictated by the Ordinance.



BUILDING SETBACK COMPARISON EXHIBIT
SCALE: 1" = 40'

STREET SEPARATION

HOWELL
COMMONWEALTH

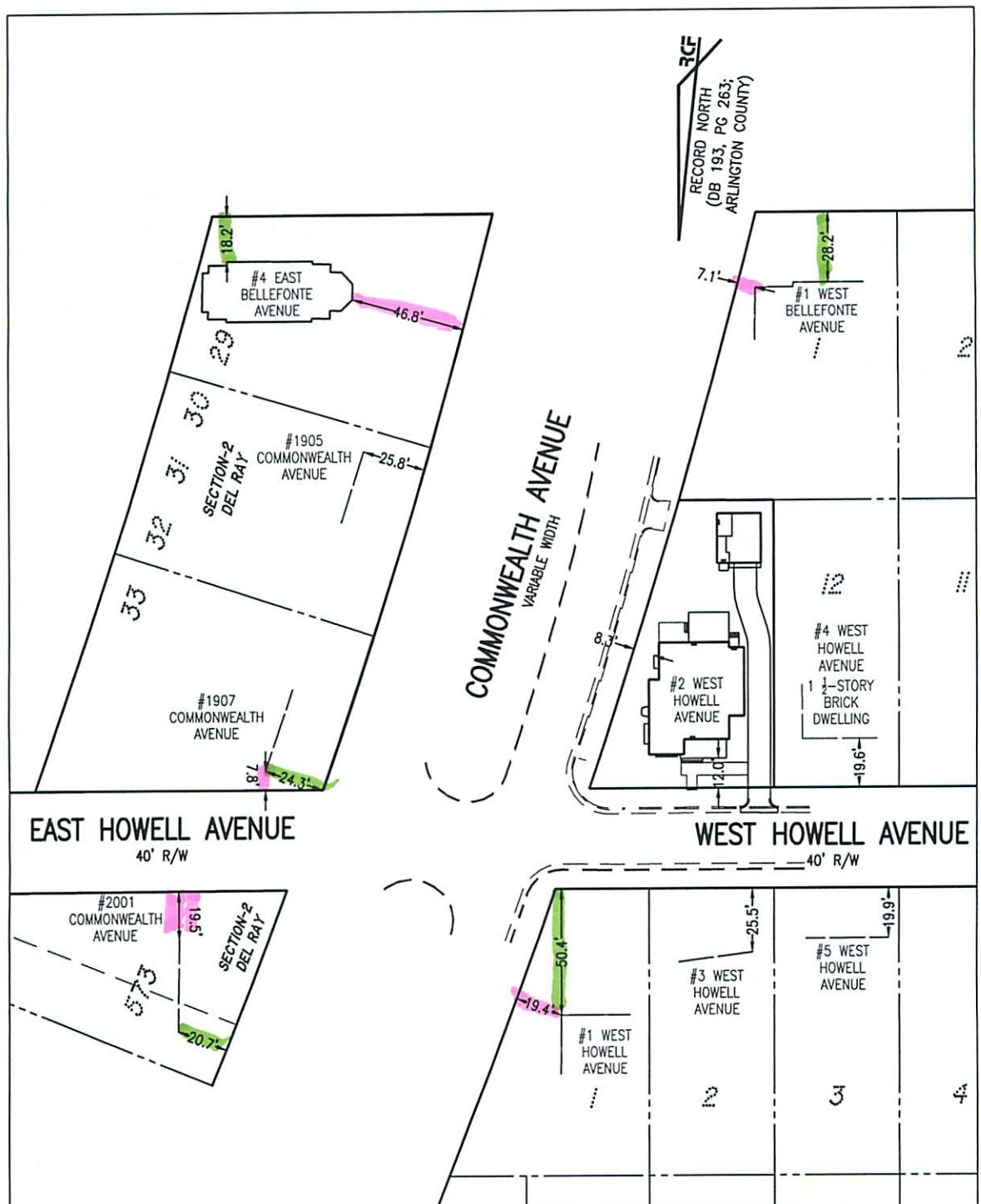
Exhibit 1

DESIGN: COE	DATE	REVISION
DRAWN: COE		
SCALE: 1" = 40'		
DATE: AUG 2014		
SHEET 4 OF 11		
FILE: 25-143		

ZONING DATA
PROPERTY LOCATED AT
2 WEST HOWELL AVENUE
INSTRUMENT #000024261
CITY OF ALEXANDRIA, VIRGINIA

RCF
ENGINEERING • LAND SURVEYING • PLANNING

625 N. WASHINGTON ST
SUITE 250
ALEXANDRIA, VA 22314
703.549.6422
www.rcfassoc.com



BUILDING SETBACK COMPARISON EXHIBIT
SCALE: 1" = 40'

YARD SEPARATION

PRIMARY
SECONDARY

Exhibit 2

DESIGN: COE	DATE	REVISION
DRAWN: COE		
SCALE: 1" = 40'		
DATE: AUG 2025		
SHEET 4 OF 11		
FILE: 25-143		

ZONING DATA
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2 WEST HOWELL AVENUE
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