

Special Use Permit #2025-00056 2 West Howell Avenue – Substandard Lot Redevelopment

Application	General Data	
Public Hearing and consideration of a	Planning Commission	December 2, 2025
request for a Special Use Permit to	Hearing:	
construct a single-unit dwelling on a	City Council	December 13, 2025
developed substandard lot.	Hearing:	
	_	
Address:	Zone:	R-5/Residential
2 West Howell Avenue		
Applicant:	Small Area Plan:	Potomac West
Daryl and Caroline Andrews		

Staff Recommendation: APPROVAL subject to compliance with all applicable codes, ordinances, and the recommended permit conditions found in Section III of this report.

Staff Reviewers: Sam Shelby, sam.shelby@alexandriava.gov

Catherine McDonald, <u>catherine.mcdonald@alexandriava.gov</u>

<u>PLANNING COMMISSION ACTION, DECEMBER 2, 2025</u>: On a motion by Vice Chair Koenig, seconded by Commissioner Lennihan, the Planning Commission voted to recommend approval of Special Use Permit #2025-00056. The motion carried on a vote of 5-2 with Commissioner Brown and Commissioner Ramirez dissenting.

Reason:

The Planning Commission generally agreed with the staff analysis. The Commissioners voting against the recommendation of approval found the proposed dwelling to be incompatible with the surrounding neighborhood.

Discussion:

Commissioner Brown expressed concern over the contextual block face analysis done by the applicant and staff. He stated that a secondary front setback of any given dwelling within the contextual block face should not be used to determine a primary front setback of the subject property. He found that the low range of the front setback requirement should be set by the property at 4 East Bellefonte Avenue, as this property has the smallest primary front yard in the identified contextual block face.

Staff responded, explaining that the front setback requirement is written to be neutral toward primary and secondary fronts. The required setback is based only on the location of the principal dwellings, regardless of which way their primary entrances face. Further, staff explained that the requirements do not differentiate between primary and secondary fronts because the location of the front door does not change how a dwelling's bulk and distance from the front lot line is perceived.

Staff explained that the setback the dwelling provides at 4 East Bellefonte Avenue from East Bellefonte Avenue would not be a proper comparison because the subject property is not located on that street. This property is within the contextual block face only because it has a yard that faces Commonwealth Avenue as does the subject property. Therefore, it is only 4 East Bellefonte Avenue's setback from Commonwealth Avenue that is relevant to the required front setback for the subject property.

In addition, Commissioner Brown stated that the rules of the ordinance regarding the application of contextual block face are too ambiguous and leave room for multiple interpretations. He expressed that he believes the rules should be clarified to state that primary fronts should only be compared to primary fronts and secondary fronts only be compared to secondary fronts. He also explained he opposed the proposal for its size (maximum permitted FAR and near maximum permitted height) because it would be detrimental to the light and air that people enjoy on that section of Commonwealth Avenue currently.

The applicant's representative, Duncan Blair, attorney, responded to Commissioner Brown's concerns, explaining that the block face study is one of the first things done in a development project. Further, he explained that the regulations refer to front yards generally of all properties facing a common street, not just those with the same primary front yard configuration as the subject property. Finally, he said that the proposal complies with the zone and that his client's architect worked to utilize surrounding homes' features so the design would fit in with the neighborhood.

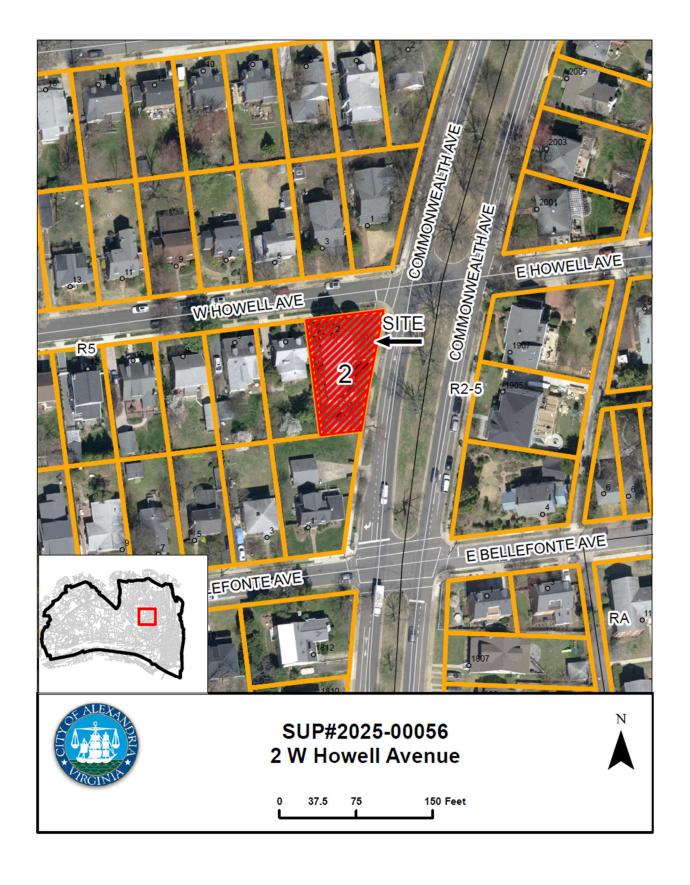
Chair McMahon and Vice Chair Koenig both agreed with Commissioner Brown that the front setback regulations, specifically for corner lots, could use clarification. They requested staff address this at a later date.

Chair McMahon spoke in support of the request. She explained that Commonwealth Avenue's large width and median would ensure that the dwelling would not dominate the street. Vice Chair Koenig agreed with Chair McMahon and they both found that the proposal met all SUP criteria.

Speakers:

Duncan Blair, attorney representing the applicant, presented the case and responded to questions from the Planning Commission.

Ashley Walker, 4 West Howell Avenue, spoke against the request citing that its height and design would be incompatible with surrounding dwellings. She also disagreed with staff analysis finding that the most immediate dwellings should be given more consideration in the contextual block face. She felt that the grade difference along West Howell Avenue would not reduce the impact of the proposed height.



I. DISCUSSION

The applicants, Daryl and Caroline Andrews, represented by Duncan Blair, attorney, requests Special Use Permit (SUP) approval to construct a single-unit dwelling on a developed, substandard lot at 2 West Howell Avenue. The existing lot is substandard as it does not meet the R-5 zone's minimum lot size requirement for a single-unit dwelling on a corner lot.

SITE DESCRIPTION

The Zoning Ordinance classifies the subject property as a developed, substandard lot of record. It has a lot size of 6,389 square feet with 74.1 feet of primary frontage along West Howell Avenue and 120.58 feet of secondary frontage along Commonwealth Avenue; the property has a primary lot width of 67.1 feet and a secondary lot width of 120.58 feet. A one-and-a-half-story dwelling currently occupies the site. It provides primary and secondary front yards of 19.63 feet and 22.73 feet, respectively; south and west side yards of 36.96 and 7.9 feet, respectively; and approximately 1,399 square feet of floor area. It has a footprint of approximately 1,532 square feet. A 300 square-foot detached garage also occupies the southwest corner of the subject property.



Figure 1 - Subject Property

PROPOSAL

The applicant requests SUP approval to redevelop the subject lot with a new single-unit dwelling. The applicant also proposes a detached accessory building containing a garage and accessory dwelling unit (ADU).

The dwelling would have 2,871 square feet of net floor area, a footprint of approximately 1,512 square feet, and would measure 28.9 feet tall. The ADU would have 700 square feet of gross floor area, a 300 square-foot footprint, and would measure 19.7 feet tall.

The applicant's proposed design would have features typically associated with Queen Anne and Colonial Revival styles. The house would have an asymmetrical building form, multiple rooflines, and a mixture of different façade materials. These features are common in Queen Anne style homes. The proposed dwelling also would feature some Colonial Revival style elements, such as a small, arched entryway and a centered door with vertically aligned windows. Figures 2 through 5, below, show the proposed elevations.



Figure 2 – Primary Front Elevation



Figure 3 – Secondary Front Elevation



Figure 4 – South Side Yard Elevation



Figure 5 – West Side Yard Elevation

The proposed dwelling would measure roughly 34 by 44 feet with a footprint of approximately 1,319 square feet. It would provide: a 12.7-foot primary front yard; an 8.8-foot secondary front yard; a west side yard each measuring 12 feet; and south side yard measuring 45 feet. Figure 6, below, shows the proposed site plan.

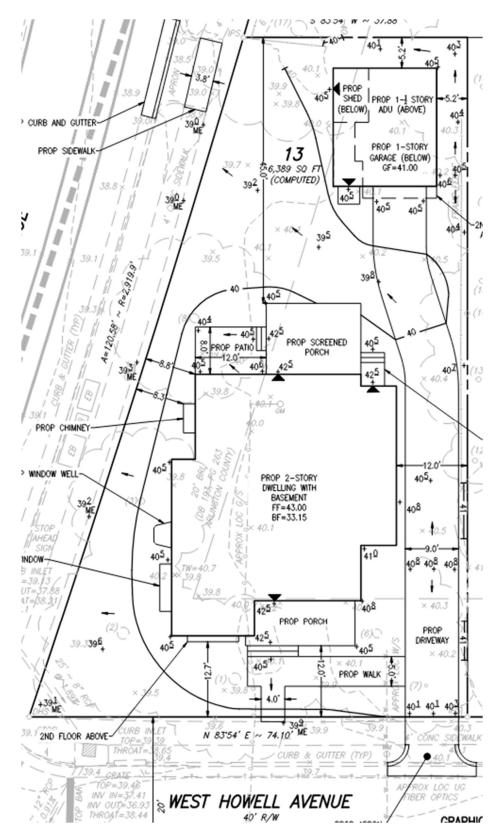


Figure 6 – Proposed Site Plan

PARKING

Zoning Ordinance section 8-200(A)(1) requires one off-street parking space for a single-unit dwelling. The proposed driveway would satisfy this requirement by providing room for multiple off-street parking spaces.

ZONING

The subject property is zoned R-5/Residential. For a corner lot developed with a single-unit dwelling, the R-5 zone requires a minimum lot size of 6,500 square feet, a minimum lot width of 65 feet, and a minimum lot frontage of 40 feet. Given the subject property's deficient lot size, Zoning Ordinance section 12-901 applies and classifies the subject property as a developed substandard lot. Because the applicant proposes redevelopment of the substandard lot, Zoning Ordinance section 12-901(C) applies and requires SUP approval.

The existing lot and proposed dwelling would meet all R-5 zoning requirements except for lot size. The following table provides a summary of all zoning regulations as they pertain to the subject property and proposed dwelling:

	Required/Permitted	Existing	Proposed
Lot Area	6,500 Sq. Ft.	6,389 Sq. Ft.	No change
Lot Width	65 Ft.	67.1 Ft. (primary) 120.58 Ft. (secondary)	No change
Lot Frontage	40 Ft.	74.1 Ft. (primary) 120.58 Ft. (secondary)	No change
Front Yard	7.8 – 50.4 Ft. (primary) 7.1 – 46.8 Ft. (secondary)	19.63 Ft. (primary) 22.73 Ft. (secondary)	12.7 Ft. (primary) 8.8 Ft. (secondary) 16.6 Ft. (garage/ADU)
Side Yard (South)	7.0 Ft.	36.96 Ft.	46 Ft.
Side Yard (West)	8.9 Ft.	7.9 Ft.	13.3 Ft.
Floor Area	0.45 Floor Area Ratio (FAR) 2,875 Sq. Ft.	~1,399 Sq. Ft. 0.22 FAR	2,871 Sq. Ft. 0.45 FAR
Height	30 Ft. (principal dwelling) 20 Ft. (garage/ADU)	13.7 Ft.	28.9 Ft. (principal dwelling) 19.7 Ft. (garage/ADU)
Threshold Height	4.2 Ft.	1.2 Ft.	2.5 Ft.

Table 1 – Zoning Analysis

MASTER PLAN DESIGNATION

The proposed single-unit dwelling residential use is consistent with the Potomac West Small Area Plan which designates this area for medium-density residential uses.

II. STAFF ANALYSIS

Staff supports the applicant's proposal to redevelop this substandard lot with a new single-unit dwelling. As required by Zoning Ordinance section 12-901(C), the proposed dwelling would be compatible with the existing neighborhood in terms of height, bulk, and design.

HEIGHT

Staff finds that the proposed dwelling would be compatible with neighborhood character in terms of height. The proposed dwelling's height would exceed the surrounding dwellings' average height (23.2 feet) by 26 percent or 6.1 feet. The surrounding dwellings' heights are shown in Table 2, below.

Table 2 – Dwelling Heights

1 West Howell Avenue	21.4 Ft.
3 West Howell Avenue	22.3 Ft.
4 West Howell Avenue	17.8 Ft.
5 West Howell Avenue	25.4 Ft.
1905 Commonwealth Avenue	27.6 Ft.
1907 Commonwealth Avenue	25.7 Ft.
2001 Commonwealth Avenue	23.6 Ft.
1 West Bellefonte Avenue	22.4 Ft.
4 East Bellefonte Avenue	22.2 Ft.
Average	23.2 Ft
Average plus 20 percent	27.8 Ft.
Proposed Dwelling	29.3 Ft.

Deviation from average height limit:

Staff experience has shown that the "accepted" height deviation for a new house on a substandard lot, as compared to the average height of its neighbors, is around 20 percent. In cases where staff recommended approval of a dwelling that exceeded the average height by more than 20 percent, the proposed house and site layout included features that lessened the height impact on surrounding neighbors. Staff finds that, in this case, the proposed design would also reduce the additional height impact on surrounding properties to an acceptable limit. Staff analysis of the specific design elements that reduce height impact is included in the design section of this report.

Grade differences:

The subject property is located at the bottom of the hill with its following neighbors to the west (4 West Howell Avene) and southwest (3 and 5 West Howell Avenue) all having average grades between approximately 1 and 4 feet higher than that of the subject property's. The adjacent lot at 4 West Howell Avenue has an average grade approximately 3.6 feet taller than that of the subject property's. Because of this grade variation, the visual height difference between the proposed dwelling and its surroundings would be lessened. Again, design choices would also further reduce the visual impact of the additional height. Staff analysis on this point follows in this report's design section.

BULK

Staff finds that the proposed dwelling would be similar in size to its surrounding dwellings. Many of the surrounding dwellings have had major additions or renovations, and 1905 Commonwealth was redeveloped with a new dwelling in 2018. As a result, the proposed dwelling's floor area is within the range of those of the surrounding dwellings.

Table 3 – Dwelling FARs

Address	FAR	Floor Area	Lot size
1 West Howell Avenue	0.44	2,644 Sq. Ft.	6,018 Sq. Ft. *
3 West Howell Avenue	0.41	1,171 Sq. Ft.	5,750 Sq. Ft.
4 West Howell Avenue	0.29	1,666 Sq. Ft.	5,801 Sq. Ft.
5 West Howell Avenue	0.29	1,664 Sq. Ft.	5,750 Sq. Ft.
1905 Commonwealth Avenue	0.39	3,333 Sq. Ft.	8,519 Sq. Ft.
1907 Commonwealth Avenue	0.39	3,314 Sq. Ft.	8,471 Sq. Ft.
2001 Commonwealth Avenue	0.28	1,872 Sq. Ft.	6,747 Sq. Ft.
1 West Bellefonte Avenue	0.20	1,518 Sq. Ft.	7,697 Sq. Ft.
4 East Bellefonte Avenue	0.23	2,022 Sq. Ft.	8,910 Sq. Ft.
Proposed Dwelling	0.45	2,872 Sq. Ft.	6,389 Sq. Ft. *

^{*}Substandard Lot

DESIGN

Overall design compatibility:

Staff finds that the proposed design would be compatible with the existing neighborhood character. This section of Potomac West displays a broad range of architectural styles and periods. Many of the neighborhood dwellings feature Colonial Revival, American Foursquare, and Queen Anne design elements.

The applicant's proposed design would feature Queen Anne architectural features. The design would borrow common Queen Anne features such as an asymmetrical footprint and a variety of roof forms.

Design impacts on height:

The applicant's proposed design would further reduce the visual impact of the height difference between the proposed dwelling and its neighbors. First, the proposed location of the house, 13.3 feet from the west side lot line and the most immediate neighbor at 4 West Howell Avenue, exceeds the minimum setback by 4.4 feet. The dwelling's proposed south facing gable on this side is the closest gable to the south side lot line. It would measure 26.7 feet tall or 2.6 feet less than the dwelling's highest gable. Given the grade considerations mentioned in the height section, the height difference between this gable roof and the neighboring dwelling's height is only 5.3 feet. This would represent a reasonable height difference between the neighboring dwelling (with one-and-a-half stories) and the proposed dwelling (with two stories). A representation of this on the proposed dwelling's south elevation is shown in Figure 7, below.

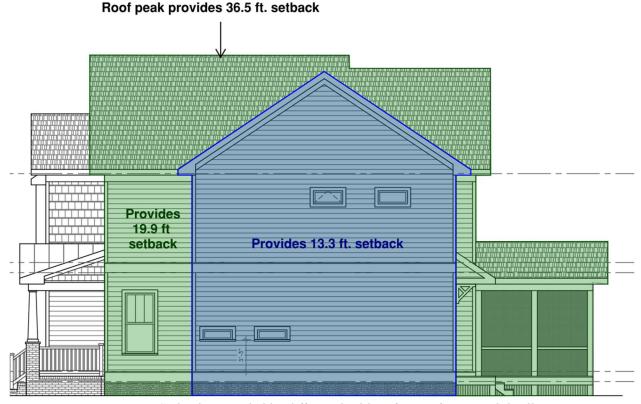


Figure 7 – Setbacks provided by different building forms of proposed dwelling

On the opposite side, the portion of the proposed dwelling closest to Commonwealth Avenue would have its non-gabled end facing the street. The height of this gable would be approximately 22 feet or 7.3 feet shorter than the dwelling's tallest roof form. Overall, the house is oriented so its widest and tallest sections would be furthest from surrounding houses. The proposed dwelling's height and massing would generally taper toward the lot lines, reducing the visual impact of the proposed dwelling height. Finally, the dwelling provides varied massing along all of its sides which further breaks up the visual impact of the proposed height and bulk. Each elevation would have at least one feature to break up the visual height and mass of the property including bay windows and porches.

Given that the proposed design would feature architectural elements common in surrounding dwellings and the neighborhood at large, and that the applicant's design choices demonstrate sensitivity to the scale and character of adjacent houses, staff finds that the dwelling's overall design would be compatible with existing neighborhood character.

ADDITIONAL CONSIDERATIONS

Staff notified the Del Ray Citizens Association (DRCA) of the request on October 31,2025. At the time of report publication, staff had not received comments or questions from the association.

III. CONCLUSION

Staff found that the proposed dwelling's height, bulk and design would be compatible with the established neighborhood character. Subject to the conditions contained in Section IV of this report, staff recommends approval of the SUP request.

IV. RECOMMENDED CONDITIONS

Staff recommends **approval** subject to compliance with all applicable codes and ordinances, and the following conditions:

1. The dwelling's bulk, height, and design, including materials, shall be substantially consistent with the application materials submitted August 28, 2025, to the satisfaction of the Director of Planning and Zoning. (P&Z)

STAFF: Catherine McDonald, Urban Planner, Department of Planning and Zoning Sam Shelby, Principal Planner, Department of Planning and Zoning Tony LaColla, AICP, Division Chief, Department of Planning and Zoning

<u>Staff Note:</u> In accordance with section 11-506(c) of the Zoning Ordinance, construction or operation shall be commenced and diligently and substantially pursued within 36 months of the date of granting of a special use permit by City Council or the special use permit shall become void.

V. CITY DEPARTMENT COMMENTS

Legend: C - code requirement R - recommendation S - suggestion F - finding

Planning and Zoning:

- F-1 This Plan submitted after March 1, 2019 shall be prepared pursuant to the 2019 Landscape Guidelines. Visit https://www.alexandriava.gov/108269 to view/download the Guidelines and access other applicable information.
- F-2 All tree protection fencing must be installed prior to demolition of the site or structures, delivery of materials (stockpiling), and/or placement or operation of heavy machinery on the site.
- F-3 Shrub, vines, perennials, and grasses that may be planted as part of the new construction are not required to be shown on the plans, however such planting must comply with the Landscape Guidelines, particularly the restriction of planting invasive species.

C-1 For grading plan:

- a. Provide proof of transmission for neighbor notification letter (certified mail or similar) indicating that the proposed construction may impact trees on their property(ies). Letter shall contain assessment of the potential impact to the trees and detail tree preservation measures.
- b. Provide dimensions for sidewalk and street tree area on Howell Avenue.
- c. A street tree planting may be required.

Transportation & Environmental Services:

- C-1 A Grading Plan showing all improvements and alterations to the site must be approved by T&ES prior to the issuance of a building permit with any land disturbing activity more than 2,500 square feet. (SWM)
- C-2 An erosion and sediment control plan may be required and must be approved by T&ES prior to any land disturbing activity. Should greater than 2,500 square feet of land be disturbed, the stormwater quality and quantity requirements of Article XIII, Environmental Management Ordinance, must be fulfilled. (SWM)

C-3 Maintaining pedestrian access:

a. Sidewalks adjacent to the site on Commonwealth Avenue; and, on Howell Avenue shall remain open during construction. If sidewalks must be closed, pedestrian access shall be maintained adjacent to the site per Memo to Industry 04-18 throughout the construction of the project. (Transportation Planning)

C-4 Maintaining bicycle access:

- a. Bicycle facilities adjacent to the site on **Commonwealth Avenue** shall remain open during construction. If a bicycle facility must be closed, bicycle access shall be maintained adjacent to the site per Memo to Industry 04-18 throughout the construction of the project. (Transportation Planning)
- R-1 Provide street trees along Commonwealth Avenue to the extent feasible. Refer to P&Z's Landscape Guidelines + City Landscape Architect for further guidance. (Transportation Planning)
- R-2 Close the curb cut on all the drawings to avoid confusion. (Transportation Planning)

Code Enforcement:

C-1 A building permit is required for new construction.

Historic Alexandria (Archaeology):

- F-1 According to a review of historic maps and aerial photographs, the property at 2 W. Howell Ave. remained vacant until the mid-twentieth century. The property could contain significant archaeological information pertaining to the mid-twentieth century development of Del Ray.
- R-1 Alexandria Archaeology recommends that the applicant/property owner call Alexandria Archaeology immediately (703-746-4399) if any buried structural remains (wall foundations, wells, privies, cisterns, etc.) or concentrations of artifacts are discovered during development. Work should cease in the area of the discovery until a City archaeologist comes to the site and records the finds.
- R-2 The applicant/property owner shall not allow any metal detection or artifact collection to be conducted on the property, unless authorized by Alexandria Archaeology.

Recreation, Parks and Cultural Activities:

- F-1 Provide tree protection measures for any trees intended to be preserved include trees in the right of way and adjacent properties where the critical root zone is within 15 feet of the LOD.
 - a. (Reference to City Landscape Guidelines Standards and Details) https://www.alexandriava.gov/planning-and-zoning/city-landscape-guidelines

- F-2 If the critical root zone of trees located on or within 15 feet of the property line is affected, refer to Bullet 4 on page 15 for additional submission requirements.
 - a. (Reference to Landscape Guidelines)

 https://www.alexandriava.gov/planning-and-zoning/city-landscape-guidelines
- C-1 For grading plan:
 - a. Identify and delineate the limits of disturbance (LOD).
 - b. Identify and delineate the construction entrance if applicable.
 - c. Provide details for proposed curb, gutter, and sidewalk.
 - a. (Reference the Green Street and Sidewalk Stormwater Design Guidelines)

 <u>https://media.alexandriava.gov/docs-archives/tes/stormwater/alexandria-gs-sw-design-guidelines=2020=final=1=.pdf</u>

Fire Department:

No comments.



SPECIAL USE PERMIT

SPECIAL USE PERMIT # 2 W. Howell Avenue, Alexandria, Virginia 22301 PROPERTY LOCATION: R-5 34.03 08 07 ZONE: **TAX MAP REFERENCE:** APPLICANT: Daryl Andrews and Caroline Andrews Name: Address: Section 12-901 (C) Special Use Permit to construct a new single PROPOSED USE: unit dwelling on a developed substandard lot. THE UNDERSIGNED, hereby applies for a Special Use Permit in accordance with the provisions of Article XI. Section 4-11-500 of the 1992 Zoning Ordinance of the City of Alexandria, Virginia. THE UNDERSIGNED, having obtained permission from the property owner, hereby grants permission to the City of Alexandria staff and Commission Members to visit, inspect, and photograph the building premises, land etc., connected with the application. THE UNDERSIGNED, having obtained permission from the property owner, hereby grants permission to the City of Alexandria to post placard notice on the property for which this application is requested, pursuant to Article IV, Section 4-1404(D)(7) of the 1992 Zoning Ordinance of the City of Alexandria, Virginia. THE UNDERSIGNED, hereby attests that all of the information herein provided and specifically including all surveys, drawings, etc., required to be furnished by the applicant are true, correct and accurate to the best of their knowledge and belief. The applicant is hereby notified that any written materials, drawings or illustrations submitted in support of this application and any specific oral representations made to the Director of Planning and Zoning on this application will be binding on the applicant unless those materials or representations are clearly stated to be non-binding or illustrative of general plans and intentions, subject to substantial revision, pursuant to Article XI, Section 11-207(A)(10), of the 1992 Zoning Ordinance of the City of Alexandria, Virginia.

Duncan W. Blair, A	Attorney/Agent	W.	MOON	18/0	828 25
Print Name of Applicant	or Agent		Signature	NA	Date
Mailing/Street Address		2 4	Telephone #	== 8=====	Fax#
City and State	Zip Code		Ema	il address	

Last updated: 11.11.2019

PROPERTY OWNER'S AUTHORIZATION		
SEE ATTACHE		
As the property owner of	,H	hereby
(Property Address)		
grant the applicant authorization to apply for the	us	se as
(use) described in this application.		
described in this application.		
Name:	Phone	
Please Print		
Address:	Email:	
Signature:	Date:	
site plan with the parking layout of the proposed floor and site plans. The Planning Director may request which adequately justifies a waiver. [] Required floor plan and plot/site plan attac [] Requesting a waiver. See attached written 2. The applicant is the (check one): [] Owner [/] Contract Purchaser	waive requirements for plan submission	'
[] Lessee or [] Other: of the	o aubicet property	
[] Outer of the	e subject property.	
State the name, address and percent of ownership of ar unless the entity is a corporation or partnership, in which of Daryl Andrews and Caroline Andrews a	case identify each owner of more than the	hree percent.
of the property. The Andrew's mailing address	is 601 King Street, Suite 250, Alexand	dria,
Virginia.		

PROPERTY OWNER'S AUTHORIZATION
2 W. Howell Avenue, Alexandria, Va. , I hereby
(December Address) Special Use Feliant to Survey Address)
grant the applicant authorization to apply for the
described in this application.
Mary S. Jensen Phone
Name:Plea
Address' Email: A
Signature: X Date: 8 28 25
Signature. / / / / / / / / / / / / / / / / / / /

OWNERSHIP AND DISCLOSURE STATEMENT

Use additional sheets if necessary

1. Applicant. State the name, address and percent of ownership of any person or entity ownline interest in the applicant, unless the entity is a corporation or partnership, in which case identify owner of more than three percent. The term ownership interest shall include any legal or equitable in held at the time of the application in the real property which is the subject of the application.	ng an each iterest
	the state of the state of the state of the

	Address	Percent of Ownership
Name	Address	Contract Purchasers
Daryl and Caroline Andrews		

2. <u>Property.</u> State the name, address and percent of ownership of any person or entity owning an interest in the property located at ____2 W. Howell Ave., Alexandria, Virginia (address) unless the entity is a corporation or partnership, in which case identify each owner of more than three percent. The term ownership interest shall include any legal or equitable interest held at the time of the application in the real property which is the subject of the application.

	Address	Percent of Ownership
Name Mary S. Jensen	7 (200)	100%

3. Business or Financial Relationships. Each person or entity indicated above in sections 1 and 2, with an ownership interest in the applicant or in the subject property are require to disclose any business or financial relationship, as defined by Section 11-350 of the Zoning Ordinance, existing at the time of this application, or within the12-month period prior to the submission of this application with any member of the Alexandria City Council, Planning Commission, Board of Zoning Appeals or either Boards of Architectural Review. All fields must be filled out completely. Do not leave blank. (If there are no relationships please indicated each person or entity and "None" in the corresponding fields).

For a list of current council, commission and board members, as well as the definition of business

and financial relationship, click here.

nad financial relationship, <u>CICK New</u>	Relationship as defined by Section 11-350 of the Zoning Ordinance	Member of the Approving Body (i.e. City Council, Planning Commission, etc.)
1. Daryl Andrews	None	
2. Caroline Andrews	None	
3. Mary S. Jensen	None	4 250 that orice ofter the filing of

NOTE: Business or financial relationships of the type described in Sec. 11-350 that arise after the filing of this application and before each public hearing must be disclosed prior to the public hearings.

As the applicant the information p	or the applicant's authorized agent, provided above is true and correct.	I hereby attest to the best of my ability that
8 28 25	Daryl Andrews	Mallhe
Date	Printed Name	Signature

If property owner or applicant is being represented by an authorized agent such as an attorney, realtor, or which there is some form of compensation, does this agent or the business in which the agent is employed business license to operate in the City of Alexandria, Virginia?	•
[] Yes. Provide proof of current City business license A Copy will be provided on request.	
[] No. The agent shall obtain a business license prior to filing application, if required by the City Code.	
NARRATIVE DESCRIPTION	
3. The applicant shall describe below the nature of the request in detail so that the Planning Commouncil can understand the nature of the operation and the use. The description should fully discuss the activity. (Attach additional sheets if necessary.)	
The Applicant is requesting a Section 12-901 (C) Special Use Permit to construct a	
single unit dwelling on a developed substandard lot. The proposed dwelling is compatible	
with the character of the neighborhood in terms of its size, design, height and building	
orientation to the adjacent rights-of way.	

USE CHARACTERISTICS

i.	[] a r [] an [] an	roposed special use permit request is for (check one): new use requiring a special use permit, expansion or change to an existing use without a special use permit, expansion or change to an existing use with a special use permit, ner. Please describe: SUP to construct a new single unit dwelling on a developed substant	idard lot.
5 _m	Pleas	e describe the capacity of the proposed use:	
	A.	How many patrons, clients, pupils and other such users do you expect? Specify time period (i.e., day, hour, or shift). Not Applicable -Single unit dwelling.	
	B.	How many employees, staff and other personnel do you expect? Specify time period (i.e., day, hour, or shift). Not Applicable - 9	Single unit dwelling.
i.	Please	e describe the proposed hours and days of operation of the proposed use:	Not Applicable -Single unit
	Day:	Hours:	
•	Please	describe any potential noise emanating from the proposed use. Describe the noise levels anticipated from all mechanical equipment and potential Not Applicable -Single unit dwelling.	patrons.
	В.	How will the noise be controlled? Not Applicable -Single unit d	lwelling.

Pleas	se provide information regarding trash and litter generated by the use.
A.	What type of trash and garbage will be generated by the use? (i.e. office paper, food wrappers) Not Applicable -Single unit dwelling.
В.	How much trash and garbage will be generated by the use? (i.e. # of bags or pounds per day or poweek) Not Applicable -Single unit dwelling.
C.	How often will trash be collected? Not Applicable -Single unit dwelling.
D.	How will you prevent littering on the property, streets and nearby properties? Not Applicable -Single unit dwelling.
	ny hazardous materiais, as defined by the state or federal government, be handled, stored, or general operty?
[] Y	es. [/] No. provide the name, monthly quantity, and specific disposal method below:

11.	Will a handl	ny organic cor ed, stored, or g	npounds, for example paint, ink, lacquer thinner, or cleaning or degreasing s generated on the property?	olvent, be
	[] Ye	es. [/]	No.	
	If yes,	provide the na	ame, monthly quantity, and specific disposal method below:	÷-
12,	What	mothede ere n		5°
12,			roposed to ensure the safety of nearby residents, employees and patrons? Single unit dwelling.	
	OHOL	SALES		
13.	A.	Will the prop	osed use include the sale of beer, wine, or mixed drinks?	
		[] Yes	[-]_No	
		If yes, descrii include on-pr	be existing (if applicable) and proposed alcohol sales below, including if the Aremises and/or off-premises sales.	ABC license will
		f		

PARKING AND ACCESS REQUIREMENTS

14.	1	A.	How many parking spaces of each type are provided for the proposed use:									
			2	Standard spaces								
				Compact spaces								
				Handicapped accessible spaces.								
				Other.								
	ſ			Planning and Zoning Staff Only								
	Required number of spaces for use per Zoning Ordinance Section 8-200A											
	Does the application meet the requirement? [] Yes [] No											
	В		. Where is required parking located? (check one) [/] on-site [] off-site									
			If the required	parking will be located off-site, where wi	ill it be located?							
ite pa r indi	arkir ustri	ng with ial use use w	in 500 feet of the s. All other used the second used the second in the s	ne proposed use, provided that the off-ses must provide parking on-site, except the permit. In the required parking is requested, pure the PARKING REDUCTION SUP								
			[] Parking re	duction requested; see attached sup	plemental form							
5.	Pl	ease p	rovide informat	tion regarding loading and unloading fac	silltles for the use;							
	A,	I	How many load	ing spaces are available for the use?	Not Applicable -Single unit dwelling.							
	Planning and Zoning Staff Only											
		Requi	red number of load	ling spaces for use per Zoning Ordinance Section	n 8-200							
		Does 1	the application me	st the requirement?								

	₿.	Not Applicable -Single unit Where are off-street loading facilities located?						
	C.	During what hours of the	Z					
		Not Applicable	-Single unit dwelling.					
	D.	Not Applicable	g/unloading operations exper- -Single unit dwelling.		er day or per w	eek, as appropriate?		
16.		t access to the subject pro ary to minimize impacts on	perty adequate or are any str traffic flow? -Single unit dwelling.	eet improveme	nts, such as a n			
SITE	CHAR	RACTERISTICS				_		
17.	Will the	proposed uses be located	in an existing building?	[] Yes	M No			
	Do you	propose to construct an ac	dition to the building?	[] Yes	[/] No			
	How lar	ge will the addition be?	square feet					
18.	What wi	Il the total area occupied b	y the proposed use be?	7,099 GFA				
		sq. ft. (existing) +	sq. ft. (addition if any)	=sq.	ft. (total)			
19.	[] a star [/] a hou [] a war [] a sho [] an of	pping center. Please province building. Please provi	zone					

End of Application



Floor Area Ratio Worksheet:

Department of Planning & Zoning Supplemental Special Use Permit Application Checklist New Development or Redevelopment of Substandard Lots

~	Existing Building
V	Proposed Building
Conte	ktual Blockface Study:
~	Threshold heights for each property
~	Front setbacks for each property
~	Building heights for each property
	*Contact staff to confirm contextual blockface
V	Photos of comparison buildings on both sides of the block
V	Site plan of immediate area showing comparison buildings and adjacent streets
V	Plat submitted to scale showing existing building(s)
~	Existing trees and trees proposed for removal – include callper and tree species
Elevati	on drawings to scale with dimensions for:
V	Helght of existing building
V	Proposed building design including dimensions for setbacks and heights
Scaled	plans with dimensions for:
V	Floor plans for each floor of proposed building, including basement and attic
V	Roof truss section

Last updated: 11.4.2019

Department of Planning & ZoningSpecial Use Permit Application Checklist

Supplemental application for the following uses:
Automobile Oriented
Parking Reduction
Signs
✓ Substandard Lot
Lot modifications requested with SUP use
Interior Floor Plan
Include labels to indicate the use of the space (doors, windows, seats, tables, counters, equipment)
if Applicable
Plan for outdoor uses
Contextual site Image
Show subject site, on-site parking area, surrounding buildings, cross streets



Department of Planning and Zoning Floor Area Ratio and Open Space Calculations for



RGIN	/ * /			•	ntial Outsic		storic Districts	
A.	Property Info							
A1.	2 W. Howell Avenu Street Address	ue				R-2-5		
40	6,389.00		x (1.45		2,875		
AZ.	Total Lot Area			Floor Area Ratio Al	llowed by Zone		mum Allowable Floor Area	
В.	Existing Gross A Basement			Allowable Exclusion	sions**	B1.	0.00	Sq. Ft.
	First Floor			Stairways**			Existing Gross Floor Area*	- 4
	Second Floor			Mechanical**		B2.	0.00	Sq. Ft.
	Third Floor			Attic less than 7'**			Allowable Floor Exclusions**	
	Attic			Porches**		B3.		Sq. Ft.
	Porches			Balcony/Deck**			Existing Floor Area Minus Exclusio (subtract B2 from B1)	ns
	Balcony/Deck			Garage**		Con	nments for Existing Gross Floor A	rea
	Garage			Other***				
	Other***			Other***				
B1.	Total Gross	0.00	B2.		0.00			
C.	Proposed Gross	oss Floor Area Area		Allowable Exclu	sions**			
	Basement	1,417.00		Basement**	1,417.00	C1.		Sq. Ft.
	First Floor	1,430.00		Stairways**	201.00		Proposed Gross Floor Area*	
	Second Floor	1,413.00		Mechanical**	10.00	C2.		Sq. Ft.
	Third Floor			Attic less than 7'**	1,767.00		Allowable Floor Exclusions** 2,824.00	
	Attic	1,767.00		Porches**	155.00	C3.	Proposed Floor Area Minus Exclus	Sq. Ft. ions
	Porches	347.00		Balcony/Deck**			(subtract C2 from C1)	
	Balcony/Deck			Garage**	250.00			
	Garage	250.00		Other***	475.00			
	Other***	475.00		Other***			Notes *Cross floor area for regidential sing	lo and
C1.	Total Gross	7,099.00	C2.	Total Exclusions	4,275.00		*Gross floor area for residential singutwo-family dwellings in the R-20, R-12 R-5, R-2-5, RB and RA zones (not inc properties located within a Historic Dis	2, R-8, cluding
_							the sum of <u>all areas under roof of</u>	

D. Total Floor Area

D1. 2,824.00 Sq. Ft. Total Floor Area (add B3 and C3)

D2. 2,875.05 Sq. Ft. Total Floor Area Allowed by Zone (A2)

E. Open Space (RA & RB Zones)

E1. Sq. Ft. **Existing Open Space** E2. Sq. Ft. Required Open Space

Sq. Ft.

measured from exterior walls.

- ** Refer to the Zoning Ordinance (Section 2-145(A)) and consult with Zoning Staff for information regarding allowable exclusions. Sections may also be required for some exclusions.
- *** Refer to the Zoning Ordinance (Section 2-145(A)) and consult with Zoning Staff for additional allowable exclusions. Additional exclusions may include space under balconies, retractable awnings, etc.

The undersigned hereby certifies and attests that, to the best of his/her knowledge, the above computations are true and correct.

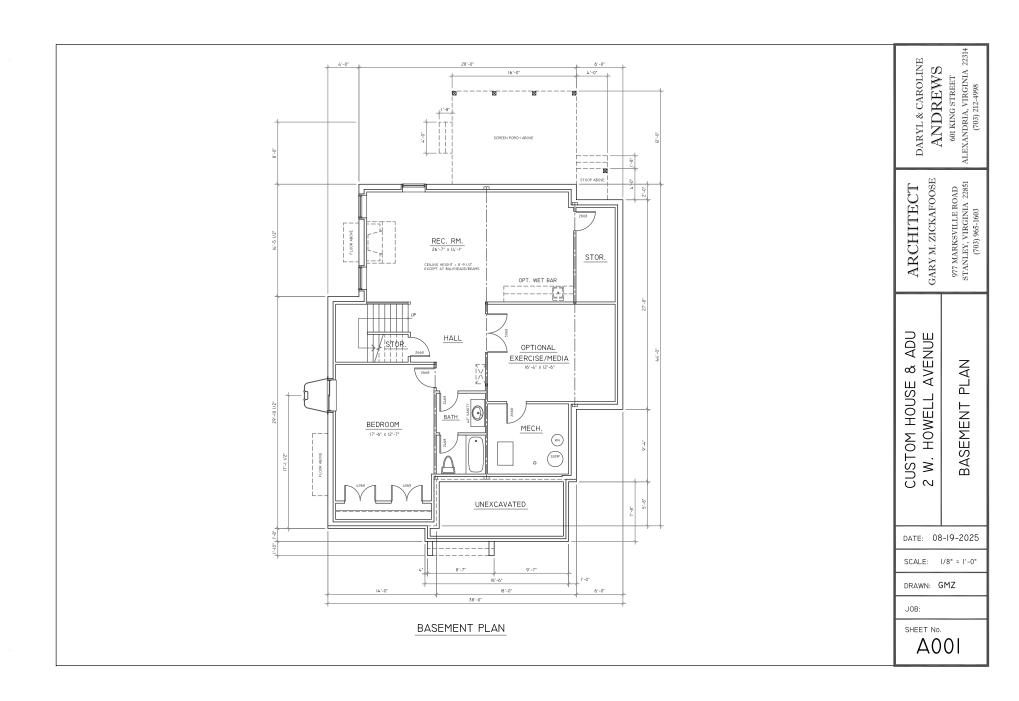
Gary M. Zickafoose Digitally signed by Gary M. Zickafoose Digitally signed by Gary M. Zickafoose Div. cn=Gary M. Zickafoose, o, ou, email=garyzickafoose, on, ou, email=garyzickafoose, ou, ou, email=garyzickafoose, ou, ou, email=garyzickafoose, ou, ou, email=garyzickafoose, ou

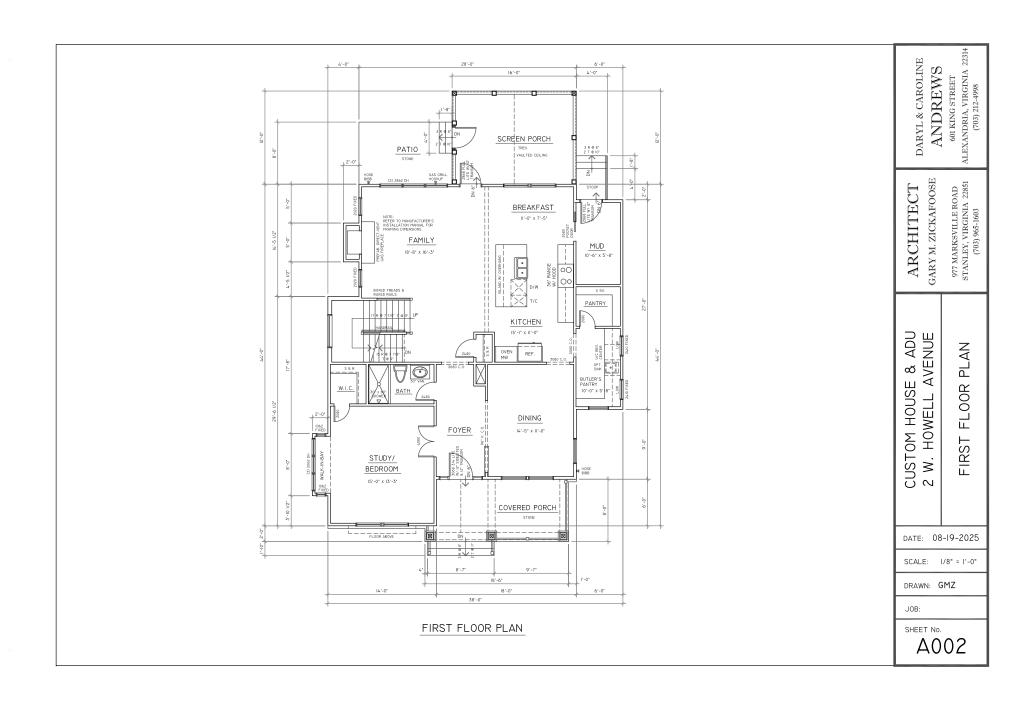
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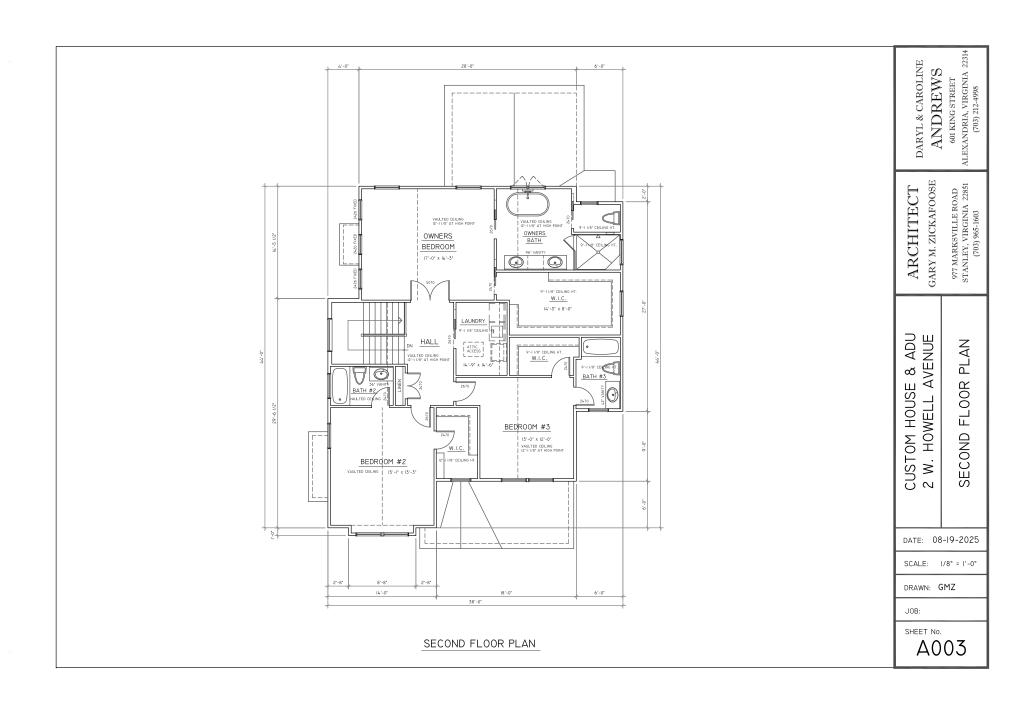
29

Proposed Open Space

E3.

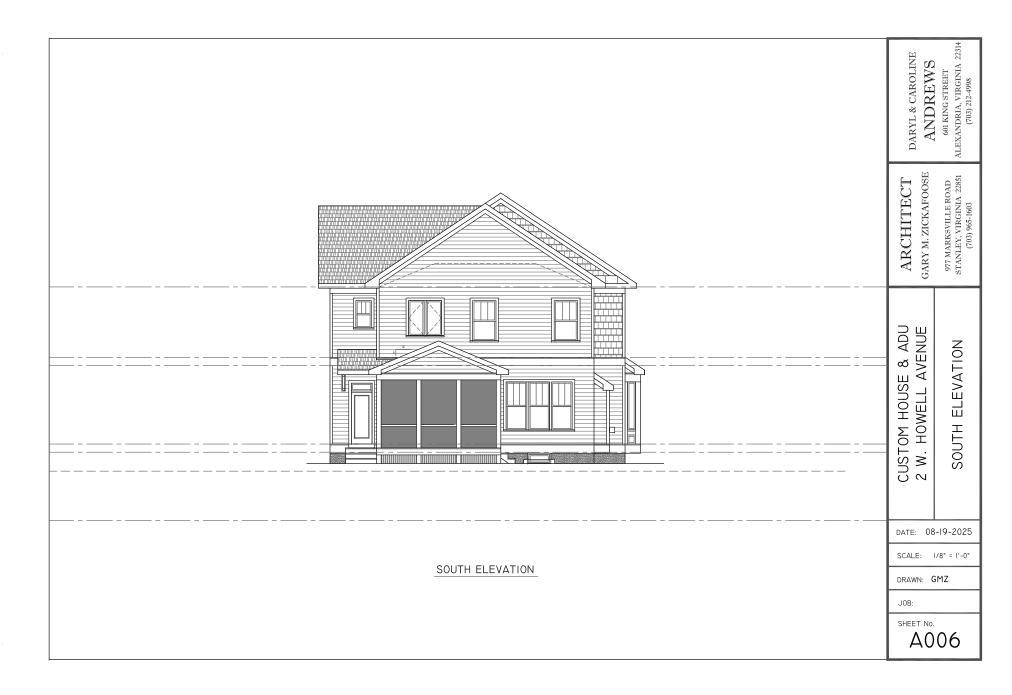


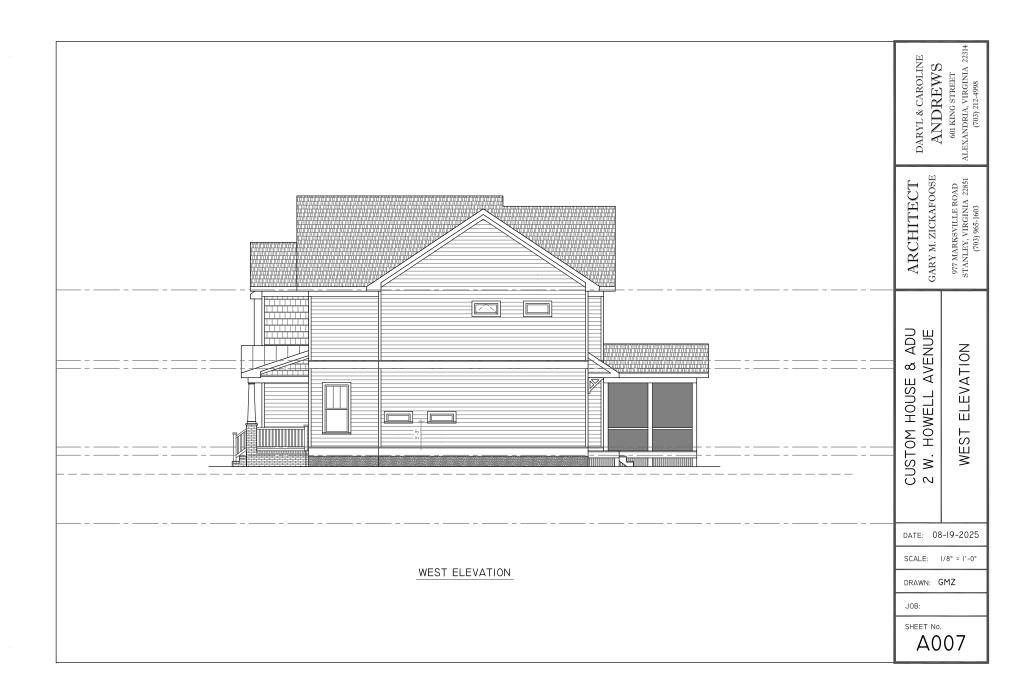


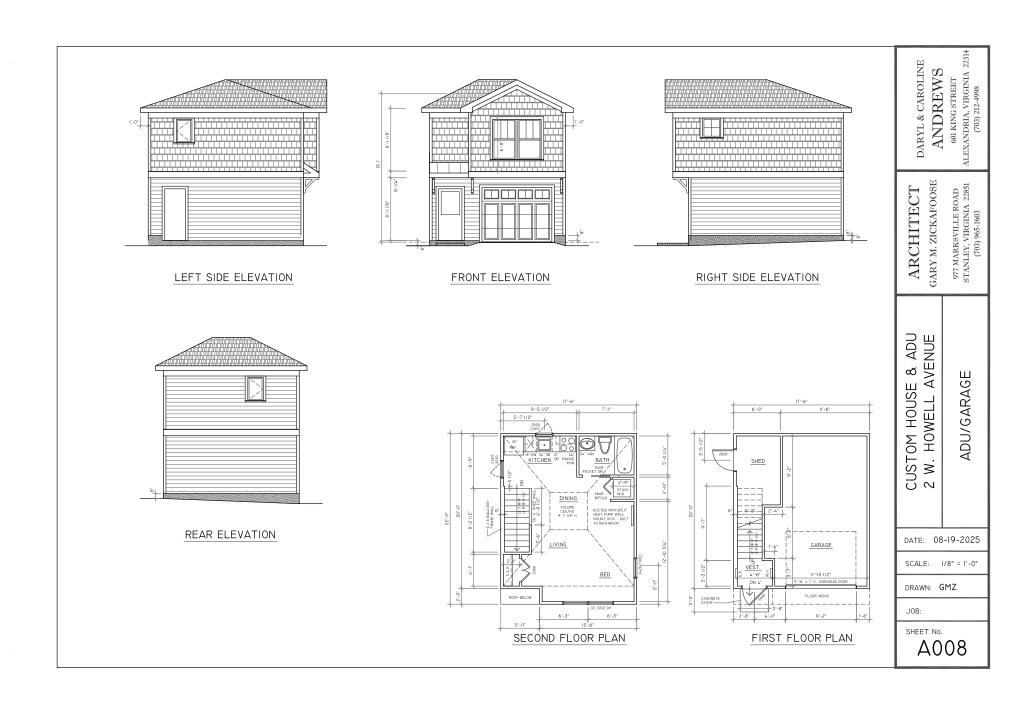












EXISTING TREE INVENTORY

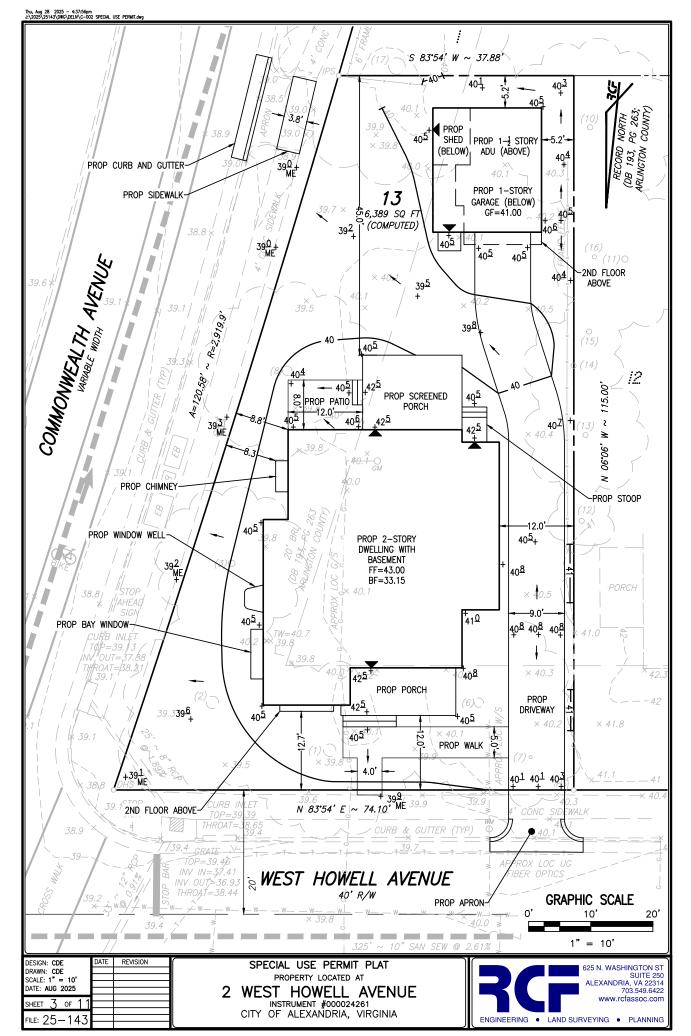
					ove?		
	1000			Condition	_	200	
Tree #	Common Name	DBH (Inches)	(Feet)	Rating %	Re	Owner	Field Notes
1	American holly	10.2, 9.7, 9.5	17.0	75%	Χ		several v-shaped branch unions near base of tree
2	Crapemyrtle	9, 7.9, 5.6	13.2	85%	Χ		minor epicormic growth
3	Crabapple	12.2	12.2	70%	Χ		weak branch union, fairly thin canopy
4	Pin oak	28.6	28.6	25%		ROW	poor form, two codominant stems with weak union, crown dieback
5	Pin oak	26, 22.5	34.4	40%		ROW	crown dieback, declining
6	Eastern red cedar	22.4	22.4	90%	Χ		
7	Eastern redbud	6	8.0	80%	Χ		wound from broken limb
8	Nellie Stevens holly	9, 8.1, 7.2	14.1	80%	Χ		clustered stems at base, included bark
9	Chinese elm	8.6	8.6	90%		ROW	
10	Japanese privet	10	10.0	90%		Off	
11	Nellie Stevens holly	18	18.0	90%		Off	
12	Arborvitae	8	8.0	90%		Off	
13	Japanese privet	12	12.0	80%		Off	epicormic growth
14	Japanese privet	6	8.0	65%		Shared	dead limb
15	Arborvitae	8	8.0	90%		Off	
16	Japanese privet	6	8.0	90%		Off	
17	Red maple	30	30.0	15%		Off	poor form, crown dieback, codominant leaders with weak union, broken limbs
18	Eastern redbud	3, 3, 2	8.0	90%		Off	

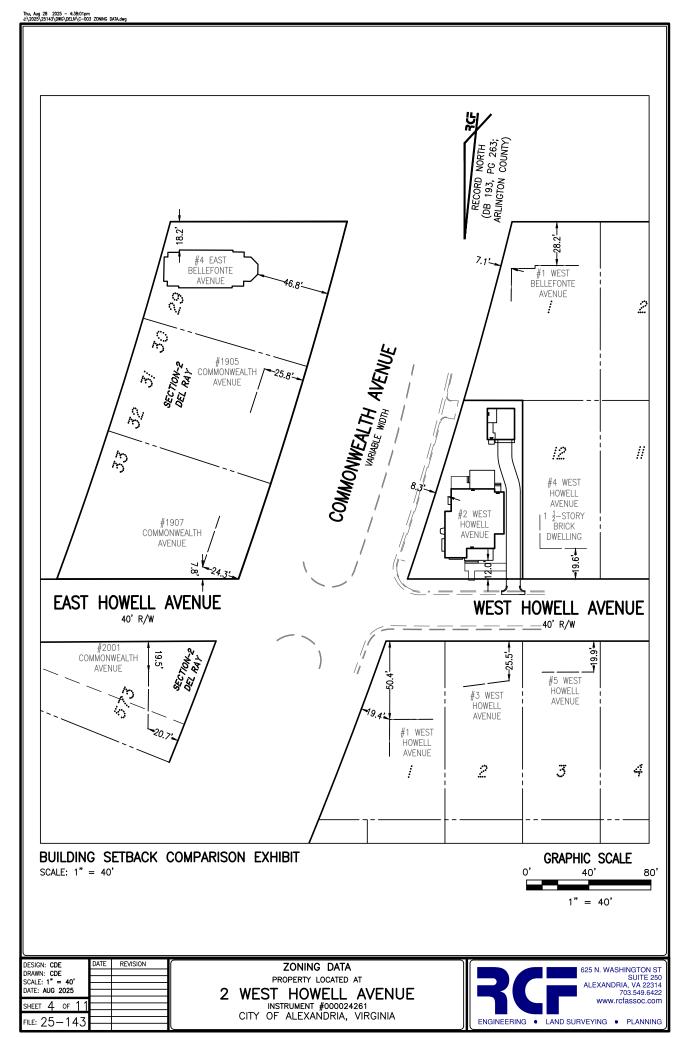
NOTE: TREE INVENTORY AND TREE ANALYSIS CONDUCTED BY CHARLES ELMER, ISA CERTIFIED ARBORIST (IL-10225A).

DESIGN: CDE	DATE	REVISION
DRAWN: CDE	_	
SCALE: NO SCALE DATE: AUG 2025		
DATE: AUG 2025		
SHEET 2 OF 11		
FILE: 25-143		
FILE: 25-145		

EXISTING TREE INVENTORY
PROPERTY LOCATED AT







BLOCK FACE STUDY

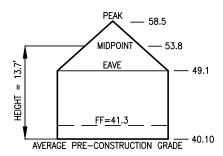
	tback and Thi	reshold <u>Data</u> JE (RCF #25-143)
		ring Threshold Height = 1.2')
		9.7' ~ Commonwealth Avenue = 14.2'
Existing setbacks - West Flower	Sil 7 (Vellue – 10	Commonwealth / Vende = 14.2
Setback Data		
	Setback Fro	om en
	Property Lin	ne
4 WEST HOWELL AVENUE	19.6'	
5 WEST HOWELL AVENUE	19.9'	
3 WEST HOWELL AVENUE	25.5'	
1 WEST HOWELL AVENUE	50.4'	ON WEST HOWELL AVENUE
	19.4'	ON COMMONWEALTH AVENUE
2001 COMMONWEALTH AVENUE	20.7'	ON COMMONWEALTH AVENUE
	19.5'	ON EAST HOWELL AVENUE
1907 COMMONWEALTH AVENUE	24.3'	ON COMMONWEALTH AVENUE
	7.8'	ON EAST HOWELL AVENUE
1905 COMMONWEALTH AVENUE	25.8'	
4 EAST BELLEFONTE AVENUE	18.2'	ON EAST BELLEFONTE AVENUE
	46.8'	ON COMMONWEALTH AVENUE
1 WEST BELLEFONTE AVENUE	28.2'	ON WEST BELLEFONTE AVENUE
	7.1'	ON COMMONWEALTH AVENUE
RANGE HOWELL AVENUE	7.8' - 50.4'	
RANGE COMMONWEALTH AVE	7.1' - 46.8'	
	BUILDING	RESTRICTION LINE IS 20.0'
	(DB 193, P	G 263 ARLINGTON COUNTY)
Threshold Data		
		Distance
		Ground to
Address #		1st Floor
4 WEST HOWELL AVENUE		2.3'
5 WEST HOWELL AVENUE		3.0'
3 WEST HOWELL AVENUE		2.9'
1 WEST HOWELL AVENUE		1.9'
2001 COMMONWEALTH AVENUE		2.0'
1907 COMMONWEALTH AVENUE		3.9'
1905 COMMONWEALTH AVENUE		2.9'
4 EAST BELLEFONTE AVENUE		2.4'
1 WEST BELLEFONTE AVENUE		4.2'
I WEST BELLET SINTE AVENUE		7.2
	MAXIMIIM	THRESHOLD HEIGHT 4.2'
	INICAMINION	THRESHOLD HEIGHT 4.2

DESIGN: CDE	DATE	REVISION
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DATE: AUG 2025		
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SHEET 5 OF 11		
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ZONING DATA
PROPERTY LOCATED AT



EXISTING DWELLING HEIGHT CALCULATION



EXISTING DWELLING HEIGHT CALCULATION						
AVERAGE EX. GRADE	ROOF EAVE ELEVATIONS	(HIGHEST RIDGE)	ROOF MIDPOINT (ROOF HEIGHT) ELEVATION	EXISTING DWELLING HEIGHT		
40.1	49.1	58.5	53.8	13.7		

BLOCK FACE: HEIGHT STUDY

	LDING HEIGHT ELEV			
	<u>HOWELL AVENUE (F</u> ING BUILDING HEIGH			
(ENST)	ING BUILDING HEIGH	11 - 13.7)		
Building Height Data				
Α	В	С	D	
Address #	MIDPOINT	AEG	BUILDING HEIGHT	
4 West Howell Avenue	61.5	43.7	17.8	
5 West Howell Avenue	67.6	42.2	25.4	
3 West Howell Avenue	63.3	41.0	22.3	
1 West Howell Avenue	61.8	40.4	21.4	
2001 Commonwealth Avenue	61.2	37.6	23.6	
1907 Commonwealth Avenue	63.3	37.6	25.7	
1905 Commonwealth Avenue	65.3	37.7	27.6	
4 East Bellefonte Avenue	58.4	36.2	22.2	
1 West Bellefonte Avenue	62.4	40.0	22.4	

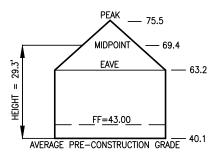
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SCALE: NO SCALE			I
DATE: AUG 2025			I
SHEET 6 OF 11			I
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FILE: 25—143	_		I

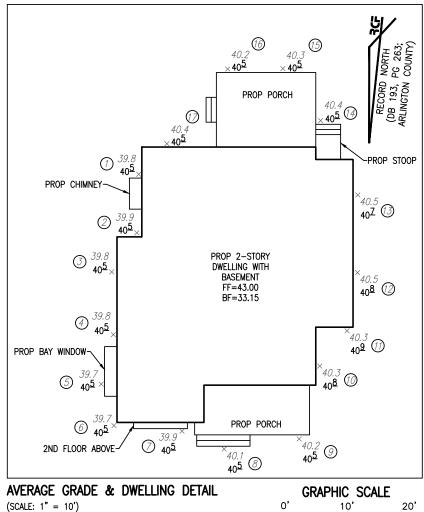
ZONING DATA
PROPERTY LOCATED AT



PROPOSED DWELLING HEIGHT CALCULATION

SPOTS	EXISTING -	PROPOSED -
35013	ELEVATION	ELEVATION
1	39.8	40.5
2	39.9	40.5
3	39.8	40.5
4	39.8	40.5
5	39.7	40.5
6	39.7	40.5
7	39.9	40.5
8	40.1	40.5
9	40.2	40.5
10	40.3	40.8
11	40.3	40.9
12	40.5	40.8
13	40.5	40.7
14	40.4	40.5
15	40.3	40.5
16	40.2	40.5
17	40.4	40.5
SUM:	681.8	689.7
AVERAGE:	40.1	40.6





DWELLING HEIGHT CALCULATION						
AVERAGE EX.	BOOE EAVE	PEAK ROOF	ROOF MIDPOINT	PROPOSED		
	ELEVATIONS	(HIGHEST BIDGE)	(ROOF HEIGHT)	DWELLING		
GRADE	ELEVATIONS	ELEVATION	ELEVATION	HEIGHT		
40.1	63.2	75.5	69.4	29.3		

SETBACK REQUIREMENTS FOR DWELLING

DI III DING CIDE	AVERAGE	BUILDING	ZONING	SETBACK	SETBACK
BUILDING SIDE	GRADE	HEIGHT	SETBACK	REQUIRED	PROVIDED
FRONT (HOWELL AVE)	40.1	23.1	SEE SHEET 5	7.8' MIN	12.0'
FRONT (COMMONWEALTH AVE)	40.1	29.3	SEE SHEET 5	7.1' MIN	8.3'
SIDE (WEST)	40.1	29.3	1:3, MIN 7'	9.8' MIN	12.0'
SIDE (SOUTH)	40.1	29.3	1:3, MIN 7'	9.8' MIN	45.0'

Threshold		
AEG along front	40.00	
FF Elev	43.00	
Threshold (prov.)	3.00	
Threshold (max)	4.2	

BASEMENT EXCLUSION COMPUTATION

1" = 10

FIRST FLOOR ELEVATION=43.0

BOTTOM OF FIRST FLOOR CONSTRUCTION=42.0

- AVERAGE FINISHED GRADE=40.6

DIFFERENCE=1.4'*

*PER SECTION 2-120 OF THE CITY OF ALEXANDRIA ZONING ORDINANCE, THE BASEMENT SHALL NOT BE COUNTED AS FLOOR AREA WHERE THE AVERAGE FINISHED GRADE IS FEWER THAN 4.0' BELOW THE BOTTOM OF FIRST FLOOR CONSTRUCTION.

DESIGN: CDE	DATE	REVISION
DRAWN: CDE SCALE: 1" = 10'		
DATE: AUG 2025		
SHEET 7 OF 11		
SHEET / OF 1		
FILE: 25-143		

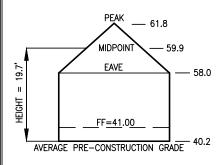
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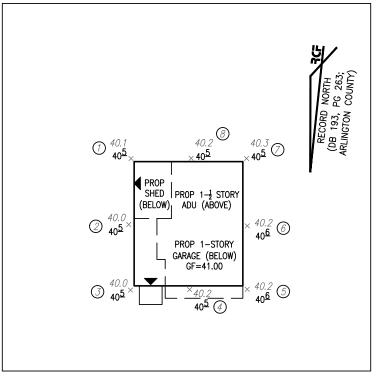
PROPERTY LOCATED AT



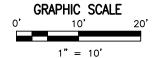
PROPOSED ADU HEIGHT CALCULATION

SPOTS	EXISTING -	PROPOSED -	
	ELEVATION	ELEVATION	
1	40.1	40.5	
2	40.0	40.5	
3	40.0	40.5	
4	40.2	40.5	
5	40.2	40.6	
6	40.2	40.6	
7	40.3	40.5	
8	40.2	40.5	
SUM:	321.2	324.2	
AVERAGE:	40.2	40.5	





AVERAGE GRADE & ADU DETAIL (SCALE: 1" = 10')



ADU HEIGHT CALCULATION					
AVERAGE EX. GRADE	ROOF EAVE ELEVATIONS	PEAK ROOF (HIGHEST RIDGE)	ROOF MIDPOINT (ROOF HEIGHT)	PROPOSED DWELLING	
		ELEVATION	ELEVATION	HEIGHT	
40.2	58.0	61.8	59.9	19.7	

DESIGN: CDE DATE REVISION

DRAWN: CDE

SCALE: 1" = 10'

DATE: AUG 2025

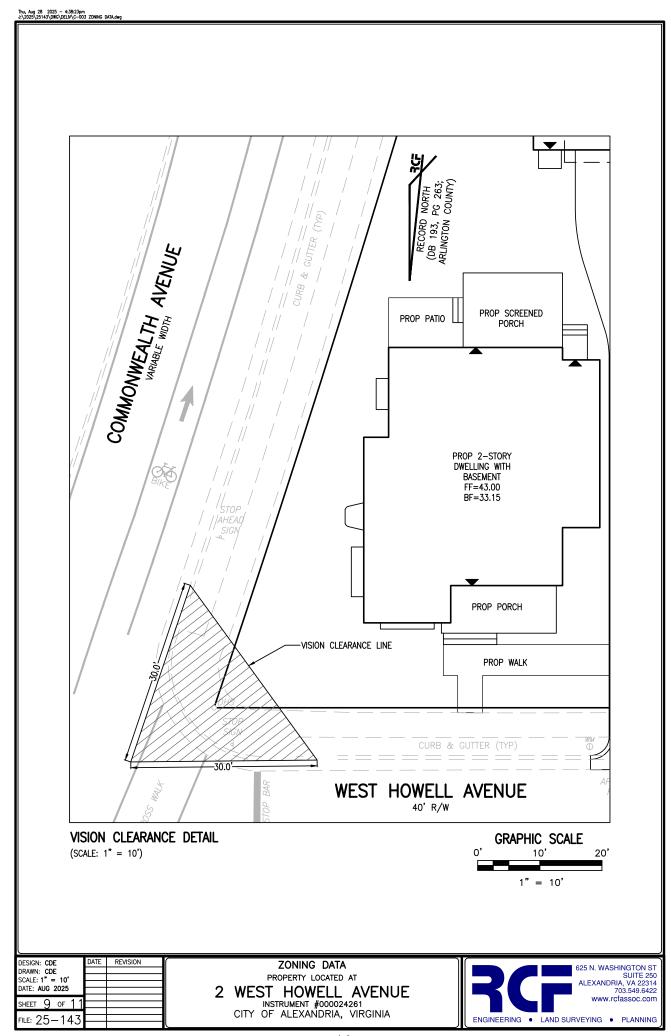
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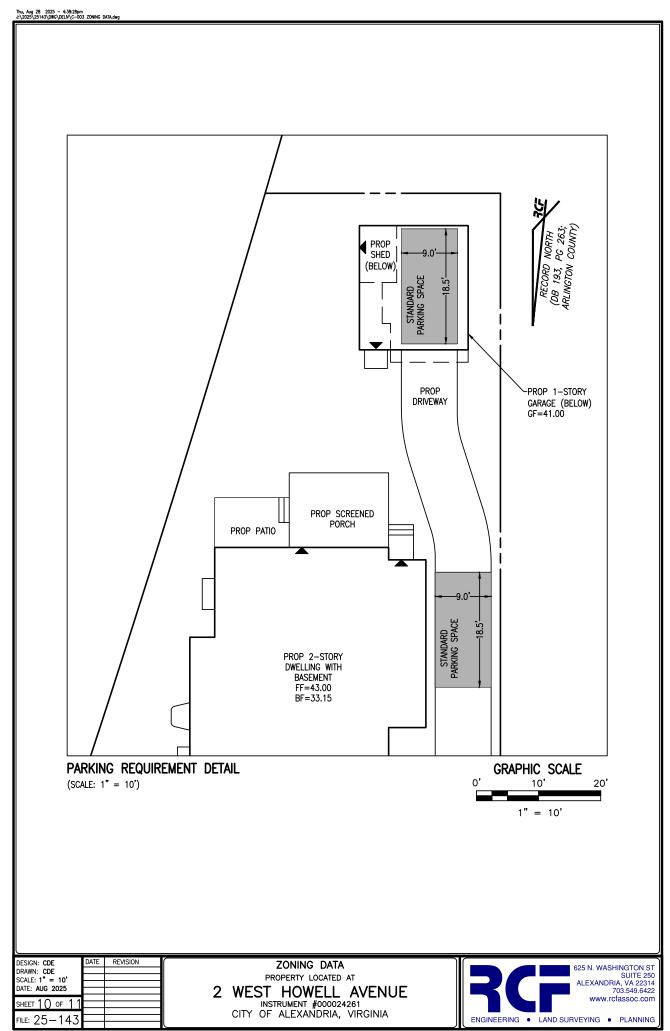
FILE: 25-143

ZONING DATA
PROPERTY LOCATED AT

2 WEST HOWELL AVENUE
INSTRUMENT #000024261
CITY OF ALEXANDRIA, VIRGINIA

625 N. WASHINGTON ST
SUITE 250
ALEXANDRIA, VA 22314
703.549.6422
www.rcfassoc.com
ENGINEERING • LAND SURVEYING • PLANNING





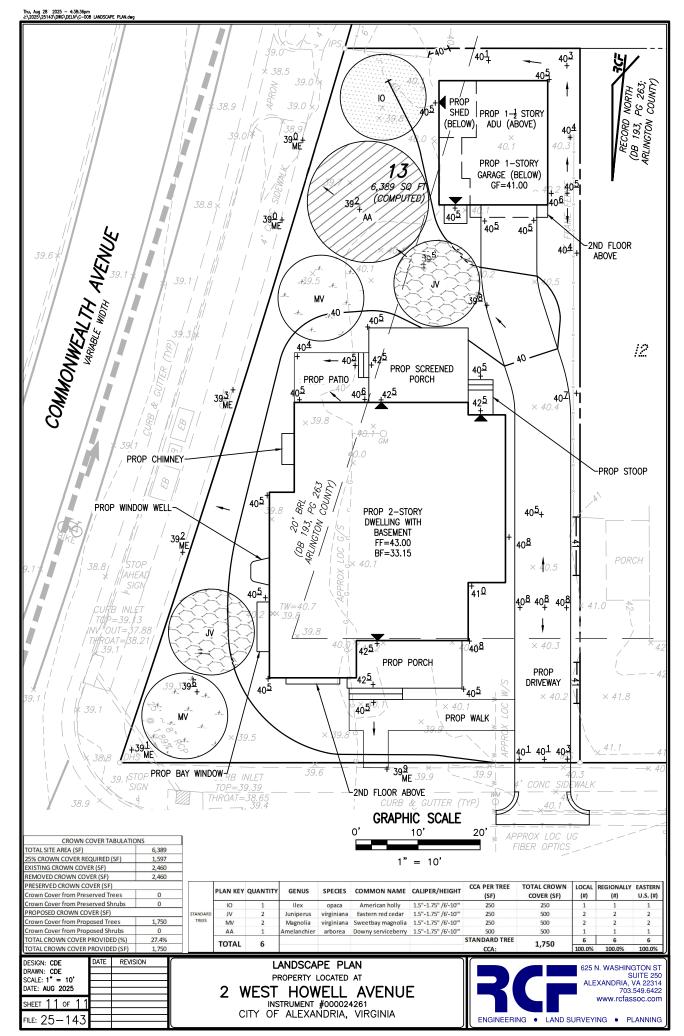
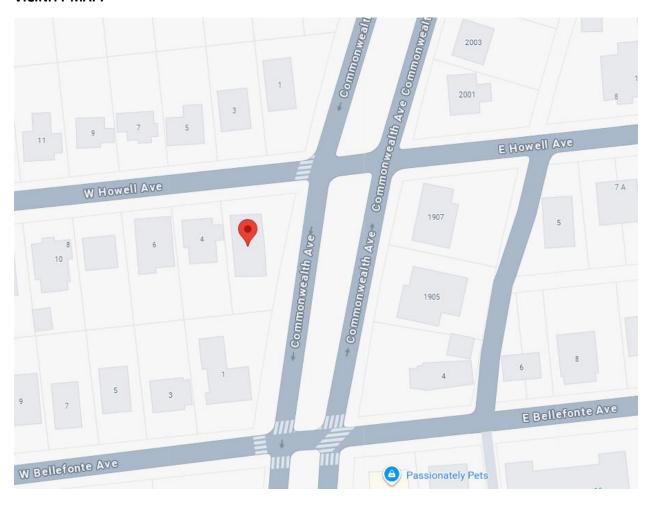


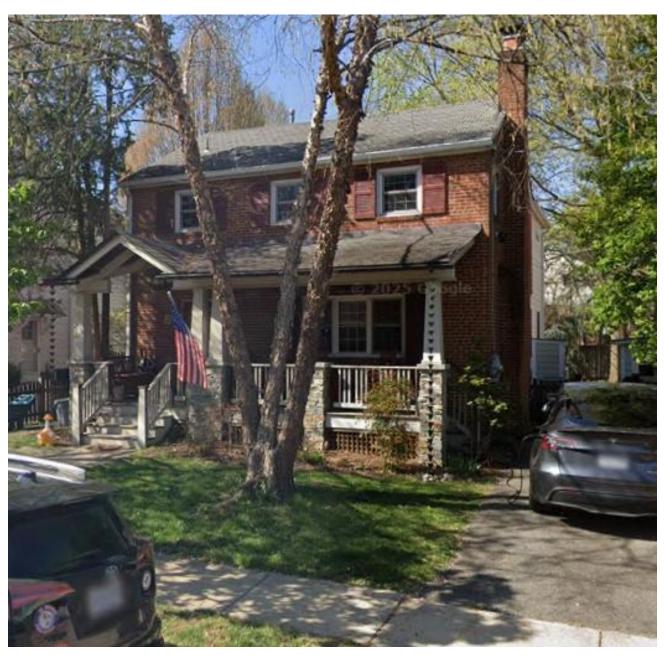
PHOTO COMPARISON:

VICINITY MAP:







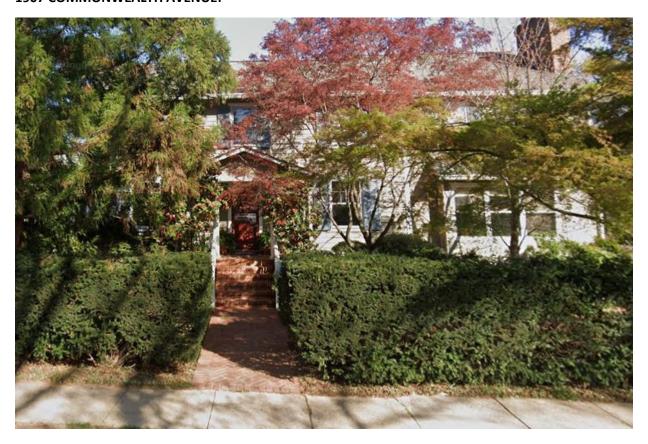




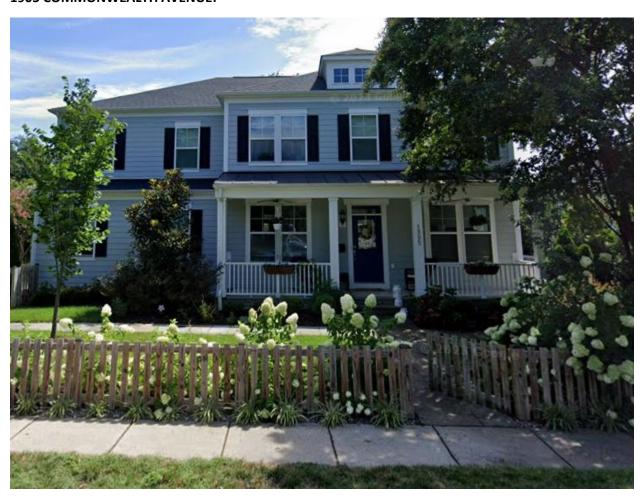
2001 COMMONWEALTH AVENUE:



1907 COMMONWEALTH AVENUE:



1905 COMMONWEALTH AVENUE:



4 EAST BELLEFONTE AVENUE:



1 WEST BELLEFONTE AVENUE:



MEMORANDUM

To: Paul Stoddard, Playming & Zoning Director

From: Dave Brown ()

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. 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.

