

**MEMORANDUM**

**TO:** District of Columbia Board of Zoning Adjustment  
**FROM:** Crystal Myers, Development Review Specialist  
*JL* Joel Lawson, Associate Director Development Review  
**DATE:** May 13, 2022

**SUBJECT:** BZA Case 20710 – Request to construct Two Multiple Dwelling Buildings

**I. OFFICE OF PLANNING RECOMMENDATION**

The Office of Planning (OP) recommends **Approval** of the following area variance relief pursuant to Subtitle X § 1000:

Subtitle C§ 305.3(b)- Vehicular Ingress/Egress width (24 ft. required; 20 ft. proposed)

The Office of Planning (OP) recommends **Approval** of the following special exception relief pursuant to Subtitle X § 900:

Subtitle C§ 302 pursuant to C§ 305- Theoretical Subdivision

Subtitle C§714.2(a) pursuant to C§ 714.3- Parking Lot Screening Requirement

Subtitle U§ 401 pursuant to U§ 421.1 - New Residential Developments

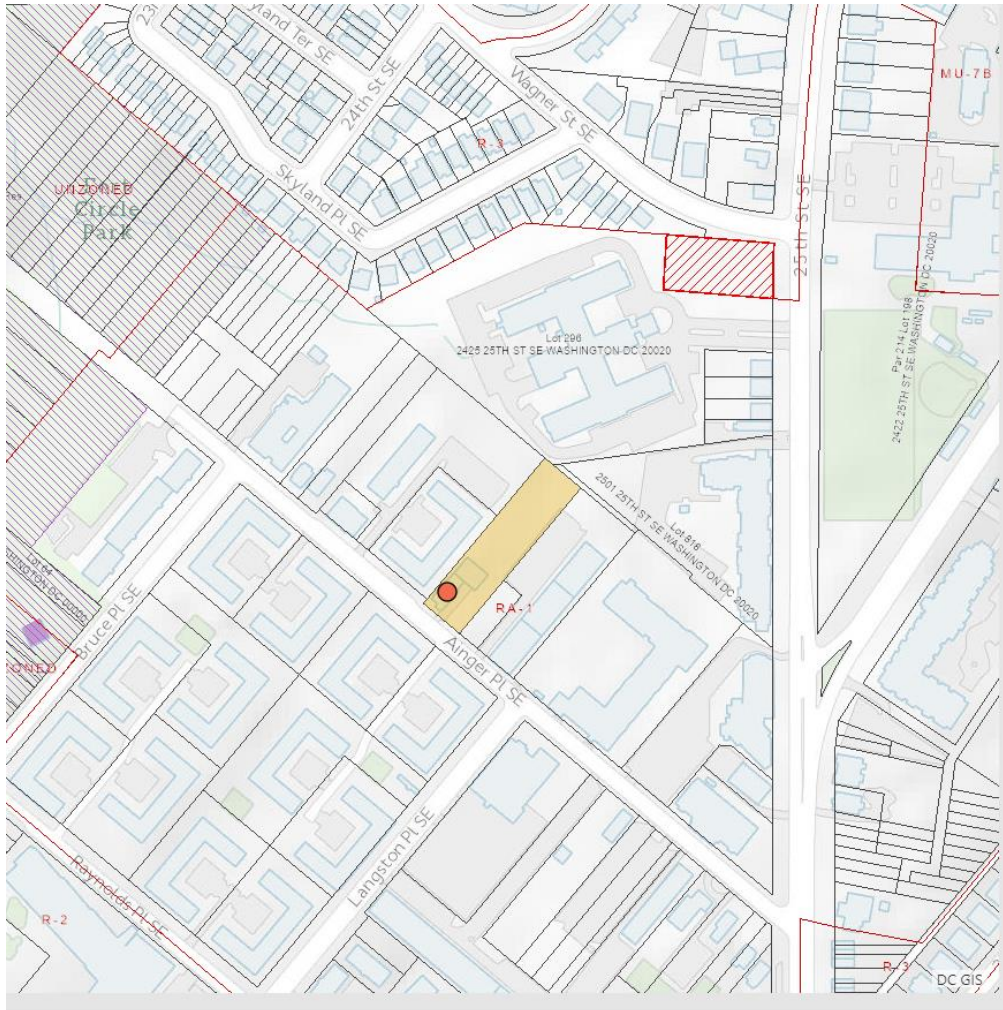
The application originally included a relief request from the C§805.1 requirement to provide a long-term bike facility in the buildings. Since then the Applicant revised the plans to include a bike storage room in each building so that relief is no longer needed, (Exhibit 19).

**II. LOCATION AND SITE DESCRIPTION**

Address	2340 Ainger Pl. SE
Applicant	Sullivan and Burros on behalf of TMT Services LLC
Legal Description	Lot 349, Square 5740
Ward, ANC	Ward 8, ANC 8B
Zone	RA-1
Lot Characteristics	84.80ft. x 342.50 ft. rectangular lot
Existing Development	Detached Single dwelling house
Adjacent Properties	The neighboring properties on both sides are apartment buildings. The neighbor in the rear is a healthcare center.
Surrounding Neighborhood Character	The neighborhood is predominantly made up of apartment buildings.

Proposed Development	The proposal would construct two rowhouse styled apartment building, with 13 units in the Building A and 8 units in Building B. All would have 4 bedrooms. The project includes 3 IZ units.
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**III. LOCATION**



**IV. ZONING REQUIREMENTS and RELIEF REQUESTED<sup>1</sup>**

RA-1 Zone	Regulation	Existing	Proposed	Relief:
Lot Width	n/a	84.8 ft.	84.8 ft.	None required
Lot Area	n/a	29,044 sq. ft.	29,044 sq. ft.	None required
Height F § 303	40 ft. max. / 3 stories max.	n/a	Building A: 20 ft. 6 in. Building B: 20 ft. 1 in.	None required
Floor Area Ratio F § 302	0.9 max. or 1.08 IZ max.	Not Provided	0.73 (both)	None required

<sup>1</sup> Information provided by the applicant, self-certified application

<b>RA-1 Zone</b>	<b>Regulation</b>	<b>Existing</b>	<b>Proposed</b>	<b>Relief:</b>
Lot Occupancy F § 304	40% max.	Not Provided	32.65%	None required
Rear Yard F § 305	20 ft. min.	Not Provided	Building A- 20 ft. 9 in. Building B- 20 ft. 1 in.	None required
Side Yard F § 306	Not less than 8 ft. on one side	Not Provided	8 ft.	None required
Vehicle Parking C § 701	6 parking spaces	0	20 spaces	None required
Bicycle Parking C § 802	1 short term 7 long term	Not Provided	1 short term 7 long term	None required
Surface Parking Screening C § 714.2 (a)	Required around entire parking lot	Not applicable	Not provided	<b>Special Exception Requested</b>
Theoretical Subdivision Special Exception C§ 305	Special Exception review	1 record lot	2 theoretical lots on record lot	<b>Special Exception Requested Includes Variance for driveway width</b>
New Residential Development U § 421.1	Special Exception review	Apartment house 4 units	Apartment House 21 units (3 of which would be IZ)	<b>Special Exception Requested</b>

**V. OFFICE OF PLANNING ANALYSIS**

**Subtitle C § 305.1 Special Exception Analysis to allow theoretical subdivision**

*Subtitle C § 305.1 In the R, RF, and RA zones, the Board of Zoning Adjustment may grant, through special exception, a waiver of Subtitle C § 302.1 to allow multiple primary buildings on a single record lot provided that, in addition to the general special exception criteria of Subtitle X, Chapter 9, the requirements of this section are met.*

**Subtitle C § 305.3 Development Standards for Theoretical Subdivision**

*Subtitle C § 305.3 The following development standards shall apply to theoretical lots:*

*(a) Side and rear yards of a theoretical lot shall be consistent with the requirements of the zone;*

According to the application, the project would comply with the side and rear yard requirements of the zone.

*(b) Each means of vehicular ingress and egress to any principal building shall be at least twenty-four (24 ft.) in width, exclusive of driveways;*

Vehicular access to the buildings would be through a 20-foot wide driveway. Discussion of the variance relief is discussed below.

*(c) The height of a building governed by the provisions of this section shall be measured from the finished grade at the middle of the building façade facing the nearest street lot line; and*

The application states that the height of the proposed buildings would be measured from the finished grade at the middle of the building façade facing the nearest street lot line.

*(d) The rule of height measurement in Subtitle C § 305.3(c) shall supersede any other rules of height measurement that apply to a zone but shall not be followed if it conflicts with the Height Act.*

The Applicant agrees to comply.

*Subtitle C § 305.4 For a theoretical subdivision application, the following information is required to be submitted to the Board of Zoning Adjustment, in addition to other filing requirements pursuant to Subtitle Y § 300...*

The required relevant information for theoretical lot subdivision has been provided.

#### Subtitle C § 305.5 Review Criteria for Theoretical Subdivision

*Subtitle C § 305.5, Before taking final action on an application under this section, the Board of Zoning Adjustment shall refer the application to the Office of Planning for coordination, review, and report, including:*

*(a) The relationship of the proposed development to the overall purpose and intent of the Zoning Regulations, and other planning considerations for the area and the District of Columbia as a whole, including the plans, programs, and policies of other departments and agencies of the District government; provided, that the planning considerations that are addressed shall include, but not be limited to:*

*1. Public Safety relating to police and fire concerns including emergency vehicle access;*

The plans were referred to FEMS and MPD but there are no comments in the record from these agencies.

*2. The environment relating to water supply, water pollution, soil erosion, and solid waste management;*

Department of Energy and the Environment (DOEE) reviewed the application and provided comments on the overall project in Appendix 1.

*3. Public Education;*

The plans were referred to Office of State Superintendent of Education (OSSE) but there are no comments in the record from them.

While comments were not received, DC Public Schools' (DCPS) on-line data for percent student enrollment data for school year 2019-2020 shows:

Stanton Elementary School – 73 % utilization

Kramer Middle School – 35 % utilization

Anacostia High School – 38% utilization

4. *Recreation;*

The plans were referred to Department of Parks and Recreation (DPR) but there are no comments in the record from them. The site is less than a half-mile from the Fort Stanton Recreation Center.

5. *Parking, loading, and traffic;*

The proposal includes 20 parking spaces accessed from a driveway off Ainger Place. The property is close to the W2 and W3 bus stops and a short walk to the priority Metrobus route 92 stop. OP defers to the District Department of Transportation (DDOT) report, which is not in the record currently, to assess the proposal's traffic impacts.

6. *Urban design; and*

The proposal is for two multiple dwelling buildings. Building A would have 13 rowhouse-style single-dwelling units and Building B would have 4 rowhouse-style flats for a total of 21 units. The building design uses hardie reveal panel and hardie plank siding. Building A has two of its entrances facing the street and a landscaped seating area in the front.

7. *As appropriate, historic preservation and visual impacts on adjacent parkland.*

Not applicable.

*(b) Considerations of site planning; the size, location, and bearing capacity of driveways; deliveries to be made to the site; side and rear setbacks; density and open space; and the location, design, and screening of structures;*

The proposed buildings and site layout comply with the development standards of the zone, so the setbacks and density are appropriate. Two open spaces would be provided. One would be a landscaped playground and seating between the two buildings. The other open space area would be the landscaped seating area at the front of the side on Ainger Pl.

There would be an individual entrance for each single dwelling unit in Building A or for each flat in Building B. Two of Building A's entrances would face the street. All the other entrances for both buildings would face the interior of the site towards the parking lot.

The site would be accessible via sidewalk or the proposed driveway off Ainger Pl. The proposed 20-ft wide driveway off Ainger Pl. would be designed to DDOT requirements so it would be adequate for all vehicles accessing the site.

A privacy fence would surround the property on all sides and there would be landscaping throughout the property.

(c) *Considerations of traffic to be generated and parking spaces to be provided, and their impacts;*

The proposal includes 20 parking spaces. OP defers to the District Department of Transportation (DDOT) report, which is not in the record currently, to assess the proposal's traffic impacts.

(d) *The impact of the proposed development on neighboring properties; and*

The proposed multiple dwelling buildings would be on a property surrounded by multiple dwelling buildings so the proposal would not be out of character for this area. Furthermore, the proposed buildings would provide the required setbacks and the property would be surrounded with a privacy fence so there should be no significant impact to the adjacent neighbors.

(e) *The findings, considerations, and recommendations of other District government agencies.*

The Office of Zoning referred the application to the following agencies:

- Deputy Mayor for Education (DME)
- Office of State Superintendent of Education (OSSE)
- DC Department of Transportation (DDOT)
- Department of Parks and Recreation (DPR)
- Metropolitan Police Department (MPD)
- Fire and Emergency Medical Services (FEMS)
- DC Water
- Department of Public Works (DPW)

OP also reached out to DOEE who provided comments, which are in attachment 1. As of the writing of this report no other District Agency provided comments to the record.

## **Variance Analysis for Relief for the Driveway Width**

### Subtitle X § 1000 General Variance Relief

#### *Extraordinary or Exceptional Situation*

The proposal is for the development of a lot that is relatively narrow, particularly in proportion to the width, for this neighborhood.

#### *Resulting Practical Difficulty*

The lot is not wide enough to accommodate a 24-ft wide driveway without resulting in an unsafe pedestrian environment or reducing the living spaces of the dwelling units. If the driveway were 24 feet wide it would result in the 6 foot wide walkway and transition area being reduced to 2 feet, which would result in pedestrians walking in the driveway amongst vehicles going in and out of the parking area, and diminish the residential character of the site design.

*No Substantial Detriment to the Public Good*

The proposed 20-foot wide driveway should not cause substantial detriment to the public good. The driveway would remain wide enough to accommodate two-way vehicular movement. The relief would allow the site to be developed with 21 residential units, including three IZ units, which would benefit the neighborhood. The property also includes 20 parking spaces, which should minimize the proposal's potential on-street parking impacts on the area.

*No Substantial Impairment to the Zoning Regulations*

Granting the requested variance relief would not substantially impair the intent of the zoning regulations. The regulations intend for the driveway width to be wide enough to ensure safe vehicular access to the site. The driveway would comply with DDOT's 18-foot minimum width requirement, so it would be adequate for safe vehicular access to the site.

**Special Exception Analysis for New Residential Development in the RA-1 zone**

Subtitle X § 901- General Special Exception Relief

*Will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps;*

The proposal would be in harmony with the general purpose and intent of the RA-1 zoning regulations. The RA-1 zone provides for low- to moderate-density multiple dwelling buildings, and the proposal is for two multiple dwelling buildings, in a rowhouse and flat format. This special exception would facilitate the construction of two multiple-dwelling buildings with a total of 21 four-bedroom units, including three IZ units, which would be in keeping with the intent of the regulations and maps.

*Will not tend to affect adversely, the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps;*

The proposal should not have an undue adverse effect on the use of neighboring properties. As discussed further below and as part of the separate theoretical lot subdivision relief above, the subject property is surrounded by multiple dwelling buildings that are similar in height and scale as the proposed. The proposed building would provide the required setbacks and the property would be screened with a privacy fence. Overall, the proposed buildings should not have an adverse impact on the neighboring properties and the community.

U §421 Special Exception Relief for New Residential Development

*421 NEW RESIDENTIAL DEVELOPMENTS (RA-1 and RA-6)*

*421.1 In the RA-1 and RA-6 zones, all new residential developments, except those comprising all one-family detached and semi-detached dwellings, shall be reviewed by the Board of Zoning Adjustment as special exceptions under Subtitle X, in accordance with the standards and requirements in this section.*

The proposal is for two new apartment buildings, which is a use permitted in the RA-1 zone, with adequate satisfaction of the relevant special exception review criteria.

421.2 *The Board of Zoning Adjustment shall refer the application to the relevant District of Columbia agencies for comment and recommendation as to the adequacy of the following:*

- (a) *Existing and planned area schools to accommodate the numbers of students that can be expected to reside in the project; and*

The application was referred to the Office of State Superintendent of Education (OSSE) at Exhibit 15. While comments were not received, DC Public Schools' (DCPS) on-line data for percent student enrollment data for school year 2019-2020 shows:

Stanton Elementary School – 73 % utilization

Kramer Middle School – 35 % utilization

Anacostia High School – 38% utilization

- (b) *Public streets, recreation, and other services to accommodate the residents that can be expected to reside in the project.*

#### Parks and Recreation

The application was also referred to the Department of Parks and Recreation (DPR) at Exhibit 15. As of the writing of this report, there are no comments from DPR in the record. The site is less than a half-mile from the Fort Stanton Recreation Center.

#### Transportation

The property is close to the W2 and W3 bus stops and a short walk to the priority Metrobus route 92 stop. OP defers to the District Department of Transportation (DDOT) report, which is not in the record currently, to comment on the adequacy of the public streets and transportation infrastructure.

421.3 *The Board of Zoning Adjustment shall refer the application to the Office of Planning for comment and recommendation on the site plan, arrangement of buildings and structures, and provisions of light, air, parking, recreation, landscaping, and grading as they relate to the surrounding neighborhood, and the relationship of the proposed project to public plans and projects.*

The proposal would have two multiple dwelling buildings with 21 units. Building A would be designed as 13 single-dwelling rowhouses and have two IZ units. Building B would be designed as four rowhouse flats and have one IZ unit. Both buildings would have a bike storage room in their cellar.

Most of the buildings' entrances would be internal to the site and facing the parking area. The two in the front, facing Ainger Pl., were turned toward the street in response to a OP Design Division's recommendation.

The eastern side of the site would be parking lot. Close to the center of the lot would be an area for trash, which would be enclosed. The neighboring property to the east would be separated from the parking lot and trash area by the 5-foot-tall privacy fence that would provide screening between the two properties. The fence would surround the property and would be 3.5 feet in the front and 5 feet on the rear and sides.

The landscape plan shows trees, bushes and shrubs would be planted in the front of the property and throughout the site. In the front yard there would be a mix of trees, flowers, and



bushes around the bike racks and mailbox area on the southeastern end of the front yard. Along the northwestern end would be a seating area surrounded by grass, flowers, and shrubs. Further into the site between the two buildings would be an open space area with bench seating and surrounded with a variety of grass, flowers, and shrubs. The plans indicate this area would be the location for a playground.

*421.4 In addition to other filing requirements, the developer shall submit to the Board of Zoning Adjustment with the application a site plan and set of typical floor plans and elevations, grading plan (existing and final), landscaping plan, and plans for all new rights-of-way and easements.*

The landscape and grading plans are Exhibit 17A-C in the record and the final plans are in the record at Exhibit 19.

### **Special Exception Relief Analysis for Relief from Parking Screening**

#### Subtitle X § 901- General Special Exception Relief

*Will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps;*

The screening as proposed would be in harmony with the general purpose and intent of the Regulations. C § 714.2 states, “Screening shall be provided around the entire perimeter of the surface parking area”. This means that a fence or evergreen hedges/trees must be installed where the paved parking area meets the sidewalk and curb.

If this were done, then the screening would serve as a barrier between the building entrances that face the parking area and the parking area. Residents would not be able to walk directly into their units but would instead be required to walk through the parking area amongst entering and exiting vehicles in order to leave through a designated opening in the screening. This would be a dangerous situation.

The proposed screening along the perimeter of the property would be sufficient to achieve the intent of the screening requirement, which is to minimize the impacts of a parking area on the surrounding neighboring properties.

*Will not tend to affect adversely, the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps;*

The proposed screening should not adversely impact the neighboring properties. A 3.5 to 5 foot tall privacy fence would surround the entire property so it would adequately screen the parking from the adjacent neighbor on the southeastern side.

#### Subtitle C § 714.3 -Special Exception Relief from Screening Requirements

*The Board of Zoning Adjustment may grant, as a special exception, a modification or waiver of these screening requirements. In addition to the general requirements of Subtitle X, the Board of Zoning Adjustment may consider:*

*(a) Impacts on the pedestrian environment within adjacent streets, sidewalks, and other public areas;*

Most of the parking area would be inside the site and screened by a 3.5 to 5 foot tall privacy fence that would surround the entire property. Only the driveway would intersect with the public street and sidewalk so there would be a 20-ft wide opening in the fence at the front of the property.

Though the screening would not be around the entire parking lot it would be around the entire property so there should be no significant impact on the public realm.

*(b) Existing vegetation, buildings or protective and screening walls located on adjacent property;*

The proposal includes a privacy fence that would be 5 feet tall along the sides shared with the adjacent properties.

*(c) Existing topographic conditions;*

Not applicable.

*(d) Traffic conditions; and*

Not applicable. The relief is needed for screening inside the property.

*(e) In granting a modification or waiver, the Board of Zoning Adjustment may require any special treatment of the premises that it deems necessary to prevent adverse impacts on neighboring properties or the general public.*

No special treatment is recommended.

## **VI. OTHER DISTRICT AGENCIES**

Department of Energy and Environment provided comments in Attachment 1. As of the writing of this report, there are no comments from other District agencies in the record.

## **VII. ADVISORY NEIGHBORHOOD COMMISSION**

As of the writing of this report, there is no report from ANC 8B in the record.

## **VIII. COMMUNITY COMMENTS TO DATE**

As of the writing of this report there are no comments in the record from the community.

## **IX. ATTACHMENTS**

- DOEE Comments

## Attachment 1

### DOEE Development Review Comments

#### **BZA 20710: Ainger Residences**

DOEE encourages the applicant to pursue environmental benefits beyond what is required by the District's zoning regulations and building codes. The following recommendations are intended to assist the applicant with incorporating sustainable design and construction strategies that will improve the project's performance, enhance occupant comfort and wellbeing, and minimize the project's impact on the environment.

Many of these strategies can be financed with no upfront cost through DC PACE. The DC Green Bank and the DC Sustainable Energy Utility (DCSEU) also offer innovative financial products and technical assistance to help projects gain access to capital. To learn about project-specific financing options, contact Crystal McDonald at [cmcdonald1@dcseu.com](mailto:cmcdonald1@dcseu.com) or complete DCSEU's Custom Rebate Form.

#### **Energy Performance and Electrification**

If the applicant is looking to increase their commitment to sustainability, some of the most significant gains would be in the areas of energy efficiency and maximization of on-site renewable energy, both of which are District priorities.

In line with the District's goal of carbon neutrality and the objectives of the Sustainable DC 2.0 and Clean Energy DC plans to reduce greenhouse gas emissions, DOEE encourages the applicant to design the project to be fully electric (i.e., eliminate the on-site combustion of fossil fuels). DOEE and DCRA are evaluating options to include building electrification requirements in future code updates. Building electrification involves powering all building appliances and systems (e.g., domestic hot water, heating equipment, cooking equipment) with electricity rather than fossil fuels (e.g., natural gas or fuel oil). Efficient electric systems reduce indoor air pollution caused by combustion equipment and can save on operating costs, especially when coupled with solar energy. All-electric buildings can also save on construction costs by avoiding the need to install gas piping. It's easier and more cost-effective for new construction to be designed with electric systems than it is to retrofit buildings later, so DOEE strongly encourages projects to evaluate electric options as part of their initial energy modeling exercises. For more information about building electrification in the District, visit [this resource page](#) created by the Building Innovation Hub.

DOEE notes that this applicant should design the project to comply with the electric vehicle make-ready parking requirements of the Green Building Act, which requires the project to include electric vehicle make-ready infrastructure to accommodate the future installation of an electric vehicle charging site at least 20% of the parking spaces. DOEE encourages the applicant to go beyond this requirement and install EV charging stations for a portion of the residences. Given the current rate of EV adoption, DOEE encourages the applicant to consider and account for a greater prevalence of electric vehicles at time of occupancy. One study found that the cost to install EV capable infrastructure during new construction is four to six times less expensive than during a standalone retrofit. The 2017 DC Green Construction Code provides some suggested thresholds for the provision of supply equipment and make-ready infrastructure. EV resources and information about available incentives are available at <https://doee.dc.gov/service/electric-vehicles-resources>.

## **Net-Zero Energy**

Clean Energy DC, the District's detailed plan to reduce greenhouse gas emissions, calls for net-zero energy (NZE) building codes by 2026. DOEE encourages the project to explore net-zero energy construction/certification ahead of this planned code requirement. An NZE building is a highly energy-efficient building that generates enough on-site, or procures acceptable offsite, renewable energy to meet or exceed the annual energy consumption of its operations. NZE buildings can benefit both owners and tenants through significantly lower operating costs, improved occupant comfort and improved indoor air quality. Under the 2017 District of Columbia Energy Conservation Code, projects can use Appendix Z as an alternative compliance pathway, which provides a working definition and guidance for NZE.

DOEE has published a *Net-Zero Energy Project Guide*, a *Multifamily Guide*, and an *Integrated Design Charrette Toolkit* to assist project teams with planning, designing, constructing and operating NZE buildings. These and other resources can be found at <https://doee.dc.gov/service/greenbuilding>.

For the past few years, DOEE has offered grants to projects exploring NZE design or other innovative green building approaches. Case studies and final reports from some of these projects are available [here](#). One grant project that may be particularly relevant to this applicant is the Net-Zero Energy Alley Dwelling Initiative by Allen Built. The project analyzed strategies to achieve NZE for a new construction detached dwelling unit. Much of the analysis and lessons learned are applicable to this project and may help inform decisions about envelope assembly, garage design, window selection, and more.

If the applicant is interested in NZE construction, either on this project or future projects, DOEE can be of assistance. Please reach out to Connor Rattey at [connor.rattey@dc.gov](mailto:connor.rattey@dc.gov) for more information.

## **Solar**

DOEE encourages the applicant to install solar panels on the project and recommends consulting with an expert from DCSEU to learn about custom rebate options and other financial incentives for renewable energy and energy efficiency measures.

Maximizing solar energy production will contribute to achieving the District's goals to rely on 100% renewable electricity by 2032 and increase local solar generation to 10% of total electricity by 2041. As a result of the District's commitments, there are many financial incentives to install solar. One way that the project can maximize solar energy production is to integrate solar photovoltaic arrays into green roofs. See the GAR and Stormwater Management section below for more details.

## **Climate Resilience**

In order to prepare for the impacts of climate change, including increased flooding and extreme heat, DOEE encourages the team to assess how climate change will affect the project and to incorporate resilient design strategies. As part of the Climate Ready DC Plan, DOEE released Resilient Design Guidelines to assist project teams considering climate resilient design. Additional DOEE Climate Adaptation and Preparedness resources are available at <https://doee.dc.gov/climateready>.

## **Green Area Ratio and Stormwater Management**

DOEE encourages the applicant to exceed the minimum GAR and stormwater requirements. This project is located in an area of the District that has a municipal separated storm sewer system (MS4), which means that stormwater runoff is discharged, untreated, into local water bodies. Stormwater from this project site is discharged into the Anacostia River. Stormwater management strategies used

by projects located in the MS4 are more environmentally beneficial than those used by projects in the combined sewer system (CSS). Additional on-site stormwater retention can earn the project Stormwater Retention Credits (SRCs) that can be sold through DOEE's Credit Trading Program. SRCs can be sold directly to DOEE through the SRC Price Lock Program (for projects located in the MS4 Sewer System only) or sold on the open market. For more information, please visit <https://doee.dc.gov/src> or email Matt Johnson at [src.trading@dc.gov](mailto:src.trading@dc.gov).

DOEE encourages the applicant to incorporate solar energy generation and/or a green roof into the project's roof design. These systems can be combined without diminishing the project's GAR or stormwater requirement compliance. DOEE has issued guidance on how to successfully incorporate solar into green roofs on pages 41 & 42 of the 2020 Stormwater Management Guidebook.

DOEE is prepared to meet with the project team to discuss GAR and stormwater opportunities on the project site. To set up a review meeting with the stormwater team at DOEE, please contact Ayende Thomas at [ayende.thomas@dc.gov](mailto:ayende.thomas@dc.gov).

### **Deconstruction and Reuse**

Wherever possible, DOEE encourages the reuse of existing buildings and materials because the demolition of these buildings and construction of entirely new buildings is very carbon intensive. Given that this project involves razing the existing structure on-site, DOEE encourages the applicant to explore options for deconstruction and reuse or salvage of materials from the existing structure. In 2018, construction and demolition (C&D) activities in the US generated 600 million tons of waste. The reuse and rehabilitation of existing buildings can reduce waste and embodied carbon. When reuse is not possible, deconstruction or pre-demolition salvage can divert waste from landfill and incineration and allow for reuse of building materials. Destruction is the process of carefully and intentionally dismantling a building rather than demolishing it. While this process is more time consuming than demolition, reusing salvaged materials can reduce construction costs, and the sale of salvaged or recyclable materials can generate additional revenue. Organizations like Community Forklift collect donations of unwanted and salvaged building materials throughout the DC region. DOEE is also working to develop a Donation and Reuse program and may have additional resources and information available at the time of project construction. The applicant is encouraged to reach out to Connor Rattey at [connor.rattey@dc.gov](mailto:connor.rattey@dc.gov) encouraged if they are interested in deconstruction of existing structures or donation and reuse of building materials.