



# AURORA HIGHLANDS CIVIC ASSOCIATION

November 21, 2023

Arlington County Board  
2100 Clarendon Boulevard  
Arlington, VA 22201

Dear County Board Members,

We are writing to urge you to confirm your support for the policy in the current General Land Use Plan (GLUP), the Crystal City Sector Plan (CCSP) and the Pentagon City Sector Plan (PCSP).

The CCSP was adopted by the Board in 2010 after years of extensive review that included the active participation by the Aurora Highlands and Arlington Ridge Civic Associations, neighborhoods to the west and those bordering Crystal City. These Civic Associations agreed to accept additional height in the center of Crystal City with the assurance as indicated in the Sector Plan that the surrounding neighborhoods, as defined in the plan, would continue to be planned and zoned for their current use.

The PCSP was adopted by the Board on February 12, 2022. The overall goal of the PCSP and CCSP is to develop denser transit-oriented neighborhoods with premium Metro access that transition down into the existing lower density neighborhoods. This has been a part of Arlington County's planning philosophy for the past half century, going back to the Pentagon City Master Development Plan (PCMDP) in 1976. Based on years of thorough review and planning, these neighborhoods should be able to rely on the commitments made to them as reflected in the plans, that are as follows:

From the CCSP:

- "Preserve the integrity of the single-family neighborhood to the west" (Page 8 & 27)
- "Tapering down in building height from Crystal City to the neighborhoods" [Aurora Highlands & Arlington Ridge] (Page 15 & 27)
- The GLUP as shown in Figure 1.2.8 of the Crystal City Sector Plan (Page 20)

From the PCSP:

- "Development along the southern border of River House should be the lowest in scale to transition to Aurora Highlands and Arlington Ridge." (Page 42)

From the PCMDP:

- "lowest densities should be in the south portion of the tract, adjacent to existing single family neighborhoods." (Page 43)

In order to maintain the policy objectives of the GLUP, the CCSP, and the PCSP, the Aurora Highlands Civic Association requests that you reject any proposal that undermines the integrity of these adopted plans and policies. The primary purpose of the Comprehensive Plan and the supporting GLUP and Sector Plans is to codify reliable planning policy. Adopting any proposal contrary to them undermines their very purpose.

An application has been submitted through the Special GLUP process that is in direct conflict with the policies set forth above in the CCSP, the PCSP, the GLUP and the low-density R-6 / C-1 Zoning. The Applicant, a single owner, proposes to change the GLUP land use designation at the property located at 750 S. 23<sup>rd</sup> Street South, (known as the “Melwood” site) from low density uses R-6 / C-1 to high-density use RA8-18. This proposed change is less than a block in size and is entirely within the Aurora Highlands borders. This site is also within an area specifically designated by both of the Sector Plans (CCSP and PCSP) to be protected as a low-density single family neighborhood.

The argument made by the applicant for this complete policy change is that the property owner will supply affordable housing through increased density. However, this argument is not relevant to the GLUP consideration and only applies as consideration for potential bonus density that is not being requested by the applicant. The critical policy issue for your consideration is whether *these arguments are sufficient to change the established GLUP, which will set a precedent for areas designated as low-density residential neighborhoods. This precedent would, in effect, eliminate all protection of current low-density neighborhoods, which essentially includes most, if not all, of Arlington. This would render the GLUP and the different zoning categories meaningless.*

Aurora Highlands has been recognized as a Historic District since 2008. In the Arlington County Historic Preservation Plan, Goal 3 is “Protect Historic Neighborhoods, Corridors, Commercial Centers and Civic Buildings”. The Historic Preservation Plan cites the Neighborhood Conservation Plans in 3.B.2 as a tool to identify the community’s support for preservation. Below are excerpts from the 2008 Aurora Highlands Neighborhood Conservation Plan:

- “In our NC survey, ninety-one percent of respondents favored the present level of development on 23rd Street—low-rise, independent businesses instead of larger-scale businesses.” (Page 12)
- “700 Block: The 700 block of 23rd Street has a combination of office, storefront commercial, and institutional usage. The Sheltered Occupational Center (SOC) [now, Melwood] occupies about half of the south side, facing low-rise office buildings across 23rd Street. The building mix and heights are compatible with the surrounding residential blocks and are of recent construction. *The community would like to preserve this arrangement and continue the existing zoning and height limitations* (a zoning map is provided as an Appendix).” (Page 14)
- “Preserve the single-family neighborhood, its character, and height.” (Page 19)

The GLUP, both Sector Plans, and the Historic Preservation Plan / Neighborhood Conservation Plan are all adopted planning documents that unequivocally set forth the importance of maintaining the existing scale and integrity of the low-density single family neighborhood. The Neighborhood Conservation Plan goes further in specifically calling out the Melwood site.

On November 14, 2023, a [position paper](#) independently developed by Tad Lunger, Esq. regarding the Special GLUP Amendment proposal at 1305 North Jackson Street “Clarendon Presbyterian Church” (CPC proposal) was sent to the County Board for consideration. It details the support for current plans and areas that the CPC proposal would undercut, including the current GLUP policy and approved Clarendon Sector Plan. There are striking similarities between the subject of his analysis and the Melwood proposal:

- Both are proposals to encroach into designated historic, low-density single-family neighborhoods and add higher density multifamily buildings.
- Both proposals include contributing properties in the neighborhoods’ designated Historic Districts.

- Both proposals create precedent for future higher density development in Arlington’s low-density neighborhoods and add unpredictability in future planning.
- Both proposals are out of scale with the current neighborhoods and create issues with increased traffic and parking demands on streets designed decades ago for low-density residential development.
- Both proposals violate the adjacent approved neighborhood Sector Plans which advocate maintaining the low density residential areas adjacent to the Sector Plan areas.
- Both proposals are in “urban villages” whose definition is to contain higher density at the transit-proximate core (e.g., Clarendon, Crystal City, Pentagon City) while conserving the surrounding low-density in the adjacent neighborhoods.
- Both proposals include properties with structures that were built prior to existing zoning codes in 1942.
- Both are proposals for “affordable” development with RA8-18 unzoning in a location currently zoned as low-density residential.

Mr. Lunger’s description of the impacts of approving the CPC proposal are compelling, and can be equally applied to the Melwood proposal:

“Implementing such a precedent would enable the arbitrary, unplanned, and unpredictable placement of high-density multi-family development in any low-density neighborhood in Arlington County, without proper consideration for the potential lasting effects on our friends, neighbors, and fellow community members residing in these areas. Such a decision lacks empathy and fails to account for the life-changing and permanent implications that will arise from such a precedent.”

"This Proposal will profoundly, immediately and permanently impact the existing neighborhood and its residents. It will irreversibly alter its planned low-density residential character, parking conditions, neighborhood transitions and historic setting. Additionally, it will have a precedent-setting impact on the entire County. Approval of this proposal will establish a precedent for subsequent similar requests in virtually any and all low-density residential neighborhoods County-wide.”

In his conclusions Mr. Lunger cites the reasons the CPC proposal does not meet the requirement for Tier 1 review (Attachment A). **Each of these answers is applicable to the Melwood project as well.** As Mr. Lunger argues, the Special GLUP Study Process Administrative Guide mandates that the CPC proposal be denied. Similarly, the Melwood proposal should have been denied at Tier 1, and certainly should be denied now at Tier 2, to limit further damage to the integrity of the planning process as a whole.

For these reasons, AHCA believes that sustaining the adopted GLUP, CCSP, PCSP, Historic Preservation Plan, and the Aurora Highlands Neighborhood Conservation Plan and rejecting the request by a single property owner is critical to maintaining the integrity and reliability of the implementation of Arlington’s adopted Comprehensive Plan.

Sincerely,



Cory Jacobson Giacobbe  
President

Aurora Highlands Civic Association

Attachment – Excerpt from Tad Lunger, Esq. Memo dated November 14, 2023, on Clarendon Presbyterian Church Proposal

CC: Mark Schwartz, County Manager  
Jim Lantelme, Planning Commission  
Anthony Fusarelli, Planning Director  
Jennifer Smith, Comprehensive Planning Manager  
Margaret Rhodes, Principal Planner

Attachment – Excerpt from Tad Lunger, Esq. Memo dated November 14, 2023, on Clarendon Presbyterian Church Proposal

**a. *Would the amendment possibly advance broader County goals?*** This Proposal is not compliant with the planning policies, goals, and ordinances established by Arlington County for the Property. It is inconsistent with the Zoning Ordinance, the General Land Use Plan (GLUP), the Clarendon [Pentagon City, Crystal City] Sector Plan, the EHO Amendments, the 2019 and 2021 Zoning Ordinance Amendments and policy. Moreover, this Proposal does not contribute to any of the county's goals stated in the planning documents concerning the Property.

**b. *Is there already an existing adopted plan or district designation on the GLUP for the subject area and/or adjacent area? If there is an existing plan or district recommendation for a specific area, a change to the GLUP may be less likely to be recommended. What conditions have changed to warrant revisiting the adopted policy?*** This Proposal and Property are governed by multiple planning, zoning and land use overlays, all of which are up to date as of 2023, particularly the Clarendon [Pentagon City, Crystal City] Sector Plan and the EHO Amendments. No conditions relating to this Property have changed to warrant a new planning study at this location.

**c. *Is the area currently under study?*** No, all planning documents relevant to this Property have been recently reviewed, extensively analyzed and concluded, ensuring their current status and accuracy.

**d. *Is this a larger or more complex (i.e., topographical, contextual, etc.) site? Are surrounding properties similar and should they potentially be included in the study? Would it be more appropriate to address the area through a small area plan?***

- No, there is nothing unusual or complex about this Property.
- No, and more emphatically none of the sites surrounding the Property should be included in this study.
- No, this Proposal is not more appropriate for a small area plan.

**e. *Is there a Phased Development Site Plan (PDSP)? Would it be more appropriate to undertake a PDSP review as opposed to a Special GLUP Study?***

- No, the Property is not located in a PDSP and a PSDP is not appropriate.

## **2. Required Action by the Long Range Planning Committee and Planning Staff**

Therefore, the Special GLUP Study Process Administrative Guide mandates that the Applicant's Proposal be denied and not be considered for further review. The required approval criteria are not satisfied, and the land use analysis provided above establishes this conclusively. The Long Range Planning Committee, in its application of existing Arlington County land use policies, has no basis for approval of a Tier I [or further] recommendation to allow the commencement of a Special GLUP Study and therefore this request must be denied. The

Applicant's Proposal violates or is in direct and explicit conflict with practically every land use policy or Zoning Ordinance provision necessary for its approval.