



March 2, 2024

Mr. James Lantelme
Chair, Melwood Special GLUP Study LRPC
Arlington County Planning Commission
2201 Clarendon Boulevard
Arlington, Virginia 22201

Re: Melwood Special GLUP Tier 2 DRAFT Study Comments

Dear Mr. Lantelme and the Members of the County Board,

The Aurora Highlands Civic Association (“AHCA”) has compiled the following attachment addressing comments and concerns from the draft Special General Land Use Plan Study Document. We encourage you to reject this document as its analysis is unsound and not founded on the appropriate principles. Throughout the process AHCA has raised numerous concerns and written multiple letters and still after two years not received any response. Our questions and concerns still remain.

Attached is a detailed analysis of the Draft Study compiled by members of the AHCA Executive Board. We ask you read it in its entirety as several key points are contained therein that are not addressed by staff in the draft report, but for ease of the reader an executive summary is included in this cover letter. We look forward to your response.

The study is not objective per the requirements of the Special GLUP Amendment policy as it is biased to the Applicant. Informal comments from County Staff to AHCA have indicated that the study only includes options the Applicant would consider, something which is contrary to the directive of the policy. The Draft study does not meaningfully explore what would be appropriate for the site with both options presented in the study being big for the site. The policy guidance omits relevant guidance from the GLUP itself, the Crystal City Sector Plan, the Pentagon City Sector Plan and the Aurora Highlands Neighborhood Conservation Plan which all speak to preservation of the scale of the historic single family neighborhood (Aurora Highlands).

The County Engagement Session section fails to reflect the comments of the community and the online survey conducted had technological errors that prevented staff from ascertaining whether input was received by residents.

The Draft Study recommends removal of a historic building with a long and important role in the community, and removal of mature trees, which is against multiple County policies. The Draft Study cites the Affordable Housing Master Plan but fails to acknowledge that the site is outside of the suggested corridor and that Aurora Highlands is saturated with affordable housing. The county policy for affordable housing states in its primary goals that affordable housing should be distributed throughout the County and in Metro Station Areas (the site is not in a Metro Station Area). AHCA has over a thousand affordable housing units with over 700 more planned, including Crystal House 3 which will include Adult Disability Services within the

building. The Current Draft Study does not acknowledge that the exact needs Melwood purports to meet with this project are already planned in our neighborhood, at a site more appropriate (closer to the metro, stores, part of the affordable housing master plan) that does not require rezoning or a use designation change.

Further the zoning change requested by the Applicant would prevent it from continuing to offer its services as community services are not allowed in areas designated as residential. The Draft Study's suggestion that the County would provide an exception¹ so that application could continue its community services in an area zoned residential, something not allowed per the code, shows how forced this analysis is. The Applicant wants the site rezoned such that it cannot operate and has made no promises it will not sell the site after it has been rezoned, but the County assumes it will give the Applicant an exception to operate (with no consideration or discussion of what would be required to achieve that exception or the impact of such an exception on the rezoned area).

Lastly, throughout this process residents, and county planning commissioners have had questions concerning the nature of the Applicants plans for affordable housing and disability reserved housing, including who would qualify for such a program. There have been no answers and Melwood has declined to meet with AHCA to continue to answer these questions. When discussion of the actual programs were raised at the Community Engagement Session, including by members of the actual planning commission, Mr. Lantelme did not allow it, because such a discussion was irrelevant to the task at hand. The Draft Study however, includes equity as a guiding principle. But the requested zoning will prevent the Applicant from continuing to offer its community services without an exception, and there is no covenant that once this zoning is approved it must be used for affordable housing. There has not been an appropriate exploration of this topic with discussion being limited.

Whether the site can accommodate a change in use designation and the associated zoning is supposed to be an objective inquiry looking "not [to] consider project specifics."² This process has been exactly the opposite, and by including equity it considers only the specific project attempting to use it to justify a change that cannot be supported by the General Land Use Plan,³ the site, the surrounding infrastructure, or the neighborhood.

We ask that you reject this draft study. For all these reasons, we opposed the Special GLUP Amendment and ask that you do not change the use designation from "Public" to "Low-Medium" Residential and do not rezone the site. Further, as discussed during the Arlington County Civic Federation Meeting with the County Board, we ask that you review the Special GLUP Amendment process and pause all existing studies.

¹ The draft study suggests the applicant requested this exception but there has been no such mention of a request by the applicant in any of the applicants materials online, nor in any of the staff materials until this draft study. This appears to be an attempt by staff to make the amendment application look more reasonable as the true ask by the applicant would have discontinued the current services it offers.

² <https://www.arlingtonva.us/files/assets/public/v/1/special-glup-studies-process-one-pager-003.pdf>

³ There is no designation for affordable housing.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rachel Hicks". The signature is stylized with a large, sweeping flourish at the end.

Rachel Hicks AHCA President & AHCA Executive Board

CC: Mark Schwartz, County Manager
Sara Steinberger, Chair, Planning Commission
Samia Byrd, Director, CPHD
Matt Mattauszek, Planner, CPHD
John Ford, President, Arlington County Civic Federation

Attachments: Aurora Highlands Civic Association (AHCA) Melwood GLUP Draft Study
Comments

**Aurora Highlands Civic Association (AHCA)
Melwood GLUP Draft Study Comments**

INTRODUCTION TO THESE DRAFT STUDY COMMENTS

The “Policy Regarding Consideration of General Land Use Plan Amendments” adopted by the County Board on 6/17/08 requires that a planning study performed by the County Manager be presented to the County Board as a precedent for review of an application of a GLUP amendment. This study per Item 3 of the County Board’s 2008 policy statement needs to be conducted “**outside the context of a specific development application**” and shall “**objectively assess the implications of the proposed changes and whether they comport with the County’s long term planning principles and goals**”. The Melwood Draft Study dated 2/9/24 does not meet these requirements.

THE STUDY IS CONTAINED TO THE CONTEXT OF THE SPECIFIC DEVELOPMENT APPLICATION

The study was conducted specifically within the context of Melwood’s development application and not “outside the context of a specific development application”. In a meeting on 2/20/24 with the AHCA, Matt Mattauszek, Arlington County Master Planner for Pentagon City, stated that the study was limited to the impacts of putting approximately 100 units on the site per the Application. AHCA presented Matt Mattauszek with a hypothetical alternate study of the site that included maintaining the existing 35’ height limit but only producing 60 units on the site such as would be allowable under the proposed zoning (without the affordable housing bonus), and asked why the County did not study any option that put less than 100 units on the site. The answer was that it was because the Applicant would not accept such a study. However, whether the Applicant would accept a study is irrelevant to the Study requirements and is contrary to the requirement to “objectively assess the site”. For any study to objectively assess the site, it needs to consider the range of options outside of the development application per the policy, and the **2/9/24 Draft Study, by design per Mr. Mattauszek, does not include any option other than those that produce the Applicant’s proposed 100 units**. The Draft Study needs to be revised to include all planning options for the site, including the status quo and those that exclude the affordable housing bonus.

The Applicant also has not justified its claims that 100 units is a required number of units for a financial program when it will seek subsidies and tax credits. That is because it can not. **There are numerous examples of much smaller affordable housing buildings being built every day.**

THE STUDY CONTAINS CARDINAL OMISSIONS

The Draft Study omits many important guiding documents and principles. The following documents all share the premise of preserving the low density of the single family neighborhood

scale. For the Study to be objective, all relevant County planning principles and documents including the following should be included and assessed:

1. The Draft Study fails to include the **2008 Aurora Highlands Neighborhood Conservation Plan** (“NCPlan”) which is listed as a Supporting Document to the GLUP in Section 6.4 of the GLUP last amended June 2023. The NC Plan specifically addresses the Melwood Site (712 23rd Street) on page 14

[https://aurorahighlands.org/_Media/NC_AuroraHighlands_Plan.pdf]

a. “(SOC) 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.**”

2. The Draft Study states on Page 8 under the Section “Special GLUP Study Background Information” that the **Crystal City Sector Plan (“CCSP”) and the Pentagon City Sector Plan (“PCSP”)** do not address Aurora Highlands “in detail” but fails to include the statements in both documents regarding Aurora Highlands. Specifically, the **CCSP mentions Aurora Highlands 18 times, and the PCSP mentions Aurora Highlands 5 times.** The premise throughout the CCSP and the PCSP is to protect the scale of the Aurora Highlands single family neighborhood by transitioning to it at the edge of the sectors. The premise of both documents is that the historic, single family neighborhood scale must be respected.

a. The CCSP specifically recommends on Page 15 “tapering down in building heights and scale from Crystal City to the neighborhoods”

i. “As Crystal City and Pentagon City evolved over the past four decades, deliberate efforts were made to establish height and bulk transitions between the high-density growth pattern in these new development areas and the lower density, existing residential neighborhoods to the west. This plan for the next generation of redevelopment in Crystal City will carefully manage development patterns and land use characteristics along this edge to retain and reinforce this transition strategy. The importance of retaining this transition strategy was highlighted in 2008, when much of Aurora Highlands received the largely honorific historical designation of inclusion in the National Register of Historic Places.”

b. The PCSP similarly recommends “development along the southern border of River House should be the **lowest scale to transition to Aurora Highlands**” on page 43.

3. The Draft Study fails to acknowledge Section 4.0 of the GLUP. Section 4.0 “Development and Growth Goals” underscores Arlington’s commitment to “concentrate high density development within Metrorail Transit Corridors and preserve lower-density residential areas.” Item 4, in Section 4.0: “Preserve and enhance existing single-family and apartment neighborhoods. Within Metro Station Areas, land use densities are concentrated near the Metro

Station, tapering down to surrounding residential areas to limit the impacts of high-density development.” **The site is NOT in a Metro Station Area.**

4. Most importantly, the **GLUP itself includes on page 17, the goal of “preserving the integrity of the single family neighborhoods to the west [of Crystal City, e.g. AHCA]”.**

These documents must be included and assessed in an **objective study** as required by the Policy. The Application proposes density that is inappropriate for the neighborhood as it is too tall for the neighborhood scale (5 or 6 stories) and too wide (removing mature landscaping and the historic building.) **The only outcome of including the review of these documents is to reject the Application as it does not preserve the integrity of the existing single family neighborhood.** The affordable housing bonus in particular creates too much height and density for the site especially when combined with the Melwood program staying on site.

THE STUDY GLOSSES OVER AND OMITTS COMMUNITY INPUT

The Section Tier II Review of the Draft Study discusses the county’s Community Engagement Session. The Draft Study states there was “equal support for the 60’ building height” to substantiate the recommendation for approval of the Applicant’s proposal. This was not so. Many of the comments to the survey opposed any increase in height. Additionally, the County survey did not allow a respondent to identify their location or provide any demographic information. The field for zip code did not work. **Without identification of the real location and validation of respondents, it is impossible to know what “community” responded to the session,** and the “community” aspect of the session is therefore invalid.

Additionally, the questions in the first survey were leading as they did not include options such as not building at all or building smaller than 100 units. There was a false choice between a building that would be very tall (6 stories) but would retain open space or a shorter building that would have no open space. Had an alternative of a smaller building in both height and width, or no building been presented, the results would have been in favor of a smaller development as **most people stated in thier written comments and at the session they “preferred ensuring the building scale, massing and materials complement the surrounding area including Nelly Custis Park”**, which can only be achieved with less overall density.

The County Engagement was insufficient and the comments regarding it in the Draft Study are misleading and should be removed entirely from the Draft Study and replaced with a more accurate summary or the County should conduct a proper engagement. Corrections to the slides in the misleading County Staff engagement session were sent 11/14/23 and are available at this link: <https://aurorahighlands.org/engagement-session-comments-231114-v2/>.

AHCA performed its own survey open to all AHCA members and voted on the proposed development. With over 100 community members present, validated in a public meeting on March 14, 2022, the neighborhood voted 6:1 against the Melwood Special GLUP Amendment Application, and the AHCA survey sent to only its members had similar results. **AHCA sent**

letters to the County opposing the Application including the results of the votes and survey, and those are posted on the AHCA site, yet, they are not even mentioned nor appended to the Draft Study. The adjacent community strongly opposes the development, and the multiple letters sent to the County from AHCA should be included in the Study.⁴

THE DRAFT STUDY GLOSSES OVER AND CONTAINS OMISSIONS FROM THE LRPC MEETING DISCUSSION 11/28/23

The Section Tier II Review of the Draft Study summarizes the LRPC meeting held November 28, 2023, but the summary is inaccurate. Any summary of the LRPC meeting should include the important points brought up by each of the stakeholder parties and the public and cite the meeting recording and the meeting minutes. The summary does not provide that information. The Draft Study failed to include any of the discussion points or reference the more detailed recording.

The Draft Study fails to include any mention of the presentation⁵ provided by AHCA at the meeting or the public who expressed overwhelming opposition to the project at the LRPC meeting. The Draft Study needs to be amended with an accurate summary of the discussion and points from all stakeholders and the public including the AHCA presentation as amended with its text.

THE DRAFT STUDY INCLUDES A PREMATURE DISCUSSION OF COMMUNITY BENEFITS

Page 19 of the draft study includes this statement on community benefits: “However, the scenarios allowing for greater height could support additional community benefits that may be sought, such as historic preservation or interpretation of the historic façade, retention of the existing open space or mature trees on site or Green Building benefits.”

Before the County and applicant consider potential community benefits, they should first consult with the community. These premature suggestions should not merit consideration as community benefits. In a development project contemplated in 2024. Open space, trees, and building green should be a “given” rather than nice-to-haves that merit rewards for a developer.

In order to begin a discussion of community benefits, the County and applicant should consult the most recent update to the community priorities as outlined in the December 14, 2023 letter to the County Board by the Livability22202 coalition, signed by the Presidents of the Aurora Highlands, Arlington Ridge, and Crystal City Civic Associations. As a reminder, those priorities include: an elementary school, community center and libraries, open space and the Green Ribbon, and safe crossings of Route 1 which include a robust transportation management plan.

⁴ <https://aurorahighlands.org/wp-content/uploads/AHCA-Melwood-LRPC-Follow-Up-240103-sig-1.pdf>. Links to previous correspondence going back to March, 2022 are in Attachment B of the letter.

⁵ <https://aurorahighlands.org/wp-content/uploads/AHCA-Melwood-LRPC-Presentation-231128-1.pdf>

They specifically did not include a request for more affordable housing, a previous priority, due to the overwhelming success in the area in past years. 22202 has over 1,000 affordable housing units and more than 1,000 additional units planned, including Crystal House 3 which will include Adult Disability Services in the building and 432 affordable units. It is unclear why this site should be rezoned when a project also affordable and with Adult Disability Services is planned nearby and in an appropriate location per the affordable housing master plan and in a Metro Station area.

THE POLICY GUIDANCE DISCUSSION IS BIASED TOWARD THE APPLICANT

The Draft Study states on page 13 “there is no adopted plan for this area”. **The GLUP itself is a plan for the area.** The site is surrounded by low density historic single family housing, and a strip of small commercial buildings. That is the plan. The plan in the GLUP, in the PCSP, in the CCSP, in the NCPlan is to preserve the integrity of the single family historic neighborhood. There is no other plan, because no other plan is required.

Affordable Housing Plan:

The Draft Study fails to compare the amount of affordable housing in Aurora Highlands to other high opportunity areas of the county. **Objective 1.1.4, one of the prioritized goals of the Affordable Housing Master Plan “Encourage and incentivize the distribution of affordable housing throughout the County”,** is excluded from the Draft Study.⁶

Affordable units located within Aurora Highlands include Claridge House - 300 units, Crystal City Lofts - 15 units, Crystal Flats - 16 units, The Gramercy - 20 units, Lofts 590 - 12 units, Sage - 12 units, and Crystal House - 123 units currently, 1,375 units planned.⁷ These buildings are listed as located in “Pentagon City / Crystal City” on the county website, but they are all in Aurora Highlands and none are in Crystal City (As a note, Pentagon City is within the official Aurora Highlands Civic Association boundary. Crystal City should be moved to its own listing of affordable housing, and there are only two in Crystal City and they are on S Eads St directly adjacent to Aurora Highlands’ boundary.) The current total approved affordable housing units in Aurora Highlands is 1,767.

Including the Crystal House project, there will be more affordable housing in Aurora Highlands than there is in Ballston (383 units), Clarendon (76 units), Courthouse (653 units), Langston Blvd – Glebe (50 units) , Langston Blvd – Palisades (116) Virginia Square (307 units) and Westover (254) **combined**, and that doesn’t include the swaths of North Arlington unlisted because they completely lack affordable housing. The County is not meeting Objective 1.1.4. **The time is long past due for the County to focus efforts on high opportunity areas in North Arlington for affordable housing. Aurora Highlands, like most of South Arlington, is saturated with**

⁶<https://arlingtonva.s3.dualstack.us-east-1.amazonaws.com/wp-content/uploads/sites/15/2015/12/AHMP-Published.pdf>

⁷ <https://www.arlingtonva.us/Government/Programs/Housing/Get-Help/Rental-Services/Affordable-Units>.

affordable housing and this unbalanced distribution contributes to the marked inequity in schools.

The Draft Study also fails to note the site is outside of the Route 1 Transportation Corridor per the map in the Affordable Housing Master Plan where affordable housing is prioritized to be.

Historic and Cultural Resources Plan

There is a 100 year old public school on the site, one of a handful of historic public buildings left in Arlington. It is a historic school in a designated historic neighborhood. Yet, the Draft Study fails to include anything meaningful from the Historic and Cultural Resources Plan. Some relevant citations from the Historic and Cultural Resources Plan that should have been included in the Draft Study:

Page 13: The benefits of historic preservation are well documented and include:

- Cultural value through preserved historic buildings and landscapes, that add architectural richness, physical character, and visual and narrative diversity,
- Environmental advantages because **preserving older buildings is a sustainable use of infrastructure**, land, and nonrenewable resources. Avoiding demolition reduces landfill waste and negative effects of new construction (mining, transport, and manufacturing by-products).

Page 14: What to preserve: Protection and interpretation typically included high-style architecture and famous people's homes. Now historic preservation also includes the modest spaces where important things happened; **places where everyday people lived, worked, and gathered.**

It is the premise of the entire Historic and Cultural Resources Plan to preserve unique, important historic buildings such as Nelly Custis School. But the Draft Study only suggests on page 17 to "consider preservation of the historic façade of the 1923 portion of the building for partial preservation or interpretation"...by "creative and flexible measures" and by this the writer likely means moving the brick façade as was suggested in the 11/28/23 LRPC meeting - presumably as a joke. **However, a brick façade does not move easily or cheaply if it moves at all (which it does not.)** The façade cannot be maintained in place in the 45' height scenario, and the building will have several stories built over it in the 60' scenario requiring the existing structure to be rebuilt even if it is in place. Further, neither of these designs preserve the building. **The County is recommending only keeping the facades of a building in the style of a theme park stage or strip mall facade. That is an antiquated approach** which has not been used since the last century and should be reviewed and rejected by the Historical Affairs and Landmark Review Board.

The Draft Study fails to state that Nelly Custis was the 3rd school in the County to be built, in 1923, and its architecture is a good representation of public building construction of the time. **It**

is a contributing building to the historic neighborhood, and the last historic building left on the block.

The Draft Study also fails to recognize the important role Nelly Custis Elementary School played in the historic desegregation of schools. Integration of the youngest children, those in the elementary schools, was the most hard fought battle of desegregation. While it is notable that Stratford School housed the first integrated black students in Arlington, until desegregation of the elementary schools, Arlington remained out of compliance with the ruling in Brown vs the Board of Education. But, in 1971, **Nelly Custis was one of several elementary schools that integrated black students from Drew Elementary completing desegregation in Arlington**, as Judge Oren Lewis when issuing the order stated “The Arlington County School Board has now fully complied with the Supreme Court decision in Brown...Arlington will have neither black nor white schools - just schools”. On August 10, 1971, **with desegregation of the elementary schools complete, Arlington became the first county in Virginia to comply with the Brown vs the Board of Education ruling.** Completing desegregation in Arlington was a watershed achievement, as Virginia, home of the capital of the confederacy in Richmond, **led** the effort to resist integration. A link to the research that should have been included in the Draft Study follows:[The Story of Arlington Public School Desegregation.](#)

Forestry and Natural Resources Plan

The Draft Study includes the requirements from the Forestry and Natural Resources Plan for 25% tree canopy on the site. However, it fails to identify where the tree canopy will be. There is a statement that the site has 25% tree canopy cover. **However, both scenarios shown on Page 20 of the Draft Study encompass the entire site leaving no room for the required tree canopy. Space for a healthy tree canopy must consider mature trees whose canopy is easily 60 ft in diameter or more.** Further, the canopy must be on the parcel proposed for building, not on an adjacent Parcel, which has an easement for other uses on it.

Transportation

The Draft Study does not adequately address the parking issues at the site. Calvary Church closes Grant Street on Sundays for their parking, and the Church of Jesus Christ of Latter- Day Saints have a contract for the use of the Melwood lot for parking. The retail stores adjacent also use the lot as well. The draft does mention parking, but fails to recognize that Melwood currently provides the community service of allowing local church goers to park in its lot on Sundays and weeknights. The parking lot is regularly full, as are the church parking lots and the street parking. The concern that residents and Melwood staff and clients will park in the neighborhood is but a part of the concern.

The greater concern is where will the church attendees park on Sundays and weeknights without the community benefit offered by Melwood. Additionally, Melwood uses the church parking lots as needed for its programing as well. This arrangement shows that even without any new residents, there is not adequate parking if Melwood does not continue to have parking available

for the community, and the churches do not allow parking for Melwood. The churches are required to have parking to operate. What happens to them when the parking is gone?

The Transportation analysis is short sighted.⁸ **It does not include impacts from the tens of thousands of units approved in 22202, the lowering of Route 1 to grade or the proposed arena in Potomac Yard.** There are only two ways to cross between Route 1 and 395 going east-west, the first is Glebe Road and the other is 23rd Street, in front of the site. There is a slow moving train wreck happening in 22202 in terms of traffic that the County is not adequately assessing or planning for, and is not included in the Study.

3-D MODELING CREATES A FALSE CHOICE

The massing models in the Draft Study as noted previously create a false choice between a 45' scenario that will not preserve the historic building and will not meet the tree canopy requirements and a 60' scenario that will also not preserve the historic building and will not meet the tree canopy requirements. **The reason these scenarios do not work is because they are both attempting to stuff too much density on a site that is simply not big enough and is not in the right location for it.**

Further, crowding affordable housing into too large buildings also does not help the residents of these units. **The units as indicated in the modeling will not be market equivalent as they will not have the market amenities in terms of landscape, light and setback.**

The Draft Study goes on to suggest that somehow the 60' scenario can accommodate historic preservation and the tree canopy, **but there is no drawing that shows how that is possible.**

The Draft Study again fails to state **there is strong community opposition to the 60' and 45' scenario**, as noted previously. And that putting a 60' or 45' building in the middle of a low rise historic neighborhood could create a **precedent** that the neighborhood and others across the County subject to similar Special GLUP Amendments (Clarendon Presbyterian Church, for example, where the community has hired an attorney to fight the Special GLUP Amendment) are strongly against. **A change.org petition against all Special GLUP Amendments has over 1,000 signatures.** Link to petition: [Petition · Stop high rises in Arlington residential neighborhoods · Change.org](#)

AN ALTERNATE STUDY

Attached is an alternate site study with realistic assumptions which was presented at the meeting with Mr. Mattauszek on 2/20/24 **Attachment A.**⁹ It assumes:

⁸ The Draft Study does not address that the site is at least a mile from the nearest grocery store, something concerning for a location that is planned to have limited parking because 59% of residents, per the study, will use transit.

⁹ Linked here and also attached at the end of this document:

<https://aurorahighlands.org/wp-content/uploads/Melwood-Study-for-AHCA-Meeting-240220-final.pdf>

- The existing tree canopy at the northeast of the site will be preserved, and heavy tree canopy will be placed along the south side of the site to create a biophilic barrier between the park and the building.
- The historic building will be preserved and adapted for residential use with a set-back one-story penthouse.
- 35' tall buildings per the existing limitations of the R-6 zoning, and required street setbacks.
- Below grade parking is sufficient for the site.
- Alternate parking arrangements have been made with the churches.
- Entry off / on 23rd Street, rather than Grant Street, in order will keep traffic out of the neighborhood and not overtax the narrow side street.
- 20K SF for Melwood program.

The Alternate Study produces approximately 60 units which is in keeping with the low-medium density WITHOUT the affordable housing bonus. **The Alternate Study reveals that the bonus creates density that is just too much for the site to accommodate.** While the affordable housing bonus might be useful on some sites where a building is tall and just growing taller, it is detrimental to and inappropriate in this low rise single family neighborhood. Additionally the neighborhood continues to oppose the low-medium designation and advocates this area should be designated as public or semi-public, and if it must be designated residential, it should be designated low to match the surrounding area.

SUMMARY

If the Draft Study were truly objective, it would have included all of the County guidance for the site and more options. For example, there is a need in 22202 for improved community facilities to accommodate the growth in the area, and **this site is perfectly suited by design to be a community center or library especially as the existing Aurora Hills library / community room location has been studied for the location of a new school.** The County could re-acquire the site and effectively rejuvenate the old school building as a centrally located library/community center space. Once the County gives up the public aspect of the current GLUP it is lost forever.

In light of the reasonable development shown in the Alternate Study, to agree with the Draft Study Recommendation is **to throw out every long held planning principle in the Comprehensive Plan in favor of a zealous, heavy-handed approach to develop affordable housing by any means necessary:** even if it is not near metro, if it is too big and tall for the site, even if it is poorly designed, even if it contributes to inequity in housing not being market equivalent, even if it rolls over historic buildings and mature landscaping, even if it negatively impacts a children's park and side streets, even if the neighbors and the Civic Association

overwhelmingly object, even if it creates an unfavorable precedent that puts the single family neighborhood at risk, even if it negatively impacts two adjacent churches and eliminates a polling location, and even if it contributes to inequity in schools by continuing to corral affordable housing in South Arlington.

No responses to correspondence from AHCA in two years regarding these concerns leaves our residents frustrated and wondering exactly whom the County Board, Planning Commission and County Staff represents.

RECOMMENDATIONS

1. Reject the Draft Study because it is not objective and therefore does not meet the requirements set out in the Special GLUP Amendment policy.
2. Review the Special GLUP Amendment process as discussed during the Arlington County Civic Federation Meeting with the County Board on 1/2/24. <https://vimeo.com/900474854>, see 17:02 for discussion. Pause all GLUP Studies until this process review is complete.
3. Perform real, verifiable, objective dialog with the community and seek agreement from adjacent neighbors and the applicable civic association per the Arlington County Civic Federation Resolution June 14, 2022: Arlington County Civic Federation Public Services Committee APPROVED Resolution to Improve Public Input for Planning, GLUP and Zoning Change
4. Perform studies that include all options for the site including researching county use of the site and a smaller, appropriate to the scale of the neighborhood envelope that retains the historic building and mature trees.
5. Provide specifics in the Draft Study recommendation for any land use change to protect the historic building, the mature trees, provide park separation, provide tree coverage, and identify the building envelope (35' height, setbacks) including diagrams as applicable.

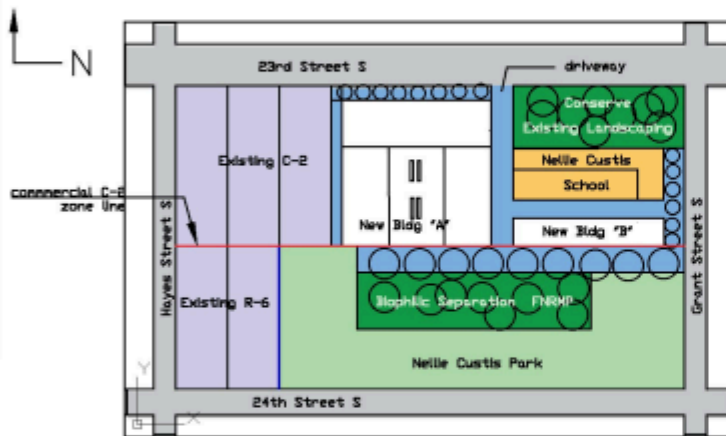
Appendix: ADDITIONAL TECHNICAL QUESTIONS

On page 3, Low-Medium GLUP Designation Residential is cited as 16 – 36 units per acre and the site is 1.89 acres, the number of units works out to 30 – 68 units, excluding the Melwood use. Zoning of RA8-18 requires 1200 SF of lot area per dwelling unit for multifamily and a height limit of 40 ft. $82K \text{ SF} / 1200 \text{ SF} = 68 \text{ units}$, excluding the Melwood use. The only way that the Low-Medium designation and RA8-18 zoning work to allow the density requested by the Applicant is to provide “low to moderate income housing” on the site per 12.3.7 on Page 7. However, the RA8-18 does not contemplate the density of the Melwood program in those calculations. How does the Melwood program fit on the site with this zoning?

Attachment A:

Massing Study – Melwood GLUP – Assumptions

1. Per Draft Study: keep historic Nellie Custis School, conserve mature landscape, biophillic separation from Nellie Custis Park.
2. 35' height limit (historic neighborhood scale as per Crystal City Sector Plan, Aurora Highlands Neighborhood Conservation Plan) and not setting precedent.
3. Assume required alternate parking is obtained for churches (LDS and Calvary – uses Grant Street) and onsite parking required is underground.



NOTES

DRIVEWAY to underground parking on 23rd Street – Grant Street is too narrow

NELLIE CUSTIS SCHOOL: Preserve facades of 1923 historic Nellie Custis School Building (in place) & design new buildings to complement. A 2:1 setback from street fronts roof top addition shown

SETBACKS

STREET FRONT: align with commercial on 23rd Street, Nellie Custis School on Grant Street. Conserve existing landscaping in front of Nellie Custis School.

WEST SIDE: 10 feet

SOUTH / ADJ. TO PARK: Extended biophillic easement on south side of site to allow for growth of mature tree of FNRMP – align with rear of Nellie Custis Park and to end of R-6 / start of C-2 zone.

MISSING MIDDLE ANALYSIS

Site appears to be textbook suited to Missing Middle / EHD framework in terms of its location in R-6 / C-2 and in site context on 23rd Street.

Site is 82,300 SF. Per Missing Middle, R-6, 8 units allowed per 8000 SF, total units allowable is 82.

Excluding 21,500 SF Melwood program (equivalent to 21 units) leaves 61 units

Massing provides desirable garden style (Missing Middle) units, appropriate density and size for location.

CALCULATIONS

NELLIE CUSTIS SCHOOL
Nellie Custis School approx 7100 SF x 2 stories = 14200 SF,
Add 1 story penthouse 2:1 setback 3500 SF = 17,700 SF, 17 – 18 units

NEW BUILDING A
Use ground floor for Melwood program, 21,500 SF
Upper (2) floors approx 15,000 SF x 2 = 30,000 SF (Letter "U" shape) – step down as required to meet 35' ht. limit. 30 units.

NEW BUILDING B
SE building 35' = 3 stories x 3900 SF = 11,700 SF – garden apartment style, 12 units.

TOTALS
Approx 60K SF residential, 21,500 for program. 60 units.

