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**REVISED**

July 29, 2021

Ms. Arlova Vonhm  
Zoning Administrator  
Arlington County  
2100 Clarendon Boulevard, Suite 1000  
Arlington, Virginia 22201

**RE: STATEMENT OF SUPPORT FOR SPECIAL GENERAL LAND USE PLAN STUDY (GLUP)  
PROPERTY: 2000 N GLEBE (RPC #07-006-344); 20<sup>TH</sup> STREET N. ARLINGTON (RPC  
#07-006-345); AND 4725 20<sup>TH</sup> STREET N. ARLINGTON (RPC #07-006-150)  
OWNER/APPLICANT: SUNRISE DEVELOPMENT, INC.**

Dear Ms. Vonhm:

This firm represents Sunrise Development, Inc. (the “Applicant”), the title owner of the above-referenced Property. On behalf of the Applicant, please allow this letter to serve as a statement of support for a Special General Land Use Plan (GLUP) Study application.

***Property Location and Size***

By way of background, the Property consists of three (3) parcels with an aggregate site area of approximately 51,330 sf (1.178 ac). The Property is located several blocks south of the Lee Highway Corridor at the intersection of N. Glebe Road and 20<sup>th</sup> Street N. N. Glebe Road is located to the east of the Property.

The Property is currently improved with an assisted living facility containing 47 units and surface parking. The Property is bordered by townhomes to the north, and single family residential to the south, east and west. The Applicant proposes to redevelop the Property with a new assisted living facility featuring approximately 85 senior housing units and below-grade parking.

This existing assisted living facility is the first purpose-built Sunrise Senior Living facility. As such, its structure and layout are significantly dated, and at this point the facility is functionally obsolete. This leaves redevelopment as the only viable option to allow this facility to continue serving Arlington County.

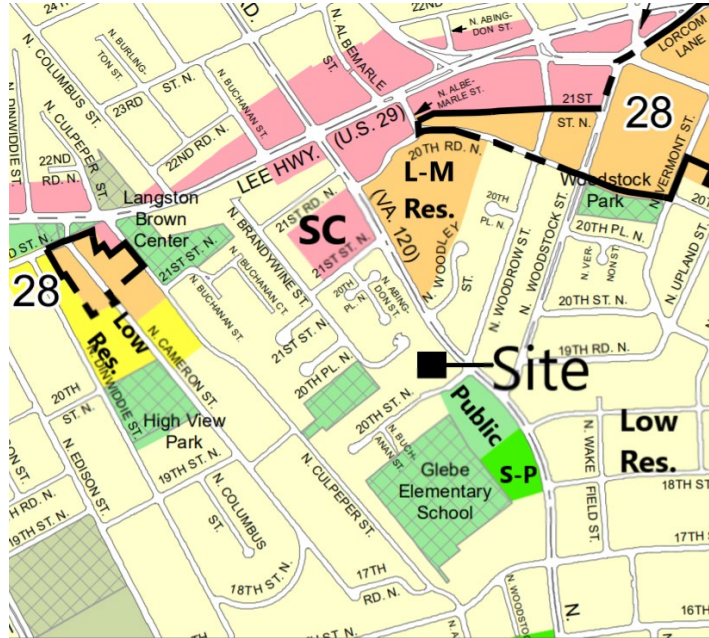


The Property is subject to an existing Use Permit (U-2535-86-1) for an institutional home, which was initially approved by the Arlington County Board in 1986. The approval permits a maximum number of residents (50) and maximum number of staff (6), and the development plan shows that 16 parking spaces were required and provided. The use permit was approved with four conditions. In 1989, the Board approved a use permit amendment that increased the maximum number of residents from 50 to 57. According to Staff, it appears that the Board had deleted the previous four conditions during a use permit review earlier in the year but added two new conditions with the Use Permit amendment approval.

***Current and Proposed GLUP Designations for the Property and Surrounding Sites***

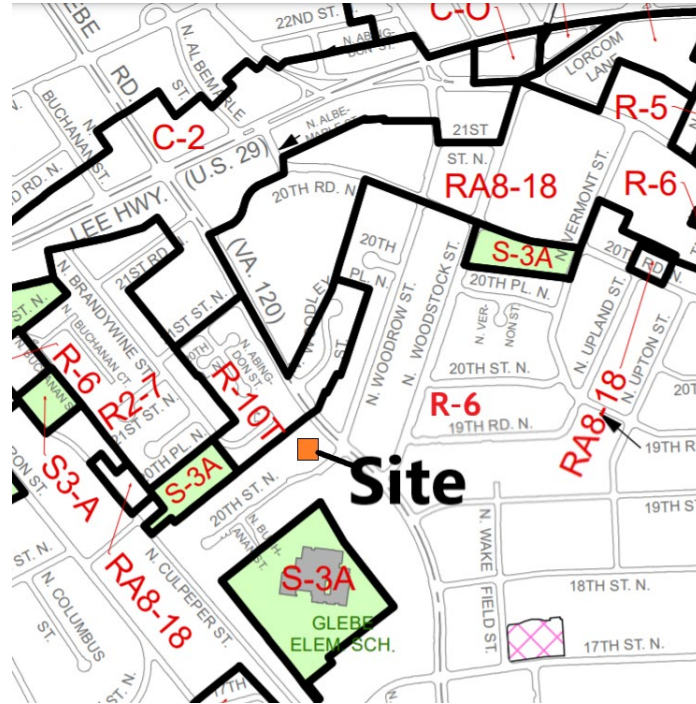
The Property is currently designated for “Low” Residential (1-10 du/ac) use on the GLUP. The adjacent sites are also “Low” Residential, with Service Commercial and “Low-Medium” Residential nearby to the north, and Public and Semi-Public use sites to the south. The Avalon Arlington North mid-rise apartments on N. Glebe are included in the nearby “Low-Medium” Residential GLUP area.

Given the restriction on assisted living facilities and any elder care use in the R districts, the Applicant proposes to redesignate the Property to “Low-Medium” Residential use, in order to facilitate future rezoning to the “RA8-18” Zoning District (discussed further below). This is consistent with the location of the Property, as “Low-Medium” Residential uses are located to the north east along N. Glebe Road.



***Current and Proposed Zoning Designations for the Property and Surrounding Sites***

The Property is currently zoned to the “R-6” Zoning District. The adjacent sites are R-10T and “S-3A” to the north, and “R-6” and “S-3A” to the south, and “R-6” to the east and west. To the northeast and northwest the “RA8-18” Zoning District is also present, which is included in the “Low-Medium” Residential GLUP. Given the proximity of “RA8-18” zones, and restriction on assisted living facilities and any elder care use, the Applicant proposes to rezone the Property to the “RA8-18” Zoning District.



Currently, “RA8-18” permits one-family detached, duplexes, semidetached, multiple-family, and townhouses (in certain circumstances) by right. Group Living Residential uses, which include nursing homes, continuing care retirement communities and assisted living facilities are permitted by site plan. Therefore, the Applicant’s proposed assisted living facility would be permitted by site plan.

***Transportation Information***

The Property is located in the Plan Lee Highway area and connects with the major artery roads of Arlington county, including I-66, Lee Hwy, Washington Blvd, and Fairfax Drive. As the Property is already part of an effective street grid, the Applicant does not envision that new vehicular connections would be necessary to facilitate redevelopment of the Property.

Please refer to the enclosed transportation summary for more information about proximity to transit and pedestrian/vehicular counts around the Property.

***Study Justification***

The Applicant proposes this Special GLUP Study in order to facilitate redevelopment of the Property and to continue the critically important assisted living services which have been

provided at the site. Significant expansion and/or redevelopment of the existing facility is not permitted under applicable Zoning Ordinance regulations and related planning guidance.

The Special GLUP Study (and eventual site plan application) is an appropriate procedural mechanism for evaluating the Applicant's proposal. In a memorandum from Arlington County dated April 23, 2021, the County stated that a Special GLUP Study would be the appropriate process to consider the appropriate land use vision for this area and determine if the designation the Applicant is considering, or another alternative designation, could represent the community's desired future vision for this area.

Since this parcel is within the Plan Lee Highway planning area, but outside of the Core Study Area, it will not be evaluated during the Plan Lee Highway process. Furthermore, a Zoning Study to consider potential for elder care uses in R districts is not currently part of the Planning Division Work Plan. Given that the Property and its proposed uses are not within the scope of any current County planning analyses, a Special GLUP Study is necessary to explore future opportunities for this site.

The proposed GLUP change and associated use will be in conformance with County plans and policies. In particular, the Affordable Housing Master Plan (AHMP) has a number of recommendations to allow for expanded housing opportunities to older adults. Specifically, Objective 2.4 of the AHMP is to "[e]nable Arlington residents to age in the community". The proposal will provide additional opportunities for aging Arlington residents to be able to continue to live in the County, and advances both this general goal and other specific objectives within the AHMP.

Further, the proposed GLUP change and associated rezoning will, at a planning level, align the existing and proposed use with the underlying GLUP and Zoning Ordinance. As a result of prior changes to the Zoning Ordinance, the existing senior housing use was removed from the underlying "R-6" zone. This makes the existing use nonconforming, despite being a use that is favored from a policy perspective. Bringing both the existing and the proposed use in line with the GLUP and the Zoning Ordinance is consistent with the policy goals of Arlington County.

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Thank you for your attention to this request. Please do not hesitate to contact me if you require additional information on the Applicant's proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Kedrick N. Whitmore". The signature is fluid and cursive, with a prominent loop at the end.

Kedrick N. Whitmore

Enclosures

cc: Matt Allman  
Maura Ikharo, AICP