



**Park and Recreation Commission**  
2100 Clarendon Boulevard, Suite 414  
Arlington, Virginia 22201



March 29, 2022

Honorable Katie Cristol  
Chair, Arlington County Board  
2100 Clarendon Blvd., Suite 300  
Arlington, VA 22201

RE: Amazon's PenPlace Development Project

Dear Chair Cristol,

The Park and Recreation Commission received at its March meeting a presentation on the park planning aspects of the PenPlace project in Pentagon City. This project is now in the final stages of the public engagement process. Multiple PRC members have participated in this process from the beginning of engagement, including on-line surveys, the site walking tour, Site Plan Review Committee meetings, and commission presentations. This advisory letter presents our views and observations about the project overall, and in particular about public spaces and public impacts.

As one of the most significant development projects in Arlington's history, PenPlace represents the impact of the Amazon HQ2, both symbolically and functionally. Situated at the north end of Pentagon City, it will have expansive views of Arlington and Washington, DC. It will also be seen by many residents and many users of our transportation system, including National Airport. As such, the importance of creating structures and spaces that are both distinctive and well-integrated is critical, and the creative challenges of meeting this goal are substantial. Overall, the PRC believes that the PenPlace design and development team has very largely met this challenge.

Support for the design concept, engagement process and resulting site plan.

Throughout the engagement process, and in the various iterations of applicant and staff documents and presentations made available, PRC representatives have taken note of numerous features and characteristics of this project that have contributed to our positive view of the current design. The following points summarize this inventory of valued attributes of both the site plan and the park space:

- Placing a high priority on user experience—to include Amazon employees and the general public—and allowing that perspective to have a strong influence on the project design in addition to functional requirements.

- Placing a high priority on the creation of spaces and the interaction of spaces, as opposed to a design in which spaces are entirely dependent on, and what is left over, after structures are built. This emphasis on negative space contributed to the creative opportunities for the entire site and provided a basis for architectural adjustments during the process.
- Incorporating biophilic design principles into the initial conceptualization of the project overall. This includes arrangement and interconnection of spaces, use of local ecological and historical references, use of building materials, and use of appropriate plants for the general locality but also the specific location in the landscape design.
- As part of this biophilic design orientation, and as part of the general theme in the first bullet, above, creating a multitude of spaces that involve kinesthetic and sensory experience for users. The inclusion of natural vegetation palettes, water features, natural light and breeze pathways, user pathways, and topography that are intended to enhance the value of user experiences regardless of the reasons for being there.
- Giving attention to the content of the Public Spaces Master Plan and the Pentagon City Sector Plan and ensuring compatibility with key elements of those plans.
- Finally, and importantly, listening to public comment and being open to many ideas that emerged through on-line surveys, commission briefings, review committee meetings, and through other meetings and comments. Changes and adjustments have been made to building shape, facade materials, park space size and design, landscape features, and circulation pathways. These changes have improved the design and also demonstrated the credibility of the team's receptivity to user perspectives on the project.

#### Request for additional engagement post-approval.

All of these attributes and approaches are complemented by the integration of sustainable infrastructure and built environment features to create a holistic solution for the site. The plans and presentations hold high promise, and we believe from the precedents in this engagement that the project team shares our expectations for executing the plans and achieving the desired results. That said, the complexity of the project leads PRC members to request additional engagement opportunities post-approval. Many critical components of development projects are not fully decided until after the Board's decision to allow it to proceed. It is not unusual that some of these are not at all small details but have fairly wide-reaching implications for the appearance and use of the project as constructed. This is not to question motives, but to acknowledge that the level of detail commitment in plans as approved are not sufficient to actually construct most projects. For PRC, this includes substantial aspects of landscape and other features highly relevant to users. (Note: this topic is also addressed in the PRC advisory letter of March 3, 2022, on recommendations for revision of the Site Plan Standard Conditions guidance.) We believe that this is an opportunity to continue in the spirit of full engagement to inspire ongoing confidence among public stakeholders and to allow additional, focused input while the team is finalizing the actual build plans.

#### Population projections and public space projections are not aligned.

The Park and Recreation Commission has a strong interest in the overall availability of public spaces for Arlington residents. The current design for PenPlace provides a commendable public park space on site. Nonetheless, we note that among the overall impacts of the Amazon HQ2 initiative in Arlington is a significant estimated increase in jobs and also county population.

Amazon is not the only driver of such increases, but a significant one. Various estimates are available for the number of new jobs, daytime population, new resident population, and both direct and indirect costs and revenues resulting from the increases in the many documents associated with the Amazon agreement.

Arlington has concern already about the availability and location of public spaces and especially parks throughout the county. That interest is expressed in one of the top priorities of the Public Spaces Master Plan (2019), which calls for an average of 3 new acres per year over the 10 years after adoption. The PenPlace addition of 2.75 acres toward this goal is substantial and welcome, but the PSMP goal appears to be exceedingly difficult goal to attain. Even reaching that goal will not maintain the current per capita ratio of residents to park acres by itself. Park land is our most endangered commodity. Soon after the PSMP was adopted, the County Board also adopted a resolution on Equity and a resolution on Biophilic Arlington. This triad of policy guidance might be said to represent an update of the concept of Smart Growth, which historically focused on transportation and development. For PRC, the availability of public spaces and public amenities is, more than ever, a top-tier issue for the county.

#### County-wide impact of increased density and contributions for land acquisition.

In this regard, while we applaud the PenPlace concept and design, we remain very interested in the potential of the standard project review category: community benefits. Given the value of this project to Amazon itself, the impact of Amazon's presence on Arlington's population, and the likely derivative impacts throughout the county, we view this project as a new frontier for Arlington's commitment to adequate park space, and to growth management generally. We recognize that some financial aspects of the Amazon deal have been defined as part of the March 2019 approval package, as documented in Board Report 29. Technology, housing, and infrastructure were all key elements in the agreement, but land acquisition, park development and public space in general were not included. The PSMP was adopted the following month. We also recognize that financial negotiations are not generally conducted as an active part of public engagement on individual site plans.

PRC, therefore, anticipates with great interest learning more about the community benefit aspects of this Amazon keystone project. Given its traditional corporate concerns for the community, and Arlington's concerns about the future adequacy of its public spaces, we would like to see substantial consideration for park land as part of any community benefit package. We believe this is an ongoing issue and will remain an ongoing challenge in the future. Therefore, we suggest that a community benefit in this case may be better viewed as a series of incremental benefits rather than a single contribution. Such a plan might be coordinated with the CIP cycle, which includes already familiar topics and decision processes.

The futures of Arlington County and Amazon are linked, and can be mutually beneficial when all costs, challenges and opportunities are included in our vision of that future. The guiding plans and principles in all of the county documents cited in this letter provide direction. An ongoing partnership will help ensure that we are able to realize that vision.

Sincerely,



Shruti Kупpa

Chair – Park and Recreation Commission

cc: Members, Arlington County Board  
Mark Schwartz, Arlington County Manager  
Jane Rudolph, Director, Department of Parks and Recreation  
Claude Williamson, Director, Department of Community Planning, Housing and  
Development