



## Memorandum

**To:** Zoning Committee of the Planning Commission (ZOCO)                      **Date:** June 2, 2023

**From:** Matt Mattauszek, Crystal City/Pentagon City Planning Coordinator  
Department of Community Planning, Housing and Development

**Subject:** Consistency with the Pentagon City Sector Plan related to permitted uses and building heights in the RA6-15 Zoning District

### ***Introduction***

Since the adoption of the Pentagon City Sector Plan in February 2022, and through subsequent review of initial redevelopment proposals, staff has identified a need for further clarity within the RA6-15 zoning district standards as RA6-15 is the existing zoning for the western portion of the Pentagon City Coordinated Redevelopment District, established concurrently with the Plan's adoption. Proposed Zoning Ordinance amendments outlined further in this memorandum support expressed guidance in the adopted Sector Plan and relate to permitted land uses, specifically the permission of retail or retail equivalent uses, and maximum building heights for elder care uses.

Through its analysis, staff has identified discrete limitations within the adopted RA6-15 district where permitted land uses and building heights would be more restrictive than intended by the Sector Plan policies and recommendations. To address these inconsistencies, staff has prepared draft zoning text for the Zoning Committee's consideration, enclosed in Attachment 1. Staff anticipates that the County Board will review a Request to Advertise (RTA) for this amendment in Summer 2023.

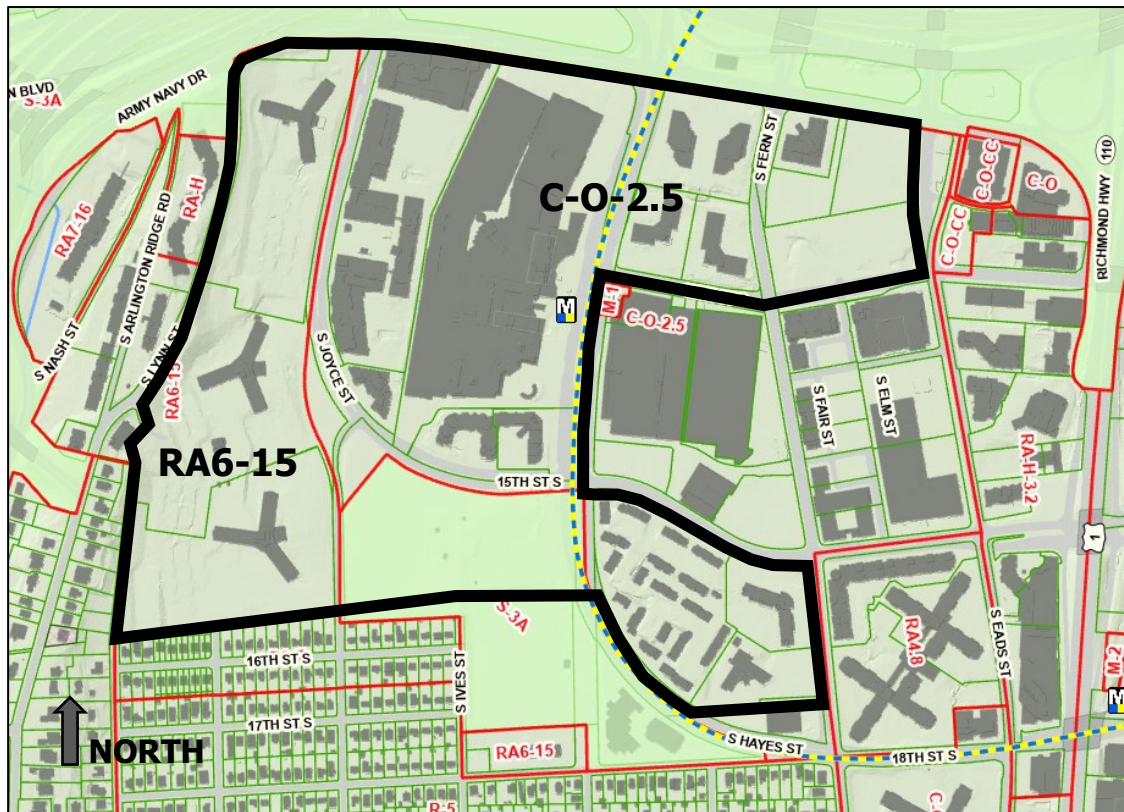
### ***Background***

Pentagon City Sector Plan: The Pentagon City Sector Plan, adopted by the County Board in February 2022, relies on a series of maps and narrative to express its vision for future redevelopment. The Sector Plan prioritizes guidance within four essential categories including land use development, transportation, public spaces, and site and building form. The site and building form recommendations outline the degree to which building heights can be increased and which land uses may occupy future building spaces as redevelopment occurs in Pentagon City.

The maximum building heights are prescribed consistently for sites within the Sector Plan's effective boundary, which is mostly zoned C-O-2.5. However, the Sector Plan recommends that building heights transition downward to lower density neighborhoods in the western, RA6-15 zoned portion of the Sector Plan's limits. Ground story uses are also reflected in the Sector Plan through descriptive use categories and an accompanying future retail map that builds upon the County's Retail Plan for this area.

At the time of the Sector Plan's adoption in 2022, the County Board also adopted several amendments to the General Land Use Plan (GLUP) and the Arlington County Zoning Ordinance (ACZO) to help implement the Sector Plan's vision. While the ACZO amendments established a clear association between the GLUP's new Coordinated Redevelopment District and the two predominant zoning districts in Pentagon City, in limited instances some further clarification in the text is needed related to building heights for future developments and the range of permitted retail uses that may occupy the ground story of those buildings. Specifically, the RA6-15 district standards include language which limits development with elder care uses to no more than 70 feet in building height while the Sector Plan permits taller building heights in the western portion of its limits regardless of the residential use type. Additionally, land uses within RA6-15 are permitted as specified in the RA districts use table in Section 6.1, however, the Sector Plan envisions nonresidential uses such as retail, food establishments, and entertainment uses within the RA-zoned portion of the Sector Plan's limits that are otherwise prohibited in RA zones. Staff's proposed zoning text changes will provide alignment with the adopted Sector Plan and enable properties within the Pentagon City Coordinated Redevelopment District with the RA6-15 district to redevelop consistent with the Plan's vision.

Figure 1: Pentagon City Zoning Map



- Pentagon City Coordinated Redevelopment District
- Zoning District Boundaries

**Discussion**

Following the adoption of the Pentagon City Sector Plan in February 2022, staff has discovered that the ACZO does not fully implement the Sector Plan’s vision that was adopted by the County Board. The County Board amended the ACZO to establish a new special planning area under §9.6 to help facilitate the achievement of the future vision as described in the newly formed Sector Plan. Concurrently, the County Board also amended §6.5 (RA6-15) and §7.12 (C-O-2.5) to establish site eligibility for properties located within the new Pentagon City Coordinated Redevelopment District as shown on the General Land Use Plan. Since that time, and through the subsequent review of initial redevelopment proposals, staff has identified discrete text within the RA6-15 district that limits permitted land uses and building heights more than intended for development that would follow the vision outlined in the Pentagon City Sector Plan. To ensure sites in Pentagon City can redevelop in accordance with the Sector Plan, staff has identified the following areas in §6.5 and §9.6 which should be amended to enable the implementation of the original intent of the Sector Plan.

**Section 6.5 (RA6-15, Multiple-family Dwelling District)**

As Section 6.5 was amended in 2022, §6.5.8 was added to establish site eligibility for future redevelopment by noting “Properties in the area designated as the Pentagon City Coordinated Redevelopment District on the General Land Use Plan may be developed in accordance with the requirements of §9.6”. As a result, most development applications in this zoning district can be considered for redevelopment consistent with the Pentagon City Sector Plan without requiring a rezoning to another zoning district. Through staff’s recent review of a proposal that may include an elder care use staff has also reviewed §6.5.6.B. more closely and found it would not allow buildings with elder care uses to exceed the maximum height of 70 feet as currently adopted. This limitation runs counter to the building height maximums included in the adopted Pentagon City Sector Plan, which, allow maximum building heights in the western part of the Coordinated Development District to exceed 70 feet, under the RA6-15 district. Since the County Board adopted the Pentagon City Sector Plan’s vision for future growth in this area, deeming certain building heights and uses as appropriate, the existing height restriction for elder care uses in the RA6-15 zoning district should be amended to include an exception for sites redeveloping within the Pentagon City Coordinated Redevelopment District.

Similarly, the existing reference under §6.5.2 to solely rely on uses specified in §6.1 does not express the full range of uses permitted in the Pentagon City Sector Plan. This particularly applies to certain retail uses which the Sector Plan envisioned could occupy the ground story of mixed-use buildings. To ensure future redevelopment in the western portion of the district has full access to the uses envisioned in the Sector Plan, clarifying language would need to be incorporated into the existing reference where permitted uses are listed in the RA6-15 zoning district.

**Section 9.6 (Pentagon City Coordinated Redevelopment District)**

Section (§) 9.6 was incorporated into the ACZO at the time of the Sector Plan adoption to further establish zoning regulations for properties within the Pentagon City Coordinated Redevelopment District. The focus of Section 9.6 is to clarify 1) the purpose of the district, 2) site eligibility to redevelop using this section’s regulations which tie back to the Sector Plan, and 3) specific criteria for the County Board to utilize when considering site plan proposals for redevelopment in this part of the County. While §9.6 effectively accomplishes its intended purpose, staff acknowledges it primarily offers the County Board broad authority to consider applications with increased height and density within Pentagon City while applying the adopted Sector Plan guidance. The County Board’s ability to consider a broader range of land uses that reflect the intent of the Sector Plan, however, is not as prominent and clear for RA-zoned properties as envisioned. As a result, staff recommends amending §9.6.3 to explicitly authorize nonresidential uses identified as permissible in the Sector Plan for approval within the Pentagon City Coordinated Redevelopment District, notwithstanding the more limited set of uses allowed by an underlying zoning district. As also proposed, a new §9.6.5 indicates key use categories with references to specific use standards and additional clarifying language in the RA6-15 zoning district to clarify that retail and retail equivalent uses would be permitted per the Sector Plan’s guidance.

Collectively, these changes would resolve any remaining ambiguity between the Pentagon City Sector Plan and the RA6-15 Zoning District as it relates to appropriate uses and maximum building heights.

### ***Next Steps and Timeline***

Following discussion at the ZOCO meeting, staff intends to bring the request to authorize the advertisement of the proposed Zoning Ordinance amendment to the County Board at its July meeting. It is anticipated the Planning Commission and County Board would consider the proposed amendment later in the fall of 2023.

### **Anticipated Schedule**

- June 6, 2023: Zoning Ordinance Committee (ZOCO) Meeting
- July 15, 2023: County Board Request to Advertise (Zoning Ordinance Amendment)
- Fall 2023: Planning Commission and County Board final consideration

### ***Attachments***

- Attachment 1: Recommended Zoning Text Changes to Sections 6.5 and 9.6

**Zoning Ordinance Amendment – Pentagon City Sector Plan Implementation**

Proposed amendments are shown with **bold underline** to denote new text, and **~~bold strikethrough~~** to denote deleted text.

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**Article 6. Multiple-Family (RA) Districts**

**§6.5. RA6-15, Multiple-family Dwelling District**

**§6.5.1. Purpose**

[Reserved]

**§6.5.2. Uses**

- A. Uses shall be as specified in §6.1.
- B. Notwithstanding §6.5.2.A, uses for properties in the area designated as the Pentagon City Coordinated Redevelopment District on the General Land Use Plan shall be as specified in the Development Framework Section 4.5 and Future Retail Map of the Pentagon City Sector Plan.

**§6.5.1. Density and dimensional standards**

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**§6.5.6. District use standards**

Use standards applicable to specific uses in the RA6-15 district include:

- A. **Multiple-family**  
By site plan approval, as specified in §15.5, the County Board may permit the inclusion of multiple-family units in site plans on abutting properties or on properties which would abut except for the existence of a public street.
- B. **Elder Care Uses**  
Under no circumstances shall the maximum height of an elder care use exceed 70 feet, exclusive of mechanical penthouses, except when located within the Pentagon City Coordinated Redevelopment District, per §9.6.

**§6.5.7. Site development standards**

The site development standards of Article 13 and Article 14 apply to all development, except as otherwise specified below.

**§6.5.8. Pentagon City Coordinated Redevelopment District**

Properties in the area designated as the Pentagon City Coordinated Redevelopment District on the General Land Use Plan may be developed in accordance with the requirements of §9.6.

# Article 9. Special Planning Area Regulations

## §9.6. Pentagon City Coordinated Redevelopment District

### §9.6.1. Purpose

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The purpose of the Pentagon City Coordinated Redevelopment District is to encourage mixed-use development of office, retail and service commercial, hotel and multi-family dwelling uses within the area designated as the Pentagon City Coordinated Redevelopment District on the General Land Use Plan. The goal of this district is to advance the vision of the Pentagon City Plan, including:

- A. The creation of a dynamic downtown for Arlington and the region, and a neighborhood where everyone is welcome and able to live regardless of race, income, age, and immigration status; and
- B. The redevelopment of Pentagon City that strengthens the entire 22202 community, diversifies housing options, and embraces biophilic design that makes nature a universal part of the everyday experience of the area.

### §9.6.2. Applicability

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The provisions of this subsection shall apply to properties which meet all of the following requirements:

- A. The property is located in either the RA6-15 district or the C-O-2.5 district;
- B. The property is located entirely within the Pentagon City Coordinated Redevelopment District as specified on the General Land Use Plan; and,
- C. The property is designated as one of the following land use designations on the General Land Use Plan:
  - 1. High Office-Apartment-Hotel,
  - 2. Medium Residential,
  - 3. High-Medium Residential, or
  - 4. High Residential.

### §9.6.3. Conformance with the Pentagon City Plan

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#### A. Provision of **land use mix**, increased height, and density

Subject to the approval of a site plan as specified in §15.5, the County Board may permit a **specific land use mix and** additional height and density **beyond that provided in §6.1 and** above that provided in §6.5.5.C and §7.12.3.B where it finds as follows:

- 1. The development project helps achieve the Planning Principles specified in the Pentagon City Sector Plan;
- 2. The development project is consistent with other applicable policy guidance for the Pentagon City Coordinated Redevelopment District, such as providing certain features, design elements, services, or amenities identified in the Pentagon City Sector Plan; and

- 67                   3. The development project adheres to the development framework identified in the  
68                    Pentagon City Sector Plan, including without limitation:  
69                    (a) land use development,  
70                    (b) transportation,  
71                    (c) public spaces, and  
72                    (d) site and building form.

73 **§9.6.4. Maximum Development Threshold**

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- 74                   A. Under no circumstances shall the County Board permit a density of more than 9.0 FAR for  
75                    sites within the Pentagon City Coordinated Redevelopment District located in the C-O-2.5  
76                    district.  
77                   B. Under no circumstances shall the County Board permit a density of more than 150 dwelling  
78                    units per acre for sites within the Pentagon City Coordinated Redevelopment district  
79                    located in the RA6-15 district.  
80                   C. Under no circumstances shall the County Board permit a building height of more than 350  
81                    feet, exclusive of mechanical penthouses and parapet walls, and except that non-  
82                    occupiable, exceptional architectural features may exceed the heights outlines in this  
83                    §9.6.4.C.

84 **§9.6.5. Uses permitted**

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- 85                   A. In accordance with the Future Retail map as specified in the Pentagon City Sector Plan, the  
86                   following uses shall be permitted:  
87                    1. Entertainment uses in accordance with §12.2.5.A.  
88                    2. Food establishments in accordance with §12.2.5.B.  
89                    3. Retail uses in accordance with §12.2.5.G.  
90                    4. Retail equivalent uses, to include the following:  
91                      (a) Artisan workshop establishments  
92                      (b) Child care centers  
93                      (c) Civic and government uses  
94                      (d) Conference facilities  
95                      (e) Medical offices  
96                      (f) Urban colleges and universities  
97                      (g) Amenity space for residential uses, such as but not limited to lobby space, fitness  
98                      centers, leasing offices, meeting rooms