

| | AHCA Comment | Applicant's Response |
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| TRANSPARENCY AND PROCESS | | |
| 1 | <p>It is our understanding that Arlington County has been assigned the development rights to the project, per information contained in the Crystal House 3 Master Developer RFP (https://www.arlingtonva.us/Government/Programs/Housing/Development/Crystal-House-Apts/RFP). Further, per its Master Developer agreement, the County Manager is now also responsible for the contract with APAH/EYA for development. Please provide AHCA with a copy of the Master Developer Agreement and the Assignment and Assumption of Option and Option Agreement. It is unclear why the County chose this structure, which is less than transparent, and it raises questions of public policy. For example, when Arlington County becomes a developer of residential buildings, how is it not part of a public budget process like a school or any other public building? Has this assignment process been done before in Arlington (if so, where)? Further, unlike a school or other public building, this development includes market rate units and for sale units – how do those finances flow? Who is getting the proceeds from the 3 for-sale buildings, who is paying for the gap on the affordable rental buildings? None of that information has been provided and the community would like to understand this more.</p> | <i>To be addressed by County Staff</i> |
| 2 | <p>The County (through its vendor) is requesting a change to the previously approved site plan, without a full SPRC public process. Letters were sent from the Crystal City Civic Association (CCCA) and AHCA in late 2023 expressing concern about Crystal House 6 not going through an SPRC process. Yet, the County has disregarded fundamental public engagement requests from the most impacted stakeholders and is continuing to use the same flawed review process. AHCA continues to insist that the Minor Site Plan Amendment process is inappropriate. AHCA cannot support a project being moved forward without regard for those impacted. In his letter of October 7, 2023, Eric Cassel, President of the CCCA wrote to Mr. Schwartz stating, “to repeat: low-income housing residents deserve the same attention as market rate residents”. https://www.crystalcitycivic.org/wp-content/uploads/2024/01/crystalhouse6a.pdf Mr. Cassel’s words were prescient. Three months after he wrote this letter, we found ourselves at the January 16,</p> | <i>To be addressed by County Staff</i> |

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| | <p>2024 meeting where the developer (as a reminder, Arlington County itself) requested to reduce the quality of the project’s façade and functional elements of the project – eliminating balconies, and the pool, reducing window sizes) and lowering the quality of construction materials. Why is the County declining to engage in the SPRC process?</p> | |
| <p>AFFORDABLE HOUSING PROGRAM</p> | | |
| <p>3</p> | <p>From the RFP, the new buildings on the site (excluding CH5) will house 554 Committed Affordable Units (148 at 50% AMI and 406 at 80% AMI). CH5, in addition to being developed by this County, is also owned by the County per the RFP, and requires 81 committed units at 80% AMI for a grand total of 635 units. From the evaluation criteria in the RFP these units will be in addition to market units. From the “Overall Tabulations” sheet in the Minor Site Plan Amendment meeting materials there are 836 total units at Crystal House 3 – 8. However, it is unclear from the presentation or materials presented as part of the Site Plan Amendment how many total affordable units are being proposed across the site and how many are in CH3, or if it is in there somewhere it is not easy to find (this is one of the challenges of dealing with each building as a separate minor site plan amendment separately, rather than reviewing them in totality, as was done in 2019). This tabulation is relevant to the Crystal House 3 amendment because we are told the affordable units have gaps in financing (requiring a reduction in quality of the building program), but one would assume the market rate units do not, so it is unclear which buildings / units have gaps / profits and whether or how the profits offset the gaps as is a common requirement in affordable housing financing. Approval of the Minor Site Plan Amendment by definition must be in context of the entire site. Please provide a tabulation of how the Affordable Units are proposed to be distributed across the site in a clear, easy to understand format such as filling in the X’s and answer the questions below:</p> <p>Crystal House 3: Total Units: 432. X% affordable at X% AMI band. For Sale or Rent?</p> <p>Crystal House 4: Total Units: 222. X% affordable at X% AMI band. For Sale or Rent?</p> | <p><i>To be addressed by County Staff</i></p> |

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| | <p>Crystal House 5: Total Units 80. X% affordable at X% AMI band. For Sale or Rent?</p> <p>Crystal House 6: 80 units. X% affordable at X% AMI band. For Sale or Rent?</p> <p>Crystal House 7: 7 units. X% affordable at X% AMI band. For Sale or Rent?</p> <p>Crystal House 8: 14 units. X% affordable at X% AMI Band. For Sale or Rent?</p> | |
| <p>BUILDING REVISIONS</p> | | |
| <p>4</p> | <p>We are alarmed by the proposed façade and amenity (including pool and balcony deletion and retail deletion) changes and reject the premise that the changes are required due to financial reasons. The County was gifted the land, the County is approving larger units and setting the program, the County is approving the “competitive funds”, the County is removing retail that would help with the payments, the County is adding a green roof, and the County is setting the unit mix (where are the market rate units, or is this building now 100% affordable?). The County is claiming poverty on CH3 yet selling other buildings in the project presumably at a profit.</p> <p>The proposed revisions make the building look monolithic and despite the efforts of the designers introducing rhythm into the very long façade, the small windows, the lack of porosity, and the lack of balconies bely what they are, cheap. The building as revised does not look close to a market-equivalent building. It looks like an economy hotel. When it comes to publicly financed buildings, <u>low income housing residents deserve the same building quality as the market just as low income students deserve the same education and low income patients deserve the same medical treatment.</u> This should not have to be said because anything less than the same quality in building leads to the slippery slope that produced the failed inequitable public housing of the last century. Please advise what amenities the building will have and what appliances the units will have. Will there be, as is standard in market rate buildings, in-unit washers and dryers and dishwashers or have those also been removed due to “cost”?</p> | <p>As previously stated in written responses to community comments and in community meetings, the proposed building meets or exceeds the quality of market rate buildings.</p> <p>Additional materials have been proposed to add additional materials/colors for brick, fiber cement, and metal panels. The specific amount of brick and fiber cement have been designed to maximize the project’s ability to obtain competitive public financing. There has been a reduction in glazing, which is in part due to high costs, but also to address the building’s energy efficiency, which is essential for the energy performance model and specific energy related financing sources.</p> <p>APAH’s design team has thoughtfully selected materials and designed a façade that creates an engaging street front and breaks up a long massing through materials, texture, and movement.</p> <p>Amenities proposed in the updated plans are designed to meet the anticipated programming needs and interests of the building’s future</p> |

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| | <p>We challenge the design team’s assertion that the green standard is driving the reduction in windows and façade materials as there are many examples of projects that have large windows and achieve LEED Gold and above.</p> <p>If there are going to be changes required for financial reasons, why not remove Crystal House 5 from the development? The building is replacing important retail parking as has been stated to AHCA by the restaurant owners on 23rd Street. The County’s Crystal City Sector Plan notes the importance of “Restaurant Row:”</p> <ul style="list-style-type: none"> • “Restaurant Row” along 23rd Street S. between Eads and Fern Streets was identified as a major community asset with local businesses that should be preserved or protected; • Parking challenges for Restaurant Row retailers need to be addressed; <p>If the County owns the property, can it reserve it for a parking garage given all the development ongoing in the area and help prevent spillover parking into the single family neighborhood? In keeping with the Sector Plan’s “preserving and retaining small, neighborhood oriented retailers” on Restaurant Row, what is the plan to replace the lost parking at CH5?</p> | <p>residents, and result in more square footage than in the approved plan. For example, APAH now proposes to add a new landscaped terrace courtyard (see Response to Comment 7) that is expected to be heavily utilized by residents.</p> |
| <p>5</p> | <p>PUDO and Package Delivery – We would like to see a clear rendering of the pickup and drop-off areas for two building entrances, as well as the plan for package delivery. The drawing should include queuing and parking space for building access. Given the proposed decrease in parking, it would be anticipated that there would be a greater need for loading areas for ride shares, deliveries, etc.</p> | <p>Building entrance renderings have been provided and are available on the project page (See submitted Plan Sheets A.101 and A.102).</p> <p>As previously discussed, a designated PUDO area is not included in the design of the building. Rather, PUDO naturally will occur at the entrance along 20th Street (a private street) to avoid the bike lane and flow of traffic on Eads St. (a public street). In addition, routine deliveries (e.g., FedEx/UPS/etc.) may utilize the loading dock, which has direct access to the building’s package room and mailroom. This area does</p> |

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| | | not require a turnaround, as vehicles and delivery trucks have sufficient space to back in and out and can exit in either direction on a two-way lane. |
| 6 | Retail at 18 th and Eads – A long-standing County policy has been to activate Eads Street and the approved retail at the corner was going to play an important role in that activation. We do not believe the applicant’s assertion that a resident-only lobby entrance instead will serve a similar role in activation. We have concerns that the deletion of retail, a financial stream, will prevent the offset costs and alleviate the need to reduce the quality of the building. | The site plan was approved with an option for 800 square feet of retail or retail equivalent space at this corner with approval of an administrative change. Consistent with this language, APAH proposes to replace the retail use with retail equivalent uses, including a building entrance, lobby, and a conference room which will be used as needed by Arlington County DHS to serve tenants of Crystal Houses III and VI. Both uses meet the definition of a retail equivalent as set forth in the County’s Retail Plan. |
| 7 | Second Level Residential Amenity Space – We understand that the second floor plaza area is an area that is restricted to the tenants. How many square feet of space does it have? How many people will be allowed to occupy the space since it was described as having only one fire egress stairway? | The second level residential amenity space is a terrace courtyard that will be an interior private open space area for CH3 residents. This courtyard will include seating areas, communal dining tables, grilling stations, decorative paving, and entertainment/play areas for the residents and has been designed to be a logical extension of the indoor amenities immediately adjacent to the courtyard, creating a cohesive and inviting recreational space for its residents. A portion of the courtyard will be reserved for planting and bioretention areas that will not be accessible to any occupants. There will be at least two means of egress as required by code, one will go directly down to the private street another will go through the building. |
| 8 | Student Generation – since the applicant’s project has more bedrooms for families and will likely have more | <i>To be addressed by County Staff</i> |

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| | school students, has there been a discussion with Arlington Public Schools? Our neighborhood schools are already at or over capacity. How will the Site Plan Amendments change the projected student increase at local schools? | |
| 9 | Increasing the number of low-income students into South Arlington is counter to the Affordable Housing Plan which aims to provide affordable housing across the county, not all in South Arlington. Please provide the updated plan that shows how the County plans to achieve these goals and will not continue to squeeze affordable housing inequitably in South Arlington. | <i>To be addressed by County Staff</i> |
| 10 | The Applicant needs to provide a complete narrative of all the proposed changes. Some changes are included in the Justification letter, some in the plans and some only in the meeting presentation for which there is not yet a slide deck posted, only a video. Are there any other (interior for example) changes not listed? Having this information spread across multiple sources has placed a large burden on the community, and also leads to concerns regarding transparency and what exact proposal is being reviewed. | Please see APAH's revised Statement of Justification dated January 25, 2024, which provides a description of the proposed changes. This document is available on the project page. |
| PARKING AND TRAFFIC | | |
| 11 | <p>Please provide detailed parking assumptions for this building and all the buildings on the site. The neighborhood strongly opposes any proposed amendment that would make parking more scarce in an area that already does not have enough parking, thus the proposed reduction in parking of 20 spaces is very alarming.</p> <p>Per the October 19, 2018, Wells & Associates traffic study for the project, https://arlingtonva.s3.amazonaws.com/wp-content/uploads/sites/31/2019/04/Crystal-Houses-TIA-10.19.18-r-A0837639.pdf, Arlington County required a minimum of 1.125 spaces per dwelling unit in a multifamily building prior to 2017 (page 40). But then in 2017 reduced the minimum parking ratio to .95. Per the report, the County then further reduced the required ratio to .2 - .6 per unit. Note, the County <u>requirements are a minimum</u>. The traffic study in 2018 recommended a ratio of .76 for the building as designed. The ratio has now inexplicably been lowered from .76 without an updated traffic or parking report. This is unacceptable.</p> | <p>The parking includes 199 replacement parking spaces for CH1/CH2 residents and 190 spaces for CH3 residents, inclusive of approximately 20 visitor parking spaces within the building's garage. The parking ratio is in line with the existing APAH portfolio for new developments that are close to high frequency transit. Arlington County parking guidelines for the Crystal City area encourage reduced parking ratios and would permit a ratio of less than 0.3 for this project. The proposed project's parking ratio is well above this minimum to best serve our future residents. Additionally, car share is available at 18th/Eads. The approved site plan provides the current assumptions of other proposed buildings on the site.</p> |

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| | <p>There is no analysis for the current revised plans which decrease the number of units (and therefore the number of parking spaces) yet increase the size of the units to incorporate family sized units. It is unlikely these new family sized units will have the same needs for parking as smaller apartment units. For example, a 3-bedroom unit may have two parents and a teenage driver, or three sisters that all drive, necessitating 3 cars per unit. A ratio of .6 may be a good assumption for non-family sized units (efficiencies / one bedrooms) but it is a mistake to apply the same assumption to larger units. As an example, Arlington requires a minimum of 2.5 spaces per townhouse development (which typically have 3 bedrooms), see 5.4.4 A7 in the zoning code.</p> <p>The larger units skew the numbers, and one cannot assume that the parking will be adequate. This is a very serious concern to the neighborhood because if there is inadequate parking, there will absolutely be spillover parking onto the streets that are already stretched for retail parking, and the parking spills over into the residential neighborhood. The County / Developer must provide updated parking analysis to confirm the changes to the parking ratios and unit sizes will not negatively impact the neighborhood.</p> | |
| <p>12</p> | <p>Please provide an updated traffic study given the increase in development in the area since the original report was completed in 2018. This seems to be not only a reasonable request, but essential for both the AHCA to analyze the proposed amendment and for the County to do so.</p> <p>The 2018 study preceded the Amazon HQ2 announcement by just a few weeks and was prior to the Pentagon City Sector Plan and several other projects that have greatly changed, or will change, the area including: River House, Kimco as revised and expanded, 1900 Crystal Drive, Crystal Tower, Missing Middle, Americana, and others. Additionally, this predates the VDOT Route 1 Study. On Page 4 of the study there is an assumption of a growth rate of .5% per year, when in fact the growth rate is unknown as the County has not provided an updated cumulative traffic report, but growth is known to be in the tens of thousands and a wholly different scale than .5%. On page 5 the study</p> | <p><i>To be addressed by County Staff</i></p> |

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| | <p>noted that in the existing condition at the time, the signals studied on Eads Street were at a Level C generally and at Level D “level of service” during peak periods - this was barely an acceptable condition at the time (page 25). The report also notes that the turn lanes did not even at the time adequately accommodate the car storage required at the intersection of Eads and 18th and Eads and 20th.</p> <p>The report showed the traffic count was expected to double during peak period due to the known development at the time, but that expectation failed to include the extreme amount of growth and development approved since Amazon HQ2 was announced. How can the County perform its due diligence as the Developer of the site without checking the impact on traffic given, especially given the vast growth that was not included in the previous projections?</p> <p>These issues negatively impact the neighborhood and will negatively impact the new residents when they can’t get out of the garage due to traffic backups. Further, the potential traffic issues present a safety concern, especially as there is a fire station just a couple of blocks away. Please explain how the County will address these concerns that appear to remain unaddressed.</p> | |
| 13 | <p>Considering that CH1 and CH2 will remain inhabited during all construction, what is the proposed plan for construction generated traffic and parking?</p> | <p>A parking plan for construction workers and related plans, including hauling routes, will be reviewed by County Staff prior to commencement of construction. There will be further community meetings prior to construction of each building to present these plans as well.</p> |
| 14 | <p>Transportation Demand Management – with a lower parking spot to unit ratio proposed, what is the plan to encourage residents not to use cars? What plan has already been implemented for the existing Crystal House buildings in order to begin limiting demand in advance of construction of Crystal House 3 and 6?</p> | <p>TDM measures for the entire site were included in the site plan conditions approved in 2019 and can be found in Condition 41 of the approved site plan. Briefly, these include coordination with Arlington Transportation Partners, contributions to Arlington County Commuter Services, transit information displays in building</p> |

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| | | lobbies, a bike facilities management plan, a parking management plan, reserved spaces for carpool and vanpool, and provision of a metro fare card to each new resident. |
| 15 | Offsite Parking – Please provide details of the offsite leased parking plan. | APAH is actively discussing potential off-site parking to serve residents of existing buildings during construction. This will likely be located in residential or office buildings or lots located within a few blocks or less of the property. |
| OTHER LONGSTANDING COMMUNITY QUESTIONS THAT REMAIN UNADDRESSED | | |
| 16 | Park Delivery – the park on Eads Street and the park at Fern and 22 nd Street are scheduled for delivery in 2027/2028 and 2030 respectively, is there any way to advance them and have concurrent delivery? What is the planning process for those two parks? Will the parks be deeded to Arlington County upon completion or will a permanent public easement be recorded? | Our development team cannot accelerate the delivery of either park. The development must be built in phases to provide parking for current residents as buildings are delivered, and the locations of both future parks will be used as construction staging areas. This is a tight infill site with limited areas for staging of construction and use of these areas will reduce the duration of construction and limit disruption to surrounding streets. |
| 17 | Superblock Porosity – One of the more significant issues for the neighborhood is our long-standing request to break up the superblocs and make them more porous for pedestrians, a policy that has been repeated in the Crystal City Sector Plan and advocated for by the Crystal and Pentagon Cities Council. The original plan had a pedestrian passage, but the proposed amendment does not. This is an area where we would really like to see the applicant make some adjustments to improve pedestrian flows, particularly as it relates to pedestrian passage through the corner of 18 th Street and Eads Street. Please explain why this is not possible and why the applicant is not being held to the original requirement. | There are many, many pathways through the site as highlighted in exhibits APAH has presented in community meetings. The original plan <i>did not</i> include a public passage through the building. The passage through the building was only open to tenants of other buildings on the property. Now that ownership on the block is divided, this is no longer appropriate for safety reasons. APAH has demonstrated, however, that available pathways through the site and around the building can bring pedestrians to the same destination |

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| | | – the corner of 18 th and Eads – in virtually the same amount of time. |
| 18 | Pets – what will be the pet policy and how will it impact the neighborhood? There are already lots of dogs in the neighborhood and the existing dog parks already get lots of use. We would like the associated green areas to be available for human and pet use. Is there a planned pet relief area? | Pets will not be allowed at CH3. Service animals are allowed, as required by law. There is a pet relief area designed into the neighborhood park as part of the approved site plan. |
| 19 | Trees – What is the expected tree loss on the entire Crystal House site under the revised scheme and what is the anticipated replacement rate? What exactly is the County regulation on soil that prohibits the applicant from increasing the number of trees on the site? How can it be mitigated? Furthermore, given the County’s commitment to the tree canopy and that the County now has development rights and the neighborhood’s need for green space it is unclear why the property does not include more green space. | The proposed changes do not impact tree preservation. An analysis of on-site tree preservation and planting is available in the Board Report from the 2019 approval. |
| 20 | Staff Analysis – When can we expect to see the staff analysis of this project? Since the County has decided to avoid even a mini-SPRC process, there will be no discussion by the Planning Commission, and it will go directly to the County Board. We are concerned that reports to the Board are often filed too late for community review before the Board meeting. | <i>To be addressed by County Staff</i> |