



Andrew A. Painter, Esq.
(571) 209-5775
apainter@thelandlawyers.com

**WALSH COLUCCI
LUBELEY & WALSH PC**

January 17, 2024

Via Permit Arlington

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

**Re: Statement of Justification
Request for Rezoning and 4.1 Site Plan Applications
Applicants: Davis Memorial Goodwill Industries (d/b/a Goodwill of Greater
Washington) and AHC Inc.
Property: 10 South Glebe Road (RPC #23-001-034)**

Dear Ms. Vonhm:

On behalf of the Applicants, please accept this statement of support for a rezoning and Administrative Regulation 4.1 Site Plan (“4.1 Site Plan”) for the above-referenced Property. As detailed below, the Applicants propose to redevelop the existing Goodwill retail store and donation center on the Property with a mixed-use building. The new mixed-use building would contain five stories of 100 percent Committed Affordable Units (“CAFs”) above a two-level commercial base. The commercial base would house a new Goodwill retail store and donation processing center as well as a child care center.

Goodwill of Greater Washington (“Goodwill”), which has operated in Arlington County since 1983, owns the Property. The proposed redevelopment would be the first such project for the organization as it seeks to further its nonprofit mission and values. Goodwill has selected AHC Inc. (“AHC”), which is Arlington County’s largest non-profit affordable housing developer, as its joint development partner.

It is anticipated that, upon completion, Goodwill will operate the donation center and retail store, while AHC will manage the apartment building component. AHC will select a mission-aligned organization at a future date to operate the proposed child care center. Both AHC and Goodwill have consented to the filing of this request.

ATTORNEYS AT LAW

703 528 4700 ■ WWW.THELANDLAWYERS.COM
2200 CLARENDON BLVD. ■ SUITE 1300 ■ ARLINGTON, VA 22201-3359

LOUDOUN 703 737 3633 ■ WOODBRIDGE 703 680 4664

Property Background

The Property comprises one parcel of record containing approximately 59,730 square feet (1.37 acres) located in the southwest quadrant of the S. Glebe Road/Arlington Boulevard (Route 50) interchange in the Alcovia Heights neighborhood. The Property is improved with a surface parking lot and an approximately 26,024-square foot building constructed in 1954 which houses a Goodwill retail store and donation center.

The Property is split-zoned to the R-6 One-Family Dwelling zoning district and C-2 Service Commercial-Community Business zoning district pursuant to §§ 7.17 et seq. and 5.6 et seq., respectively, of the Arlington County Zoning Ordinance (the “Zoning Ordinance”). The existing building is located on that portion of the Property zoned to the C-2 zoning district, while the surface parking lot is located on that portion of the Property located in the R-6 zoning district.

The entire Property is planned for “Service Commercial” uses on the General Land Use Plan (“GLUP”). The “Service Commercial” designation recommends personal and business services from one to four stories as well as a series of zoning districts, including the C-2 and C-O-1.0 zoning districts. The Property is not located within the boundaries of a Sector Plan or Area Plan.

Proposal

The Applicants propose to rezone the Property in its entirety to the C-O-1.0 zoning district pursuant to § 7.10 et seq. of the Zoning Ordinance concurrent with filing a 4.1 site plan for the proposed mixed-use building. The proposed mixed-use building would contain six stories with a basement level, and approximately 178,425 square feet of gross floor area (“GFA”), resulting in a development intensity of a 2.99 floor area ratio (“FAR”).

The new building will have five levels of affordable housing containing approximately 144,040 square feet of residential GFA and 128 CAFs. The CAFs would be offered to households earning up to 60 percent of Area Median Income for a period of 30 years. In an effort to help meet the need to provide affordable housing for families, approximately 74 percent of the CAFs are proposed as two- and three-bedroom units. Resident, child care, employee, and overflow customer parking will be located in the below-grade garage, while retail customer, visitor, and future resident parking will be provided in the surface parking lot proximate to the residential lobby entrance.

The 128 CAFs will sit above a two-level commercial base which will be comprised of one full floor above grade as well as a basement level that is more than 51 percent below grade (and, accordingly, is not considered a story under the Zoning Ordinance). The commercial base will contain an approximately 18,335-square foot Goodwill retail store on the ground level, and an approximately 13,050-square foot donation processing center on the second level. Similar to Goodwill’s existing operations, the donation processing center will receive donated items and prepare them for sale in the retail store. Parking for these uses will be located in both the surface parking lot and in the below grade garage.

The two-level commercial base will also include an approximately 3,000-square foot child care center on the ground floor of the building. The child care center will be located on the ground level to the rear of the Property, where it will be conveniently accessible to, but physically and acoustically insulated from the more intense vehicular and pedestrian activities generated by the Goodwill store, apartment units, and traffic along Route 50.

The child care center will contain a fenced-in, on-site, outdoor playground, and will have parking spaces located in the below-grade parking garage reserved for its use. Child care centers are permitted in the C-O-1.0 zoning district with approval of a use permit, for which a future child care provider will file at a later date once selected.

The proposed building will be served by 178 parking spaces and two loading spaces to be shared by the retail and residential uses. Approximately 171 parking spaces will be in a below-grade garage and 7 surface parking spaces will be located in front of the retail and residential lobby entrances near S. Glebe Road. Approximately 110 parking spaces will be allocated to residential use at a ratio of 0.86 spaces per unit; 64 parking spaces will be allocated to retail uses at a ratio of one space per 490.39 square feet of retail GFA; and four parking spaces will be allocated to the child care use.

The proposed site circulation has been designed to accommodate the various proposed uses, including a covered donation center drop-off and queuing area, retail and future resident parking, and garage parking for all uses. The donation drop-off and child care pick-up and drop-off zones are located in the center of the building, below the residential apartments and between the donation processing center and the child care center. The ground floor entrances to the residential lobby and retail store will be located on the eastern building façade near S. Glebe Road, while the child care center entrance will be located in the passageway near the pick-up and drop-off zone.

The Applicants will close the existing curb cut from S. Glebe Road into the northern portion of the site and all vehicles will access the site from the existing (remaining) curb cut on S. Glebe Road to the south. After entering the Property, vehicles may immediately turn right to access the surface parking area in front of the retail and residential entrances, and they may continue to the covered donation drop-off and child care pick-up/drop off area. Alternatively, vehicles may enter the Property and elect to continue straight to access the parking garage entrance and the retail and residential loading area.

The proposed C-O-1.0 zoning district is appropriate for the Applicant's building program as this district is intended to encourage the redevelopment of older sites with limited office building land uses and, under appropriate conditions, office building, hotel, multi-family, commercial and/or institutional uses. As noted in § 7.10.1 of the Zoning Ordinance, the determination of the appropriate densities of uses is to be based upon the characteristics of individual sites in their neighborhood and on the need for community facilities, open and landscaped areas, circulation and utilities.

Here, the proposed retail store, child care center, and affordable housing development are consistent with the intent of the C-O-1.0 zoning district. These uses are appropriate given the retention of a valued nonprofit organization and County policies encouraging the construction of affordable housing and expanding access to child care services. Additionally, the proposed zoning district is more consistent with the Property's GLUP designation and the proposed mixed-use development will replace an aging commercial building. The proposed development conforms with the requirements set forth in the Zoning Ordinance for the C-O-1.0 zoning district, with the exception of the modifications noted below.

Proposed Modifications & Density Exclusions

The Zoning Ordinance permits the County Board to modify certain regulations for 4.1 Site Plans. With this application, the Applicants request the following Zoning Ordinance modifications:

- Pursuant to § 15.5.7.A.1 of the Zoning Ordinance, and given that the proposed use will seek tax credits from the Virginia Housing Development Authority, the Applicants request approximately 20,906 square feet of bonus density at the 0.35 FAR level for Earthcraft Multifamily certification in accordance with Arlington County's *Green Building Density Incentive Policy*;
- Pursuant to § 15.5.8 of the Zoning Ordinance, the Applicants request an additional 97,385 square feet of bonus density – not including any EarthCraft bonus density or gross floor area (“GFA”) exclusions, discussed below – for the provision of on-site affordable housing units;
- Pursuant to § 15.5.7.A of the Zoning Ordinance, and consistent with Arlington County policies, the Applicants request a reduced parking ratio from 1.125 space per dwelling unit to 0.86 spaces per dwelling unit for the residential use and from one space per 250 square feet plus one space for every 1,000 square feet for the retail and retail processing uses, respectfully, to one space per 490.39 square feet of commercial GFA. The proposed retail parking reduction takes into account that the retail processing area is not open to the public and does not contribute to the parking demand for retail uses. Further, the proposed reductions are consistent with similar approvals for the proposed use types, and are sufficient to meet the parking needs of the mixed-use building;
- Pursuant to § 15.5.7.A of the Zoning Ordinance, the Applicants request a reduced loading space requirement from three to two. In the Applicants' experience, the proposed loading spaces and additional loading area is adequate to serve the proposed uses on the site;
- Pursuant to § 15.5.7.A of the Zoning Ordinance, the Applicants request reduced rear and side yard setback requirements, as shown in the enclosed plans, to accommodate the proposed building footprint; and
- All other modifications necessary to achieve the proposed development.

The Applicants propose 3,390 square feet of exclusions from GFA, as follows:

- A total of 1,590 square feet of below grade mechanical rooms;
- A total of 725 square feet of below-grade tenant storage;
- A total of 1,075 square feet of mechanical shafts, exhaust vents, and air intake vents; and
- All other exclusions necessary to achieve the proposed development.

Summary

The Applicants have carefully planned the design of the building to accommodate the proposed uses. The mixed-use development will benefit the community by increasing Arlington County's affordable housing stock in a building with high-quality architecture. The proposal will also deliver a modern and efficient retail store and donation processing center for a successful non-profit organization that provides important services and benefits to Arlington County's disenfranchised populations. Additionally, the proposed use will increase the area's supply of child care services, which are in high demand in Arlington County.

We would appreciate your review of this application and thank you for your time and consideration. Please feel free to call us with any questions or comments.

Very truly yours,

WALSH, COLUCCI, LUBELEY & WALSH, P.C.



Andrew A. Painter

Enclosures

Cc: Ms. Catherine A. Meloy, Goodwill of Greater Washington
Mr. Jeff Cole, Goodwill of Greater Washington
Mr. Alan Goldstein, AHC Inc.
Mr. Thomas Wallinga, AHC Inc.
Mr. Joshua Childs, AHC Inc.
Mr. Michael Foster, MTFA Architecture, P.L.L.C.
Mr. Robert Cochran, VIKA Virginia, LLC
Mr. Jeffrey Kreps, VIKA Virginia, LLC
Mr. Mike Pinkoske, VIKA Virginia, LLC

Ms. Sharon Bradley, Bradley Site Design, Inc.
Lauren G. Riley, Esq., Walsh Colucci