



# *Arlington Ridge Civic Association*

P.O Box 2443, Arlington, VA 22202  
www.arcaonline.org

## **PenPlace and Development Questions Posed By Community Members**

The following are the cumulative written and spoken questions from the ARCA community and attendees from other communities at the January 23<sup>rd</sup> ARCA meeting, as well as questions provided in writing before or after that meeting. Questions have been grouped when possible, and in most cases is seeking County policy, legal positions, or the current county board thinking.

The document is being sent in Word, with questions numbered to facilitate distributing the questions to appropriate departments if necessary, and to receive responses in a timely manner. Given the urgent nature of this process, we would welcome having the answers come in as they are available, rather than waiting for every question to be answered.

1. We understand the Final Site Plan Review process will determine the characteristics of buildings and is yet to come. However, our community wants to more clearly understand what is being awarded through this current SPRC process. Please ensure answers to the following questions are included in any explanation:

- A. What is the order and timeline of changes anticipated for the following:
- PDSP

Following the SPRC process, the PDSP will go through a public hearing process at the Transportation Commission, Planning Commission, and County Board.

- GLUP

No GLUP changes are proposed with the applicant's proposal. The site would retain its Three-fourths "High-Medium" Residential (maximum 3.24 FAR Residential) and one-fourth "Medium" Office-Apartment-Hotel (maximum 2.5 FAR Office, 115 units/acre Apartment, and 180 units/acre Hotel) development land use classification.

- Zoning (currently C-0-2.5)

A rezoning is not proposed with the subject application. The site would retain the "C-0-2.5" zoning designation.

- TDR transfers if any

The TDR program would allow for the legal transfer of development rights from sites with, among others, existing or proposed historic preservation, open space, affordable housing, community facilities and/or recreation, through the site plan and is not required to be located in a zoning area that allows the special exception site plan option. There are two major steps an applicant must undertake to pursue the use of TDRs. The first step is for an applicant to submit a TDR Certification application to the County for evaluation. The reason for this application is to determine whether or not a proposed sending site meets the eligible purposes and location criteria described in this policy document and to determine the nature and amount of development rights that are eligible to be transferred. A recommendation would be forwarded to the County Board and, if approved, the sending site becomes certified.

The second step involves the County's special exception site plan process. TDRs from a certified sending site can only be used in conjunction with a special exception site plan application on a proposed receiving site. The County Board will take into consideration the appropriateness of the additional density or other development rights at the proposed receiving site, and whether TDR approval is consistent with the Zoning Ordinance and approved land use policies and plans.

- Awarding of bonus density if any

The PDSP will establish the parcel's overall density, height, parking, and use mix. Any bonus density is awarded at the time a final site plan is adopted by the County Board.

- Awarding of Commitment of benefits

Typically, conditions are approved with the PDSP Amendment approval that address mitigation measures and other requirements that must be fulfilled with final site plan approval. In addition, the final site plan approval, which also goes through a public review process, will include more site specific conditions of approval that would apply to that particular phase of development.

- B. If the above listed actions will not take place simultaneously (for instance in the same board session) please indicate the established process when they will occur.

PenPlace includes an amendment to the Pentagon City Phased Development Site Plan. A public notice is required to be filed prior public hearing process and final site plan. Final site plans will go through an extensive public review process, which take, at a minimum, 120 days from the application acceptance to the public hearing (County Board meeting). This process includes numerous Site Plan Review Committee meetings and Transportation and Planning Commissions review before the County Board meeting.

- C. Once the density, height, office use and parking is awarded, would that then put the future PenPlace processes that stay within those levels into a "by-right" proposal process?

No. Future development will be required to file Final Site Plans for that phase of development and follow the established 4.1 process, including a SPRC process and public hearing by the Planning Commission, Transportation Commission and County Board.

- D. Would the developer be able to request additional density, height, parking or uses at final site plan by offering additional “benefits”?

Applications are required to demonstrate compliance to the GLUP, zoning ordinance, and PDSP, however the applicant does have the ability to request changes to policy and implementation guidance. Additional height and density would require a PDSP Amendment to any density allocation, maximum heights, or parking requirements set forth in the PDSP. Subsequent final site plans would continue to be evaluated for their consistency with the GLUP, zoning ordinance and PDSP.

- E. Which of the aforementioned planning documents awards the “by-right” status to the Developer for these changes, the GLUP, the PDSP, Zoning, TDR transfer or some combination?

The Pentagon City PDSP conditions the density allocation for the subject parcel. However, all property retains a by-right density and other requirements which are granted under current zoning. In this case under “C-O-2.5” zoning, which by-right allows:

- one-family dwelling (approximately 20 homes per area requirements)
- Churches or other places of worship, including parish houses and Sunday schools, but excluding rescue missions or temporary revivals
- Family day care homes providing services for up to five (5) children
- .6 FAR for offices, businesses and professional (approximately 240,450 sq. ft. GFA per area requirements).

The by-right height limit for C-0-2.5 is thirty-five (35) feet and bulk, coverage and placement requirements vary depending on what use is built on-site and can be found in Section 32 of the Zoning Ordinance.

2. As presumably Vornado will pay ‘market price’ for TDRs, does this density then become an asset “owned” by Vornado, available for possible future transfer in order to leverage increased density on other sites? For example, if the full density is not used on Parcel 1D, could TDR policy be invoked (if approved by the County Board) to allow its transfer to other sites such as River House? If not, please explain – with clarity and completeness – why this cannot be done and is therefore not of concern to the community.

TDR density is transferred to a specific receiving site to be used on that site concurrent with a final site plan based on County Board approval. Density transferred from a sending site to a receiving

site is for use on the receiving site only. Once the density has been transferred it cannot be re-transferred to another site.

3. It has been suggested by SPRC members, and the community concurs, that awarding such a large amount of density at one time to a single developer, with so many outstanding issues and unknowns about the tenants or uses, will leave little leverage for the County or community to ensure concerns are meaningfully answered in upcoming processes. We would like to ask the County to only award density in increments as the site is built out to better ensure the development meets County and community's standards and expectations. If this will not or cannot be done, please explain – with clarity and completeness – why not?

The PDSP will define density allocation, building envelopes, parking, site and open space configuration, and uses, among other elements, but density will not be entitled until the adoption of a final site plan for any given building. The 4.1 process, including a SPRC process, which includes representation from Civic Associations, Planning Commissioners, and neighborhood representatives, will provide additional analysis and guidance for future development. Final site plans are required to go through a public hearing process, where the public will have an opportunity to provide input, at the Transportation Commission, Planning Commission, and County Board.

4. TDR policy is one of many tools the County can use to help encourage Smart Growth while preserving open space and historic structures for a neighborhood. The first implementation of the TDR policy on the Founders Square Site was a model example of this “Win-Win” promise of TDRs. Unfortunately, our community feels that PenPlace is poised to be an example of how loose interpretations of TDR policy can also create a win/lose situation. When the needs of, and impact on the receiving community are ignored and/or not compensated, the neighborhood is the loser. (Please answer the following questions using the expected sources of density at the level requested in the PenPlace proposal).

A. Please identify the approximate portion of density anticipated from

(a) bonus density formulas (LEED certify, Affordable Housing etc)

These bonuses are based on the land area associated with each phase/building, which are not set until the final site plan applications for each respective phase/building. The density bonuses for each phase will be determined according to the PDSP, zoning ordinance, and GLUP. Therefore, at this PDSP level, we can only approximate the land area (about 97,000 sq. ft. for each phase/building) and assume that the zoning ordinance and County policies in effect today will remain unchanged. With these assumptions, a LEED Gold certification for all phases/buildings (excluding the proposed hotel) would result in approximately 135,000 sq. ft. of density, a LEED Silver for the hotel would result in about 24,000 sq. ft. of density, and a .25 affordable housing bonus for all phases/buildings (excluding the proposed hotel) would result in 97,000 sq. ft. of density

(b) conversion of existing density

This amount continues to be the subject of negotiations between the County and the applicant

(c) density anticipated from TDRs

400,000 – 610,000 sq. ft. from County-owned certified sending sites; unknown amount from privately-owned certified sending sites and potential sending sites.

- B. Please share with the community the sending sites under consideration for transfer to PenPlace

In addition to the March 16, 2013 certification of development rights from the North Tract, which has been considered as a potential sending site, the applicant will ultimately be responsible for acquiring development rights certified by the County Board.

- C. As it has been discussed that Long Bridge Park is among the sending sites, would this be the first time the County has “sold” density from a County Park?

No. The County transferred all of the density for Potomac Yards from a part of the North Tract. The County also transferred density from another part of the North Tract to the adjacent Monument site plan project.

- D. What is the rationale for selling density from the park when the density is already locked in and the transfer does not result in any additional land preservation?

The zoning ordinance defines permitted density based on a specific zoning district. The transfer of development rights is contingent on County Board adoption of a final site plan, which is required to go through the SPRC process, as well as a public hearing process with the Planning Commission, Transportation Commission and County Board.

- E. Has the County asked Vornado to offer density from one of its own properties to increase the stock of open space, creating a win/win for the County and Community, if not why not? In particular, the 81 acres of Vornado’s River House property contain a large amount of open or underutilized surface parking that could provide open space as well as a buffer to future development for the community. Has the County approached Vornado on contributing open space from River House? If not, why not?

The County continues to explore all options that pertain to the future transfer of development rights that will achieve the objectives of the Comprehensive Plan and Pentagon City PDSP.

5. There is widespread support for the Long Bridge Park and the Aquatics Facilities in our community. However, many feel that allowing the developer to link the PenPlace proposal to the park facilities amounts to (in the words of one audience member) a “bribe,” inappropriately incentivizing the County Board to approve a development that, on its merits alone, does not represent good planning or “Smart Growth” in a process that has deviated radically from the Arlington Way. Will the County be willing to sever the tie between the two projects so that both can be approved on their merits?

The PenPlace proposal is being reviewed solely on its own merits and we are not considering the aquatics facility as a determinant.

6. PenPlace as proposed represents a huge departure from the requirements of the Pentagon City PDSP, leading neighbors to believe the County is entertaining this proposal for density individually and without a coordinated plan or study (spot zoning). In addition, because PenPlace comes on the heels of the Crystal City Sector Plan neighbors are worried that South Arlington (south of I-395) has been singled out for greater density than other metro areas in order to provide benefit to other communities or projects.

- A. There is a growing feeling within our community that this decision to move large amounts of density to our Community is a “done deal.” This feeling seems verified by the 8.1 Forecast prepared for the Metropolitan Washington Council of Governments that indicates a 128.6% increase in employment for the Pentagon City area even though there is very little approved commercial space available for development. Did County staff assume approval of the 1.8 million square feet of additional office density requested by Vornado for PenPlace when developing these forecasts? If not, please indicate what planning documents were used by the County staff to develop these forecasts?

Staff has a practice of including proposed development under review at the time of any forecasting round in order to ensure it is included in the analysis. Staff adjusts the forecasts for actual approvals in later forecasting rounds.

- B. Many community members feel frustrated with the SPRC process: they do not believe it is operating in a way that is adequately representing the community’s concerns. The extended PenPlace process, brought to our Community Center, has not yielded a single integration of community-voiced concerns. What measures does the County have in place to determine if a County process has been successful? If there are none, please explain why not?

Community input for development proposals is sought through the LRPC and SPRC processes and Planning Commission and County Board public hearings. The SPRC process

seeks to guide a development proposal through analysis by SPRC members, including representatives from the community and the Planning Commission. Although there may be general agreement regarding certain elements of any given proposal, the goal of the SPRC is not to seek unanimous consensus or integration of any singular perspective. Rather, SPRC members are encouraged to lend their guidance and views regarding the key elements of a PDSP or final site plan proposal. Additional community input is sought during the public hearing process with the Transportation Commission, Planning Commission and County Board.

- C. Proximity to metro is often cited for the appropriateness for heights and density, Virginia Square, Clarendon, and Courthouse have Metro stations with much lower metro usage (Pentagon City is the third highest metro after Rosslyn and Pentagon). What policies or planning documents are protecting those neighborhoods from the types of proposals like PenPlace?

In the case of Pentagon City, the Comprehensive Plan, General Land Use Plan, Zoning Ordinance, PDSP and the conditions established as part of final approved site plans provide the important land use, transportation, environmental and growth management policies, strategies and regulations to guide development.

- D. The Vornado Attorney told ARCA representatives in February 2012 that the County had assured Vornado at the time the land was purchased that they would be granted 1 million square feet of additional density. The strong implication in that statement was that the 1 million was a done deal so the PenPlace request was only the 800,000 above that 1 million. Was this density assurance a formal agreement made with the County, and was this based on any public process or involved any community input?

The density allocation specified in the Pentagon City PDSP for Parcel 1D includes 930 residential units and 882 hotel units. Additional density entitlement must be approved through a PDSP amendment and final site plan process, which is subject to SPRC review and public hearings with the Transportation Commission, Planning Commission and County Board.

7. It is a 'paradox of densification' that while concentration of density lowers regional carbon footprints, it also concentrates these effects locally. In the case of the effects of densification of Crystal City, Pentagon City, and the Jefferson-David corridor, the locality in question is our neighborhood. These effects are being concentrated where we live, where we walk, where we raise our children. What proactive mitigation or protections are being planned by the County for our community? If none, please explain why not?

PDSP and final site plan proposals are reviewed through the SPRC and the public hearing process with the Transportation Commission, Planning Commission and County Board. County planning policies and development and growth goals contained in the GLUP and in the Crystal City Sector

Plan seek to preserve and enhance existing single-family and apartment neighborhoods and mitigate detrimental impacts. The Pentagon City PDSP further defines conditions and commitments that are aimed at providing protections for the surrounding community. Additional measures have been discussed during the PenPlace SPRC process and will continue to be discussed during the public hearing process. In addition, the consideration of future final site plans will include further analysis through the SPRC and public hearing process.

8. Views of the monumental core are a community asset. The Developer has repeatedly discussed the value of that asset for their proposed buildings' unobstructed views and the premium rents they will command. A side effect of the increased height on the Vornado land would be that other developers and existing developments will have those same views blocked. Given that all agree on the value of this asset, the community asserts its value should not be maximized for a single developer.
  - A. At what point in the process will the County take steps to ensure the view assets for the entire area for maximum public enjoyment and commercial gain, as was seen in the Rosslyn Building Heights study. If this is not part of the process, why not? If this is not part of the process, the community requests the County Board direct these steps be taken anyway. If the County Board will not do so, please explain why not?
  - B. Will the County conduct any of the following studies prior to a decision on building heights at the PenPlace site?
    - View Study
    - Shadow Study
    - Property Value/rent Study based on access to view
    - Any study to determine the full economic impact of increased heights on the surrounding community both single family homes as well as adjacent and future commercial development? If not, please explain why not?

The applicant has submitted a number of graphics regarding views as part of the SPRC process and as requested by SPRC members. Building heights are typically evaluated and considered in conjunction with the surrounding context of development proposals.

A formal shadow study has not been requested or submitted, but staff will explore the provision of a shadow analysis as a more refined concept plan for PenPlace emerges. Although shadow studies are not a requirement of the PDSP and final site plan process, it is likely that additional information will be provided and evaluated at the time of final site plan submittal.

9. "Metro Station Areas have been the focus of County planning efforts for several decades. Dense development is clustered around the station entrance in a bulls eye pattern with the tallest buildings adjacent to the station itself... with the tallest and most dense development adjacent to the Metro stations quickly tapering to lower buildings and single family neighborhoods... " (Arlington County website). **Our community supports this County tapering policy; and, for this**



**reason we did NOT voice opposition to the Pentagon Centre PDSP.** PenPlace as proposed seriously diverts from this strategy as well as the tapering strategy of the Crystal City Sector Plan. The Community requests that the Arlington County Board reinforce with the PenPlace SPRC the importance of adherence to this established County strategy? If the County Board will not do so, please explain to us why not?

Pentagon City is a mixed-use, walkable urban district as opposed to a corridor. The buffers that surround Pentagon City are unique in that I-395 and the Pentagon create a boundary on the northern edge of Pentagon City, while low density residential development exists at the southern edge of the district.

Although the Pentagon City Metro is centered within Pentagon City MSA, the provision of transit accessibility is provided throughout Pentagon City; particularly with the introduction of the planned streetcar network. Also, in considering the overall Pentagon City Master Development Plan goals and the Report of the Pentagon City Planning Task Force, the tallest building heights in the Pentagon City area are more appropriate to be located in the northern and easternmost portion of the Pentagon City PDSP area, which is Parcel 1D. The potential building heights continue to be an important element of the SPRC process for Pen Place.

10. An Arlington County Board Resolution of Concern Regarding Building Heights Related to the National Capital Mall Axis says, in part: “NOW, THEREFORE, BE IT RESOLVED that the Arlington County Board will endeavor to maintain approved building heights within the basic site plan heights specified in the Arlington County Zoning Ordinance and, consistent with Virginia law, will discourage in the Mall Axis the use of bonus provisions for height except in clearly appropriate circumstances; AND BE IT FURTHER RESOLVED that the Arlington County Board will encourage developers of high rise structures in these areas to use neutral and non-reflective facades to minimize their visual impact from the Mall area.”

- A. Given that PenPlace will be very prominent and visible from the National Mall area, has the County considered the impact on the National Mall, and preservation of those viewsheds as has previously been done in the development of Rosslyn?

The Pentagon City Metro Station Area is not located on the axis of the National Capital Mall referred to in this question.

- B. Has the County sought input on increasing building heights and commercial development in Pentagon City with either the National Capital Planning Commission or the National Park Service or any other agency charged with preserving the character of the Capital City? If not, why not?

The Planning Division routinely consults with NCPC and the NPS. Future development on Parcel 1D will not have a direct impact on NPS land nor does it impose on the axis of the National Capital Mall.

11. The PenPlace Traffic Impact Analysis relies on a background development factor of 1% to account for expected development that has not yet occurred.

- A. Does the County have data showing that the planned development for the Jeff Davis Corridor (CC/PC/PY) only represents a 1% growth rate? If so, please provide this to the community.
- B. How does that reconcile with the County's 8.1 Forecast which indicates a 65% increase in employment over the next 27 years and the 49% increase in population for the JD corridor?

The TIA is used as a tool to identify the potential traffic impacts associated with a specific project, in this case the phased build out of PenPlace over the next 5 to 10 years (assumed). It is these specific impacts that are used to determine what mitigations are necessary because of the development. It is not a study of all of the potential development within the 8.1 Forecast.

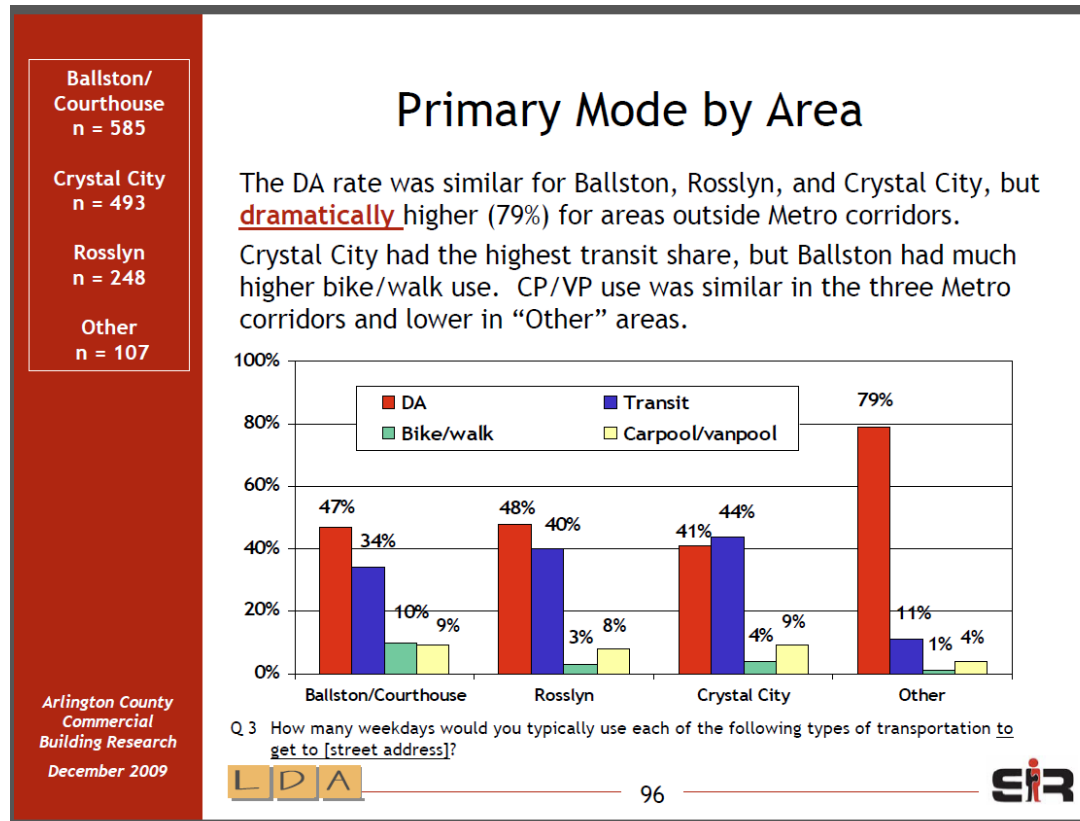
To address the growth identified in the 8.1 Forecast the County has identified and planned a broad range of multi modal transportation improvements in the JD corridor. These improvements have been discussed in detail in the past as part of the Crystal City Sector Plan process. The County has prioritized them and plans to phase these improvements over a 40 year horizon as identified in the Crystal City Sector Plan. Our current capital improvements plan (CIP) identifies funding for near term projects and their construction.

In regard to the 1.0% growth rate for background traffic, the traffic impact study (TIS) states "In addition, during the scoping meeting it was determined that a 1.0% regional growth rate for background traffic should be used, which is higher than the 0.25% to 0.5% growth used in other studies to account for any possible redevelopment beyond the area immediately surrounding the PenPlace site." The 1.0% assumption was used as a conservative estimate in light of the fact that Arlington County and VDOT data show that background traffic is growing at rates lower than 1% annually. The scoping process also assumed the first phase of the project would be built out in 2015 with the second and final phase, being delivered by 2020.

Attached please find a summary of historical County data compiled and presented as part of the SPRC process. The data shows how traffic volumes have been declining or stable over the recent past.

12. County staff has stated that PenPlace will produce 16,800 trips a day. Based on surveys and projections, they expect 60% of those trips to be mitigated through Transportation Demand Management (TDM) strategies, resulting in 6800 car trips a day.

- A. What kind of TDM reduction levels has the County achieved on other projects?
- B. Has the County achieved 60% reductions anywhere else? If so what were the projects and the conditions that lead to the reduction?
- C. What was the parking to square foot of Commercial office use ratio of those projects?
- D. Does the County have data from any other comparable jurisdiction or project that shows an actual 60% reduction in expected trips?



Regional and Arlington-specific research over the past decade indicates that the combination of transit-oriented mixed use development and employer/resident/visitor transportation demand management support services provided by Arlington results in fewer vehicle trips generated relative to traditional suburban development. Traffic Impact Studies/Analyses (TIS) for infill site plan redevelopment in Arlington typically apply a “reduction factor” to account for this, because the available trip generation rates by land use from the Institute for Traffic Engineering (ITE) does not reflect the way development in Arlington performs. For projects in the Jefferson Davis Corridor (Pentagon City and Crystal City) research shows that approximately 60% vehicle trip reduction would be appropriate for the land uses proposed in the PenPlace project.

Traffic engineers draw on local sources of information on travel habits and patterns to refine their estimates of how a development is likely to generate car trips. In the Traffic Impact Study (May 2012) for PenPlace (Table 4, page 37), the non-auto mode reduction for office use is based on the Arlington County Commercial Building Research Topline Report,

July 2009, and the non-auto mode reductions for hotel and retail uses is based on the 2005 Development-Related Ridership Survey by Washington Metropolitan Area Transit Authority (WMATA) and various other studies conducted nationally and throughout the Washington DC area.

Specifically, Arlington County Commercial Building Research Topline Report, July 2009 slide 97 shows that approximately 41% of the commercial trips in Crystal City were drive alone (59% vehicle trip reduction), compared to 79% for areas in the County not in Metro corridors. The data is based on 493 commercial building respondents in the Crystal City area. This was a broad sample and it did not account for specific buildings or additional TDM that may have been available encouraging/supporting higher vehicle trip reductions. The study also did not correlate parking supply and mode split for the Crystal City sub area.

Furthermore the PenPlace TIS explains that the 2005 Development-Related Ridership Survey by WMATA found that non-auto mode share for hotel and retail uses located near Crystal City Metro Station (Crystal Gateway Marriott, Crystal Hyatt Regency, Crystal Plaza Shops, and The Underground) was on an average about 75%. Thus, the assumption of 65% non-auto mode share for hotel and retail land uses in the TIS was considered a conservative estimate of the TDM/transit reduction.

**Table 15**  
**Mode Shares at Retail, Hotel and Entertainment Sites**

Site Name	Site Type	Mode			
		Metrorail <sup>1</sup>	Metrobus & Other Transit <sup>2</sup>	Auto <sup>3</sup>	Walk & Other <sup>4</sup>
Ballston Station Area					
Ballston Common	R	23%	7%	43%	27%
Holiday Inn Arlington	H	17%	0%	67%	17%
Regal Cinemas	E	35%	9%	39%	17%
Crystal City Station Area					
Crystal Plaza Shops	R	36%	5%	24%	36%
The Underground	R	31%	6%	27%	35%
Crystal Gateway Marriott	H	27%	7%	24%	42%
Crystal Hyatt Regency	H	48%	3%	21%	28%
Eisenhower Avenue Station Area					
AMC Hoffman Theaters	E	12%	1%	83%	4%
Friendship Heights Station Area					
Embassy Suites Chevy Chase Pavilion	H	33%	5%	25%	36%
Silver Spring Station Area					
Silver Spring Neighborhood Center	R	9%	10%	67%	14%
Holiday Inn Silver Spring	H	8%	4%	54%	33%
AFI Silver Theater	E	39%	2%	49%	10%
The Majestic 20	E	19%	13%	56%	13%
U Street/African American Civil War Memorial/Cardozo Station Area					
U St Main Street	R	44%	13%	19%	25%
Average Among Sites					
Retail Sites	R	29%	8%	36%	27%
Hotel Sites	H	27%	4%	38%	31%
Entertainment Sites	E	26%	6%	57%	11%

Notes: <sup>1</sup> Includes multimodal trips that may have involved auto or bus use in combination with Metrorail.

<sup>2</sup> Includes bus only trips, and commuter rail, such as MARC, VRE or Amtrak.

<sup>3</sup> Includes trips as driver and passenger of a private automobile.

<sup>4</sup> Includes cycling and any other form of transportation one may use.

R: Retail

H: Hotel

E: Entertainment (Movie Theater)

(WMATA, 2005)

For additional examples of how Arlington land uses might differ in trip generation from similar uses elsewhere in the region, the 2010 Regional State of the Commute Survey found that people who live or work in Arlington are less likely to drive alone (54% and 55%, respectively) than people in the region as a whole (64%), and more Arlington residents and workers commute by train (21% and 20%, respectively) than commuters in the region (15%). In another example, the Commercial Building Survey referenced above found that employees who worked close to Metrorail used bus and train more often and drove alone less often than did employees who worked farther away. Employees who worked within five blocks of a Metrorail station made 42% of their work trips by transit, compared with 19% of trips for employees who worked more than five blocks from Metrorail.

E. What plans/capabilities are there to collect the needed data to measure this?

Arlington County recognizes the importance of collecting detailed transportation data for both existing and new development. To compile data related to transportation performance for development within the County, a broad range of transportation data collection and research has been performed for more than ten years through Arlington County Commuter Services. This data is publicly accessible from [the Mobility Lab web page](#).

To evaluate transportation performance of new development, current site plan conditions include a performance monitoring study requirement. Studies are required at two years, five years, and every subsequent five year period after initial occupancy of the building. Older site plan projects near the PenPlace site such as Metropolitan Park I Gramercy, Metropolitan Park II Millennium, Crystal City Plaza, National Century Center, and others have at least a one-time post-occupancy study requirement. These studies consist of manual or mechanical counts of vehicle movements in and out of the parking garage, as well as a voluntary mode split survey of building occupants. These two kinds of data can give a good picture of trip generation at the site. To date, individual commercial site plan studies show peak hour trip generation rates of less than 40% of ITE (>60% reduction). The County will be able to publish aggregate results of these studies when we have accumulated enough building level data for statistical confidence in the results.

F. What are the consequences to the developer of not achieving the expected reductions?

The County does not set site plan specific transportation goals which must be achieved as a requirement of the project's site plan conditions. The estimates for mode split or trip reduction used to identify the impacts of a proposed project are identified based on observations and data available representing transportation trends from existing similar projects.

G. What back-up strategies could be developed if the County/developer projections are not achieved?

Arlington's Comprehensive Plan is fundamentally built around the approach of coordinating the planning and development of our built environment with our multi-modal transportation system. This approach is guided by the County Board adopted General Land Use Plan (GLUP) and the Master Transportation Plan (MTP). The MTP was most recently revised and adopted 2007 through 2011. The MTP outlines the County's goals, policies and implementation strategies related to transportation planning, one of which is to continue to shift users from SOV to other modes of transportation. This is specifically outlined in MTP Goal 2.

*Goal 2 – Move More People Without More Traffic. Provide more travel choices and reduce the relative proportion of single-occupant-vehicle (SOV) travel through Transportation Demand Management (TDM), telecommuting, and travel shifts to other modes including transit, carpooling, walking, and bicycling.*

### *Strategies*

- 1. Implement land-use policies such as transit-oriented and mixed-use development that result in better access and use of the transportation system.*
- 2. Focus on minimizing person delay across modes rather than focusing exclusively on minimizing vehicle delay.*
- 3. Encourage the use of environmentally sustainable modes, including bicycling, walking, transit, carpooling, and telecommuting. "MTP Goals and Policies Summary, pg 3"*

This is, in turn, used to help inform the County's Capital Improvement Program (CIP) and our continuing investment in our multi-modal transportation network. The recently approved \$1.12 billion, 10 year, transportation CIP has been planned to support existing and continued commercial development within the County.

13. Will the County consider making developer contributions for enhanced traffic management tools and technology a condition of any approval for projects in the Jeff Davis Corridor (including PenPlace and the CCSP)?

Each final site plan associated with the PenPlace PDSP amendment will be required to have a transportation demand management (TDM) plan and make site specific transportation improvements to mitigate the impacts of the use. Staff has not finalized negotiations on the PDSP TDM condition for PenPlace. The PDSP TDM condition will be designed to be responsive to changing conditions on the site, and will result in building-level TDM plans tailored to the specific use and character of the buildings. Typical site plan TDM conditions contain, among other things, long-term annual developer contributions to support commuter services. TDM conditions typically also include a separate transit subsidy program and reduced parking rates for carpoolers and vanpoolers.

In addition all commercial development in Arlington contributes to the Transportation Capital Fund (TCF) at 12.5 cents per \$100 of assessed value through the Commercial and Industrial Real Estate Tax. Annually this represents 23 to 24 million dollars in local transportation funding. The County uses these locally generated dollars to leverage additional state and federal dollars to fund most of the large scale multi-modal projects identified in the CIP, with a significant proportion of these projects occurring in the Pentagon City/Crystal City area.

The PenPlace site is also located within Crystal City, Potomac Yard, and Pentagon City Tax Increment Financing (TIF) area. The TIF is intended to support significant planned public infrastructure improvements in streets, transit, and public open spaces. This will directly reinvest increased tax revenues, from redevelopment, into the Crystal City, Potomac Yard, and Pentagon City area supporting transportation initiatives.

14. As the Jeff Davis Corridor grew in the 90's and early 00's, Metro was an important safety valve in keeping traffic volume south of 395 from growing out of control. But during that period, Metro had significant growth capacity. Future availability of that capacity is clearly in question given the condition and size of Metro's rolling stock and the reduction in service to and from the RB Corridor

and western suburbs and western DC during rush hour due to the advent of the Silver Line. For example, the County's analysis in the Crystal City Multi Modal study assumed there would be 8 car trains on 50% of Blue and Yellow Line rush hour trains by 2010. It is now 2013 and not only has that not been achieved but the number of Blue Line cars will be reduced even further due to Rush Plus.

There has been no reduction in the number of trains and cars serving JD Corridor stations, rather, more trains are connecting directly to Downtown over the Yellow Line bridge. If a rider is going Downtown, this is a benefit. If a rider is heading for the RB Corridor, there is less service. The County continues to work with Metro to address these connectivity challenges, and additional north-south bus or Metrorail service that has been planned or already added includes:

- Additional 8 car trains are proposed for the Blue Line,
- Metrobus service extending from the Pentagon to Rosslyn,
- Addition of new N/S ART bus service servicing the Pentagon City or the Jefferson Davis Corridor.

A. Has the County factored in the changes to Metro service, capacity and costs in its transportation analysis?

The applicant's TIA assumes the mode splits discussed above. The Rush Plus changes have not specifically been factored into the TIA, however neither has the broad range of transportation capacity enhancements planned by the County for this area. Please also refer to the response to Question 12.

B. Just because Metro has been a safety valve in the past in keeping traffic volumes down, why does the County believe this can continue indefinitely in light of the current state of Metro?

Transit and other non-SOV modes are not "safety valves" but rather integral components of Arlington's transportation network and transportation planning. As approximately 40% of all Virginia's transit trips are generated within Arlington County, the County is and plans to continue to invest heavily in expanding and enhancing multi-modal transportation options for residents, employees and visitors. The County also supports multi-modal transportation projects within the region. Please also refer to the response for Question 12. G.

15. Residents living near the Interstate 395 , were extremely grateful when the County Board insisted Environmental Impact studies be conducted prior to construction of HOTlanes. As PenPlace will offer a similarly staggering increase in vehicles traveling through those same neighborhoods each day, we call on the County Board to once again demand proactive rather than reactive protection and mitigation. Will the County require an Environmental Impact Study to determine the effects on air quality, noise quality, watershed, and pedestrian safety in the neighborhoods adjacent to Parcel 1D from the increase in automobile traffic be completed prior to approving additional density and/or before approving parking spot numbers?



The PenPlace project is being review based on Arlington County established [Administrative-Regulations-4.1](#) governing the submittal and review of site plans and phase development site plans. The regulations do not require the submittal or review of an Environmental Impact Study.

16. The community has repeatedly asked for neighborhood serving commercial spaces such as doctors' offices, medical facilities, meeting spaces, professional service offices, day care facilities, dance and fitness studios etc. in Pentagon City. Parcel 1D represents the final unused parcel of land in Pentagon City, yet the uses of the site requested by Vornado have not included any commitment to any type of neighborhood-serving commercial.

- A. Has the County done any studies to determine distance to medical services and accessibility for medical services for those of us who live in this part of the County? If so, please share those studies with the community?

No studies of this nature have been prepared by County staff.

- B. When building a complete community, shouldn't these types of services be required, especially given this the last remaining parcel of Pentagon City available for development? If not, why not?
- C. Daycare facilities are scarce in this part of the County and none exist within Pentagon City, and inclusion of Daycare facilities was part of the original PDSP. Given this is the last undeveloped track within the PDSP does the County intend to hold the developer to the obligation from the original PDSP? If not, why not?

Land uses throughout the County are specified in the General Land Use Plan and zoning ordinance. A PDSP further allocates land uses across parcels. Retail allocations and the location of potential use categories, including service-oriented uses, may be specified within the Phased Development Site Plan. Final site plans, which are required to go through the SPRC and public hearing process, provide additional detail regarding the types and location of uses.

17. The community has requested that the PenPlace site retain some residential development. The developer has rejected this request, preferring instead to move the allotted residential density to Met Park, thereby increasing heights and density on that site as well.

- A. Will the transfer of the density to MetPark be done during this process? If so, for what reason are the two parcels not being considered together in this PDSP amendment?

On July 14, 2009, the County Board approved an amendment to the Pentagon City PDSP for the purpose of revising Condition #2 to allow 930 residential units allocated to Parcel 1D (the PenPlace parcel) and 300 hotel rooms allocated for Parcel 3 (the Metropolitan Park parcel) to be used on either parcel subject to the approval of subsequent final site plan applications. Therefore, the reallocation of these uses has already occurred and will be

further evaluated with each final site plan application that seeks to use this density on either parcel.

Pen Place and Met Park are separate applications and are subject to the review processes articulated by the Zoning Ordinance and associated site plan review procedures. Both the Planning Division staff and the Planning Commission committees responsible for the review of the subject applications are coordinating closely.

The proposed PenPlace project is an application to amend the Pentagon City PDSP to permit densities to be allowed, subject to final site plan applications, in amounts greater than what Condition #2 currently permits. The Metropolitan Park 4/5 project is a final site plan application that seeks approval to construct a building using density that is already allocated to Parcel 3 per the PDSP without consideration of using any part of the 930 residential units that are permitted to be provided on this parcel.

- B. If as has been suggested by planning staff that transfer will not need to occur until a building is proposed on Met Park that exceeds available parcel 3 density (assumed to be Met Park 7 or 8 and a year in the future). Please explain with clarity and detail why this is not more evidence that the County is not considering the community in a holistic plan, and instead is conducting “spot Zoning?”

All PDSP amendments and subsequent final site plan applications on Parcel 3 have occurred within a public review process that is consistent with Arlington County ordinances and practices that invite and encourage public participation. The General Land Use Plan, zoning ordinance and Pentagon City PDSP provide planning guidance for the review of development applications. The public participation process for Parcel 3 included review by the SPRC and public hearings with the Planning Commission and County Board.

18. The proposed secure buildings essentially prevent the center of PenPlace from being used by the public, and the adjacent roads essentially become private driveways. The resulting development will likely have a feel similar to the adjacent Lincoln Properties (aka MCI or NEA/TSA site)

- A. What is planned for within the boundaries of Parcel 1D that will enliven the site evenings and weekends?

The PDSP will define overall density, height, streets, open space, and a range of uses. Specific uses will likely not be determined or known until a tenant is secured and a final site plan is adopted. A specific design for the open space will occur subsequent to the adoption of a PDSP, however a number uses and activities that would help activate and enliven the space have been discussed during open space discussions for the SPRC process.

- B. The developer has made a profitability argument for not moving the secure buildings to the northeast corner, (private tenant will pay the premium for the views of the monuments). Given

the impact on the entire site the community is asking the Board to reject this argument in favor of better planning. If the County Board will not do so, please explain to us why not?

The number and location of potential secure facilities has and will continue to be considered through the SRPRC process and ultimately by the Planning Commission and the County Board.

19. The County has stated additional office density was “necessary” to creation of an office/residential proportion suited to supporting local retail. However, the data utilized to determine this office/residential proportion did not include the adjacent Pentagon office building which produces enormous daytime shopping and lunch crowds for Pentagon City businesses. Has the County studied the viability of existing retail in the area? If so, please provide the reports. If not, please explain why not?

Land uses throughout the County, including retail uses, are specified in the General Land Use Plan and zoning ordinance. Retail uses are often specified in conjunction with a PDSP proposal and further considered at the time of final plan submittal. County staff has considered the land use and retail mix within the Pentagon City PDSP area and within Crystal City as part of the approved Sector Plan.

20. Much of the open space in Pentagon City is by permit only or permit preferred, greatly reducing actual open space available to the community. Permits are required for use of Long Bridge Park, both softball fields at Highlands and the soccer field at Highlands. Residents of Pentagon City must walk with their children through heavily trafficked streets to reach other play parks that are over-utilized and crowded. Will the County Board direct the SPRC to ensure the required one acre of green space in PenPlace be planned as active parkland in any recommended development offered to you? If not, why not? If not, what compensating play area if any will the County require?

Through the SPRC process, several Committee members and staff have expressed a preference for a mix of active and passive uses for the public open spaces on-site. Alternative plans discussed with the SPRC and proposed by the applicant include public open space in excess of 1 acre.

21. The original Pentagon City PDSP was specific in addressing the need to build 12<sup>th</sup> street. Page 50 of that document reads “From South Fern Street to South Eads Street --U4-- The applicant commits to the construction of the full cross-section of approximately 51+ feet from face of curb-to-face of curb and said full width construction will be provided at the time of building construction on the adjoining or abutting development tract/block or parcel.”

- A. As it states 12th Street is to be built out at the time of development of the first adjoining parcel, and as now that first adjoining parcel is Met Park, the community is asking why the County and developer repeatedly state that the obligation to fully build out 12th Street is a major community benefit attached to PenPlace, rather than to Met Park?
- B. The community has requested of Staff (in November 2012) any documentation that would have modified or eliminated this commitment from the MetPark side of the street. We also asked to be directed to the transcript of the County Board meeting at which these modifications were approved. We are particularly interested in whether or not this

modification was treated as a new condition warranting additional density or consideration to the developer in either PenPlace or Met Park?

- C. As construction of 12th Street was a known condition to development of the MetPark parcel when Vornado purchased the property, then please explain why 12<sup>th</sup> street continues to be represented as a major community benefit of PenPlace when the timing and completion of the street could have been accelerated had the original PDSP been honored and attached to Met Park. Please explain why this is not a concession to the developer, allowing them to delay the construction rather than a benefit to the community?

Specifically you have asked about the following commitment from the Statement of Commitments in the 1976 Pentagon City Master Development Plan (pg. 50, section c.4).

*“From South Fern Street to South Eads Street --U4-- The applicant commits to the construction of the full cross-section of approximately 51+ feet from face of curb-to-face of curb and said full width construction will be provided at the time of building construction on the adjoining or abutting development tract/block or parcel.”*

We reviewed the following documents. They have been hyperlinked or attached for your reference:

- [Pentagon City Master Development Plan](#) (click to use hyperlink to the document)
  - Statement of Commitments
  - Arlington County Board - Zoning Approval Minutes
- Staff Report for Phase 1 of Metropolitan Park (included as an attachment)
- Staff Report for Metropolitan Park MTP amendment (included as an attachment)
- Staff Report for Phase 3 of Metropolitan Park (included as an attachment)
- [Metropolitan Park Design Guidelines](#) (click to use hyperlink to the document)

To frame the issue it is important to understand the role of the PDSP, along with the role of the subsequent Final Site Plans. The PDSP provides a general set of rules for the development of a large site plan area that would be built out in phases. The PDSP does not provide the final approval for the construction of any buildings within the PDSP area. For each phase of the PDSP the County Board approves a Final Site Plan specifying, through the plans and conditions, what can be built along with what infrastructure (streets, sidewalks, utilities, open space, etc...) is required to be provided to support the approved Final Site Plan.

Specifically, condition #14 of the PDSP (pg. 68) is relevant to street construction. It states:

*14. The developer shall construct the total frontage of street and sidewalk required on a block face commensurate with the first building construction on the block face. On corner lots, construction of the total block face frontage shall be required only on the longer side and the building site frontage only on the shorter side.*

This PDSP condition obligates the developer to construct the "total frontage of street and sidewalk required on a block face". Neither "block face" or nor "total frontage" was specifically defined. These general rules were then considered nearly 30 years later in the development of the Metropolitan Park plan and the three subsequent Final Site Plans approved to date.

As part of the public review for the Metropolitan Park plan a set of design guidelines was developed to further help inform the build out of Parcel 3 (Metropolitan Park). The Metropolitan Park Design Guidelines included a phasing plan (pg. 17) detailing the street infrastructure to be built with each phase of the Metropolitan Park development. Twelfth Street South is shown as being built in two phases, associated with Met Park Phase 3 (Final Site Plan approved) and associated with Met Park Phase 4 (Final Site Plan under review currently). In Phase 3 the road would be built from South Fern Street to South Elm Street and in Phase 4 from South Elm Street to South Eads Street.

The Met Park Design Guidelines also identified a cross section for 12th Street (pg. 19) however it has the following caveat:

*\*\*Prior to Phase 3 approval, an alternative design for 12th Street, including accommodation for transit, will be reviewed by Arlington County.*

This was noted at the time (2004) because staff knew that 12th Street South would be used to support future transit operations and that the street section required would most likely be different than the 51' curb to curb section shown as U4 in the 1976 Pentagon City Master Development Plan and the section shown in the 2004 Met Park Design Guidelines. It was identified in 2004 that the time it would take to get to an approval for Phase 3 would enable the County to better determine its 12th Street design requirements. During the Met Park Phase 3 review process staff identified that a 72' curb to curb section would be required along 12th Street South to support future transit operations.

At the conclusion of that process and based on County Manager, Transportation Commission, and Planning Commission recommendations, the County Board approved the construction of the 36' wide section from Fern Street to Eads Street.

22. The community is concerned that the some items characterized by the County and developer as community benefits accrued to the development of PenPlace appear to be existing commitments or obligations from the original PDSP.

- A. We ask that the County conduct an analysis and provide a clear list of benefits that are promised, committed or obligated by the requirements of the original PDSP, and which of these are anticipated to be realized with the PenPlace Proposal.
- B. If the County anticipates waiving any of those benefits obligations or commitments or exchanging them for different commitments, please indicate which ones with a corresponding rationale or explanation.
- C. Please provide the list of new benefits, either expected or under consideration, that the County considers as those resulting from the building of or rewarding of additional density or height to PenPlace and are not part of the original PDSP.

No benefits have been committed or obligated, nor have any commitments been waived or exchanged. As the project proceeds through the SPRC and public review processes, staff will evaluate and report on appropriate community benefits associated with PenPlace. Potential benefits will be reviewed during the SPRC process and ultimately considered by the Planning Commission and County Board.