

AURORA HIGHLANDS CIVIC ASSOCIATION

1. Flexibility:

- a. This plan, particularly now that it is a "sector plan", offers a great deal more flexibility for developers in what and where they build than equivalent plans elsewhere in the county. There is some value in this, we have seen the downsides of rigidity in making the Crystal City Sector Plan work over time, but it also provides a lot of uncertainty for the neighborhood, particularly when it comes to when community facilities, discussed more below, will come online.
- b. The plan needs to better incorporate a process, akin to site-specific PDSPs, to allow higher level review than the SPRC process allows, especially for the larger sites in the package. **RESPONSE:** Staff agrees and has added a requirement for larger sites (RiverHouse, Fashion Centre, and Westpost/Pentagon Row) to submit a Phased Development Site Plan (PDSP) for community benefits whenever they file site plan applications. This will ensure staff can monitor incremental progress in achieving the vision in the Sector Plan while allowing everyone to track how each phase, over time, contributes its share to the community benefit package outlined in the Plan for each site. To be clear, the PDSP for community benefits is simply an implementation tool to help track gradual progress of larger sites to ensure they meet the Sector Plan’s vision. The PDSP is not intended to reimagine what is possible or change key recommendations developed through the course of this planning study.
- c. Without more clarity, there is a good likelihood that, when it comes to implementation further down the road, residents, developers and the county will also have fairly different interpretations of whether the goals are being achieved. **RESPONSE:** See earlier response.

2. Affordable Housing:

- a. It is very good that this plan calls for on-site affordable units in the new residential development. However, the affordable units are only guaranteed for 30 years.
- b. Given the affordable housing comes as part of a deal with developers who gain enhanced density, and therefore indefinite market value, the ability for residents of all incomes to afford this neighborhood should not be so short term. **RESPONSE:** Staff does not consider a 30-year commitment as “short-term”. Additionally, buildings (particularly those built using wood-frame construction), are not considered indefinite assets and ultimately will reach their useful life before wholesale replacement is needed. Furthermore, potential changes to the standard 30-year commitment for affordable units needs to be considered at a County-wide level and will not be resolved at a Sector Plan level. Increasing the length of the commitment involves a higher cost and would therefore likely result in a lower quantity of units which represents a significant tradeoff. While extending the duration of CAFs is preferred by all and such an effort will certainly require innovative approaches, CAFs can often become reclassified as Market Rate

Affordable Units (MARKs) given their age, condition, and relationship to the surrounding real estate market once the initial 30-year commitment expires. Staff considers MARKs an equally supportive element in the County's overall housing inventory.

3. Open Space:

- a. While the report touts acres of public space, that is not a fully accurate description. Rather the majority of the open space featured is improved spaces, such as moving Grace Murray Hopper Park, greening the space outside the Pentagon City Mall and revisioning the pedestrian areas around the Brookfield development. While these are certainly improvements, the actual expansion of new open space is not significant. **RESPONSE:** Considering the totality of the overall green ribbon network, the expansion of the Virginia Highlands Park, and well distributed public plazas, staff considers these improvements noteworthy and commensurate with the level of growth envisioned by the Plan.
- b. Of particular concern is the decision to spend significant sums of money moving Joyce street to expand Virginia Highlands Park. This money, leading to a very awkward street alignment and shifting previously separate, if underused, park land to an already sizable park, would be better spent instead expanding open space within the River House site itself or elsewhere. We should spread park space throughout the neighborhood, not concentrate it and lose money that could be spent on better pursuits. **RESPONSE:** As depicted in the Plan, the realigned Joyce Street could connect to an existing signalized intersection providing further traffic controls over the vehicular movements in this area. In terms of costs, JBG Smith would only be expected to design and construct the new segment of the roadway which would expand the existing RiverHouse driveway and parking areas. Changes to the existing Joyce Street (running along the western edge of the park) would become part of the subsequent park master planning effort to determine how that space may best be repurposed to address community needs. Staff considers the 1-acre expansion a significant opportunity to expand a centrally located asset that will be expected to support a growing population and continue to house public facilities. The remaining public plazas called for in the Sector Plan are already well distributed within the planning study area while the RiverHouse property alone will deliver almost a mile of the total three linear miles identified for the green ribbon network upon full build-out.
- c. Similarly, it is concerning that the county plans to use limited community benefits to obtain the right of way for the green ribbon areas. This is part of a bad trend where pedestrian passages are now being treated as open and public space, allowing developers to offset density and avoid spending community benefit dollars elsewhere. Given this plan does not envision the county purchase or use capital project funding for any new space, these trade offs may not be worth it. **RESPONSE:** Emphasis on public parks/plazas and publicly accessible connectivity through Pentagon City reflects recently identified priorities by Livability 22202. The Plan's main objective is to ensure these community improvements are delivered at the time of site plan development and not subject to CIP funding negotiations which may significantly extend their delivery timeline. The approach of focusing private investments on public spaces, sustainability, and on-site affordable housing, will allow the County to strategically focus its CIP funding on larger items such as public facilities which generally involve County-owned land.

- d. The expression of the Green Ribbon suggests that it may not be fully realized as a truly lush, heavily planted area. The proposed PenPlace design plans, where many portions of the Green Ribbon on this site are not aligned with the design guidelines, are an example of this concern being realized. Given the potential for only 4-foot planting zones with many gaps and use of non living materials, the Ribbon allows a lot of room for minimal commitment **RESPONSE:** The biophilic objectives outlined in the Sector Plan apply beyond just the green ribbon network and are expected to be achieved on private property through redevelopment. Each site will need to adapt the design guidelines to fit its respective design proposal, resulting in unique interpretations. Staff believes the variety this offers will benefit the overall character of the network which will offer various concepts from site to site. Given this network will traverse a broad geography and often intersect with other pathways, outdoor seating for restaurants, residential amenities, or other features, limited breaks in the planting zone may be necessary.
- e. Tree Canopy & Vegetation:
- The addition of tree canopy minimum coverage is good, though unambitious, and reflects an important neighborhood priority. However, strict supervision and a plan of enforcement is needed to ensure proposed plans can meet it. For example, given that some of the goal can be achieved not at grade, a planning review should include a close look at soil depth and tree selection to ensure that proposed above-grade plantings can realistically meet canopy goals in the long term. We do not want to end up with a lot of empty planters on buildings. **RESPONSE.** Agreed. Such reviews already occur (and will continue to) at the site plan level by various staff and commissions.
 - For above-grade spaces, developers of residential buildings should be encouraged to engage residents in the spaces either by making sure greened spaces are accessible, ideally to the general public, or by encouraging residents to plant publicly visible balconies and patios. For example, units could come with planter boxes installed with a subsidy for purchasing plants. This helps new residents take some ownership over the neighborhood in addition to the greening benefits. **RESPONSE.** Agreed on the accessible comment (in general), however, the Sector Plan specifically distinguishes (as similar documents have before) between those areas which will serve a public benefit and those which will serve the tenants of a particular building. Requiring public access to all courtyards and private greened spaces would trigger those areas to be valued and incorporated into the broader community benefit discussion which could conflict with previously identified priorities. Suggestions like these can still continue to be made at the time of site plan review.
 - The PDSP should consider what happens should site plans subsequently come out of alignment with planting requirements. The best method would be to not just evaluate sites by planting requirements during the SPRC process but to include the planting requirements in the site plan itself. This ensures that the plantings must be maintained in order for the site to remain in compliance. **RESPONSE:** This is normally captured in the landscape plans and further reinforced in the condition language referencing those plans. Some requirements are specifically set to apply “for the life of the site plan” and may trigger subsequent inspections if maintenance is not conducted.

4. Community Facilities:

- a. The core Sector Plan document itself makes mention of a school, which the neighborhood has highlighted as a priority but APS has not provided a timeline for, and a fire station. It fails to mention anything about other expanded community facilities like a library and community center, especially since the existing inadequate facility may be replaced (by the school and/or expanded fire station mentioned in this section). This document is inadequate if these are not mentioned as priorities at 1.6. **RESPONSE:** Noted. Section 1.6 has expanded to reflect that.
- b. In the implementation matrix, there is a proposal to locate the existing primary fire station building, a new elementary school, a library and a community center on the existing Aurora Hills facility site. It is our understanding that there has not been a feasibility analysis to see whether there is space for all of these facilities, but a visual comparison shows that this is either unrealistic or would require sacrificing a significant amount of park land. The community is unwilling to accept a choice between not having these facilities, which are needed to accommodate the growth in population, or losing parkland, which we are asking for more of, not less. While details of this will be determined in a Virginia Highlands Park master planning process sometime in the future, we need a commitment now to a realistic plan to accommodate our short and long term needs before all land becomes spoken for. **RESPONSE:** The draft Sector Plan strategically highlights which public facilities are considered necessary to ensure Pentagon City can thrive and elaborates on this in section 1.6. This assessment represents an initial step to inform the subsequent park master planning effort for VHP which would confirm (through proper analysis and involvement of appropriate stakeholders) exactly what the spatial analysis suggests is possible. Prior to this process being initiated, the Sector Plan encourages pursuit of opportunities where private redevelopment could deliver ground floor space accommodating a library or community center – both of which may qualify as community benefits helping meet the vision of the Plan. However, should those efforts prove unsuccessful, the commitment to siting these facilities is represented by the recommendation to initiate the park master plan in the near term.
- c. River House would be a logical place for an expanded community facility; it could be located on the southern half of the current Grace Murray Hopper Park, the proposed use of which both the community and land owner agree is inappropriately vague. If unable to be built with community benefit dollars, this facility should be included in the implementation matrix as a future CIP item **RESPONSE:** This location would need to be studied further during the park master planning process as other options and tradeoffs are identified for consideration. Again, the Sector Plan is setting the stage for such opportunities to even be possible by first requiring the Grace Murray Hopper Park to be fully dedicated and become County-owned land.

5. Transportation:

- a. This plan assumes a very aggressive shift away from cars, which would be necessary to avoid significant traffic congestion as a result of the new density. However, its proposed methods of moving towards a more pedestrian, bike, micro mobility and transit-oriented mode are not aggressive, leaving many streets without or with insufficient bike facilities, not envisioning enhanced Metro facilities and leaving questions like increasing bus access for planning down the road.
- b. The plan vaguely calls for monitoring but does not say how it will occur or what will happen if the mode share goals are not achieved. The plan should more greatly invest both in incentivizing non-car modes of travel and in planning for how trends will be tracked and acted on.
- c. The plan fails to envision a second entrance for the Pentagon City Metro station in more detail than as a potentiality tied to capacity, rather than as a means to encourage more ridership through reduced pedestrian distances to the station entrance
- d. A 10-foot clear zone is essential on all sidewalks and a greater focus on how pedestrian travel will be encouraged and made 100% safe.
- e. Serious gaps remain in the protected bike network, particularly the need for separated lanes in both directions along the full stretches of 12th, 15th and Joyce Streets
- f. While the community's desire in the long term is for the Pentagon parking lots to be replaced with public space or developed buildings, the inclusion of a new bus station is positive. This bus station should be designed working with the community in addition to the other stakeholders and should have a goal of reducing bus parking and idling along Hayes. There should be a clear, safe pedestrian passage across Army Navy to make this a safe place for pedestrians to access.

OVERALL RESPONSE: The plan does envision (but does not focus on) enhanced Metro facilities and dramatically improved bus access. Much of that planning is accomplished in other County documents, particularly regarding buses. Improved pedestrian access to Metro via improved quality and quantity of connections is a major component of the plan. Although compromises are inevitable, the plan also includes the most aggressive bikeway network ever proposed in an Arlington area/sector plan. Several tasks regarding these issues are explicitly noted in the transportation section of the Implementation Matrix.

6. GLUP Map:

The discussion of the Sector Plan has primarily focused on increased density at a few major sites, namely RiverHouse, Brookfield, Simon and PenPlace. The plan has made mention of some potential to develop an expansion of the Regency Care site along Fern St. However, the new GLUP map includes the Claridge House in the increase to High Medium Residential. It is important to not incentivize redevelopment at Claridge House, which provides unique and badly needed committed affordable senior housing. Any change should explicitly be stated to sustain the long-term existence of this important community feature, while development should primarily be infill or around the Regency Care site. **RESPONSE:** The Claridge House property is located within the planning study area and therefore subject to the Sector Plan's recommendations. The recommended GLUP change reflects several elements associated with this site. First, the over 300-unit building currently exceeds its existing GLUP designation so the recommended GLUP change would ensure the existing improvements would at least be compatible with the site's GLUP designation (even if no changes to the site were to occur). Second, the Sector Plan already establishes pathways where modest expansion could be possible for sites like Regency Care and Claridge House by designating them with a much lower Floor Area Ratio (density cap) when compared to the rest of the study area. This becomes critical as both buildings were constructed in the late 70s and at some point may need to consider significant renovations that will require unique phasing opportunities – permitting a continuation of existing operations while the necessary maintenance work can take place. The incremental increase to the next residential GLUP designation further reinforces this vision by not permitting significant densities (as those found in the neighboring High Office-Apartment-Hotel designation for example). Beyond those recommendations, however, the Sector Plan is not able to restrict future growth to solely represent potential expansions of the existing use.

7. Community Integration:

- a. This plan would lead to thousands of new residents in Pentagon City, primarily through new multi-family buildings, likely to be residential. Without intentional planning, these new residents are likely to fail to participate and integrate into the broader neighborhood. The civic association has faced many barriers to engaging with current residents who live in these buildings, particularly reluctance for property managers to regularly share information and news with them. The plan should explicitly endorse access for community organizations to sharing information with residents of buildings in Pentagon City and structure the built environment to facilitate community communication channels such as providing community bulletin boards in public spaces, and access by community organizations to electronic signage, information kiosks, etc.. **RESPONSE:** The revised Sector Plan now includes two additional performance metrics under the Equity planning principle which acknowledge this issue.

8. Implementation Matrix:

- a. Add development of the Pentagon parking bus station. **RESPONSE:** Timeline is uncertain and dependent on WMATA. It is a WMATA/Pentagon project with Arlington involvement being tertiary.
- b. Add specificity for which bike facilities will be expanded and when, if not connected to expected developed sites. **RESPONSE:** We can't answer that, although a task in the implementation matrix could be to ID possible capital projects in the future.
- c. Under land use and zoning, monitor for other elements of site plans beyond housing and biophilia that are required by this Sector Plan. Either add them, such as open space, transportation, sustainability, etc or combine into one point. These are scattered elsewhere, but are directly connected to land use. **RESPONSE:** Noted.
- d. Add detail on how site-based trip generation will be monitored, such as periodic studies or regular traffic, bike, etc counts. **RESPONSE:** Site-based trip generation will be monitored via the future new standard site plan condition for TDM.
- e. Specify which bike facilities will be expanded and when. **RESPONSE:** See earlier response in "b".
- f. Given our comments on Joyce, add study the most helpful alignment and location of Joyce, potentially in conjunction with the VHP master planning process. **RESPONSE:** That's already expected to happen with the initial phase of the RiverHouse site plan. The VHP master planning process will determine what happens with the existing S. Joyce Street alignment.
- g. Add transit related items, such as Metro and bus improvements. **RESPONSE:** These are handled in the Transit Development Plan, except for coach-bus related issues. There should be an implementation matrix mention of finding a staging location for tour buses
- h. Add a process/plan to improve pedestrian facilities where site plans are not expected to occur in the near future. **RESPONSE:** Staff believes this is already captured in the implementation matrix.