



Peter Schulz
Department of Community Planning, Housing & Development
Planning Division
2100 Clarendon Blvd., Suite 700
Arlington, VA 22201

June 13, 2016

Dear Peter,

At its monthly meeting AHCA heard a presentation about the minor site plan amendment filed for perimeter lighting on Crystal House. We had a lively discussion during which the applicant explained that the sole purpose of the lighting was for aesthetics. We discussed whether it might be acceptable to the community to reach an accommodation by agreeing to lower luminance levels or limited hours of operation.

Although some felt that those sorts of conditions might make the lighting itself more tolerable, in the end, the association voted to oppose the application. Our neighborhood's position has been consistent in opposing lighting such as signage that shines into the residential neighborhood. While this perimeter lighting is not technically a sign, the applicant admitted to us that it serves no purpose other than to make the building more visible at night from our neighborhood. .

Among other concerns expressed was whether approving the application would set a precedent for other building owners, and whether the county should be encouraging businesses to install design features that increase light pollution and energy consumption, particularly when the county—and even the applicant—is undertaking dark sky initiatives. We envision that during the fall and winter months, when the leaves are off the trees, the lighting would be even more intrusive. In short, we did not view it as an “amenity,” as described in the application.

Finally, the administrative change request originally submitted included the lighting as one of the “decorative architectural elements” in the package of roof deck amenities. That application did not make clear that this element was not in fact an amenity for users of the roof deck but rather a continuous strip of bright lighting along the building's perimeter *facing out* into the residential neighborhood.

We understand that Crystal House has spent considerable money on this lighting, which it thought was approved by County staff. However, the fact that Crystal House made an investment based on a misunderstanding does not change the fact that it did not follow applicable procedures to get this type of lighting approved, and it should not be a reason to grant the approval now. AHCA urges staff to recommend against it.

Sincerely,

Natasha Atkins
President, AHCA