

# Aurora Highlands Civic Association (AHCA) Melwood Special Land Use Study Review

4/30/2024

This is a review of the proposed development recommended in the Melwood Special Land Use Study (“the Study”) dated March 24, 2024, provided to the public April 13, 2024 which can be found at the following link:

<https://www.arlingtonva.us/files/assets/public/v/1/melwood-study-document-updated-3.24.24.pdf>

These recommendations were approved by a vote of AHCA April 24, 2024, nearly unanimously.

Detailed review and comments regarding the Melwood Special Land Use Study *Process* will be provided separately.

# Executive Summary

- Melwood is proposing “Low-Medium” land use designation in their Special GLUP Amendment application, but via the proposed Special Exception this is the equivalent of “High-Medium Mixed-Use” land use, in the middle of a “Low” land use, historic, single-family neighborhood.
- The Study recommends approving this density, but this density is **completely inappropriate for the neighborhood**. The approval will be not only a **negative precedent on 23<sup>rd</sup> Street, but across the county**. As far as we are aware, approval of this application will be **the first and only “High-Medium Mixed-Use” density (equivalent) land use to be approved in the middle of a “Low” land use single-family area or outside of a Major Planning Corridor in Arlington**.
- Melwood proposes changing the Land Use from “Public”, but there is a deed restriction for “school use only” that was not addressed in the Study. The Study does not include an option for retaining the “Public” use to allow uses such as a school, library or community center which is needed and widely supported by the community, and also conform with the deed restriction.
- The Study evaluated only options that are not sustainable or appropriate for the site, to achieve density of 123 units and 22K SF of program space. The two options, 60’ tall or 45’ tall, are both too tall for the location, especially given the wide sight lines and adjacency to Nelly Custis Park. **Further, neither Melwood nor the county sought agreement from the AHCA or adjacent neighbors**. Project website:

<https://www.arlingtonva.us/Government/Projects/Plans-Studies/General-Land-Use-Plan/Studies/Melwood>

- The proposed density is
  - **not eco-friendly**, there is no open space and no **space for required tree coverage or natural stormwater management**
  - not Neighborhood appropriate, the density does not allow for needed traffic and pedestrian access.
  - **not preserving Historic County resources: the historic Nellie Custis School will not be preserved – this is both a cultural and a sustainability concern**.
- **The Study is not objective**, contains omissions and inaccuracies, and needs to be rejected and revised. There are also problems with the GLUP Amendment process itself which are being reviewed by the County Board.

# LAND USE REVIEW

# Proposed Land Use Designation is Incorrect for Proposed Density & Use

“Low-Medium” land use has a 40’ height limit and 36 units / acre on 1.73 acres (= 62 units total) limit. However, with affordable housing, there is a 20% increase allowable by Special Exception (ACZO 12.3.7) and an alternate Special Exception per ACZO 15.5.9.A.3(b) where the County Board can approve up to **60’ height**.

The Study recommends up to 60’ height, 123 units on 1.73 acres (= 71 units / acre) + 22K SF (145K SF total) for the Melwood program. **This density that is more than double the top density indicated in “Low-Medium” land use. See GLUP Land Use Designation >>**

The 60’ height (and associated density) is not effectively a “Low-Medium” land use. Per the GLUP Land Use Designations, even the “Medium” use designation caps at 72 units/acre - **residential alone and no program space**.

While the Study acknowledges that an exception must be applied to allow Melwood to operate its program in a residential area, the **Melwood program does not meet the Arlington County Zoning (ACZO 4.1.2) definition of “Community Service” use** as is recommended in the Study – because that use includes only **publicly accessible** facilities like a library, school or community center, not uses like offices and career training space that Melwood requires for their program.

The Land Use designation that fits the proposed development, including density and accounting for the office / training use, is closer to “High-Medium Residential Mixed Use”. **The proposed density is unprecedented outside of a Major Planning Area or in the middle of a single-family neighborhood.**

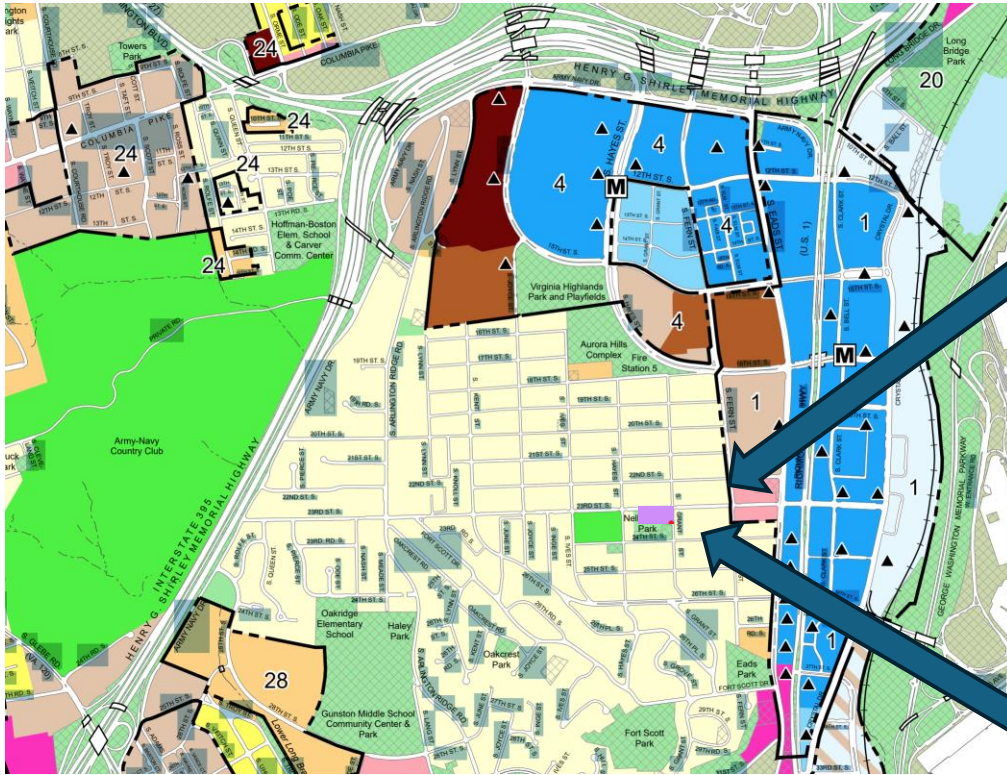
This is the crux of the problem. High-Medium density is inappropriate in a Low single-family neighborhood no matter what the use, the envelope is the same **and it is just too big**.

## Land Use

Land Use Designation*	Range of Density/Typical Use	Zoning**		
<b>Residential</b>				
Low	1-10 units per acre, including one-family dwellings, accessory dwellings, and expanded housing option uses	R-20, R-10, R-10T, R-8, R-6, R-5		
Low	11-15 units per acre	R2-7, R15-30T		
Low-Medium	16-36 units per acre	R15-30T, RA14-26, RA8-18		
Medium	Up to 37-72 units per acre	RA7-16, RA6-15, RA-H		
High-Medium	Up to 3.24 F.A.R. (Floor Area Ratio) Residential	RA-4.8		
High	Up to 4.8 F.A.R. Residential Up to 3.0 F.A.R. Hotel	RA-H-3.2, C-O Rosslyn		
<b>Commercial and Industrial</b>				
Service Commercial	Personal and business services. Generally one to four stories, with special provisions within the Columbia Pike Special Revitalization District.	C-1-R, C-1, C-1-O, C-2, C-O-1.0, C-TH		
Service Industry	Wholesale, storage, and light manufacturing uses, including those relating to building construction activity.	CM, M-1, M-2		
<b>Public and Semi-Public</b>				
Public	Parks (Local, regional, and federal). Schools (public). Parkways, major unpaved rights-of-way. Libraries and cultural facilities.	S-3A, S-D		
Semi-Public	Country clubs and semi-public recreational facilities. Churches, private schools and private cemeteries (predominant use on block).	S-3A, S-D		
Government and Community Facilities	County, state and federal administration and service facilities (police, fire, property yard, etc.) Hospitals, nursing homes, and institutional housing. Utilities, military reservations, airports, etc.	P-5, S-D, S-3A		
<b>Office-Apartment-Hotel</b>				
	<b>Office Density</b>	<b>Apartment Density</b>	<b>Hotel Density</b>	
Low	Up to 1.5 F.A.R.	Up to 72 units/acre	Up to 110 units/acre	C-O-1.5, C-O-1.0
Medium	Up to 2.5 F.A.R.	Up to 115 units/acre	Up to 180 units/acre	C-O-2.5
High	Up to 3.8 F.A.R.	Up to 4.8 F.A.R.	Up to 3.8 F.A.R.	C-O, C-O Crystal City, C-O Rosslyn, RA-H-3.2
<b>Mixed Use</b>				
Medium Density Mixed-Use	Up to 3.0 F.A.R. with special provision for additional density within the “Clarendon Revitalization District” (See Note 12) and the “Special Coordinated Mixed Use District” for East End of Virginia Square (See Note 3)			C-R, C-3, MU-V5
High-Medium Residential Mixed-Use	Up to 3.24 F.A.R. including associated office and retail activities.			R-C
Coordinated Mixed-Use Development	This is a high density mixed-use district with actual density determined by site size. Up to 6.0 F.A.R. with office not more than 3.0 F.A.R.			C-O-A

\* The land use designation on the GLUP map indicates a range of densities and typical uses for that general location. An approval by the County Board of a development project within this range is consistent with the County's goals and vision. The higher end of that density range may not necessarily represent the vision for a specific development. If a development proposal substantially complies with County goals and vision, and is consistent with good zoning practice, and/or assists in achieving the vision, the County Board may approve that development project at the higher end of the density range. \*\* The zoning districts which are listed next to each General Land Use Plan designation are those which typically correspond to that specific land use plan designation. However, there may be instances where other zoning categories may apply or cases in which the listed zoning categories are not appropriate, since the determination of an appropriate zoning district for a particular site depends upon factors other than simply the General Land Use Plan designation. This list is provided as a guide only. If an area is shown “Public” but is not publicly owned (not crosshatched) the existing zoning of the property and surrounding land uses should determine the development potential of the site.

## Land Use Designations from GLUP



## Land Use

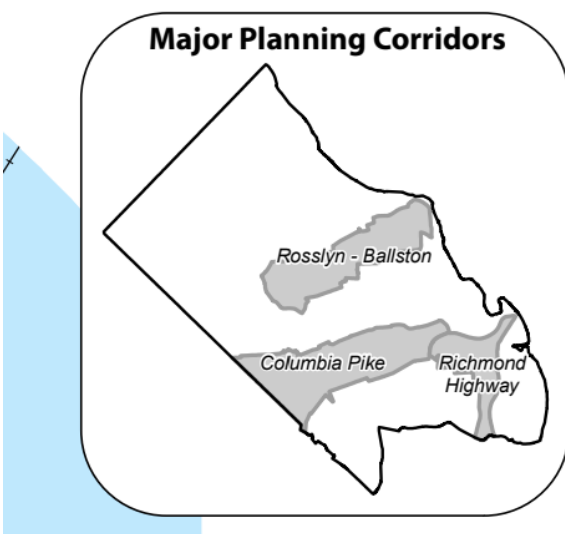
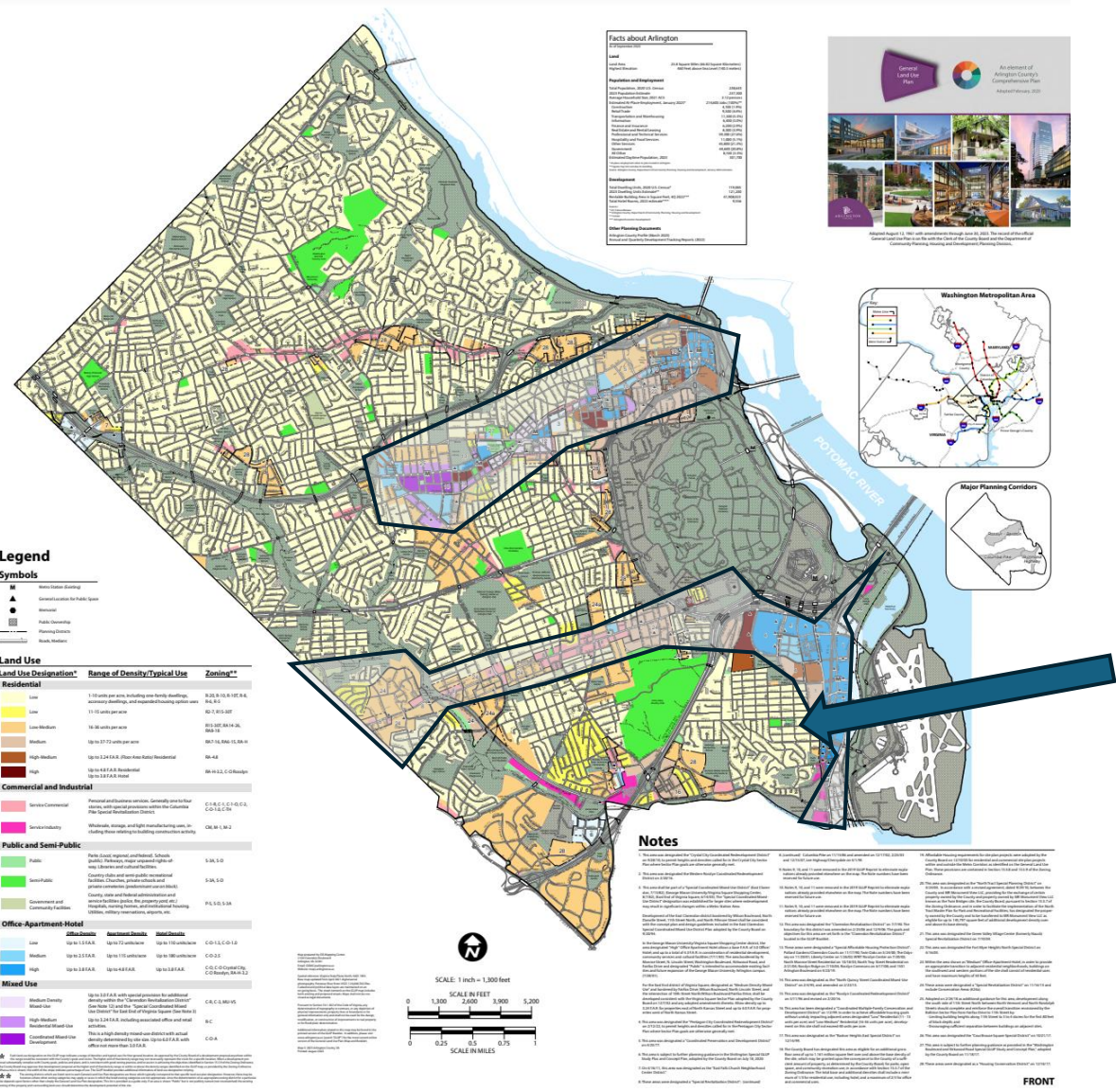
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High-Medium	Up to 3.24 F.A.R. (Floor Area Ratio) Residential	RA-4.8		
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<b>Commercial and Industrial</b>				
Service Commercial	Personal and business services. Generally one to four stories, with special provisions within the Columbia Pike Special Revitalization District.	C-1-R, C-1, C-1-O, C-2, C-O-1.0, C-TH		
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Semi-Public	Country clubs and semi-public recreational facilities. Churches, private schools and private cemeteries (predominant use on block).	S-3A, S-D		
Government and Community Facilities	County, state and federal administration and service facilities (police, fire, property yard, etc.) Hospitals, nursing homes, and institutional housing. Utilities, military reservations, airports, etc.	P-5, S-D, S-3A		
<b>Office-Apartment-Hotel</b>				
	<b>Office Density</b>	<b>Apartment Density</b>	<b>Hotel Density</b>	
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High-Medium Residential Mixed-Use	Up to 3.24 F.A.R. including associated office and retail activities.			R-C
Coordinated Mixed-Use Development	This is a high density mixed-use district with actual density determined by site size. Up to 6.0 F.A.R. with office not more than 3.0 F.A.R.			C-O-A

High-Medium Residential Mixed Use (equivalent) is the third most dense Land Use Designation, and this density is unprecedented in the middle of a Low use single-family neighborhood which is also outside of a metro transportation corridor. Purple shown is at the site for illustration purposes.

\* Land use designation on the GLUP map indicates a range of densities and typical uses for that general location. An approval by the County Board of a development proposal must be consistent with the County's goals and vision. The highest end of that density range may not necessarily represent the vision for a specific location. Development proposal substantially complies with County's goals and vision, and is consistent with good zoning practice, and/or assists in achieving the objectives of Section 15.5.9 of the Zoning Ordinance. The County Board may approve that development proposal if the applicant demonstrates that the proposed development is consistent with the County's goals and vision, and is consistent with good zoning practice, and/or assists in achieving the objectives of Section 15.5.9 of the Zoning Ordinance. Where a mix is shown, the width of the stripe indicates percentage of use. The GLUP booklet provides additional information on the GLUP map, as provided by the Zoning Ordinance.

\*\* The zoning districts which are listed next to each General Land Use Plan designation are those which typically correspond to that specific land use plan designation. However, there may be instances where other zoning categories may apply or cases in which the listed zoning categories are not appropriate, since the determination of an appropriate zoning district for a particular site depends upon factors other than simply the General Land Use Plan designation. This list is provided as a guide only. If an area is shown "Public" but is not publicly owned (not crosshatched) the existing zoning of the property and surrounding land uses should determine the development potential of the site.





There are currently no high density (blue / purple) land uses outside of Planning Corridors. The Melwood Special GLUP Amendment would likely be the first approval of such high density in a low-density neighborhood and would set a negative precedent.

The General Land Use Plan (GLUP) – Planning corridor overlay approximated – see inset upper right.

# 1921 Deed Restriction

The Study did not address the questions that were brought up AHCA's LRPC Representative in a letter to the County March 6, 2024, regarding the deed restriction to build for "school-use only". The deed restriction appears to carry through to the current use "Melwood Horticultural Training Center" and in perpetuity. If so, the application should have been rejected at Tier 1, or as part of the Tier 2 Study. The deed restriction must be addressed before the application is approved. The AHCA letter can be found here:

<https://www.arlingtonva.us/files/assets/public/v/1/melwood-deed-study-240306.pdf>

*Fletcher Kemp*  
*10/18/22*

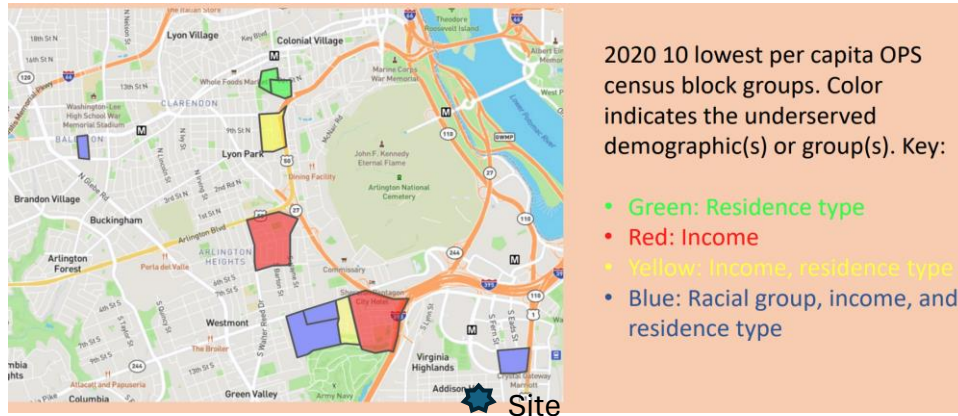
\*\*\*\*\*  
HENRY C. MORRIS et ux " "  
to B. & S. ✓ " " THIS DEED, made this 15th  
JEFFERSON DISTRICT SCHOOL BOARD # 1 " day of November, (1921) in the year one  
\*\*\*\*\* thousand nine hundred and Twenty-one  
by and between Henry C. Morris and Imogene W. Morris, his wife, both of the City of  
Washington, District of Columbia, parties of the first part, and Jefferson District  
School Board #1, Arlington County, Va. for school purposes only, party of the second part.

Snip from 1921 Deed for  
Land at Nellie Custis  
School

# Existing Neighborhood Conditions



# Community Services, Open Space & Health Equity in Arlington

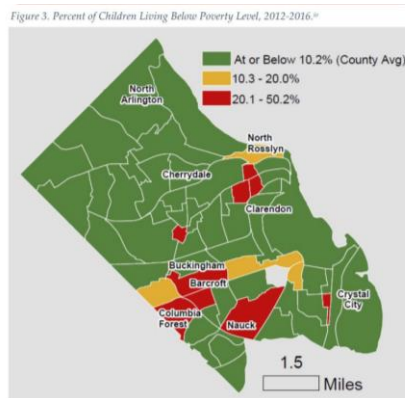


Open Space Lost or Gained at 750 23<sup>rd</sup> Street is critical – Nelly Custis Park is blocks from one of the lowest open space demographics in the County by all 3 measures – racial group, income and residence type. Residents of nearby hi-rise apartments use tiny Nelly Custis Park heavily.

The site is also adjacent to one of the areas of highest child poverty in the county – and this was in 2016 before 1300+ units of affordable housing at Crystal House. Community services like open space, schools, community center and a library are critically needed, and this location is uniquely suited to providing them. South Arlington has far more affordable housing than North Arlington – adding more is not in keeping with the Affordable Housing Masterplan which calls for distributing affordable housing **equitably** across the county.

<https://www.civfed.org/newContent/2024-04/2024-04%20ACCF%20Public%20Space%20Equity%20Presentation.pdf>

March 2024 CivFed Presentation on Open Space Equity in Arlington



**What we need is community and open space to prevent health inequity** as stated by Livability22202 “Because of the extraordinary successes in delivering affordable housing units of all kinds the last few years, the community feels it is time to prioritize infrastructure needs for current and future residents. The community has an ongoing interest in helping existing and future residents remain in the neighborhood.”

<https://www.civfed.org/newContent/2024-04/2024-04%20ACCF%20Varghese%20Presentation.pdf>

March 2024 Civ Fed Presentation on Poverty in Arlington

# 22202 Needs the Public Space in Aurora Highlands

- The Aurora Highlands and 22202 are in desperate need of public space to keep up with a current population that is expected to grow by 117% by 2050. Aurora Highlands is central geographically and the current community center (currently serving seniors only), library and elementary school cannot adequately serve the existing population. The existing library at Aurora Hills needs to be renovated and Livability 22202 has asked the County to prioritize providing these services in an additional central location in 22202. See Livability22202 letter to County Board 12/14/24:
  - <https://livability22202.org/wp-content/uploads/Livability-revised-priorities-transmittal-to-County-Board-13-Dec-2023-v1.2.pdf>
- **While many sites would be appropriate for Melwood’s proposed density of residential and office - Crystal City, for example, with its widely publicized vacancy\* and metro access - this site is uniquely suited to be a library, community center or school** – it is centrally located within walking distance of both Crystal City and Pentagon City, it has parking and the adjacent park. These uses are what is anticipated by the existing GLUP designation “Public” and to change this designation would leave a large part of the area without access to public services. **The most eco-friendly and cost-effective development is to reuse the existing building as a library, add landscaping and renovate, and find space in vacant office for Melwood.**
- Public Use fits with the deed restriction “for school use only” if it is associated with or auxiliary to the public school system.
- For example, a library could allow the existing polling location and parking arrangements with the churches to remain as is.
- The community has long expressed support for an appropriately sized library in this location. The fact that this location is not being considered for the public, educational use for which it is designated and restricted, and especially when such things are needed, is surprising and is extremely disappointing to residents.
- **We are asking the Planning Commission to recommend keeping the Public Land Use Designation**

\*[https://www.gazetteleader.com/arlington/news/arlington-mulls-what-to-do-with-empty-office-buildings-8631814?fbclid=IwZXh0bgNhZW0CMTAAR2INfVWwarPgo8M1UhybdOm0CYUIgWQOKPYEWmfhp731lmsTm6Tl2iHYHr8\\_aem\\_AU7EbChu1KbsBKB9lkS1SkmWdtlYCUlqod9AV4uqFICCGDtBteARhznq5oBJSz9lYo69b-TyJXhbaahwCQ0b4PR](https://www.gazetteleader.com/arlington/news/arlington-mulls-what-to-do-with-empty-office-buildings-8631814?fbclid=IwZXh0bgNhZW0CMTAAR2INfVWwarPgo8M1UhybdOm0CYUIgWQOKPYEWmfhp731lmsTm6Tl2iHYHr8_aem_AU7EbChu1KbsBKB9lkS1SkmWdtlYCUlqod9AV4uqFICCGDtBteARhznq5oBJSz9lYo69b-TyJXhbaahwCQ0b4PR)

# Tree Canopy Inequity In Arlington & Heat Island Effect

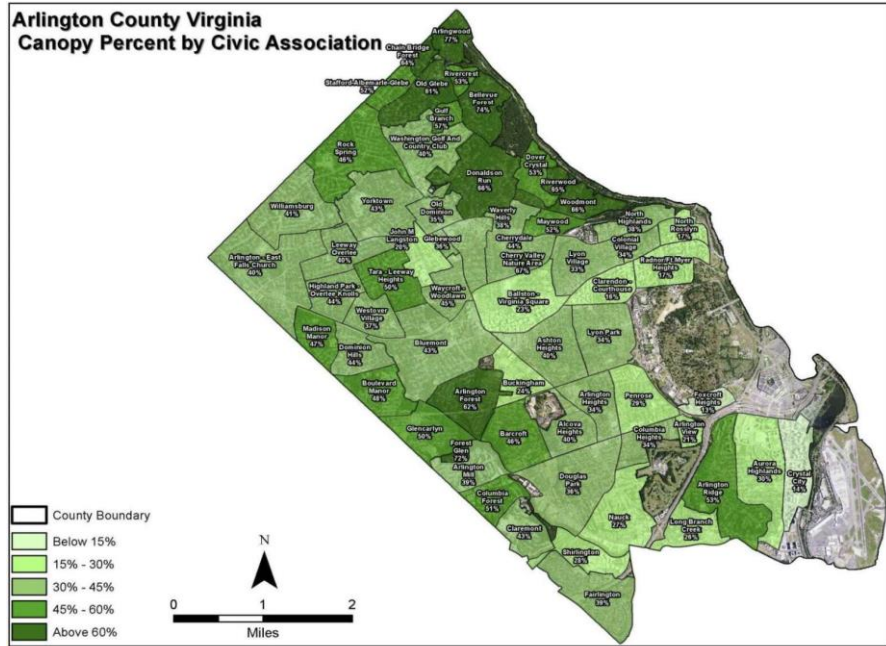


Figure 7. Tree canopy cover by civic associations in Arlington County.

<https://www.arlnow.com/2024/04/24/new-tree-canopy-goal-for-d-c-area-calls-on-arlington-to-get-greener>

Arlington needs to honor its commitment to being a partner in the Biophillic Cities Network as Libby Garvey stated back in 2020 “Now is the time to develop better systems and practices so that future generations of Arlingtonians benefit...people are happier, healthier and more productive when they live close to nature. See link:

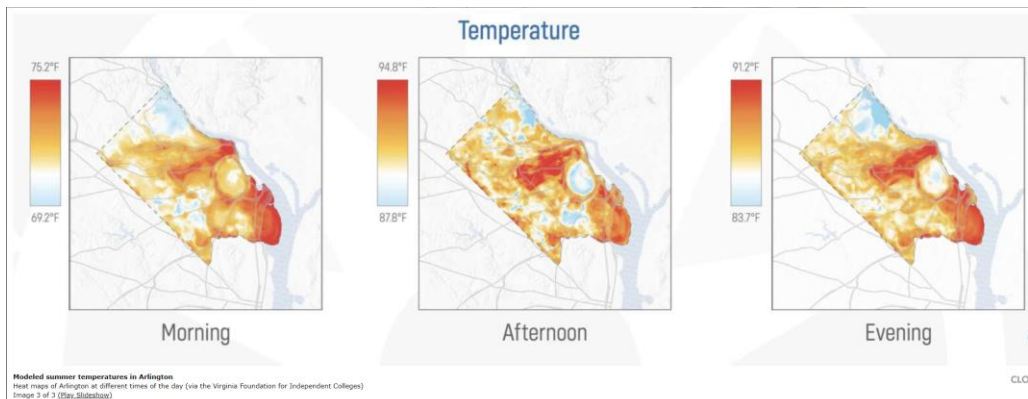
<https://www.arlnow.com/2020/03/12/arlington-joins-group-dedicated-to-connecting-cities-and-nature>

Tree Inequity is - not surprisingly - highest in areas of Open Space Inequity and poverty.

The Council of Governments is calling for urban tree coverage at 35 – 40% and Aurora Highlands is currently at 30% - via math that means Aurora Highlands needs about 25% MORE TREES to get to average (30% x 1.25 = 38%.) There are few opportunities for more trees given the amount of development in the neighborhood both on commercial and single-family sites and this site represents a unique opportunity to increase canopy coverage – if the development is done with care.

Lack of tree coverage is also a hyper local issue with the heat island affect the worst in areas with fewer trees. Aurora Highlands is typically 6 to 8 degrees warmer than the more leafy parts of the county in the summer which is a serious health issue.

<https://www.arlnow.com/2022/03/31/arlington-hottest-areas-lack-tree-canopy-to-soak-up-the-sun-study-finds/>





# Preserve the Historic Aurora Highlands Neighborhood & Nellie Custis School



Picture of Nellie Custis School from 1932 with what appears to be the existing giant evergreen in front.



Aurora Highlands is an historic neighborhood included in the **National Register of Historic Places** including elements from circa 1896 including bungalows, four-squares, cape cods in the Craftsman, Tudor Revival and Colonial Revival style among others, similar to other historic areas of Arlington and Alexandria **like nearby historic Del Ray** with its very similar small scale commercial strip.

[https://www.dhr.virginia.gov/wp-content/uploads/2018/04/000-9706\\_Aurora\\_Highlands\\_HD\\_2008\\_NRfinal.pdf](https://www.dhr.virginia.gov/wp-content/uploads/2018/04/000-9706_Aurora_Highlands_HD_2008_NRfinal.pdf)

Many planning documents recognize the importance of keeping the historic single family scale of the historic neighborhood including the Crystal City Sector Plan (page 15), the Pentagon City Sector Plan (page 43), the 2008 Aurora Highlands Neighborhood Conservation Plan (link below), and even the **GLUP in Section 4.0 states as one of its goals: "preserving the integrity of the single-family neighborhoods to the west [of Crystal City, e.g. Aurora Highlands]"**.

[https://aurorahighlands.org/Media/NC\\_AuroraHighlands\\_Plan.pdf](https://aurorahighlands.org/Media/NC_AuroraHighlands_Plan.pdf)

Nellie Custis School is 101 years old and one of a handful of historic public buildings left in Arlington, and as such it was recently **nominated as a Local Historic District**. It is a **contributing building to the historic neighborhood** and the last historic building on the block. The large evergreen in front has been the home to an annual tree lighting ceremony, "The Miracle on 23<sup>rd</sup> Street" for decades, which is a very popular event with the neighborhood.

Nellie Custis School is older than every one of the 21 buildings on the Essential list in the County's Historic Resources Inventory and older than every building on the entire list except 3. It is also far more significant (known to the community, unique in its architecture). History was made in this school. Integration of the elementary schools was the hardest fought battle in the move to integrate public schools. Nellie Custis was one of several elementary schools that took black students from Drew Elementary completing integration. On August 10, 1971, **only upon integration of the Arlington elementary schools, Arlington became the first county in Virginia to comply with the Brown vs the Board of Education ruling**. Full integration in Arlington was monumental as **Virginia led the effort to resist integration**. A link to the research follows:

<https://library.arlingtonva.us/2018/01/11/the-desegregation-of-arlington-public-schools/#:~:text=Each%20January%2C%20the%20world%20remembers,Martin%20Luther%20King%2C%20Jr.&text=One%20of%20those%20places%20was,culminated%20on%20February%202%2C%201959>

The historic single family neighborhood is **an authentic historical resource that cannot be replaced once it is gone** and must be respected, and Nellie Custis School must be preserved as a building, not a facade. This low density area serves as an amenity to high density Arlington and is a key part of Arlington's heritage.

<<typical low slung historic homes in Aurora Highlands

# Review of Massing Recommended in Study



# Existing Building Massing



The diagram below shows about 27 that are homes directly in the sight line of 750 23<sup>rd</sup> Street, most are ~25' tall.

In addition to other impacts of density (traffic, parking, noise), these single-family homes will be negatively impacted by the light pollution from the towering development.

Historic Nellie Custis School & Landscape – **recently nominated as a Local Historic District**, currently under review



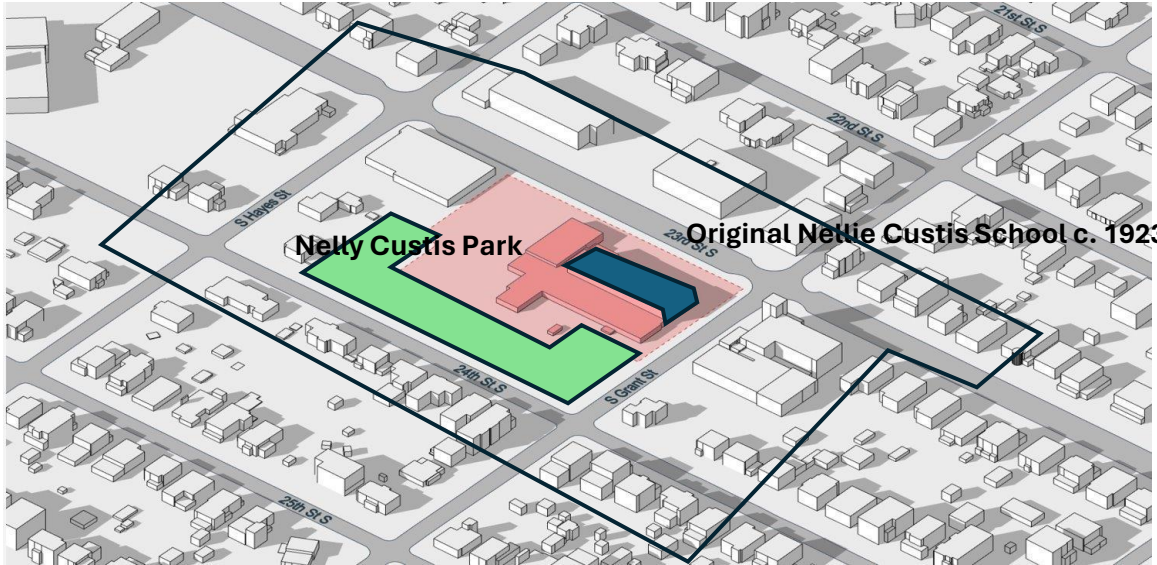
View of Nellie Custis School from residential 24<sup>th</sup> Street and Nelly Custis Park



Typical Aurora Highlands House on 23<sup>rd</sup> Street, ~25' tall



Calvary Church at 23<sup>rd</sup> & Grant ~35' h with ~25' h steeple



Historic Aurora Highlands Single Family Neighborhood



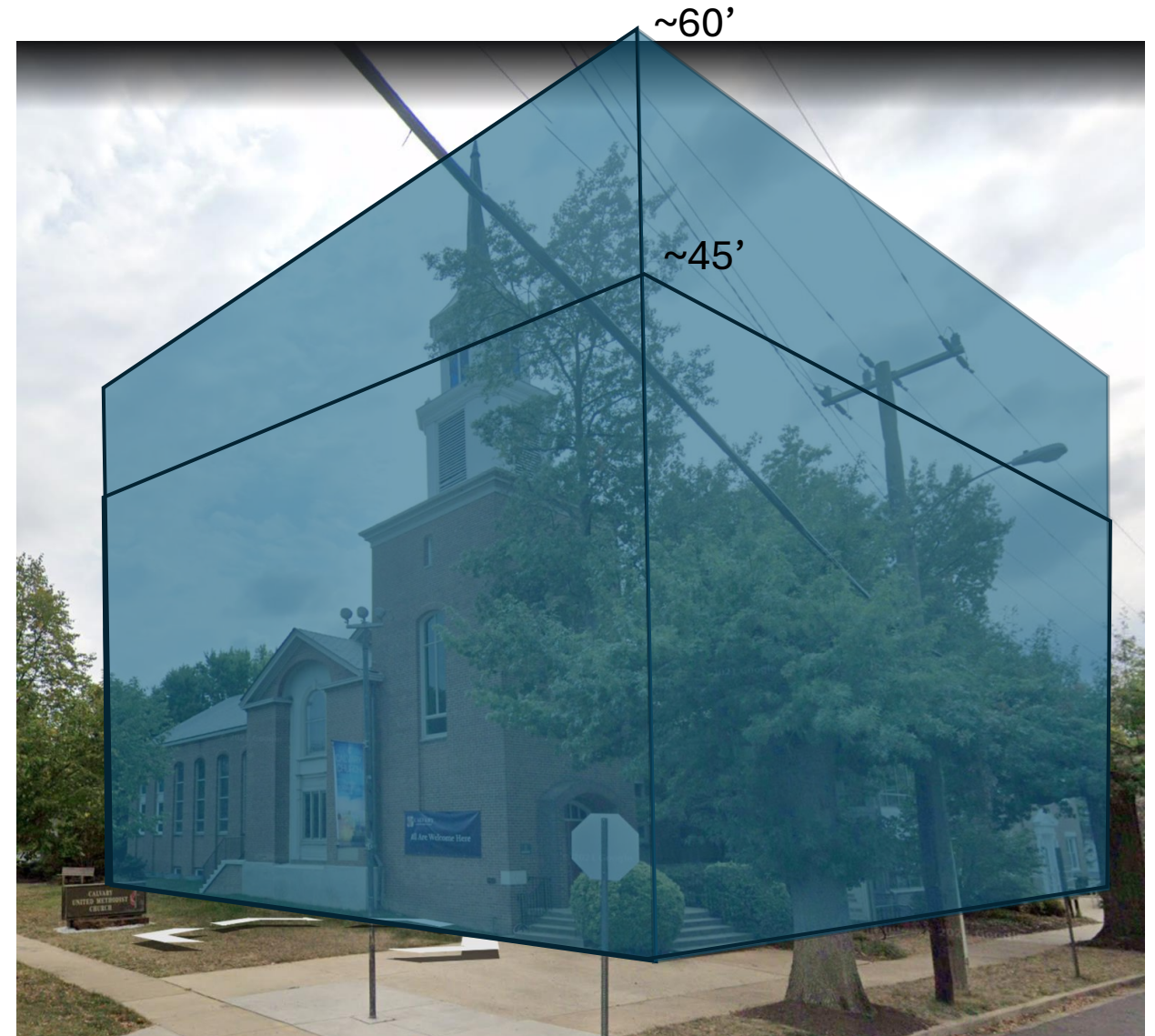
# Wire Diagram Scale Comparison

The top of the Calvary Church steeple across from Nellie Custis School is approximately 60' tall, which is the height being proposed for the Melwood project. The steeple is significantly taller than anything else in the neighborhood by design, so it can be seen, and its charming bell enjoyed by the neighborhood. The other non-residential buildings on the block do not appear to exceed 35'.

The 60' (equivalent to 6 stories) building will also tower over the neighborhood, but in a negative and imposing way creating a nuisance with light pollution. It would also be taller than most trees.

The approval of 60' sets a negative precedent for 23<sup>rd</sup> Street which will destroy its unique historic small scale.

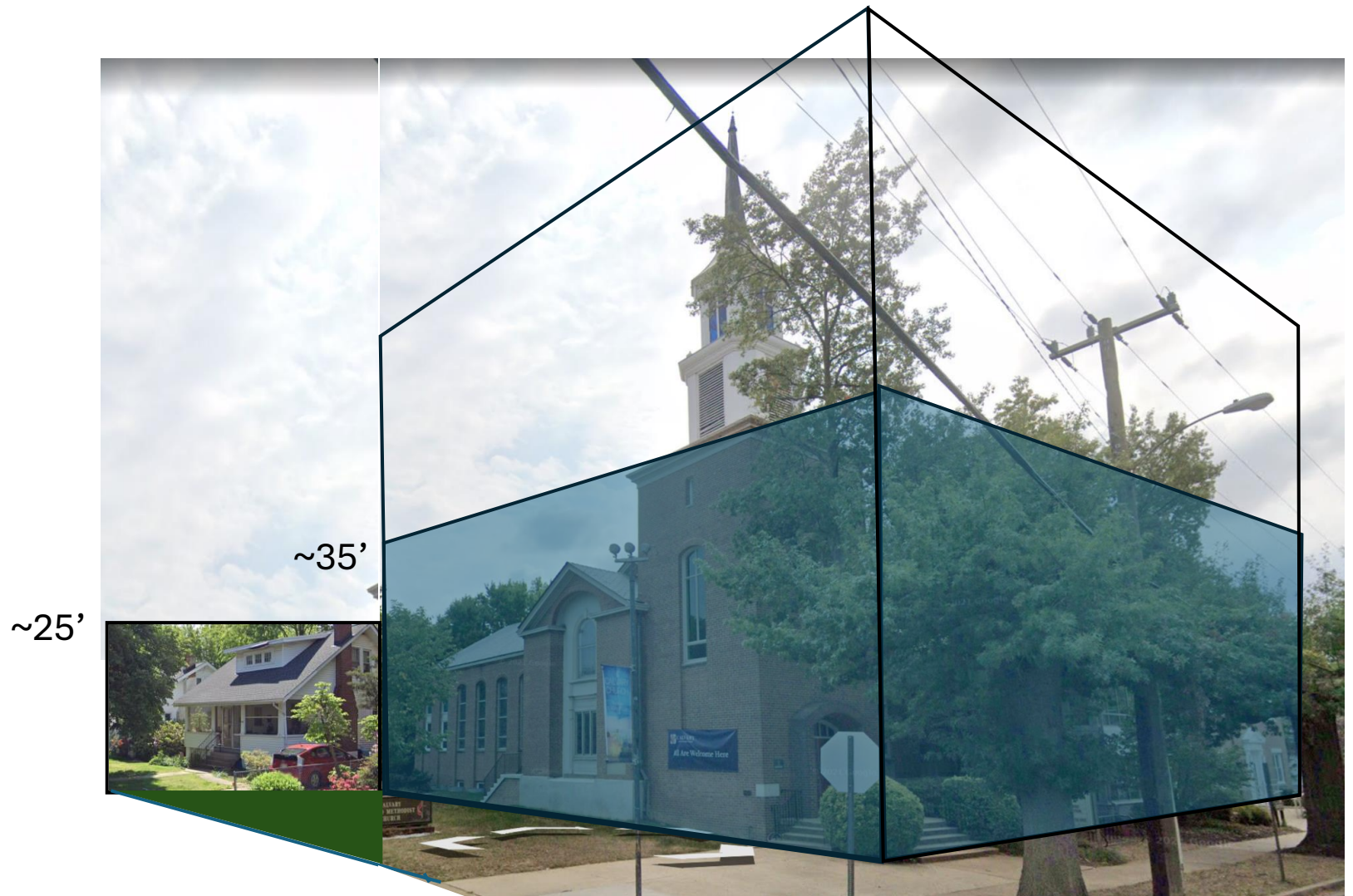
The 45' (equivalent to 5 stories) height recommended in the Study does not resolve the problem it is also just too tall as most of the houses are 25' tall.



Wire diagram of 60' and 45' recommended height compared to adjacent Calvary Church.

The brick base of the steeple appears to comply with the 35' height limit.

The existing 35' height limit allows daylight to the street while still allowing for increases in height. 35' is much less imposing and is in scale with the historic neighborhood where the majority of homes are around 25' tall.



Wire diagram of existing 35' height limit compared to the adjacent typical 25' tall historic home.



Because of the wide sight line across Nelly Custis Park building setbacks do not make much of a difference in reducing the perceived building mass. All increases in height are visible.

As you can see in the picture to the right even the ~25- 30' Nellie Custis School on 23<sup>rd</sup> Street is completely visible a block away, from 24<sup>th</sup> Street, and any additional height added to it will be just as (and more) visible.

(Setbacks like those proposed in the Study can be effective on higher and tight urban sites due to limited sight lines, but don't really do much in this situation.)



Wire diagram of 60' and 45' recommended height as seen from 24<sup>th</sup> Street South and Nelly Custis Park.



The existing 35' height limit allows more sky to be seen from the park – it reduces but does not eliminate the problems with the taller height, including light pollution.



Only when combined with a wide setback for a heavy biophillic separation (e.g. a thick planting of evergreen trees), can the impact of the building on the park be reduced.



Wire diagram of existing 35' height limit as seen from 24<sup>th</sup> Street and Nelly Custis Park. Existing tree roots from the park extend outside the fence line. Note: the Melwood Parcel slopes up to 23<sup>rd</sup> Street – about 8'.



# Review of Study Massing Scenarios

The Study included the Scenarios 2 & 3 shown to the right.

The previous slides clearly show 60' or 45' height is too tall for the neighborhood.

In the 45' height Scenario 2, the building takes up most of the lot leaving **no open space**. The **101-year old Nellie Custis School** building which has recently been nominated as a Local Historic District **will not be preserved**. The ~20' setback shown in Figure 8 yields ~ **70% lot coverage**, but when the Forestry Natural Resources Management Plan requires 25% tree coverage, nearly every inch of the setback would have to be covered in trees to meet this criteria, leaving no room for necessities like firetruck and parking access, loading and trash storage which are not shown.

The 60' height in Scenario 3 is **nearly 2.5X higher** than the typical 25' tall houses. The setback shown is ~20' on all sides, and the front and east lines of the historic building – keeping the façade only, but tearing down the historic building. The footprint appears to take up 61% lot coverage. This option is also unlikely to meet the 25% tree coverage requirement due to need for access, driveways and back of house operations which are not shown.

Both Scenarios are too big. They are too tall and have too large a footprint for the site. **The Study only shows these options requested by Melwood which are the biggest envelope possible and only achievable by ignoring every traditional planning principle.**

Figure 8. Scenario 2: 45' Building Height

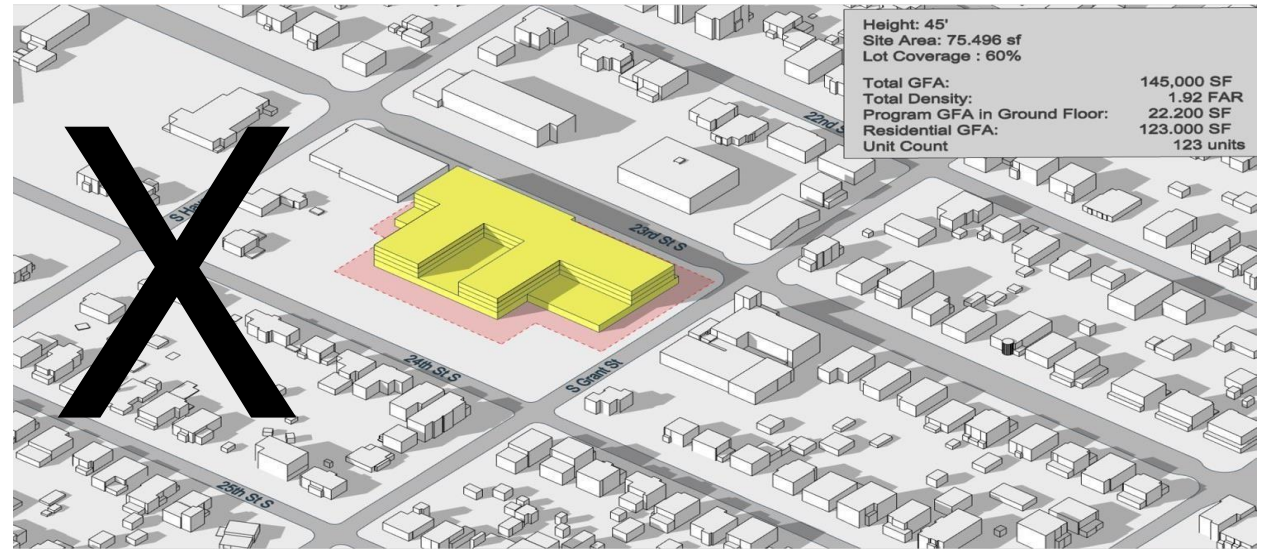
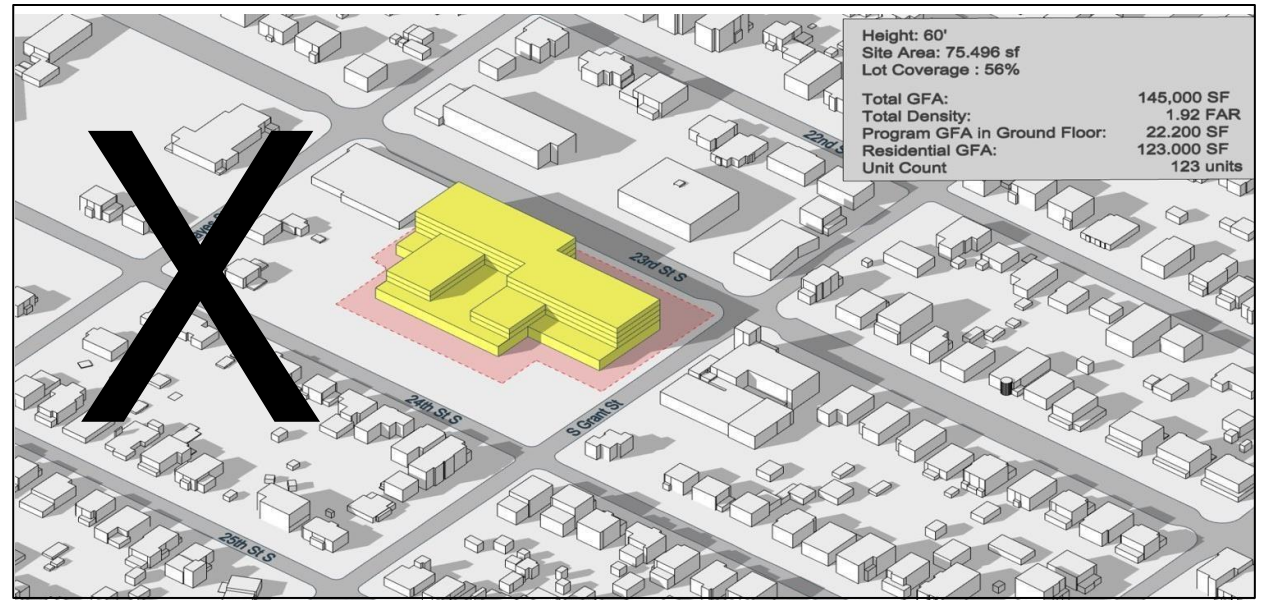


Figure 9. Scenario 3: 60' Building Height



# Why Is Such a Big Structure and Envelope Recommended by the Study?

- The Study states “additional housing supply” as the reason such a large multifamily structure was considered, but provides no data on the density currently available in the existing GLUP or any comparison to projections for growth to justify the need to change the GLUP and add more housing.
- In discussions at the LRPC and with Staff, Melwood has claimed they cannot build a smaller development for financial reasons and staff has claimed they must consider only what is financially viable to the Applicant. But, a smaller building even in the range of 50 - 60K square feet is not a small project and will enjoy economies of scale in building and operations.
- Both Scenarios 2 & 3 are inappropriate because they are just **too big** (<<this font is sized proportionally to standard font at a scale of 60 / 25.)
- Melwood has provided no justification for requiring an overly large project other than saying they will not accept anything besides the largest envelope possible (per County staff). Approving the largest envelope possible would amount to approving a project with a complete disregard for all planning and zoning principles and **this leaves two bad choices, neither of which work.**
- As with most / all affordable housing, the financing will likely include **Virginia LIHTC** (affordable housing tax credits) which REWARDS competitive points and **ENCOURAGES projects that are SMALLER and under 100 units** – see the Virginia Housing Federal Housing Tax Credit Manual (“VHFHTCM”) Section 7.8.8. As well, developer fees are capped at \$5M **purposefully making large projects unattractive.** This is likely because the **large all-affordable housing projects of the 20<sup>th</sup> Century similar to the ones recommended in the Study were abject failures.**
- Here is the link to the VHFHTCM reference:

<https://mc-0e9acafd-48f4-4c49-b478-6257-cdn-endpoint.azureedge.net/-/media/docs/partners/rental-housing/tax-credit-application-process/2024/2024-lihtc-manual.pdf?rev=2c66095e876d479a99eeb302321c6a5a&hash=2FFAF66089D3BE9F66D466EC52D54CE2>



# Local Small Affordable Housing Examples

Small all-affordable or mixed-income projects are the state of the art today because they have been proven to better for residents than large all-affordable buildings.

Some recent local examples – (in more urban / dense neighborhoods):

- 18 units with Net-Zero:
- <https://www.heleos.co/projects/cycle-house>
- 55 units with adaptive reuse of an historic school:
- <https://dc.urbanturf.com/articles/blog/dc-selects-land-trust-team-to-redevelop-langston-slater-campus/18158>

Smaller buildings are also inherently more sustainable – buildings taller than 3 or 4 stories (35') and can't leverage solar roofs as well as smaller buildings. See "Here and Now" article link below:

<https://www.wbur.org/hereandnow/2022/09/21/urban-planning-more-housing>



The city-owned site that was the subject of DC's first EquityRFP may be redeveloped using an equity-focused model.

On Tuesday, Mayor Bowser's office and the Office of the Deputy Mayor for Planning and Economic Development (DMPED) selected a co-development team for the Langston-Slater school campus in Truxton Circle: a team that includes the Douglass Community Land Trust (Douglass CLT).

The plan put forth by the Douglass CLT team would deliver 55 mixed-income units, including some for-sale units and units with permanent affordability, to the site of the Slater and John Mercer Langston Elementary School buildings at 33-45 P Street NW ([map](#)). More specifically, there will be 43 rental apartments and 12 infill townhouses, along with 21 surface parking spaces. Roughly 49% of the units in the "Lebanon Village" development will be affordable to households earning up to 30%, 50%, and 80% of area median income.

The DC historic Langston-Slater School is being adaptively reused for 55 units of affordable housing.



## Cycle House

**Location:** NW Washington, DC  
**Location Type:** Urban  
**Year of Completion:** 2024 (projected)  
**Type:** Mixed-use / Affordable  
**Net Zero Energy:** LEED Gold Certified  
**Units:** 18 affordable units  
**Gross Square Feet:** 20,000 sf  
**Solar:** Photovoltaic Solar Array

## DC'S FIRST MIXED-USE NET ZERO ENERGY BUILDING

**Mixed-Use- 18 units plus retail, Affordable, Net Zero Energy**

Cycle House will be DC's first mixed-use net zero energy building. The 20,000 square foot mixed use building in DC's Truxton Circle neighborhood at the intersection of Bates Street and North Capitol Street NW. It will be LEED Gold certified, net zero energy, and feature renewable energy, low CO2 emissions, and zero storm-water runoff from the site.

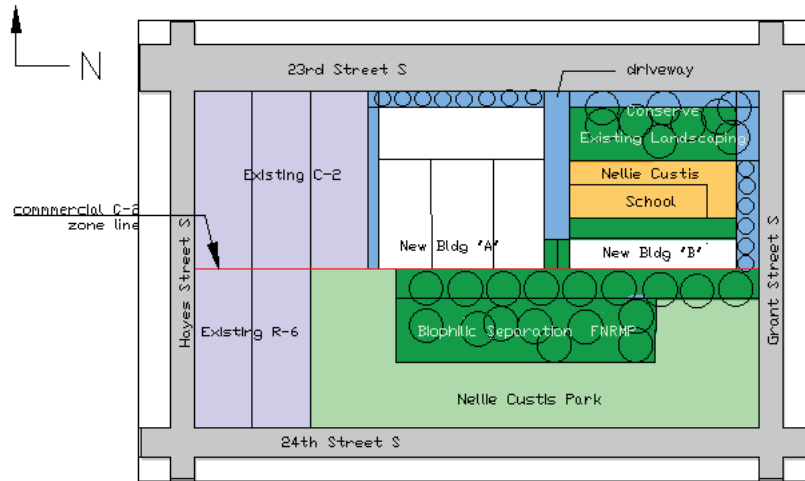
The building program includes 18 long-term affordable residential apartments. This will bring much needed opportunities for workforce housing available to persons earning 50-60% of the area's medium income and serve as a catalyst for revitalizing the stretch of North Capitol Street between Florida Avenue and New York Avenue.

A new small-scale building on North Capitol Street for 18 units of eco-friendly Net-Zero affordable housing. Net-Zero is easier to achieve in a shorter building.

# An Alternative Example

# The Appropriate Size Envelope Is About Half the Size of the Proposal

Given that neither alternative in the Study provided an appropriate development envelope, we worked backwards – we asked, given the site constraints of the park separation, height limitation, tree canopy requirements, etc., what would the appropriate size of a development on this site look like? Assumptions below:



## CALCULATIONS

### NELLIE CUSTIS SCHOOL

Nellie Custis School approx 7100 SF x 2 stories = 14200 SF,  
Add 1 story penthouse 2:1 setback 3500 SF = 17,700 SF,

### NEW BUILDING A

Use ground floor for Melwood program, 21,500 SF  
Upper (2) floors approx 15,000 SF x 2 = 30,000 SF (Letter "U" shape) – step down as required to meet 35' ht. limit.

### NEW BUILDING B

SE building 35' = 3 stories x 3900 SF = 11,700 SF

Total ~80K SF

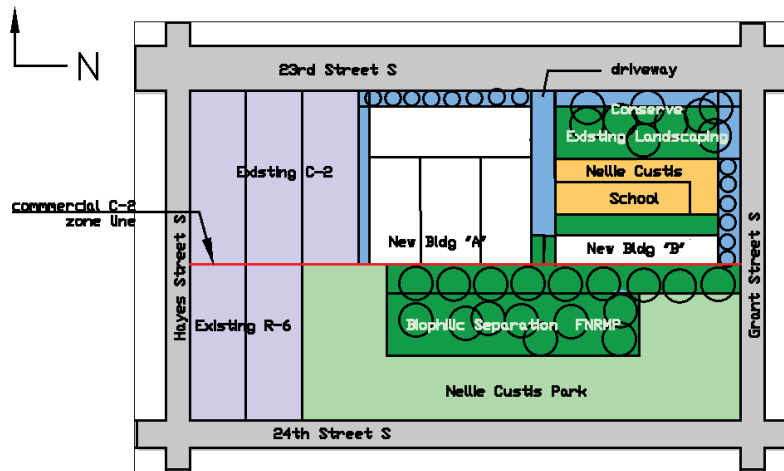
- require a 35' height limit,
- preserve the historic Nellie Custis School building and mature landscaping,
- manage all parking on site, and loading off 23<sup>rd</sup> Street
- Include driveways for fire access, loading and trash
- require heavy evergreen continuous biophillic separation between the proposed building and Nelly Custis Park in line with the existing R-6/C-2 demarcation line,
- require measurable and maximum light and noise pollution reduction measures,
- require adequate open space to support well being of residents and,
- provide a 10' setback at the west side.

The plan diagram view to the left is an **example** of a layout that includes all of the required assumptions for the site. The appropriate maximum sized development for this site is approximately 80K SF, just over half of the 145K SF proposed.



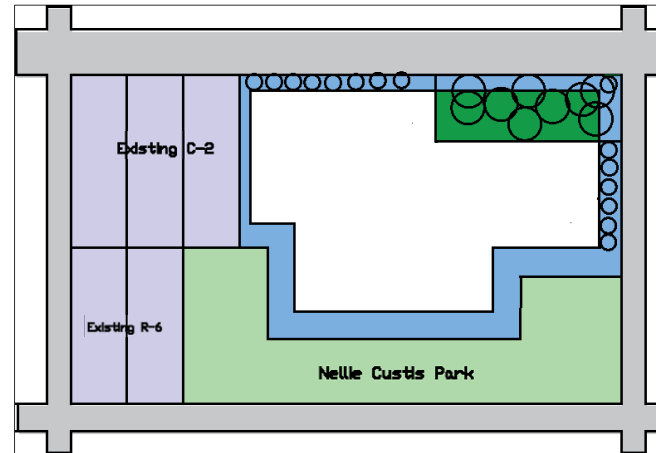
# Eco / Green Space Comparison

“Appropriately Sized Development Example”



GREENSPACE CALCULATIONS (ALL approx.)  
 Building footprint: ~42%  
 Paved: ~16%  
 Greenspace: ~42%

“Study Scenarios 1 & 2”



GREENSPACE CALCULATIONS (60' Scenario)  
 Building footprint: ~61%  
 Paved: ~30%  
 Greenspace: ~9%

GREENSPACE CALCULATIONS (45' Scenario)  
 Building footprint: ~70%  
 Paved: ~30%  
 Greenspace: ~0%

The “**Appropriately Sized Development Example**” allows for **42% greenspace** plus the necessary 16% for paved areas. The greenspace is necessary for a biophilic separation between the building and the park, for the residents’ wellbeing. **This site drains directly into a stormwater inundation zone** and the additional **greenspace will help offset runoff** (quality & quantity) into the nearby Potomac River per DES concerns regarding downstream impacts in the Study.

The **60’ high Study Scenario only allows 9% for greenspace**, requiring the balance of 25% Forestry Coverage (per FNRP) to be taken from the areas slated for access / paving. This plan is not in keeping with the requirement to “reconnect nature in daily life”, the goal of the FNRP.

The 45’ high Study Scenario is worse, as it eliminates the small landscaped area in the NE corner – all of the 25% Forestry Coverage requirement must be shared with areas needed for access and paving and **there is (0) open space.**

# Recommendations

1. Preserve the Public use of the site.
  - a. A school or public use like a library or community center should be considered - NOT zoning the site residential. The deed states the property is for “School Use Only”.
2. Green goals, open space, sustainability and historic preservation must be prioritized.
3. Consider AHCA alternate example.
4. Reject the study and delay all Special GLUP Study processes until the County completes the analysis requested by the Board (discussed in Jan 2, 2024 meeting with CivFed/County Board.)

The Local Historic District nomination is under review for Nellie Custis School and the Study includes no option that preserves the building.

There are no details on the proposed affordable housing program or recommendations to require affordable housing as part of the approval. With the Study requiring no commitment, the site could be flipped by Melwood once the zoning is changed, when the publicized premise of this entire study is for the County to gain affordable housing. This oversight must be addressed.

We encourage the County to seek agreement with AHCA and adjacent impacted neighbors per the 2022 CivFed GLUP Resolution and address at least the following community concerns that were not addressed in the Study:

- research County use of the site (as a library, school, or community center),
- resolve Calvary Church parking: Melwood rents its parking lot on Sundays to the Latter Day Saints and Grant Street is closed for Calvary Church,
- research required parking, access and loading on site,
- require heavy evergreen continuous biophilic separation between the proposed building and Nelly Custis Park,
- require measurable and maximum light and noise pollution reduction measures,
- require adequate open space, and
- address traffic and street crossing / sidewalk issues on path to Nelly Custis Park (Parks Commission Tier 1 meeting comment).

Thank You.

Correspondence from AHCA to the County Board, Staff, and Planning Commission regarding this project can be found on the AHCA website:

<https://aurorahighlands.org/documents/>

There has been (0) written response from the County to these letters and reports going back over 2 years:

<https://aurorahighlands.org/wp-content/uploads/melwood-response.pdf>

<https://aurorahighlands.org/wp-content/uploads/Melwood-Draft-Study-Comments-.pdf>

<https://aurorahighlands.org/wp-content/uploads/Melwood-Meeting-Letter.pdf>

<https://aurorahighlands.org/wp-content/uploads/Melwood-Letter-230130-signed.pdf>

<https://aurorahighlands.org/wp-content/uploads/AHCA-Melwood-LRPC-Follow-Up-240103-sig-1.pdf>

<https://aurorahighlands.org/wp-content/uploads/AHCA-Melwood-LRPC-Presentation-231128-2.pdf>

<https://aurorahighlands.org/wp-content/uploads/AHCA-Letter-on-Melwood-21-Nov-2023.pdf>

<https://aurorahighlands.org/wp-content/uploads/AHCA-Letter-to-County-re-Melwood-application-22-March-2022.pdf>

<https://aurorahighlands.org/wp-content/uploads/Zoning-Committee-Report-and-Cover-Memo-Signed-031822.pdf>