

Subject: Fwd: AHCA feedback on Crystal substation expansion
From: "Scott Miles, AHCA President" <president@aurorahighlands.org>
Date: 10/24/20, 5:38 PM
To: CountyBoard <CountyBoard@arlingtonva.us>
CC: Matt Mattauszek <Mmattauszek@arlingtonva.us>, Bob Duffy <Bduffy@arlingtonva.us>, egearin@egearin.com

Please see the attached letter on AHCA's current position on the Dominion Crystal Substation expansion. I understand staff is still working on this project, and we also have a discussion with Dominion scheduled next week, so I hope we can make progress on the items before the anticipated County Board review in November.

----- Forwarded Message -----

Subject:Re: Crystal substation expansion use permit amendment and rezoning - Feedback requested
Date:Wed, 21 Oct 2020 16:54:14 -0400
From:Scott Miles, AHCA President <president@aurorahighlands.org>
To:Kevin Lam <klam@arlingtonva.us>

October 21, 2020

Kevin Lam
Associate Planner
Department of Community Planning, Housing, and Development (CPHD)

RE: LRPC, Crystal City Substation

Dear Kevin,

Thank you for keeping AHCA apprised of the schedule and notifying us of the revised open space area design. We are encouraged to see some improvements related to pedestrian access and hardscape reduction and appreciate that the County and Dominion have taken note of those concerns. We still have a number of outstanding concerns that would be in everyone's interest to address. Many of these pertain to the principles and goals outlined in the Livability 22202 goals for the area. If you are unfamiliar with these, please see the report at livability22202.org.

Location alternatives

As we expressed to the LRPC, this substation sits at a prominent spot in the neighborhood, at the intersection of two major pedestrian street connections, both north/south and east/west. It also exists at the point where the denser Pentagon City area transitions to the lower density neighborhood. The proposal will lead to a loss of green space in this area while limiting other potential long term uses for this portion of the block

Some in the community are still unconvinced that expansion in this site is necessary and there are no other reasonable alternatives. Alternatives always exist, and Dominion indicated they evaluated other options and determined the proposed expansion to be the only feasible route. **Although it is very late**

in the process, we still expect to see details related to alternatives that were considered in the interest of transparency and robust community engagement.

Design aesthetics

The overall reaction to the proposed structure is one of resigned acceptance. The addition of the mesh panels provides some visual relief, which we appreciate, and the “cloud” design is preferable to the alternative proposed.

While utility infrastructure is not typically known to be inspiring, recent developments such as the Seattle Denny substation show they can be great additions to the urban fabric. I understand that project was an aspect of initial conversations with the County, yet little of that innovation made it into what was presented to the community. We urge both the county and developers to take advantage of the times and propose bolder and more innovative concepts.

For the design at hand, before committing to the “cloud” concept for the mesh panels, **we suggest Dominion and the County engage further with the arts community and National Landing BID to consider alternatives more reflective of the unique characteristics of this area.**

We look forward to the public process that will provide additional artistic elements to the site.

Sidewalks & Pedestrian Access

The sidewalks leading up to this site on both South Hayes and South Fern Street approaches are some of the most pleasant pedestrian experiences in Pentagon City, with wide 10’ sidewalks lined with large 8’ planting strips and shade trees, in line with the prescient guidelines of the Pentagon City PDSP. This corner has always been the exception, with narrow walkways and exposed access resulting in an uncomfortable experience.

I am encouraged to see the revised design corrects these deficiencies to some degree, with 6’ sidewalks and partial planting strips to be provided per the county improvement project. This still represents a narrowing of sidewalks present throughout the rest of the block and is the absolute minimum clear zone width for the future of this urban area. It also results in insufficient planning space to meet the street tree requirements per section 14.2.2.B.1, with a 12 tree deficit.

This project should prioritize walkability by striving for wider sidewalks and additional shade. In areas where it is not possible for Dominion to accomplish this, the County should step in. **Specifically, some street parking along the Hayes street frontage should be removed, to either extend the curb line outward allowing the planting strips to be connected, or to provide a planting median in the vacated area.**

Tree Canopy & Shade

From the outset, a major community issue with the proposed project was the removal of natural open space and newly planted canopy trees. Adjustments to the planting strips as recommended above can

address some of the required street tree deficit. Dominion is removing the grove of shade trees recently planted by the County, thus reducing the achievable future canopy. **The projected canopy coverage should be replaced at Dominion's expense elsewhere in the neighborhood.**

In areas where shading is not possible on the site, other structural designs should be considered. For example, pergolas with native plantings could be situated in the grassy knoll areas depicted along the site edges to activate this otherwise dead space. Dominion may wish to incorporate artfully designed solar panels to provide shade while alluding to the power distribution nature of the substation.

Open Green Space

The revision in the plan along Fern did reduce impervious surface by removing some of the unnecessary walkways, but there was no apparent effort to do anything creative with the additional green space that change provided. **We hope your landscape architect will use Livability 22202's guidance to add native plantings to make the area more in line with goals for sustainability, wildlife habitat, and visual interest.** A simple patch of lawn achieves none of these. Nor is the location or design particularly conducive to sitting and relaxing on the grass.

Zoning, GLUP, and Use permit

The proposed project requires a rezoning of a portion of the property to C-O-2.5, extending the existing use permit to include the new addition, and a use permit to use the 18th & Ives parcel for construction staging. We do not have any issues with these elements that are required to support the project.

Given that the construction site and construction staging site are in and adjacent to high rise developments, elder care facilities, and single-family homes, **we expect the civic association and neighbors will be provided regular construction updates and will have the ability to contact a construction representative with any concerns.** Clark Construction has significantly advanced the status quo with respect to community engagement with the MetPark project, which we hope can also be applied to this project.

Safety & Use of 18th & Ives parcel

Conveying the 18th & Ives parcel is an essential component of this project to soften the loss of the County natural space along Hayes. However, we oppose the County accepting this land without a definitive plan to address potential contamination.

The community remains concerned about the safety of this lot. In the past, the County has asserted that it is too contaminated to be acquired and used as a public space. We understand soil testing has been performed and Dominion is asserting that contamination is minimal. If that is the case, addressing this concern should be relatively easy.

First, we would like to see the parcel reviewed by the Arlington Environment and Energy Conservation Commission (E2C2) to provide their independent opinion on the state of the parcel and any levels of remediation that would be required for various uses.

Based on this review, **Dominion should perform the level of remediation that would be required for the space to be safely used as unimproved passive space** before conveying the parcel to the County, or as a clean-up stipulation in the construction staging use permit. Leaving this cleanup to be handled after the fact, with an unknown time frame, using an unknown amount of funding from the use permit is not acceptable. **After final use, the site should be provided with fences removed and safe for passive community use.**

We understand the ultimate use of this parcel may not be as public park space. In fact, it may be more appropriately used for housing, or, with the acquisition of the adjacent parcel, as a site suitable for public facilities such as a school, and we look forward to being part of that conversation when the time comes.

Thank you for your attention to these concerns. We remain available to discuss these issues and look forward to getting to a satisfactory resolution prior to this proposal being brought before the County Board.

Thank you,
/Scott Miles/

President
Aurora Highlands Civic Association
www.aurorahighlands.org