



AURORA HIGHLANDS CIVIC ASSOCIATION

Ms. Emma Martin
Associate Planner, Arlington County
By email

June 30, 2025

Dear Ms. Martin,

The Aurora Highlands Civic Association Zoning Committee (AHCAZC) has reviewed the presentation and filings from JBG Smith (JBGS) regarding the proposed adaptive reuse of 2100/2200 Crystal Drive. We have also reviewed the Crystal City Civic Association (CCCA) letter to you dated June 30, 2025. We support the CCCA as it advocates as *representatives of the local community that will be most affected by the impacts of the change of use. We strongly believe that the local community's concerns should be given great consideration – because they live their lives there.* This is a concept fundamental to the Zoning Commission where residents seeking variances are nearly required to provide evidence of approval from their neighbors. The same or similar courtesy should be extended to commercial requests for change of use as it was in the past. We support of the overall concept, but have the following concerns and recommendations.

PROCESS

JBG Smith proposes to adaptively reuse the currently vacant office 2200 Crystal Drive into 195-residential units (mostly 2/3 BR units) and the currently vacant office 2100 Crystal Drive into a 344-room hotel with conference space. It was mentioned at the June 16 Crystal and Pentagon Cities Council (CPCC) meeting that this is the first project being reviewed under the County's Adaptive Reuse Amendment 15.5.3.D.

Understandably, given the office real estate market changes, it makes sense to adaptively reuse buildings in this way; and understandably, the county is motivated to restore the properties to being active and vibrant. However, neither of these concerns negate the fact that *hotel and a residential use have impacts that are very different from office use and must be accounted for.* The few months needed to do a public review as per 15.5.3.A, where the principal use "would change in more than 5% of the total floor area" is brief considering these buildings have presumably been vacant for a long time – years / decades? And the use is changed by not merely 5% but by 100% for not one, but two, large buildings.

These comments are provided with the expectation that while the process to review the modification is characterized as an "Administrative Change", the County must perform *a robust review of impacts in this case, especially since this approval sets a precedent for Adaptive Reuse proposals.*

Developments directly result from the planning process, and if the County does not perform its duty to protect the public, to regulate, review or weigh in on the design of these buildings, the Arlington community will be negatively impacted by too little parking, uninteresting architecture, congested streets and a building that does not meet sustainability requirements. Further, if the County does not maintain its *commitment* to supporting the infrastructure required for development per the Crystal City Sector Plan (CCSP), what is it doing at all? Or, has the County decided that per its comments from the dais February 22, 2025 regarding Melwood, like the Comprehensive Plan, the CCSP no longer matters because it has become inconvenient to certain special interest agendas?

RESIDENTIAL PARKING

Office buildings require more parking per square foot than residential, and there are acres of parking underground in Crystal City, so it is curious why there is such vastly insufficient parking provided for the residences. From the Gorove Slade April 4 Transportation Review Memorandum (“Gorove Slade Memo”), 220 20th Street has a parking ratio of .9, and 2221 S. Clark Street has a parking ratio of .56. Yet, 2200 Crystal Drive has a parking ratio of .3 - and that doesn’t account for the large number of 2 and 3-bedroom units. Per Sheet EC.002 of the application, there are 319 bedrooms, which, if you discount for 6.6% of the bedrooms for children per the Arlington County School Generation Rate for elevator buildings, results in 307 adult bedrooms with 59 parking spaces, or a ratio of .19 parking spaces per bedroom, translating to at least 33 spaces missing, and hundreds if the ratio were market equivalent to the new nearby buildings. A savvy developer such as JBG Smith understands the tenant requirements for parking, so it is even more odd that so little parking is being provided. There should be more information about how these ratios are generated when they vary so widely from one building to another in the same neighborhood.

2100-2200 Crystal Drive - Plaza Block Parking
06.12.2025



SP #11									
Use Group / Space Type	220 20th Residential	2221 S Clark Residential	2221 S Clark Office	Office	2221 S Clark Retail	Retail	2100 Crystal Drive Hotel	2200 Crystal Drive Residential	Total Spaces
PLAZA BLOCK									
PLAZA	0	0	0	0	0	81	0	0	81
G1	0	62	0	0	0	146	0	0	208
G2	239	59	15	0	10	49	106	69	547
PLAZA BLOCK TOTAL	239	121	15	0	10	276	106	69	836
PARKS BLOCK									
Total Spaces Provided	239	121	15	0	10	276	106	69	836
Minimum Spaces Required	239	121	15	0	10	71	104	69	629
Dev. Size (du/sf)	265 du	216 du	24,960 sf	0 sf	6,161 sf	127,455 sf	344 rooms	195 du	--
Parking Ratio	0.9	0.56	1782	--	617	1820	0.30	0.30	--

Note 1: Table does not include Crystal Plaza Apartments (539 units, 550 spaces, 1.02 ratio)
 Note 2: Table does not include 2050 and 2051 S Bell Street (307 spaces)
 Note 3: Table does not include former Plaza 5 (Office)

The only time we have seen such low parking ratios was at Melwood, where the proposal is for a 100% affordable building, and upon studying the ratio there we found no basis for such a reduction. If JBG Smith intends for this to be an affordable building, that should be stated as part of this application and it is not. Is this intended as an affordable building? Please explain the reasoning for so little parking.

HOTEL LOADING

Per the Gorove Slade Memo Table 11, the hotel will generate a peak of 58 vehicles per hour, but the report doesn't break down vehicle traffic between those that park and taxi / Uber. Per the report "Curbsite Management" section, there are 6 on-street spaces for pick-up and drop-off, but these also service the retailers. If half of the hotel visitors arrive via taxi, that is 24 vehicles per hour, with maybe 3 of the 6 spaces available for the hotel and the rest for the retail. 3 spaces x 4 changes per hour (15-minute spaces) = 12 spaces per hour, versus 24 vehicles per hour, or a shortage of at least 3 drop-off spaces. Clearly, more detailed study regarding this situation is required informed with data from the retailers regarding their need for this 15-minute parking and perhaps a Monte Carlo simulation or application of some other standard algorithm to model hotel pickup and drop off. Further, the hotel contains conference space, but the traffic and parking impacts from that space are not included in the Gorove Slade Memo.

With the generous amount of underground parking spaces, it seems there would be an opportunity to allow pick up / drop off in the garage as is done in many urban locations.

The issue is critical because Crystal Drive is already congested with double-parked cars, bikes and pedestrians. We also take issue with the Gorove Slade Memo's Table 7 assessment of crashes as an impersonal set of statistics (notably at a time when the existing buildings were vacant). *We only see one statistic: there has already been a pedestrian accident with injury even in the short time period studied – during COVID era low traffic and a vacant building.* The project documents do not address the adopted Arlington County Vision Zero programs which aims to eliminate *all* pedestrian traffic severe injuries or fatalities.

Table 7: Crash County by Collision Type

Collision Type	Count	%
Rear End	1	11%
Angle	4	44%
Pedestrian	1	11%
Sideswipe - Same Direction	2	22%
Other	1	11%
Head On	0	0%
Sideswipe - Opposite Direction	0	0%
Total	9	100%

Or, is it that the Arlington County Vision Zero program, like the Comprehensive Plan and the CCSP, is also now meaningless because it is inconvenient? Does Arlington County just have goals that are not meaningful, or does it actually regulate development as needed to achieve those goals? Please explain.

<https://www.arlingtonva.us/Government/Programs/Transportation/Vision-Zero>

DOGS

Will dogs be allowed in the hotel or residential building, and if so, facilities need to be provided for them. If facilities are not provided, the buildings should be restricted from housing dogs, as this is a very urban location.

ARCHITECTURE

It appears JBG Smith is doing as little design for the residential façade as possible. The hotel looks like someone at least tried with an interesting roof, but it just seems like there was no care to the design of the residential building. Even the WeLive building got some interesting paint colors. Is this really the best that JBG Smith can offer and that Arlington should expect? 220 20th Street is a beautiful building a few blocks away. How does the market drop off so dramatically? Or is it simply that 220 20th Street went through a real review process with involved county planning?



SUSTAINABILITY

Arlington needs to walk-the-walk when it comes to its commitment to sustainable practices. Per the letter from Venable June 12, 2025, the applicant is not going to submit “a biophilic design narrative”, “draft plant palette”, “energy model”, “public art letter”, or “sustainability commitments” as they are “not requirements for Adaptive Re-use”. Of these, the idea that in 2025 an energy model is not required for a commercial building seeking a change of use is the most shocking. There is no reason to not require sustainability commitments in the age where we are now experiencing the impacts of climate change.

COMMUNITY BENEFITS

Please provide the list of community benefits that are being proposed in exchange for the adaptive-reuse approval.

CRYSTAL CITY SECTOR PLAN (CCSP) 3.7.4 – PUBLIC OPEN SPACE

The CCSP states that “As redevelopment occurs in Crystal City, preserving and creating high quality public open spaces for the community will remain a key priority.” And yet, there is no additional public open space proposed with this application.

Yet, there is a locked off unused volleyball court at the corner of 23rd and Crystal Drive where Park #11 is supposed to go. Why isn't there anyone at the County looking out for the quality-of-life issues for the people that will reside in this location. Why isn't the volleyball lot required to be an actual functioning park? Please explain.



Snip of Parks in the Crystal City Sector Plan (CCSP), Park 11 is a locked-off, unused volleyball court.

The CCSP draws a map of the public parks that are within a 10-minute walk - see snip below. For this project, Eads Park, Nelly Custis Park and Virginia Highlands Park in Aurora Highlands are all within a 10-minute walk, yet there are no improvements to these parks proposed to handle the additional traffic generated from this and other development in National Landing. What is the County's plan for these parks? Please advise.



There are no plans to improve the aging Aurora Hills library, or address the school overcrowding (other than bussing across 395). See page 147 of the Crystal City Sector Plan 4.3 "Implementation Matrix" for relevant requirements:

Parks & Open Space: Item 22, 23, 24, 25, 26, 27, 28, 32, 33

Sustainability: Item 36

Economic Development: Item 37, 38, 39

Monitoring: Item 43

We have asked the staff liaison for an update on these items and others as outlined in the CCPC 2024 report, but as of to date had no response. What is the status of the response to the report?

SUMMARY

The Administrative Change process is inadequate to vet the public's interest in the change of use as noted herein. The result? We have a proposed building that doesn't properly mitigate the impacts of the change of use: congested streets, inadequate parking, poor design, and a big punt to every sustainability practice and pedestrian safety practice presumably espoused by the county government. The idea fundamental to the CCSP – that there would be equitable increases in public infrastructure alongside development – swept under the rug with a list of excuses not the least of which is money, (when simultaneously there is the outrageously expensive pedestrian bridge to the airport being proposed when there is a metro stop right there anyway...)

After Melwood, after River House, after Missing Middle, after Hotel Pentagon, after the Rouse Estate, after fill-in-the-blank, it is clear the County does not actually care about what the public thinks or experiences in regard to development and its impacts to streets or the local community. Because, if it did care, it would have at least sent the proposed change of use through the inclusive SPRC process. Finally, there is a need for an after-action report of this process, as it is the first project under CMRI 2.0, and there are definitely lessons learned that need to be captured.

Thank you, we look forward to your response.

Regards,



Stacy Meyer

Vice President, Aurora Highlands Civic Association, Zoning Committee Chair

CC: Aurora Highlands Civic Association Board
Crystal City Civic Association
Arlington Ridge Civic Association
Crystal and Pentagon Cities Council
Arlington County Civic Federation
Arlington County Planning Commission
Arlington County Board