

To: Cory Giacobbe  
President of the Aurora Highlands Civic Association

From: Stacy Meyer, Chairperson   
Aurora Highlands Civic Association Zoning Committee

Date: April 29, 2022

Re: Proposed South Eads St GLUP Amendment and the Crystal City Heights Study

After meeting and discussion, the Zoning Committee submits the accompanying report for review and approval. It addresses two issues:

1. the proposed South Eads Street GLUP Amendment
2. the Crystal City Heights Study.<sup>1</sup>

The Zoning Committee recommends the ACHA oppose the proposed South Eads Street GLUP Amendment and the Crystal City Heights Study recommendations (in particular in the area within and adjacent to Aurora Highlands. )

If the membership concurs, the accompanying report should be forwarded to the Arlington County planning staff, Planning Commission and the County Board, with a letter from the ACHA President.

CC: Rob Douglas, AHCA Zoning Committee Vice Chair  
Allison Cusick  
Alexander Fernández-Pons  
Rachel Hicks  
John Schaus

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<sup>1</sup> The memo is based on the current materials available on the Arlington County website for the projects:  
Crystal City Building Heights Study - October, 2021 Slide Presentation  
<https://www.arlingtonva.us/Government/Projects/Plans-Studies/Land-Use/Crystal-City-Building-Heights-Study/Documents>  
and the South Eads Residential GLUP Amendment  
<https://www.arlingtonva.us/Government/Projects/Plans-Studies/General-Land-Use-Plan/Studies/South-Eads-Residential>

Aurora Highlands Civic Association Zoning Committee Review of the South Eads Residential GLUP Amendment and the Crystal City Heights Study  
April 29, 2022

The AHCA Zoning Committee has identified two primary issues of interest to AHCA members:

- a) South Eads Residential GLUP Amendment: the proposed change to the zoning status in the South Eads Street Residential GLUP Amendment presents a significant precedent altering Arlington County's existing General Land Use Plan (GLUP), allowing a 60' high building to abut existing single family homes in a long standing single-family neighborhood, doing so without robust resident input or adjacent neighbor approval.
- b) Crystal City Heights Study: the county is pursuing a revision of the existing Crystal City Sector Plan (approved in 2010) to increase height / density (via the Crystal City Heights Study) without adequate incorporation of resident or Civic Association input or consideration of the impact of such possible changes on the quality of life and availability of community features for a much larger population base.

**I. Proposed South Eads Residential GLUP Amendment Summary**

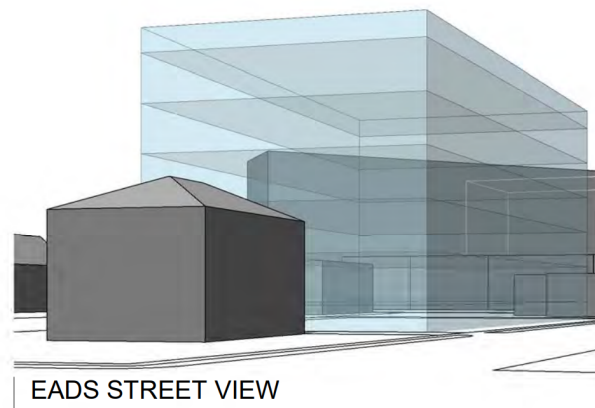
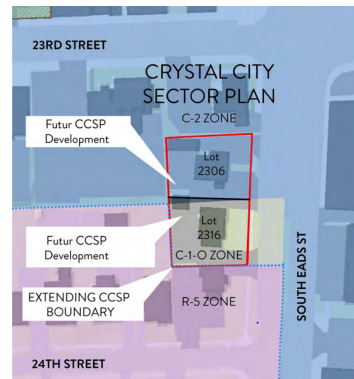
Arlington County received an application to modify zoning to allow construction of a new building on Eads St. The proposed building would be up to a 60' high, 22-unit multi-family, 42,000 square foot structure adjacent to the single family neighborhood.

The applicant requested that the 2010 Crystal City Sector Plan ("Sector Plan") be expanded to include a parcel to the south of the existing boundary along on the west side of Eads Street and to change the zoning from C-2 and C-1-0 to C-O Crystal City for both parcels through a GLUP Amendment. At present, the Sector Plan splits the two parcels between Crystal City and Aurora Highlands.

Map of the two parcels under review.



Northern parcel is in Crystal City Sector plan; southern parcel is not currently in the Crystal City Sector Plan.



Massing Study of Future Building Submitted by the Applicant

### **Current Status of the South Eads Street Residential GLUP Amendment Proposal**

On December 6, 2021 the request was approved for a GLUP Amendment Tier 2 review, which is now ongoing despite LRPC representatives from AHCA expressing concerns about the size of the project during the LRPC Tier 1 review.

The AHCA Zoning Committee understands that the review of the application for the Eads Street Project is on hold pending the results of the Crystal City Heights Study (“Heights Study”) – a study which is reviewing increases in the heights approved in the 2010 Sector Plan “to evaluate

whether changes to maximum building heights could provide an opportunity to achieve additional community benefits and higher-quality architecture, beyond what was originally identified [in the Crystal City Sector Plan]."

#### AHCA Zoning Committee Analysis of the South Eads Street Residential Project

It is not clear to the AHCA Zoning Committee that the South Eads Street Residential Project meets the threshold for GLUP review laid out in 2008 policy. The 2008 policy establishes an expectation that the proposed amendment would comport with the County's long term planning goals:

*"Arlington has a longstanding tradition of **carefully planning**", and in Item 2 "planning policies...provide **predictability.. to the community..**" and Item 4: "Amending the GLUP without...understanding whether it comports with the County's long term planning goals...**and obtaining full input from...the community, disservices, and may result in decisions contrary to the county's planning principles...**"*

The increased height of the project does not meet intent of the GLUP, the existing zoning, the Sector Plan, the Aurora Hills Neighborhood Conservation Plan (which on page 16 recommends rezoning the whole block of Eads Street including the corner of 23<sup>rd</sup> and Eads to R-5), the Historic Preservation Master Plan, or the Open Spaces Master Plan which all preserve the historic neighborhood's character and scale.

Changes to zoning, heights, and density under the GLUP Amendment process do not require adjacent neighbor involvement or input to the decision. This stands in contrast to the current BZA process, which requires homeowners in the neighborhood to obtain written approval from all adjacent neighbors to construct something as small as a non-conforming front porch or building eave.

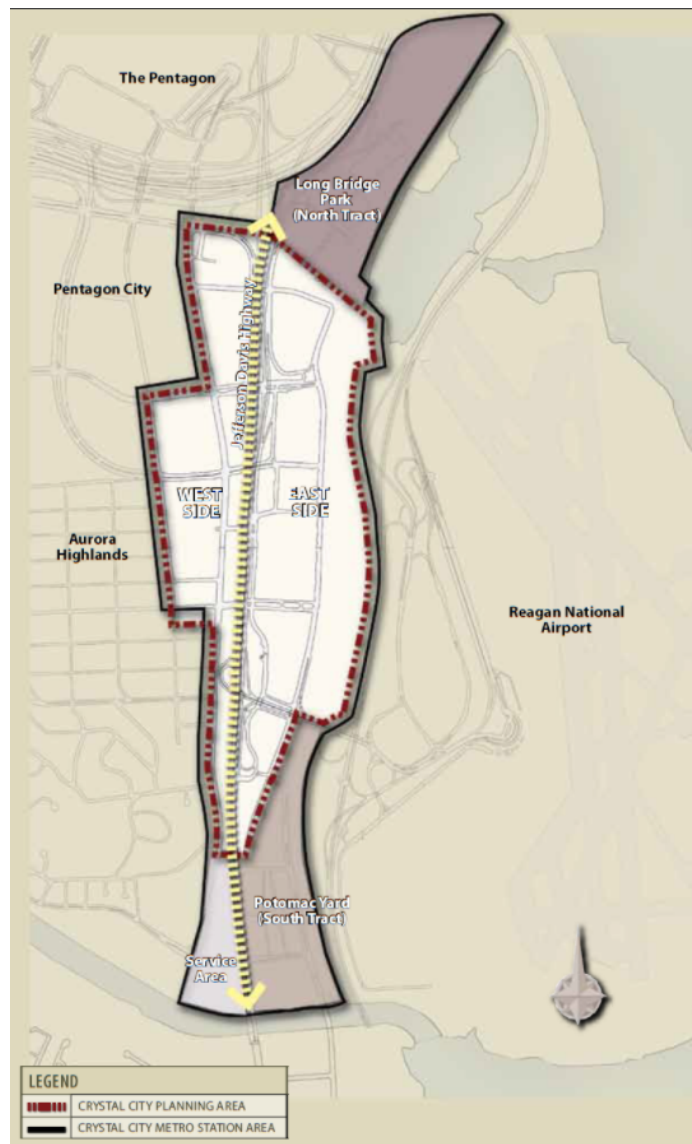
## **II. Crystal City Heights Study ("Heights Study")**

The Heights Study is currently in the 3<sup>rd</sup> of 4 phases. The 3<sup>rd</sup> Phase will be completed when the county provides a "Policy Guidance Update" which, upon approval, will be incorporated into a Zoning Ordinance Amendment in Phase 4. The 3<sup>rd</sup> Phase was intended to be complete by the end Q1 2022, but is now expected to complete in the next month or two. The Heights Study includes one representative from each of the local civic associations, as a small portion of the overall participants.

The slides from the Heights Study public engagement presentation October 6, 2021 make it clear that the goal is to increase height (and therefore also, density):

- Identify whether/how new maximum building height parameters could support the vision and goals of the Crystal City Sector Plan (CCSP) while helping achieve higher-quality architecture in Crystal City
- Identify and mitigate potential impacts created by increased building heights
- Support the CCSP vision for a varied skyline, among other goals

The study speaks to the bulk and massing of buildings to achieve a “varied skyline and enhanced architectural expression”. The primary focus of the study appears to be the high-rise buildings in Crystal City but the study also includes the portion of Aurora Highlands.

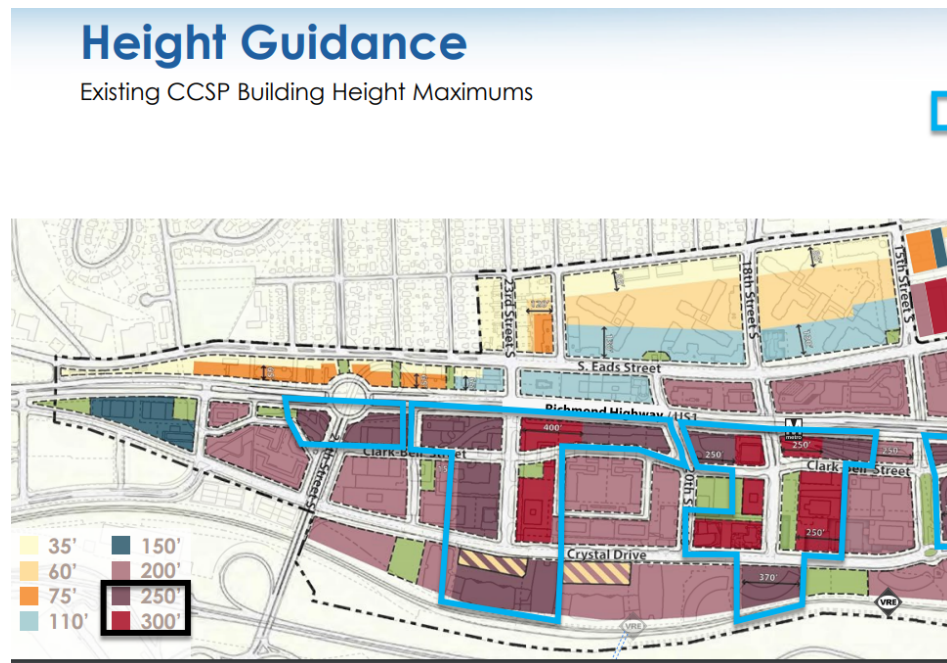


Excerpt from the Crystal City Heights Study Indicating Extent of Study Area

## **AHCA Zoning Committee Analysis of the Crystal City Heights Study**

The AHCA Zoning Committee review scope is contained to the areas in and adjacent to the AHCA neighborhood.

Aurora Highlands differs from Crystal City in one notable way – it contains a historic, small-scale, residential neighborhood. The Sector Plan, which was intended as a 40-year vision for development in Crystal City, and which was developed with significant community input over four years, recognized the importance of maintaining the Aurora Highland’s existing neighborhood character. One of the primary goals of the Sector Plan is to “preserve the integrity of the single-family neighborhood to the west [Aurora Highlands].” To this end, prescriptive building height and tapering was included in the Sector Plan. For example, the heights along 23<sup>rd</sup> Street and adjacent to the historic single-family neighborhood were limited to 35’.

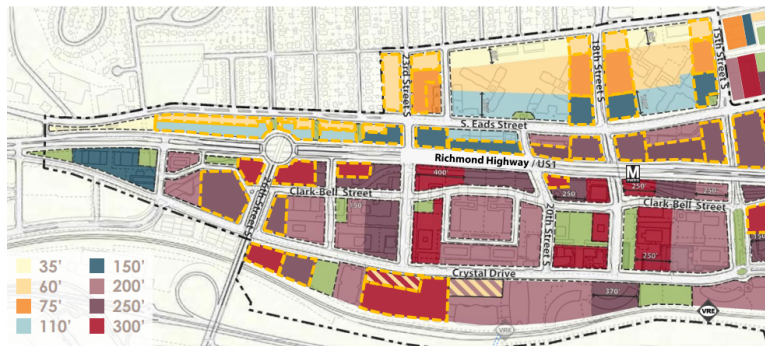


Excerpt from the Crystal City Sector Plan on Building Heights

However, the “preferred scenario” included in the October 2021 presentation of the Heights Study increases heights from 35’ to 60’ along Eads Street facing the single-family neighborhood and along 23<sup>rd</sup> Street and Fern:

## Updated Preferred Height Scenario

Additional Height Allocations



To utilize the additional height of 60' or 75' along 23<sup>rd</sup> Street, the existing buildings on 23<sup>rd</sup> Street would likely be torn down. Further, the additional height would not likely be used for retail, but would house other uses, likely multi-family residential. Impacts of the additional density such as increased parking requirements have not been studied.

There is nothing in any existing policy document that provides a precedent for increasing the building heights in and adjacent to Aurora Highlands single family residential area – the GLUP, existing zoning, the Sector Plan, the Aurora Hills Neighborhood Conservation Plan, the Historic Preservation Master Plan, the Open Spaces Master Plan all recommend preservation of the historic neighborhood's character and scale.

Further, increasing the heights of the buildings in and adjacent to AHCA does not support the goals of the Heights Study itself to improve architecture. The neighborhood's existing unique eclectic architecture and warm pedestrian scale will be negatively impacted by promoting tear down of the existing buildings. Further, there is no mitigation of the impacts of the increased density such as parking and open space included. Opportunities for incorporating open space, which is at a premium in the area, such as the outdoor dining that began during the Covid-19 pandemic along 22<sup>nd</sup> Street will be lost.

The October 2021 presentation on the Crystal City Heights Study does not appear to address comments included in the letter sent to to Matt Mattauszek, Planner, Pentagon City Planning Study and James Schroll, Chair, Long Range Planning Committee dated May 25, 2021, from *all three* of the impacted civic associations (Crystal City Civic Association, AHCA and the Arlington Ridge Civic Association) in response to the May 17, 2021 LRPC meeting. The letter can be found on the Crystal City Heights Study website. All three civic associations opposed the proposed additional density.



### **III. Zoning Committee Recommendations**

#### Recommendation 1: South Eads Street Residential GLUP Amendment

The AHCA Zoning Committee recommends that AHCA send this memo to the Arlington County Board, county staff and the planning commission and oppose the South Eads Residential GLUP Amendment application. Approval of this project would create a precedent for other landowners to seek to expand the extent of the Crystal City C-O zoning, and would create a precedent for other landowners to seek to increases in height and density and to rezone parcels within the single family neighborhood without regard for other residents in the neighborhood or the neighborhood's existing single-family character. The project is clearly inappropriate in this location, and out of scale with the existing neighborhood.

#### Recommendation 2: Heights Study

The AHCA Zoning Committee recommends that the building heights in and adjacent to the single-family residences within AHCA remain as established in the existing Crystal City Sector Plan and existing zoning.

The AHCA Zoning Committee also recommends that AHCA send this memo to the County Board, the planning commission and county planning staff and oppose the changes in zoning, heights and density proposed within and adjacent to the Aurora Highlands boundaries, and request they recognize and incorporate the opposition to the increases in density as indicated in the Aurora Highlands Civic Association, the Crystal City Civic Association and the Arlington Ridge Civic Association in their joint May 25, 2021 letter.

#### References:

Arlington County Zoning Code

[https://www.arlingtonva.us/files/sharedassets/public/building/documents/codes-and-ordinances/aczo\\_effective\\_01.12.2022.pdf](https://www.arlingtonva.us/files/sharedassets/public/building/documents/codes-and-ordinances/aczo_effective_01.12.2022.pdf)

2008 GLUP Amendment Policy

[http://arlington.granicus.com/MetaViewer.php?view\\_id=&clip\\_id=654&meta\\_id=49254](http://arlington.granicus.com/MetaViewer.php?view_id=&clip_id=654&meta_id=49254)

Crystal City Sector Plan

[https://arlingtonva.s3.amazonaws.com/wp-content/uploads/sites/31/2021/09/CRYSTAL-CITY-SECTOR-PLAN\\_JAN112012\\_web.pdf](https://arlingtonva.s3.amazonaws.com/wp-content/uploads/sites/31/2021/09/CRYSTAL-CITY-SECTOR-PLAN_JAN112012_web.pdf)

Aurora Highlands Neighborhood Conservation Plan 2008



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

Crystal City Building Heights Study October 2021 Public Engagement

<https://www.arlingtonva.us/Government/Projects/Plans-Studies/Land-Use/Crystal-City-Building-Heights-Study>

South Eads Street Residential GLUP Project

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

South Eads Street Residential GLUP Application

<https://arlingtonva.s3.amazonaws.com/wp-content/uploads/sites/31/2021/08/Binder1-Application.pdf>