



AURORA HIGHLANDS CIVIC ASSOCIATION

February 12, 2026

Re: State Bill for Increasing Density SB388 / HB1279 "Faith in Housing"

Dear Hon. Virginia State Legislator,

We apologize for the late arrival of this letter, but we only became aware of the legislation SB388/ HB1279 last week in ARLNOW coverage, and met last night to discuss the issue. We would have appreciated direct notice of proposed legislation that will so severely impact our neighborhood.

The Aurora Highlands Civic Association (AHCA) in Arlington, Virginia includes the portion of National Landing which is the home of Amazon HQ2, Pentagon City, the Fashion Center mall, 23rd Street "Restaurant Row", and the Aurora Highlands Historic District, a low-slung historic residential bungalow community that preceded the establishment of Arlington, Virginia.

AHCA is already one of the most densely populated areas in Virginia (around 20K / square mile) not counting the thousands of residential units in the pipeline for construction. Our neighborhood has experienced a tsunami of growth since Amazon HQ2 announced in 2018, including 1500 affordable units at the Crystal House development. Here is a snapshot of what that growth looks like:

- Our schools were overcrowded before Amazon HQ2 announced with children in trailers since at least 2016. Student performance has been negatively impacted by overcrowding.
- Our parks are stressed with multiple competing uses including people coming from DC and other parts of the county to use them.
- The crime rate is up 25% just since 2023, and more for violent crime.
- There is congestion on through streets: S. Fern Street, S. 23rd Street and Arlington Ridge Road, two lane roads which include a school crossing also back up for blocks regularly as they are used by the commuters to and through Crystal City. Wazers speed through on residential side streets avoiding Route 1 backups, and Uber drivers use Eads Street as a National Airport cell phone lot.

There has been no funding approved for the community public infrastructure needed to support of the growth within National Landing. Recently, the Arlington County Government approved the "Missing Middle" allowing 6-plexes in residential neighborhoods without accounting for parking spaces, additional schools, additional community facilities, or additional infrastructure needed.

Our organization has reviewed the "Faith in Housing" statewide mandate which allows every church to build affordable housing by-right without any public review, proper planning or budgeting for impacts. In our neighborhood there are five churches on S. 23rd Street, a two-lane road in the center of our historic district backing up to low slung, historic residences. 4 of them within 2 blocks of one another adjacent to an approved 60 ft tall building at a density of 58 units per acre - which would then per this bill allow copycat heights of 60 ft and density of 58 units per acre. It is just too much!

We believe this bill needs to be amended to ensure infrastructure and density are linked together, particularly when considering existing high-density communities like ours where growth has already outpaced existing resources with no sign of further public investment.

We recently also reviewed the proposal to demolish historic Nelly Custis School on the same area of 23rd Street and build an out of scale affordable apartment building in the middle of this historic residential

neighborhood. After extensive review we proposed an “Alternative Envelope” – which we believe would allow development to fit into the neighborhood. We believe an alternate envelope could also work as a model for Faith in Housing in dense, historic neighborhoods like ours. See Attachment A.

We agree with the Virginia Association of Counties who opposes these state-wide one-size-fits-all mandates for zoning revisions. Zoning decisions are simply not a one size fits all, which is why the local government should be charged with these decisions and engage in a public process.

Please at least consider areas like ours across Arlington are already straining with the impacts of density, and carve those out for additional review. Aurora Highlands and other similar historic communities in Arlington are unique in Virginia as they are at the edge of the DC metro system and adjacent to “Sector Plans” with high rises tapering to historic bungalows which, with the 500’ rule means there are many situations like ours for copycat hi-rises in historic low density residential neighborhoods. Has any study even been done that shows what the potential impact will be across the state? How can a law be passed without consideration of the impacts to localities? We would like to see such a study.

The Arlington County General Land Use Plan (GLUP) – part of the Arlington County Comprehensive Plan states *“land use densities are concentrated near the metro station tapering to surrounding residential areas to limit the impact of high-density development.”* This promise has been fundamental to Arlington County planning for decades and was cardinal to the sector plan approvals. This proposal fundamentally counters the promises in the Arlington GLUP. Specifically, the potential for copycat heights which allows development to the height of nearby buildings needs further study before enactment in edge communities like ours.

That no one asked us about this or even notified us is disappointing, but here we are. We come to you now to say we just cannot handle the additional unmitigated density that this legislation proposes on two blocks of 23rd Street S, as written for the health, safety and welfare of our community, not the least of whom are the school children that cross already congested 23rd Street every day to get to Nelly Custis Park playground. We are begging our government officials to deal with the congestion and density impacts we already have, not add more to it.

Thank-you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stacy Meyer', with a long horizontal line extending to the right.

Stacy Meyer
President, Aurora Highlands Civic Association

Attachment A: Appropriate Envelope for a Multi-Family Building in Aurora Highlands

Attachment B: References and Citations

Cc: Virginia State Legislature
Virginia Governor Abigail Spanberger
Virginia Association of Counties
Arlington County Board
Arlington Civic Federation
Aurora Highlands Civic Association Board

Attachment A – Appropriate Envelope for a Multi-Family Building in Aurora Highlands

SCALE OF NEIGHBORHOOD

- HEIGHT: 35 ft height limit, this is the existing height limit and maintains the historic viewshed.
- SETBACKS: existing neighborhood minimum setbacks

CONGESTION / PEDESTRIAN SAFETY

- PARKING: Market equivalent parking, managed on site and behind a door. 1 space for efficiencies / one-bedroom, more for 2 bedrooms and above.
- TRANSPORTATION STUDY: study the impact on local streets to determine if new traffic signaling is required and if the development will create dangerous congestion conditions.
- PICK UP / DROP OFF: require lanes for pick up and drop off, not on the street

REDUCE NUISANCE ISSUES

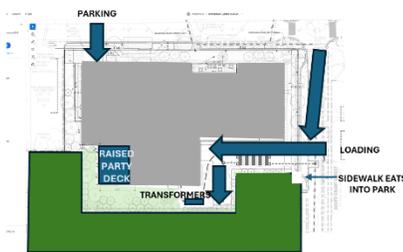
- SCREENING: heavy landscaping where the development meets low-density residential areas, screening around mechanical units and transformers, screened loading and trash.
- NUISANCE REDUCTION: light pollution mitigation, Juliet balconies only, loading from the main street - not on a residential street side street, no party decks.
- Proper venting of car exhaust away from residences.
- Proper removal of food trash

LONG TERM PLANNING

- BUDGET: For impacts on schools, parks, community facilities, police, fire and utilities.
- JURISDICTIONAL GOALS: Arlington public building green building standards, Arlington tree canopy requirements, Arlington on-site stormwater management, etc.

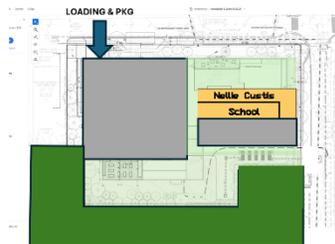
EXAMPLE OF INAPPROPRIATE VS APPROPRIATE ENVELOPE:

As Proposed by Melwood 154K SF



- Demo historic school
- Remove 10+ mature trees
- Loading dock by park, consume Grant St. parking
- Min. separation from park, not enough room for tree canopy with loading + transformer field
- 60 -70' + penthouse High-Med density
- 17% tree canopy excluding park
- Inadequate parking - overflow
- Unscreened raised party deck facing residential neighborhood & park
- Expands sidewalk into park in NE corner

AHCA Alternative Envelope – half the size, ~80K SF max



- Adaptive reuse of the Nellie Custis School
- Retain mature trees per GLUP Study
- Parking entry and loading off of 23rd Street
- Heavy separation from park – allows for tree canopy
- 35' tall – actually Low- Med density
- 25%+ tree canopy excluding park – allows for open space, native / pollinator plantings
- Adequate parking on-site / below
- Solar roof potential

Parking Studies at Affordable Housing Developments & Garden Apartments:

Rutgers University Center for Real Estate

<https://realestate.business.rutgers.edu/sites/default/files/media/documents/Rutgers%20Center%20for%20Real%20Estate%20Parking%20White%20Paper%20September%202023.pdf>

The Rutgers Study analyzed high-rise apartments in high density transit corridors and garden apartments (defined as low and mid-rise) outside of the transit corridors, like Melwood, for actual usage and found the following at garden apartments:

- Studios / 1-bedrooms require 1 space per unit,
- 2-bedrooms require 1.45 spaces per unit and,
- 3-bedrooms require 1.8 spaces per unit.

This parking needs to be required as a part of the development, and considered in traffic studies.

Fairfax County performed a study “Parking and Trip Generation in Multifamily Residential Developments” with Nelson/Nygaard Consulting Associates in 2016 that found the following:

One of the projects studied was Springfield Crossing (a TOD, Transit Oriented Development), an affordable housing multi-family building with a significant number of family sized units, located a quarter mile from the Springfield Metro.

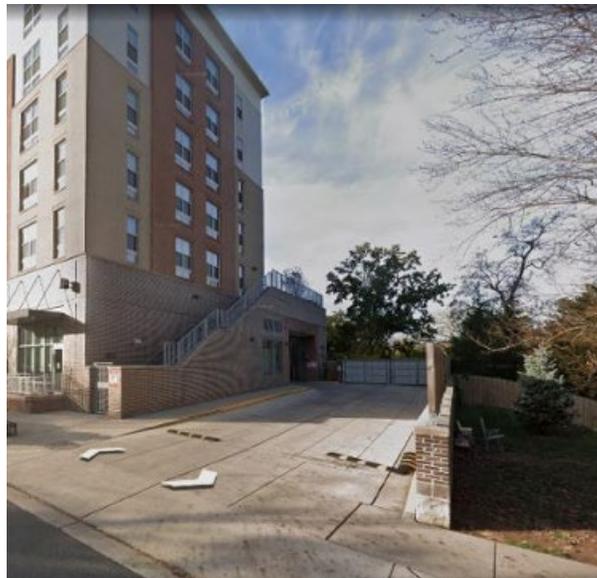
Springfield Crossing is within walking distance to a grocery store and the retail at Springfield Town Center and offers a free shuttle to the Metro. The parking requirements found at Springfield Crossing (an affordable building) were not different from market-rate buildings in the study. The study did not indicate reduced parking at the affordable building versus market-rate building. From the Fairfax Study: Springfield Crossing Unit Mix:

- 2-Bedroom 208 units 60%
- 3-Bedroom 139 units 40%
- Total 347 units

The Fairfax study found that out of the 555 parking spaces originally provided, Springfield Crossing had 65 potential excess spaces, and a maximum parking occupancy of 490. 490 / 347 translates to a demonstrated parking ratio of 1.41 which reflects the large size of the units including the 3bedroom units, that are the size of townhouses, which otherwise require 2 spaces per unit.

Both studies inform that parking is required at affordable housing sites just as they are at market rate sites, and parking is required in the range of 1 -2 spaces per unit, depending on the size of the average apartment. These ratios are not necessarily regulated in by-right development depending on location. These are real considerations for congestion, parking overflow, and livability for the tenants.

Excerpts from the review of Gilliam Place, an affordable housing development on Columbia Pike in Arlington, Virginia that replaced a historic church: <https://aurorahighlands.org/wp-content/uploads/Gilliam-Place-Comparison-25.01.10.pdf>



Gilliam Place is on Columbia Pike, a major road unlike 23rd Street, but it also backs to a single-family neighborhood, towering over it, eliminating privacy for those in its viewshed.

Landscaping, setbacks, loading dock screening, parking screening, light pollution mitigation, proper transformer placement, pick up and drop off, proper exhaust placement requires a public process.