

The Melwood GLUP Study omitted and or doesn't comply with the following policy guidance:

- 1) GLUP 4.0, Item 1 *"concentrate high-density residential within designated Metro Station Areas"*.
 - a. The density proposed is equivalent to high-density residential but the site is not in a Metro Station Area.
- 2) GLUP 4.0 Item 4 *"Preserve and enhance existing single-family and apartment neighborhoods....land use densities are concentrated near the metro station tapering to surrounding residential areas to limit the impact of high-density development."*
 - a. The site is proposing high density, but not in a Metro Station Area. It is in a single family neighborhood.
- 3) GLUP 4.0 Item 4 *'throughout the County, the Arlington Neighborhoods Program (aka The Neighborhood Conservation Area Plans, only the name was changed in 2023)....help preserve and enhance older residential areas"*.
 - a. The Aurora Highlands Neighborhood Conservation Plan provides long range planning guidance for the site, and specifically calls out the site as existing zoning to remain.
- 4) GLUP 5.1.2 recognizes the Aurora Highlands Neighborhood Conservation Area as *"stable, single family residential areas include Arlington Ridge and Aurora Highlands Arlington Neighborhood Program Areas (aka Aurora Highlands Neighborhood Conservation Area)"*.
 - a. This acknowledgement was omitted in the GLUP Study
- 5) GLUP 5.4 vision for low density areas (aka EHO) like Aurora Highlands includes only options that are contained within the existing envelope of those areas and meet traditional neighborhood design principles aka duplexes, triplexes and small multifamily buildings (35'), and not high-density 60' buildings as is proposed in R-6 zoning.
 - a. This guidance was omitted in the GLUP Study.
- 6) GLUP 6.1. Affordable Housing Master Plan
 - a. 1.1.4: *"The County will use its financing and land use tools to encourage and incentivize the **geographic distribution** of committed affordable housing units."*
 - i. This site is 3 blocks from the most dense concentration of affordable housing approved by the County – Claridge House & Crystal House and not geographically distributed.
 - b. 1.1.10: *"The County's land use policy **to limit high density development to transit corridors means that affordable rental housing is located in these areas that support multi-family housing."***
 - i. The site is not in a transit corridor. It is over a half mile from metro and is only served by one bus line.
 - c. 1.2.3 *"The County will explore zoning policies that allow and promote a wider diversity of housing types in single-family neighborhoods that help meet the need for changing definitions of families and households **while maintaining neighborhood character and underlying zoning."***
 - i. The proposal does not maintain the neighborhood character or underlying zoning.

- 7) GLUP 6.1 Historic Preservation Master Plan.
 - a. Page 6: Arlington *“seeks cultural heritage and landscape preservation through cultural heritage and landscape preservation initiatives, partnership with the Department of Parks and Recreation, collaborations with neighborhood advocates – not just historic buildings”*.
 - i. Yet, Nellie Custis School is more than a story it is also a historic building.
 - b. Page 6: *“Historic preservation is complementary to affordable housing, green space and tree conservation, energy efficiency initiatives, and equity work. Partnering requires being intentional and flexible in approach”*.
 - i. AHCA proposed an “Alternative Envelope” that allowed enough space for affordable housing, Melwood’s program, tree conservation, green space, and historic preservation but this was rejected by the Applicant.
 - c. Page 15: *“ Goal 1: Enhance Understanding of Arlington’s History and Historic Character.”*
 - i. Clearly, a historic school fits into this category.
 - d. Page 16: *“Goal 3: Protect Historic Neighborhoods.”*
 - i. Aurora Highlands is a designated historic neighborhood. The building proposed for demolition is a contributing building to the neighborhood. It has been accepted by HALRB for an LHD.
 - e. Page 19: *“Historic preservation is a natural partner with affordable housing”*.
 - i. AHCA proposed an Alternative Envelope that allowed for adaptive reuse of the Nellie Custis School but was rejected by the Applicant.
- 8) GLUP 6.2
 - a. The Crystal City Sector Plan – calls for tapering to the single-family neighborhood to the west (Aurora Highlands)
 - i. *“As Crystal City and Pentagon City evolved over the past four decades, deliberate efforts were made to establish height and bulk transitions between the high-density growth pattern in these new development areas and the lower density, existing residential neighborhoods to the west. This plan for the next generation of redevelopment in Crystal City will carefully manage development patterns and land use characteristics along this edge to retain and reinforce this transition strategy. The importance of retaining this transition strategy was highlighted in 2008, when much of Aurora Highlands received the largely honorific historical designation of inclusion in the National Register of Historic Places.”*
- 9) GLUP 6.4
 - a. The Aurora Highlands Neighborhood Program Plan (aka Neighborhood Conservation Area Plan). Calls out 750 S. 23rd Street as existing zoning to remain.
- 10) GLUP 6.7 outlines how Historic Preservation Districts are established. HALRB has urged the County to not act on the site plan approval until they act on the Local Historic District application.
- 11) GLUP 7.0. This is language required to be inserted into the GLUP booklet by the 2008 GLUP Amendment Unanticipated by Previous Planning Efforts Resolution. It clearly states that long range planning processes include both Sector Plans and Arlington Neighborhood Program Areas (aka Neighborhood Conservation Areas) and that where these long range planning documents

exist they are the guiding documents and therefore individual requests for specific change are not warranted. See letter sent February 11 from AHCA to the County Board regarding the omission of the Neighborhood Conservation Area as a guiding documents in GLUP Studies beginning only in 2017.

12) GLUP Map Note, ** *"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."* This clear guidance that surrounding land uses should determine the development potential of the site was omitted and disregarded.

13) GLUP Study Guiding Principles

a. *Ensure building scale, massing and materials complement the surrounding area, including the adjacent Nelly Custis Park.*

i. The building is at least twice as tall and twice as big as is appropriate. The building materials are inappropriate as there is nothing left of the original Nelly Custis School, a historic school, which should be preserved. Further, the scale of the building is in conflict with the GLUP, the proposed land use designation, the Crystal City Sector Plan and the Pentagon City Sector Plan. Additionally, the size is larger and taller with less setback and step back than the Study recommended. The Study recommended 60' ONLY IN THE CENTER OF THE SITE, not to all edges as proposed, it proposed transitions around the park, tapers, biophilic roof and walls, and landscape screening to minimize visual impact to the park - none of these recommendations are included in the Site Plan Application.

b. *Provide for attractive and welcoming pedestrian-level conditions through landscaping, other biophilic design and underground parking.*

i. The building lacks the evergreen biophilic separation discussed in the November 2023 LRPC meeting, it removes mature native trees which were specifically called out to be retained, and it does not provide enough parking. Loading on Grant Street will create a dangerous situation for pedestrians (including children) who are traveling to Nelly Custis Park and nearby Nina Park. The loading and parking entrances are not adequately screened.

c. *Enhance access, connectivity, and safety for all modes of travel in and around the site.*

i. The Multimodal Traffic Assessment does not adequately take into consideration development in the area and should be peer reviewed by a 3rd party. There is no justification for the reduction in parking which will create overflow onto residential streets which already compete with retail parking.

d. *Prioritize open space, tree conservation and sustainability, by minimizing increases to the building and paving footprint.*

i. The oversized building footprint does not conserve on-site open space, it does not conserve trees or help with natural stormwater mitigation. As a comparison, the footprint proposed by AHCA does conserve the trees, buildings and natural stormwater mitigation, while still allowing 80K SF of program, enough for a library or small school, or if after a study is completed that proves the public use is not required, the proposed Melwood program and 60 units - enough for all of the disabled units proposed (30) plus 30 more units, large

enough for economies of scale in construction and in the size range that is like many of Wesley Housing's existing portfolio and in a size range preferred by the Virginia LIHTC scoring system.

- e. *Prioritize affordable, accessible, equitable housing with redevelopment.*
 - i. If equitable affordable housing were prioritized then the project would not be located in an area that is not in walking distance of a grocery store, that is three-quarters of a mile from metro, outside of the metro walkshed, and that is in an area (South Arlington and Aurora Highlands) already concentrated with the county's affordable housing which exacerbates the current inequity in schools. Further if equity were a consideration the Application would provide adequate market equivalent parking. With no requirement for a covenant in perpetuity in exchange for the county giving up a public good, in this case the public use designation, there is a giveaway of density that can and likely will be flipped and monetized at the end of the LIHTC period, cheating taxpayers out of public amenities that could have and should have remained in this location.

14) Other GLUP Study Recommendations Page 26

- a. Low Medium Residential is determined to be "potentially" appropriate in the Study but does not clarify that the effective density is closer to Medium or High Density with the affordable housing bonus.
- b. Height: *"include a building height maximum of no more than 60,' tapering down to approximately 2-3 stories towards the neighboring park (to the south), South Grant Street (to the east) and 23rd Street South (to the north). The greatest building height should be focused towards the middle of the site"*
 - i. The proposed design only tapers to the south and does not taper to 2 – 3 stories to the north, east or west.
- c. *"Circulation and parking impacts should be mitigated"*
 - i. Concerns about the loading dock on Grant Street / safety, parking overflow due to reduced parking ratios and only 20 parking spaces for 18,000 SF of office and training area, loss of church parking, and lack of separation from Nelly Custis Park have not been mitigated.
- d. *"The site should be designed to allow for open space and the greatest extent of tree conservation possible"*
 - i. The footprint is as large as possible. AHCA provided an Alternative Envelope that preserves the mature trees in the NE corner and 40% tree canopy, which is the county goal. The proposed design only includes 25% tree canopy at best. No open space is conserved and Nelly Custis Park is negatively impacted by lack of separation from the loading dock, garage exhaust, transformers, 2 party decks and over 100 unscreened condenser units on the roof.
- e. *"The historic façade should be considered for preservation/interpretation"*
 - i. The preference by the County HPP is for preservation. Again, the Alternative Envelope AHCA provided and recommendations provided January, 2025 would allow preservation of the historic façade in place. All recommendations were rejected.

15) Other GLUP Study Recommendations Page 27

- a. *The building footprint should be minimized to the extent possible to meet the environmental goals identified below under “Environment.” This should include a reduction of impervious surfaces and a green buffer introduced between the subject property and adjacent Nelly Custis Park*
 - i. See previous comments – the building footprint is too large for a proper buffer with Nelly Custis Park and retention of the mature trees in the NE Corner of the site.
- b. *While there is a preference among some community members to retain a shorter building on this site that resembles the existing built conditions, taller building heights of up to 60’, with the specific tapers outlined below, could be considered in the middle of the property if such a height facilitates the achievement of guiding principles, including additional affordable housing, greater green space on site, greater buffering between this building and Nelly Custis Park, and/or preservation or interpretation of the historic façade in situ or in a new location on site.*
 - i. “taller building heights in the middle”, with “tapers” is not what is proposed. Greater greenspace is not achieved and there is inadequate buffering between the park and the party decks, loading dock, transformers and garage exhaust
 - ii. In situ means not demolition. The Applicant is proposing demolition.
- c. *Biophilic roof and wall designs, as well as landscaped screening, should be considered for that portion of the building closest to Nelly Custis Park, which will need to consider the viability of the existing trees planted within the northern edge of the park space.*
 - i. No biophilic wall are provided.
 - ii. Green roofs are provided as need for stormwater / LEED requirements only
 - iii. Minimal landscape screening is provided from Nely Custis Park
 - iv. Existing mature trees in the NE corner will be removed

16) Other GLUP Study Recommendations Page 29

- a. *Parking and loading entrances should be designed and screened in such a way that noise and light disturbances affecting other properties are minimized. The possibility of a driveway on the minor street, in this case South Grant Street, or on the main street, 23rd Street South, should be evaluated, but may be restricted to right-in right-out turning movements. Careful consideration should be given to the impact on the residential portion of the neighborhood.*
 - i. The loading dock, garage exhaust, transformers are not screened from the park
 - ii. The proposal is so large Grant Street needs to be widened to accommodate the truck turning radius as noted in the Study.
 - iii. No consideration was given to the impact on the residential neighborhood at all, especially the addition of the 2 party decks adjacent to the houses on the same block. In a conversation with Mr. Ron Lee who owns the house on Hayes and 24th on February 10, 2025, he was not ever made aware these party decks were being proposed at all. They are yards from his house which has been his family home for generations. This is not careful consideration of the residential portion of the neighborhood, this is complete inconsideration of the residential portion of the neighborhood.

- iv. HVAC screening for 105 condenser units was removed on the January 2025 set of drawings.
 - b. *With any site plan development proposal, a multimodal traffic assessment (MMTA) should be submitted with transportation proposals designed to reduce impacts to the existing residential traffic issues on 23rd Street South. To assess the influence of church activity, traffic studies should incorporate data gathered on Sundays.*
 - i. See AHCA comments – the traffic study has serious flaws in its assumptions of the multimodal split which doesn't match with the County's data from Mobility Lab and it doesn't include the impact of the thousands of units approved for construction. It needs peer review.
 - ii. No church activities traffic study was provided
 - c. *and the tree canopy should be prioritized*
 - i. The AHCA Alternative Envelope allowed for 40% tree canopy, the county goal. The proposal may just get to 25% minimum requirement.
- 17) Other Study Recommendations Page 30:
- a. *The mature trees on site, particularly on the northeast corner, should be conserved with redevelopment to the extent possible. The northeast corner has a mature Norway spruce, a large linden tree, four large hemlocks and several small linden trees near the bus shelter. This area has some of the higher value trees and opportunities for enhancement.*
 - i. These are being removed.
 - b. *A diverse, vegetated green buffer should be created between the site and Nelly Custis Park and between the site and adjacent properties with screening provided by lush vegetation, tree canopy increases and/or diverse shrub and herbaceous plants to make a functional, vegetated transition.*
 - i. Minimum is provided – it is unclear if there are both understory and canopy trees
 - c. *In addition, biophilic roof and wall designs, and green infrastructure architectural solutions, should be considered for both the overall building benefits in addition to the portions of the building closest to the park to allow for a more seamless transition between the future building and the public space.*
 - i. Did not happen. See previous comments.
 - d. *The historic façade of the original 1923 design and/or portion of the building should be considered for retention/ or interpretation in situ*
 - i. Did not happen. See previous comments.