

AHCA Comments 1800 / 1901 S. Bell Street Adaptive Reuse Proposal

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Date: Tuesday, October 14, 2025 at 01:20 PM EDT

Dear Chair Karantonis and Members of the County Board,

The Aurora Highlands Civic Association (AHCA) is reviewing JBG Smith's adaptive reuse permit application for 1800 and 1901 S. Bell Street (Site Plan #56). JBG Smith presented the project at our October 8, 2025 meeting. We are also in receipt of the Crystal City Civic Association (CCCA) letter of September 3, 2025. Our initial comments follow.

ADAPTIVE REUSE PROCESS

We support the CCCA's September 3, 2025 letter regarding the proposal. As in our previous letter regarding adaptive reuse (2000 / 2100 Crystal Drive), we agree with Mr. Cassell's (CCCA) assessment that there is a disproportionate benefit to the applicant in this adaptive reuse process. In this case especially, because at the time JBG purchased the Vornado portfolio, it was well known that many buildings needed full rehabilitation or demo. The vacancy problems JBG Smith are - yes, due to external economic factors beyond their control - but the fact that the portfolio with buildings 50 years old needs significant investment is not news.

Center Park is the jewel in the crown in the Crystal City Sector Plan, and delaying its completion for 30 years was never part of the plan. The current proposal is a complete change in direction and a big ask by JBG Smith of the community and the county. The Crystal City Sector Plan was intended to be a framework for improving the area for all stakeholders; not a developer give-away. The County cannot just shrug its shoulders when it involves Center Park; meaningful offsetting benefits must be part of this approval.

INFRASTRUCTURE IMPACTS

We support CCCA's request for infrastructure to serve the residents, but want to ensure that any library or theater space in Crystal City is not installed at the expense of the facilities in Aurora Highlands. The Aurora Hills library serves the growing Pentagon City neighborhood and is also in need of improvements. As mentioned by the Parks and Recreation commissioner in attendance at the September 30, 2025 CPCC meeting, there is increased stress on the Aurora Highlands parks and infrastructure, and a plan for maintenance and expansion is needed. We have asked about the plan for these improvements, but have never gotten a response from the county. We would like a response.

NEGLECT OF SOUND PLANNING PRACTICES

We agree with CCCA that sound planning practices are being way-sided in Crystal City, and also in Aurora Highlands, consistently; sound practices that protect pedestrians by providing adequate pick up and drop off, that alleviate congestion, that provide adequate parking, and protect and enhance public, community, historic and natural resources. See our previous correspondence on Melwood at 750 23rd Street and 2000 and 2100 Crystal Drive. We remain frustrated with the lack of responsiveness by the county to our concerns, especially at 750 23rd Street where we have written tomes documenting the problems with the proposal, voted against it as a community, petitioned against it, proposed alternatives to it, only to be completely ignored by our county representatives (with the exception of Ms. Cunningham.)

TIF FUNDING / CRYSTAL CITY SECTOR PLAN

We recommend that the county not use TIF funding for the "Pawn Shop Park" on 23rd Street, as we have stated in previous correspondence. Instead, we recommend using TIF funds for planning infrastructure improvement in Aurora Highlands, Crystal City and Pentagon City as is required in the implementation matrix of the Crystal City Sector Plan. Using TIF funds for infrastructure improvements in Crystal City was also recommended by the National Landing BID at the September 30, 2025 CPCC meeting. See Item 20, 22 - 29, 32, 33, 37, 38, 39 and 43 on pages 147 - 149 of the Crystal City Sector Plan for requirements. The County's reactive approach to planning where it just grubs for short term tax revenue while ignoring long term consequences to the community is not in compliance with the Sector Plan. See the CPCC 2024 Report, for which there has been no response from the county in a year despite multiple requests for a response.

LACK OF AFFORDABLE HOUSING IN CRYSTAL CITY

We do not know of any affordable housing that has been built within the Crystal City Sector Plan boundaries. This is not in compliance with the Sector Plan Implementation Matrix items 6 - 12, especially Item 8 "*Prioritize use of site plan cash contributions for (affordable housing) projects within the planning area*".

Per JBG Smith, by utilizing the existing structure, the units at 1800/1901 will be less expensive to build, and there will be large family sized units even with in-unit side-by-side washer-dryers as required by Virginia Housing for LIHTC funding. We see the combination of large floorplates + low cost as an opportunity to put the Melwood affordable housing in Crystal City.

Meanwhile, the Melwood affordable housing proposal that scored high for LIHTC funding will be negatively impacted by the approval of the Local Historic District application for the Nellie Custis School site as the school is a *unique historic resource in an area* where the historic fabric has nearly all been demolished: the historic fire station, the Luna Park, the brickyards, to name a few.

1800 / 1901 are much better suited to the density Melwood requires than 750 23rd Street, and they are located near transportation and grocery. Locating the Melwood affordable housing in one of these buildings would also be a nearly shovel-ready way to bring the county into compliance with the Sector Plan requirement for affordable housing.

CASE STUDY EXAMPLE OF A COMPREHENSIVE APPROACH TO PLANNING

Attached is a "Case for Mixed-Use Affordable Housing 1800 or 1901 Bell Street S." Progressive cities are leveraging mixed-use projects for affordable housing. Affordable housing on top of a library was done in Chicago and above retail in DC in these examples:

<https://www.som.com/projects/taylor-street-apartments-and-little-italy-branch-library/>

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The case study concept is to utilize a portion of 1800 or 1901 Bell Street for the Melwood affordable housing and a library/theater in exchange for JBG's proposed change of use and offsetting Center Park. This concept resolves AHCA's concerns about the historic preservation of Nellie Custis School and the impact of the oversized, out of scale, inappropriate design of the Melwood proposal at the historic Nellie Custis School site, and CCCA's concerns about community benefits while allowing Melwood to build their program in a better location than current, and JBG to make good use of their degraded buildings. Costs could be paid via LIHTC funding, existing library funding, TIF funding, affordable housing credit and offsetting Center Park.

SUMMARY

We recommend that Arlington engage in comprehensive planning to support a progressive win-win concept via the sought-after approval of change-of-use for two buildings (in addition to the two already approved) by JBG Smith and the pending Local Historic District designation of the entire Nellie Custis School site.

AHCA welcomes the opportunity to discuss these issues with the Board and County staff. We agree with the CCCA letter that given the complexity of this project compared to prior adaptive reuse efforts, early engagement is critical to ensure a streamlined review process that balances community and applicant interests.

Sincerely,

Stacy Meyer

VP, Aurora Highlands Civic Association, Zoning Committee Chair



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