

From: Ben D'Avanzo, AHCA Representative on the Pentagon City Study Focus Group  
To: Interested 22202 Neighbors  
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## **Background and Timeline**

Since July of 2020, Arlington County, through its Planning Division, has worked to [develop an update](#) to the Pentagon City Phased Development Site Plan (PDSP). [Originally devised in 1976](#), this plan has been little changed for nearly 50 years, with some smaller changes in 2003, but has essentially guided most of the development in the area. While originally River House was not part of the PDSP, the County Board requested it be included in this study when requesting the process in an April 2019 [planning session](#).

Arlington County hired a consulting firm, Goody Clancy, to both run the process and develop the plan based on direction and feedback. The primary feedback mechanisms were through a focus group and a series of five community workshops. I represented Aurora Highlands on the focus group, as a resident in the study area and as someone with experience representing civic associations on development projects. Crystal City and Arlington Ridge also had representatives on the focus groups, as did the major property owners in the area, the Crystal City Citizens Review Council, a local renter, and members of the planning commission, including a longtime neighborhood resident. All the presentations for those meetings are available [here](#).

The first series of meetings focused on discussing principles and core concepts to be the basis of the plan. It took until July of 2021 for an actual [draft plan](#) to be released, at which point Aurora Highlands started offering comments on each subsequent draft. In August, a [transportation analysis](#) was released as well, and a more official [launch](#) of a public draft in October. The focus group has not met since the first draft was released.

## **Planning Terminology**

Many neighbors may be unfamiliar with the Arlington County planning process, and so I wanted to highlight a few high level points here to provide context.

### Process

- At a high level, while overall Arlington development is primarily guided by the [zoning ordinance](#), which governs rules around buildings, and the [General Land Use Plan](#), which envisions future development, as well as the different elements of the [Comprehensive Plan](#) (transportation, housing, public spaces, etc), its major transportation corridors are governed by their own separate plans. For example Crystal City has the [2010 Sector Plan](#) to guide its future.
- Most large developments in Arlington are built using [Site Plans](#), which sets a number of requirements on developers, including community review.

- When developers wish to have a site plan reviewed in an area governed by a local planning document, like a sector plan, their proposals are supposed to be guided by the planning documents guiding the area.
- The site plan review process, which includes community and Planning Commission members, is meant, in part, to review whether a proposed new development is in alignment with the neighborhood's local planning documents. Only after site plan review, does the County Board consider a site plan.

### On Community Benefits

Developers with sites wishing to receive more density (measured by [floor to area ratio](#)) than allowed by the base zoning can “offset” it with “[community benefits](#).” The cost of these benefits is negotiated between the developer and county, but it is intended to equal the value of the additional floor area. Therefore, higher density means more community benefits. These can include affordable housing, new parks, protecting existing parks, sustainability measures, public art and other, though not unlimited, items connected to the building and surrounding area.

Note that this is separate from any taxpayer funded infrastructure, which is typically realized through the [Capital Improvement Plan](#).

### Connection to Livability 22202

The [Livability 22202](#) initiative, formed by the three 22202 civic associations, urged neighborhood wide planning like is seen in this plan. The plan itself acknowledges the influence of the initiative. There are both elements of alignment with Livability and areas where the vision isn't fully met. More specifically the [Livability Action Plan](#) (with more detail in subsequent reports around housing, open space, etc) called for:

- Address Housing Affordability - Met partially in this plan through committed affordable units, though not clear if there will be opportunities for ownership.
- Provide Essential Services Across the Community - This is an area of concern, as described below.
- Foster Environmental Sustainability - This is met in many ways with the plan's strong focus on biophilic development and the green ribbon, which was formulated in the framework, though the plan also doesn't greatly increase open space or public gardens.
- Encourage Engagement, Arts and Culture - The plan has several improved plazas that could have programming, but does not allow for any new arts specific space (though art could be incorporated into the green ribbon) nor sufficiently plan for community space.
- Extend the Multimodal Transportation Network - This plan makes quite a few improvements for pedestrians, bike access and buses, though also there are areas where it could be stronger.

### Outstanding Concerns

Summarizing from below, despite progress in a number of areas, the plan lacks important content that AHCA has raised repeatedly throughout the process. Most significantly perhaps is the need to plan for adequate publicly funded community facilities including parks, library,

community center and school to meet the needs of a growing population. In terms of park space, rather than leading to significant new space such as in the original Pentagon City plan from the 1970s, this plan focuses on only improving current open space and new additions are generally on the margin. These concerns intersect with concern about overburdening the site of the current Aurora Hills Center, which likely cannot sustain both its current functions (library and community/senior center) and a new school, and concern that park space may be lost, pitting neighborhood needs against each other.

Another outstanding concern repeatedly raised is opposition, though not universal among AHCA leaders, that Joyce Street should not be realigned and that Grace Murray Hopper Park space should not be all consolidated with Virginia Highlands Park.

**Status of AHCA comments on the Pentagon City Plan**

When the initial outlines of the plan were first released in the spring of 2021, I led a survey of 22202 residents to receive their feedback on the plan. The [results](#) of the 200+ respondents, though not fully representative of the neighborhood’s demographics, influenced the directions of our comments on the subsequent draft plans.

The AHCA comments on the various drafts of the Pentagon City proposed plan outlined areas of agreement and areas where the plan needs improvement. Below is a table summarizing the comments from each set of comments and where they currently stand as of draft 3. Page numbers refer to the pages in the pdf of [this document](#) (not the numbered pages).

Note that others have weighed in on the plan as well outside of this process. For example, some people made estimates of how much open space would be needed. The county response to that is here.

June 2020

Issue Raised by AHCA	Status As of Draft 3
Pedestrian Improvements - Desire for clearly articulated improvements to pedestrian access to and through PC	Covered in plan starting on page 76, the plan creates a number of new standards for sidewalk widths, street intervals, and pedestrian zones. Overall lays out a vision for improvements by each street. Less clear is how these will be achieved in currently poor condition sidewalks that are not adjacent to expected new development.
New and Better Open Space - Casual space, public plazas and areas of public seating are particularly desired. Expressing concern	Page 116. The plan adds little new net open space, but rather focuses on improving current poorly used open spaces, or moving

<p>about moving Grace Murray Hopper Park. Desire to improve the Nordstrom plaza.</p>	<p>them (Grace Murray Hopper Park, Nordstrom Plaza, interior plazas for the TSA/DEA buildings). Acreage estimates of open space in the plan isn't clear in terms of how the new space relates to these current poorly designed ones.</p>
<p>Locating Density Strategically - Desire for the heaviest density to be at the north and east, with less towards the south and west.</p>	<p>Page 44. The plan does reflect generally higher buildings in the north and east. River House remains fairly dense, though as requested, heights/density is lower at the southern end.</p>
<p>Avoid Traffic Congestion - New development should avoid increasing car traffic</p>	<p>Page 100 - Does not alter parking standards beyond those set more broadly for the county. Sets mode split goal of cars - "25% of trips for office and residential uses, 20% of trips for hotel uses, and 5% of trips for neighborhood retail/commercial uses" which is lower than current use. However, less clear is how this will be achieved. Transportation Demand Management is set for further study and each site will have to be monitored, but there's not information on what happens if the goals are not achieved.</p>
<p>Improve Bike Access - Add bike lanes, especially east/west connection</p>	<p>Page 94 - Adds protected bike lanes on Joyce, Hayes and Fern, as well as pieces of 15th St, but neglects other pieces of 15th as well as 12th. Hayes will have followup study.</p>
<p>Improve Transit Access - Improve buses and metro, particularly a 2nd Metro entrance</p>	<p>Page 88 - Calls for improving bus access along Hayes but a 2nd Pentagon City Metro entrance is only called for in the long term if capacity requires it.</p>
<p>Biophilia and Beyond - Call for green and sustainable design elements all throughout the plan</p>	<p>Page 118 describes the green ribbon, a biophilic pedestrian pathway first envisioned by the Livability initiative throughout 22202. Page 68 - Specifies that a specific percent of sites's square footage must have plantings, allowing for green to be incorporated into buildings themselves. Page 128 requires LEED Gold at a minimum for building and suggests developers look for innovative opportunities.</p>
<p>Address Housing - Include affordable and attainable housing</p>	<p>Page 63 - Sites must have at least 10% committed units for 30 years for those who make less than 60% of area median income.</p>

	Additionally, the overall large amount of new housing will relieve pressure from rising rents in existing market rate affordable buildings in the area.
Mall Pedestrian Connection Support - Improve east-west pedestrian access through the mall	As shown in several maps (Page 137 for example) a passageway is envisioned in any future development of the mall.
15th Street Mall Exit Improvements - Improve the intersection between 15th Street and the exists from the Fashion Centre and Pentagon Row	Page 83 describes these and other 15th St Improvements.
Set Up Immediate Additional Planning Efforts - Call for a Virginia Highlands Park Master Plan and school location process after adoption of the plan.	Page 146 has the Implementation Matrix with these and other details

**Comments on Subsequent Drafts of the Plan**

[Comments on Draft 1 - September 3, 2021](#)

<b>Issue Raised by AHCA</b>	<b>Status As of Draft 3</b>
Flexibility vs Vagueness	The plan continues to be intentionally flexible in many areas favorable to developers, such as location and size of buildings, though additional details have been added in subsequent drafts. Still, compared to documents like the Crystal City Sector Plan, this plan is much higher level. This means site plans processes will be all the more important.
Longer Term Planning and Timeline	Implementation Matrix is now included
County Investments	While some of this is covered in the matrix, there is little detail how major investments, like a school, library and community center would be funded.
Impact of Increased Density on Existing Facilities	Per our requests, population counts and student generation rates (page 174) are now included.
Green Ribbon	Green ribbon design guidelines are now included with more specificity (page 154) but there is concern that these guidelines provide

	<p>a lot of flexibility for areas with little to no actual live plantings, resulting in little difference than today. Implementation, starting with the PenPlace site, will be important to closely track.</p>
Park Space	<p>The plan still envisions moving Grace Murray Hopper Park to be incorporated into Virginia Highlands Park, something we did not support. There is no contemplation of the county using tools beyond developer community benefit contributions to acquire park land. It does envision Green Ribbon connection to Prospect Hill Park.</p>
Mode Shift	<p>It remains concerning that while the plan set strong goals for the rates of people driving vs taking other modes of transportation, it does not envision significant enough changes to the area to facilitate a car-free lifestyle, leaving each site responsible for explaining how it will achieve the goals rather than neighborhood wide planning.</p>
Density	<p>The heights and density in River House taper lower to the south where they meet single family neighborhoods. Brookfield has the tallest buildings at the north, though this still has limitations.</p>
Land Use Mix	<p>PenPlace continues to be an office-only block, though staff's response to this issue is that the retail elements make it a block with different use types.</p>
Community Benefits	<p>Page 64 mentions the benefits in the plan (open space, housing, sustainability, etc.) as a baseline, though it could be clearer that additional benefits may be made available on top of them.</p>
Site Coverage	<p>More detail has been added about site planting coverage requirements, differentiating the different types, including minimum tree canopy (Page 68) within and outside of the site boundary. Ideally they would all be at higher rates though. As is, about 25% of the site boundary must have greenery of some kind.</p>
Tour Buses	<p>Page 93 discusses making Hayes pick</p>

	up/drop off only for tour buses, while page 100 mentions a new bus facility on the Pentagon parking lot across from the mall.
Pick Up Drop Off	Page 105 discusses minimizes PUDO impact on pedestrians, but page 44 calls for further study.
Sustainable Design	The plan now has a section on sustainable design at page 128, including stormwater, which is also mentioned in other portions of the plan around green design.
Affordable Housing	The site requires at least 10% of new housing to be affordable, though only for 30 years.
Upper Floor Public Realm Encroachment	The plan is now silent on how many feet balconies and other features may encroach into the public realm, potentially allowing bigger spaces to better connect between private and public areas.
Southampton	The plan no longer shows the green ribbon traversing through the privately owned Southampton property except at property borders.

[Comments on Draft 2](#) (excluding areas of comment already mentioned above)

<b>Issue Raised by AHCA</b>	<b>Status As Of Draft 3</b>
Vision Statement	The statement now incorporates Crystal City into the downtown comment but still includes mention of “diversify housing options”.
Diversity and Equity	The plan still does not have a measurement of success for diversity in community input into planning processes.
Pedestrian Circulation	The plan is clearer about avoiding encroachment into sidewalk clear zones, but still allows for minor streets to have only 8 foot clear zones.
Community Integration	The plan lacks details for how Pentagon City will grow as a community as the population increases, such as how to encourage civic engagement.

Evaluation of the PDSP Over Time	While the Implementation Matrix calls for some level of review, it is not clear and over the long term.
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Comments on the third draft are available [here](#), with a fourth draft expected in late January.