



edge for review with the Zoning Committee, enclosed in Attachment 1. Staff anticipates that the County Board will review a Request to Advertise (RTA) for this amendment in September 2024.

## ***Background***

### *Adoption of C-O Crystal City District.*

In 2011, the Arlington County Zoning Ordinance (ACZO) was [amended to add a new C-O Crystal City zoning district](#) to implement the vision established in the [Crystal City Sector Plan](#). This vision was created at a time when portions of Crystal City's initial generation of mid-rise office, hotel, and multifamily residential development would need updating to stay regionally competitive and to address significant office vacancies at that time resulting from 2005 Base Realignment and Closure decisions made by the federal government. The long-term guidance captured in both the Sector Plan and its associated new zoning district reflect a series of regulations and form-based standards aimed to effectively create a vibrant and attractive urban environment that helps achieve:

- An improved neighborhood form with guidelines for building placement and enhanced sustainable urban design;
- A mix of land uses that create active street life to increase safety and walkability;
- Improved accessibility, circulation, and wayfinding via a comprehensive and multimodal transportation network;
- The creation of new and/or improved existing public open spaces as part of a network of diverse, usable, accessible and high-quality parks and plazas; and
- Financing and implementation of improvements to the public infrastructure networks of streets, transit, and public open spaces needed to support future growth in Crystal City.

The above objectives resulted in a planned distribution of density throughout the Crystal City planning area which considered criteria such as access to transit, existing context, land use objectives, and the economics of redevelopment. While the bulk of new density was focused near Richmond Highway, areas to the west were gradually reduced in their density potential to ensure appropriate height and massing transitions could be achieved near the adjacent low-scale residential neighborhood.

Figure 1: Excerpt of the Crystal City Sector Plan’s Illustrative Plan (Western Edge)

### 3.3.6 WEST SIDE

#### BUILDINGS AND DEVELOPMENT

This district includes all the blocks within the planning area boundary west of Jefferson Davis Boulevard and south of 15th Street. The Master Plan for this district balances preservation of the Aurora Highlands neighborhood to the west with potential development in the planning area that incorporates reduced planned building heights for most blocks south of 20th Street and limiting cut-through traffic in the neighborhood by directing vehicles towards arterial streets. The narrow blocks between Eads Street and Jefferson Davis Boulevard north of 23rd Street will see some redevelopment, mostly on the southernmost block. An opportunity for infill development on the northeast corner of the block south of 15th Street would occur with the reconfiguration of the highway on/off ramps, creating new frontage on Jefferson Davis Boulevard. On the two large blocks to the west, the plan anticipates the existing residential building will stay in place with some residential infill, mostly three story multi-family buildings located along Fern Street. At the corner of 18th Street and Eads Street, the post office site is envisioned for redevelopment possibly of residential use. While it’s understood that the USPS does not envision maintaining the free standing building at this location, they wish to maintain a retail presence in the vicinity, which is strongly supported by the community. At Restaurant Row (500 block of 23rd Street), the plan visualizes preserving and retaining small, neighborhood oriented retailers. Should redevelopment occur in this area, such retailers should be accommodated, to help support active streetscapes. Recommended building envelopes in this plan provide deliberate tapering down to the west, while offering flexibility for development at the corner of 22nd and Eads Streets to help achieve parking to support the 23rd Street retailers.



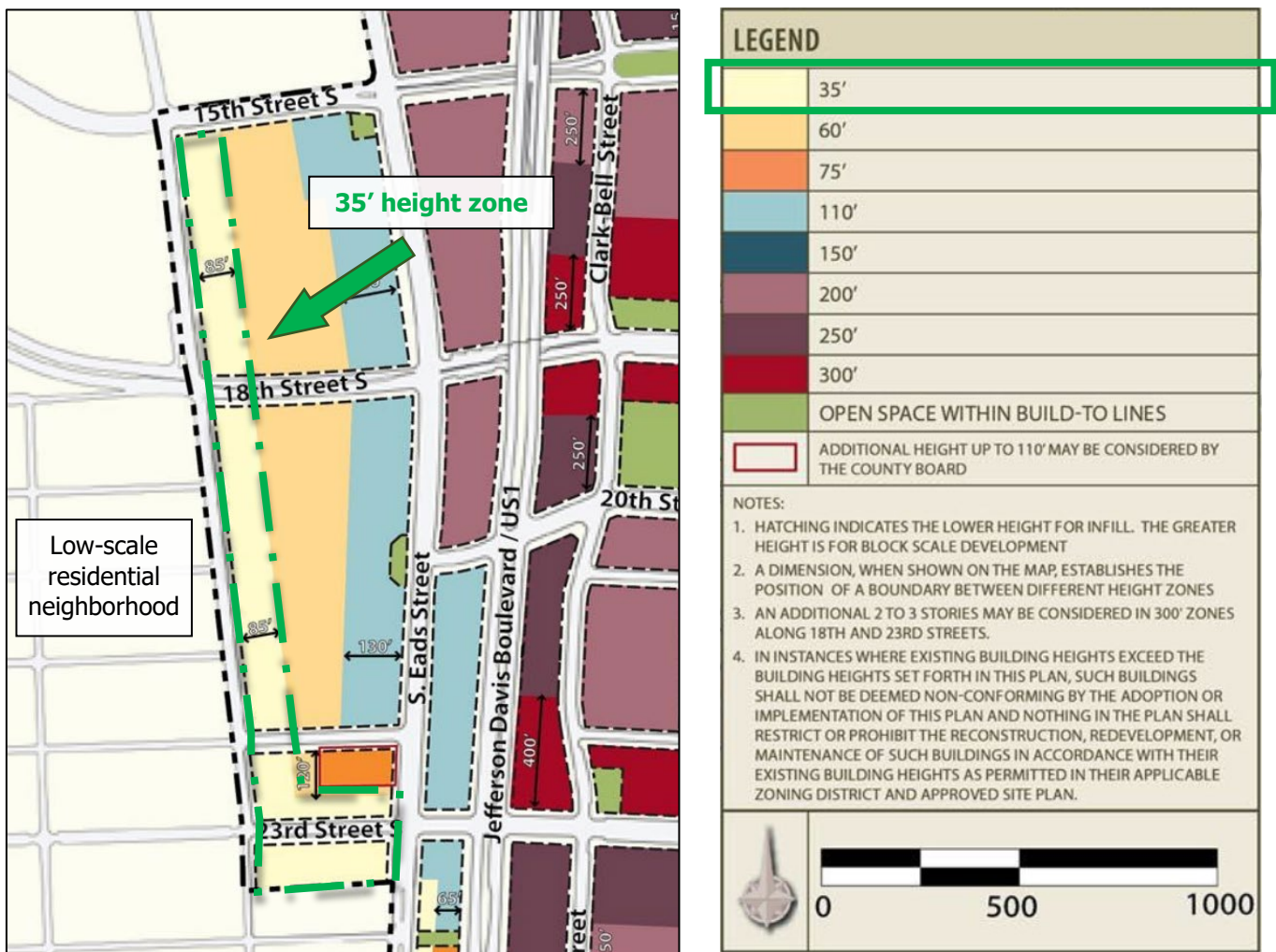
*Note: References to Jefferson Davis Boulevard in the Sector Plan and this exhibit should now be read as "Richmond Highway"*

### *Building Heights and Topography*

As part of its prescriptive, form-based regulations, C-O Crystal City relies on a series of maps to convey the envisioned land use mix, specific locations for future buildings, areas where architectural features and strategic setbacks should be incorporated, future street connections, and public open spaces. These maps, created for and adopted as part of the Crystal City Sector Plan, were integrated into the ACZO as part of the 2011 establishment of the C-O Crystal City zoning district.

One of these maps establishes building height maximums to implement the Sector Plan's development framework. The maximum height levels are expressed through maximum number of feet. Maximum Building Heights, as prescribed on the building heights map, rely on a legend detailing the geographic distribution of eight different building height categories. As noted in [this map](#), maximum building heights range from 35 feet located on the western edge of the planning area to 300 feet located in the core neighborhoods on the east side of Richmond Highway. The greatest heights are focused on the east side of Route 1, particularly along 18<sup>th</sup> Street adjacent to the Metro Station, and along 23<sup>rd</sup> Street.

Figure 2: Excerpt of the C-O Crystal City Building Height Map (Western Edge)



While the plan anticipates mixed use development in the Crystal City neighborhood, these height levels are intended to increase the range of residential building typologies, number of bedrooms per unit, and overall price points, all of which help contribute to a more diverse housing mix as Crystal City redevelops. The maximum building height is paired with several other design specifications to achieve the desired form, including bulk plane angles affecting the amount of sunlight at grade in public spaces and rights-of-way. Specifying maximum building height in feet during the Sector Plan process allowed for simplicity in height measurement and accounted for the proximity of Reagan National Airport where building height would routinely be measured to evaluate potential impacts to aviation navigation paths. As the Federal Aviation Administration (FAA) conducts its obstruction evaluation/airport airspace analyses using building heights measured above mean sea level, expressing the sector plan’s planned maximum heights in feet above average site elevation would allow for ease when evaluating potential impacts buildings may have on air navigation.

Most of the aforementioned guidance would help achieve reinvestment, diverse architecture and sculpted skyline, and quality public realm, particularly in the areas of greatest building height east of Route 1. In the western portion of Crystal City, density and height increases above existing conditions were also envisioned although lower when compared to height potential east of Route 1. More gradual increases in building height were specified to provide appropriate transitions to adjacent lower-scale development outside of the Coordinated Redevelopment District. In these areas, particularly in areas planned for 35 feet, air navigation paths and bulk plane angle criteria were not key determinants in setting maximum building height. The western side of Crystal City is depicted in Figure 2, which emphasizes the portions of the district recommended for no more than 35 feet in permitted building height.

*ACZO Dimensional Standards and Definitions*

The ACZO requires the use of a specific methodology for determining a building's height for purposes of compliance with maximum height requirements. These height measurement protocols are applicable for development within the C-O Crystal City District. §3.1.6 dictates that building height shall be calculated on a computed average grade (or site elevation) calculation established for the entire site area (reflecting the limits of proposed redevelopment as defined in §3.1.1) following construction. These methods of measurement remain consistent throughout the County where redevelopment proposals are reviewed for consistency with building height guidance found in other Area and Sector Plans or zoning districts. As a result, the consideration of potential changes to the methodology for establishing the average site elevation is outside of the scope of this study.

***Discussion***

The 35-foot height maximum is applicable to the western-most portions of several properties shown in Figure 1 fronting South Fern Street (between 15<sup>th</sup> Street South and mid-block between 23<sup>rd</sup> Street South and 24<sup>th</sup> Street South) and S. Eads Street (south of 23<sup>rd</sup> Street).

In those areas, most notably near 18<sup>th</sup> Street South, existing topography changes have proven to unintentionally restrict some sites' ability to deliver the intended 3-story building form while still meeting the 35-foot building height limit. The resulting outcomes may generate buildings, or portions of buildings, that are taller or shorter with potentially more than 3 exposed floors above grade when accounting for the height measured from the average site elevation. Average site elevation (ASE) is measured along the perimeter of the site and is used to establish a single baseline from which all proposed redevelopment is measured.

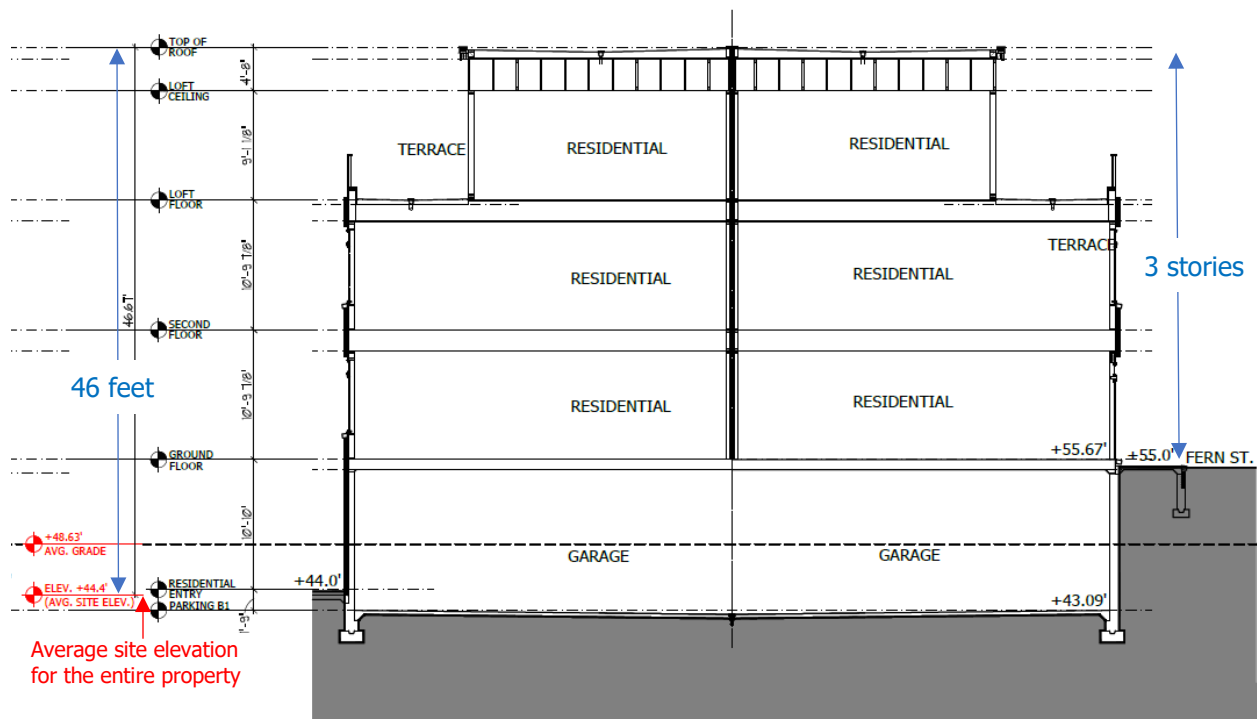
In these particular instances, achieving the previously envisioned form of development within a 35-foot height limit becomes even more difficult when the ASE is applied within blocks covering expansive areas, particularly those under single ownership, where future redevelopment would be informed by a single calculation to determine height compliance for multiple buildings. When significant grade changes occur on such large site areas, they often result in portions of the site that have grade elevations below or above what has been computed as the average site elevation. In these instances, the average site elevation could artificially limit building heights that may be achieved, particularly in development scenarios comprised of multiple moderately sized buildings rather than a single large building. Since neither the Sector Plan nor its associated C-O Crystal City zoning district require large sites to be subdivided for purposes of redevelopment, the decision to do so is at the discretion of the property owner. A subdivision may or may not always reduce the differential between the average site elevation of the entire parcel and the grade at the individual building, or lead to the envisioned 3-story form of development.

Given the large scale of these particular blocks along Crystal City's western edge, combined with unified property ownership, future redevelopment is likely to occur through a phased approach utilizing a progressive sequence of smaller buildings. As the Zoning Ordinance requirement for establishment of an average site elevation would apply the calculation to the site plan site area, (constituting the majority, if not entire block in these two instances), building design, height, finished floor elevation, or other features would continue to prove difficult to achieve consistency with Sector Plan guidance. Specifically, near 18<sup>th</sup> Street South where the changes in grade are most significant, shorter buildings would likely achieve less than the envisioned 3-story form of development to remain within a maximum building height of 35 feet and therefore may prove less economically feasible, reducing the likelihood of achieving the Sector Plan's vision for this area.

The combination of factors outlined above exist along the Crystal Towers and Crystal Houses blocks of Crystal City, located along South Fern Street and South Eads Street between 15<sup>th</sup>

Street South and 22<sup>nd</sup> Street South (see Figures 4 and 5). When considering the western edge in these areas, the above factors would disrupt the Sector Plan’s envisioned recommendation for a 3-story form of development. As recently demonstrated by an active site plan application for the Crystal Houses site, this would result in an otherwise compliant building that partially exceeds the 35-foot height limit, a scenario which was not previously contemplated. As depicted in Figure 3, the proposed Crystal Houses development produces a 3-story structure along South Fern Street (right side of the exhibit) but when measured from the overall Crystal House’s average grade calculation, the structure measures 46 feet in height (left side of the exhibit, further into the property).

**Figure 3: Crystal Houses (Phase 7/8) Proposed Development at Intersection of S. Fern Street and 18<sup>th</sup> Street S.**



**BUILDING CH 7 SECTION 4  
(18TH STREET SOUTH)**



Figure 4: Comparison of the C-O Crystal City Building Height Limits and 2-foot Contour Lines (Indicating Topographical Changes) on the Western Edge

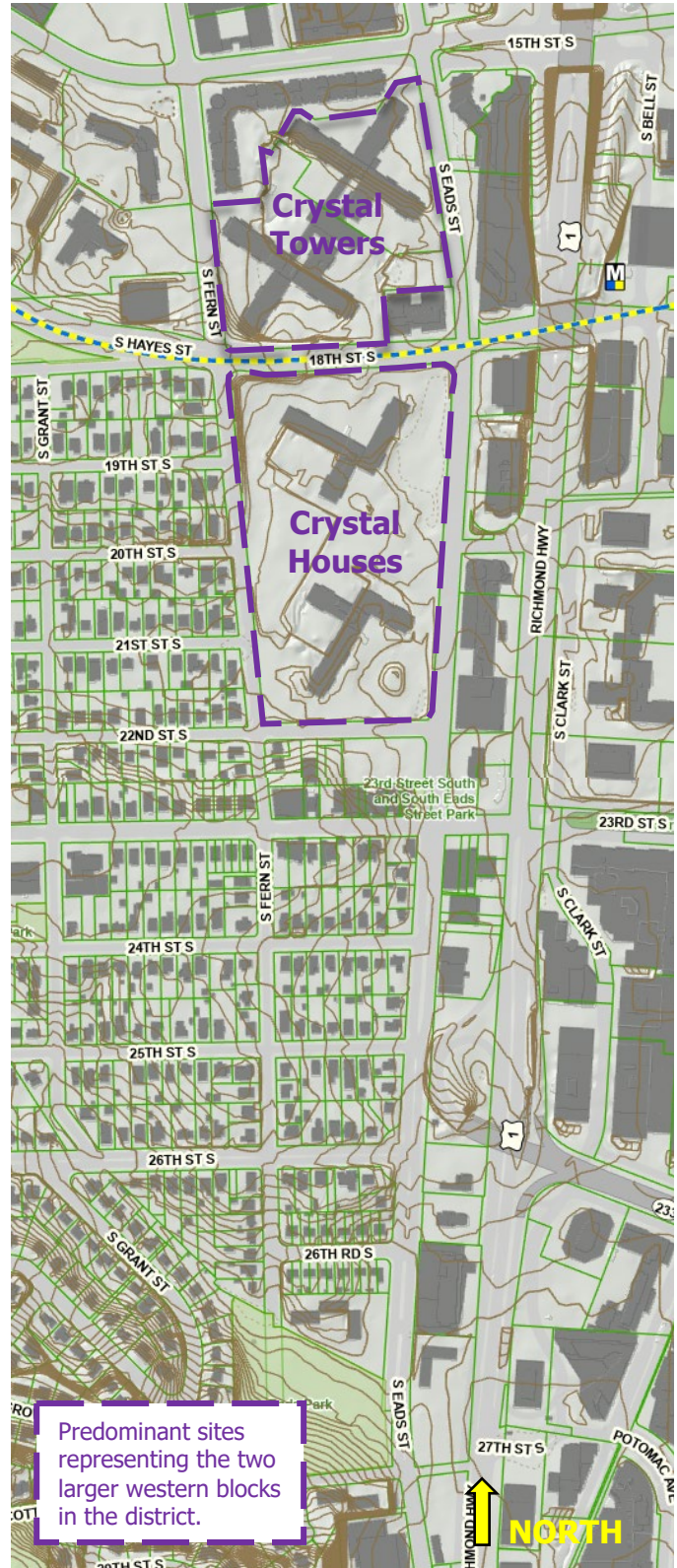


Figure 5a: View of Crystal Houses near the Intersection of 18<sup>th</sup> Street S. and S. Fern Street



Figure 5b: View of Crystal Towers near the Intersection of 18<sup>th</sup> Street S. and S. Fern Street



### ***Recommended Change***

Factors potentially limiting the delivery of the envisioned 3-story form of development are only present along the western edges of the Crystal Towers and Crystal Houses blocks. As a result, staff recommends amending the building heights map to introduce an alternative height measurement which would only apply to this discrete area of the C-O Crystal City zoning district. As shown in Attachment 1, the introduction of a new pattern and corresponding legend item for the two South Fern Street blocks located between 15<sup>th</sup> Street South and 22<sup>nd</sup> Street South should adequately address this issue in a manner that is clear, legible, and easily identifiable to all stakeholders who may need to reference this information. At this time, staff does not see a need to recommend any corresponding text changes to C-O Crystal City to effectuate this change.

## ***Next Steps and Timeline***

Following discussion at the ZOCO meeting, staff intends to bring the request to authorize the advertisement of the proposed ACZO amendment to the County Board at its September meeting. It is anticipated the Planning Commission and County Board would consider the proposed amendment at their respective meetings in October 2024, at which point a concurrent consideration of the Crystal Houses site plan amendment is anticipated.

## **Recent and Anticipated Schedule**

- June 26, 2024; Crystal and Pentagon Cities Council (CPCC) Meeting
- July 16, 2024: Zoning Ordinance Committee (ZOCO) Meeting
- Early September 2024: Community Meeting
- September 14/17, 2024: County Board Request to Advertise (Zoning Ordinance Amendment)
- October 7/9, 2024: Planning Commission recommendation of draft text/map changes
- October 19/22, 2024: County Board final consideration

## ***Attachments***

- Attachment 1: Recommended Zoning Map Changes to Section 7.16.8

Attachment 1: Recommended Map Changes to Section 7.16.8

