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Revised May 5, 2023

Via Permit Arlington

Ms. Arlova Vonhm, Zoning Administrator
Arlington County Zoning Division
2100 Clarendon Boulevard, Suite 1000
Arlington, Virginia 22201

**Re: Statement of Justification
Request for Major Site Plan Amendment – Site Plan #13
Applicant: TOWERS ASSOCIATES II, LLC d/b/a Dweck, LLC
Property: 1600 South Eads Street (RPC# 35-011-010, -011)**

Dear Ms. Vonhm:

On behalf of the Applicant, please accept the following as a statement of justification for a major amendment application to Site Plan No. 13 (“SP #13”) for the above-referenced Property, also known as the “Crystal Towers” development. With this application, the Applicant proposes to construct two new infill buildings including a one-story retail building with approximately 19,865 square feet of gross floor area (“GFA”) and a ten-story mixed-use building with approximately 8,211 square feet of ground floor retail GFA (28,076 square feet of retail GFA in total) and approximately 205,101 square feet of residential GFA with 209 residential units on the Property.

Property Background

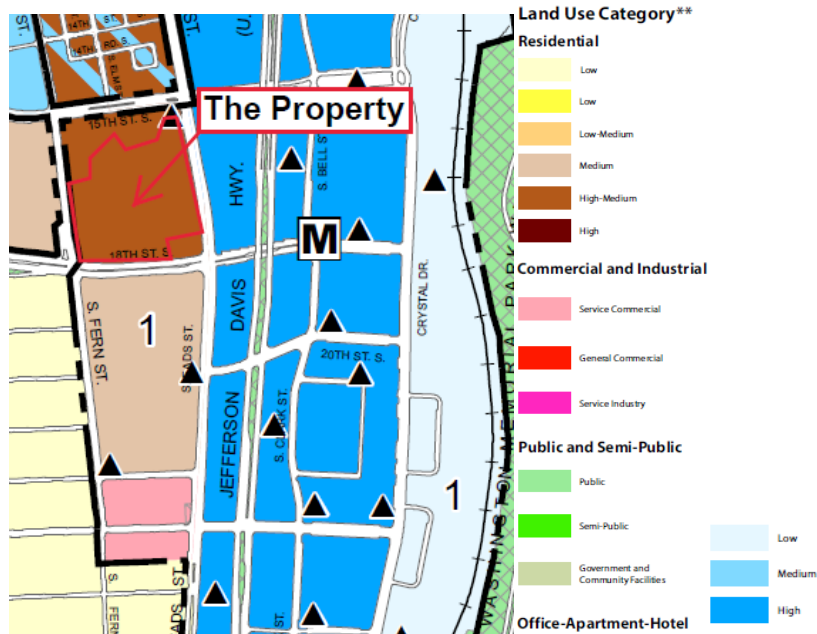
The Property consists of a portion of the block bounded by South Eads Street, 18th Street South, South Fern Street, and 15th Street South located in the Crystal City neighborhood. This block also includes the Crystal Towers apartment buildings, the Lofts 590 building to the north and the Crystal Flats building on the southeast corner. The site area for the area of disturbance for the proposed infill development is 130,690 square feet, while the site area of SP #13 owned by the Applicant is 424,363 square feet. The total site area of SP #13, including the Lofts 590 building, is 563,449 square feet.



Planning Guidance

General Land Use Plan (“GLUP”)

The Property is designated Residential High-Medium, with a typical range of density up to 3.24 FAR for residential use prior to any requested bonus density. This is consistent with the Property’s RA4.8 zoning district. There is an open space designation at the corner of 15th St. S. and S. Eads St; this portion of the block is partially owned by Equity Residential, which owns the Lofts 590 building. The Property is also subject to a GLUP note stating that the “area was designated the ‘Crystal City Coordinated Redevelopment District’ on 9/28/10, to permit heights and densities called for in the Crystal City Sector Plan where Sector Plan goals are otherwise generally met.”



Zoning

The Property is zoned RA4.8 or “Multiple-Family Dwelling District.” RA4.8 zoning permits, by special exception site plan approval, 3.24 FAR of residential development, of which a maximum .5 FAR of retail and food establishments are permitted on the street level only. With special exception site plan approval, heights are limited to 136 feet for multi-family residential use, including any mechanical penthouse and parapet walls. Parking requirements for multi-family residential uses in the RA4.8 district, by special exception site plan approval, are one off-street space per dwelling unit, which must be located below grade or within the residential structure, except as may be allowed in an approved site plan. More recent guidance for multi-family residential site plan projects in Metrorail corridors adopted by the County Board in 2017, however, recommends a parking ratio as low as .3 spaces per unit due to the Property’s proximity to nearby Metrorail stations and other transit options.

Site Plan Approval

The Property is also subject to SP #13, which was approved in 1965 concurrent with a rezoning to the RA4.8 zoning district and included the two residential buildings which constitute the 912-unit Crystal Towers development. By way of background, on April 20, 2002, the County Board approved a major site plan amendment to add a four-story apartment building containing 212 units on the northwest portion of the block, which is now known as the Lofts 590 building. In total, the Crystal Towers buildings and the Lofts 590 development include 1,124 residential units at a density of 2.60 FAR.

On November 14, 2006, the County Board approved a major site plan amendment that combined the Crystal House Apartments block with SP #13 to facilitate the construction of two additional residential buildings on the Crystal House Apartments site. This amendment was

necessary because the Crystal House Apartments were constructed in 1961 as a by-right development and due to amendments to the Zoning Ordinance, the Crystal House Apartments site became nonconforming with regard to residential density. The approval combined the two blocks under Site Plan #13 in order to take advantage of the excess density available on the Crystal Towers block. Since the Crystal Towers block is zoned RA4.8, which permits an FAR of up to 3.24, even after the construction of the Loft 590 building, 0.64 FAR of density remained available for use. The two proposed buildings on the Crystal House Apartments block used approximately 275,750 square feet of available development potential, which left approximately 27,169 square feet of development on the Crystal Towers block.

As part of this approval, the developer agreed to street dedications to the County to replace existing street easements. The dedications decreased the combined site area on the Towers block by 22,092 square feet. The Applicant was permitted to use the site area of the dedications to support development on the Towers block. The total post-dedication site area, according to County records, is 1,194,897 square feet (27.43 acres), which includes 563,449 square feet (12.9 acres) from the Crystal Towers block.

Subsequently, on November 18, 2017, the County Board approved a site plan amendment that combined the two buildings on the Crystal Houses block from the 2006 approval into one building with the same number of units and approximate building height. Later, in 2019, the County Board approved a C-O Crystal City (“C-O-CC”) development for Crystal Houses. The C-O-CC zoning district is form based, so the new development could not use the transferred density. This sent the transferred density “back” to the owners on the Towers block. Of that remaining available density, 133,130 square feet of GFA is available.

The Applicant has purchased an additional 30,000 square feet of GFA from Equity Residential, owner of the Lofts 590 development. This agreement is expected to be executed in April 2023. With this additional GFA, the density available for use by the Applicant in this proposal is 163,130 square feet.

Proposal

The Applicant proposes to construct two infill buildings in addition to the two apartment buildings currently located on the Property. These structures will include approximately 28,076 square feet of ground floor retail GFA and 205,101 square feet of residential GFA with 209 units. The proposed residential building is 10 stories (with amenity space on the rooftop) and approximately 114 feet tall with an approximately 19-foot mechanical penthouse. It will replace an existing surface parking lot situated between the Crystal Flats building and the existing Crystal Towers buildings fronting South Eads Street. The associated retail building will be placed to the north, also fronting South Eads Street, replacing another existing surface parking lot. It will be a single-story structure that will redefine the streetscape along South Eads, replacing the legacy parking lot with Sector Plan compliant development that will activate the streetscape, replace aging sidewalks, and provide new community-serving retail.

In accordance with County policy, parking will be provided in a new single level below-grade parking garage with 42 parking spaces, as well as within the existing Towers parking garage and surface parking lots. The newly proposed overall residential parking ratio for Crystal Towers I, II, and III is 0.70, with 780 residential spaces, and 10 residential visitor spaces. The proposed retail parking ratio is one space for 936 square-feet of retail, or 30 parking spaces.

The Applicant also intends to pursue LEED Gold certified construction for both buildings and meet the additional green building requirements outlined for .25 FAR bonus density in the County's Green Building Incentive Policy. In addition, the Applicant is committed to site plan improvements, such as utility improvements, sidewalk, curb and gutter, streetscape and bicycle lanes as well as contributing toward affordable dwelling units, public art, the County Utility Fund, and Transportation Demand Management measures. Finally, the entire development will feature first class architectural design with a commitment to biophilia. For example, the Applicant intends to install a large green roof over a portion of the existing buildings where balconies at the rear of the new residential tower look out over the existing outdoor amenity area and a second green roof over the new retail development fronting South Eads Street. Additional plantings and landscaping will be integrated with the redesigned courtyard and access areas surrounding the new residential tower and leading to the entrance of the existing buildings as well.

As a result of feedback received from the SPRC during the project's online engagement opportunity and the first SPRC meeting, the Applicant has made several revisions to the project to better suit the needs of the community and to ensure the proposal is compliant with guidance set forth in the Crystal City Sector Plan. The first major change to the project is that the tower separation distance between the residential building and the Crystal Flats building to the south has increased to 40 feet to conform with Sector Plan guidance. This increased separation between buildings results in the widening of the southern alley that is at-grade between the two buildings. The widened alley provides more room for outdoor seating as well as more space for pedestrians and cyclists to traverse through this area. The grading of the alley has also been revised so that building entrance accessed from the alley is now at-grade, and the alley will ramp as it heads east, where the Applicant proposes a trail that would allow for the future connection to the interior of the Crystal Towers block and to 18th Street S.

Another major change to the proposal is revisions to the open space located at the corner of South Eads Street and 15th Street S. The Applicant has added public seating, additional paths connecting 15th Street S. and S. Eads Street as well as pathways connecting to the interior of the Crystal Towers block. The existing tree is proposed to remain.

Proposed Modifications & Density Exclusions

The Zoning Ordinance permits the County Board to modify certain regulations for 4.1 Site Plans. With this application, the Applicant requests the following Zoning Ordinance modifications:

- Bonus density for LEED certified construction in accordance with Arlington County's Green Building Incentive Program.

- Reduced parking ratios in accordance with adopted County policy.
- All other modifications as necessary to achieve the proposed development.

The Applicant also proposes a total of approximately 5,136 square feet of density exclusions from GFA for below grade storage, building service areas, including mechanical areas, which do not contribute to the visible mass of the buildings, and vertical shafts, which provide for venting through the building to the roof and eliminate vents on the building façade in support of the County's goal of providing for better quality design. Per the Zoning Administrator's April 11, 2016 advice on density exclusions, these are typically acceptable exclusions for site plan projects.

Thank you for your attention to this matter. Please do not hesitate to contact me if you need additional information.

Very truly yours,

WALSH, COLUCCI, LUBELEY & WALSH, P.C.
Nicholas V. Cumings



Enclosures

cc: Robert Vaughan, Dweck
Kristen Walentisch, Walsh Colucci
Melissa Mahan, Walsh Colucci