

# The Radnor/Ft. Myer Heights Civic Association

(RAFOM)

*Dedicated to Preservation and Conservation of the Radnor/Ft. Myer Heights Community  
Arlington, Virginia*

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1510 N.12<sup>th</sup> Street, #701  
Arlington VA 22209  
March 2, 2015

Mary Hynes  
Chair, Arlington County Board  
2100 Clarendon Blvd.  
Arlington VA 22201

Dear Ms. Hynes:

The County Board will consider staff recommendations for the Western Rosslyn Area Plan Study (WRAPS) shortly, and the Radnor/Ft. Myer Heights (RAFOM) Board wishes to state its strong opposition to the loss of any green and open space in the Wilson School site, including the Rosslyn Highland Park

As we have long participated in the WRAPS process, we have made the case for more, not less, public park and playfield area. Your Board is well aware that our community suffers from the dearth of such open and green space readily available for thousands of current and future residents. To cede public land for private use is not in the best interest of the County as a whole and certainly not in keeping with the expressed values of Arlington County. In addition, we are not convinced that a privately owned public space would be the equivalent of an outdoor County park, nor does interior school space offer the same benefit as a central gathering place for the community.

Finally, though the issue of Wilson School historical designation is not in the County Board's charge for WRAPS, we feel it is important enough at least to be part of the discussion for the site.

Respectfully,

  
Stanley G. Karson  
President, RAFOM

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Stanley Karson, President  
Patricia Darneille, Vice-President  
Kenneth Robinson, Secretary\*\*\*David Treworgy, Treasurer  
Leslie Arminski\*\*\*Steve Campbell\*\*\*Stuart Stein

[www.rafom.org](http://www.rafom.org)

WRAPS



# PARK AND RECREATION COMMISSION



March 3, 2015

The Honorable Mary Hynes  
Chairman, Arlington County Board  
2100 Clarendon Blvd., Suite 300  
Arlington, VA 22201

Subject: Rosslyn Highlands Park

Dear Chairman Hynes:

Members of the Park and Recreation Commission have participated in the WRAPS process and have kept the commission apprised of developments including the recent staff recommendation. The commission strongly objects to the staff recommendation of significant loss of open space envisioned for Rosslyn Highlands Park.

As was noted in our December 2014 letter to the Board, transferring County parkland to a private developer in exchange for non-park related amenities will result in a "mini-park" that falls far short of the diverse recreation and open space needs in Rosslyn. We do not believe that a privately owned plaza between two tall buildings should in anyway be equated with the existing mix of passive and active public recreation, as is suggested in the staff recommendation. We recognize the significant pressures for a wide range of needs within the WRAPS site, but the staff proposal is weighted heavily toward meeting the needs of the developer, while neglecting the needs of the larger community that were clearly identified at the community meetings.

Also disturbing is the fact that participants in the 18-month long WRAPS process were led to believe that their input had value and would be considered. But we now understand that the county signed a Memorandum of Understanding with the developer in 2013 relating to the transfer of park property, though the details of the MOU have not been revealed. The fact that this deal existed without the knowledge of those participating in the WRAPS process seriously undermines confidence in the integrity of the resulting outcomes.

We object to using Arlington's citizens' parks as bartering chips for making deals with developers or for funding non-park related amenities. As the Board should be aware, our citizens consider parks and open space to be a top priority in the quality of their lives. Rosslyn has been highly underserved when it comes to parks and open space and this is compounded by the recent and projected increase in population. The County government

appears to be embarking on a course that will result in the chipping away of our existing public land resources, leaving just bits and pieces of our current parks with very little usable space for our future when Arlington will be more crowded and even more in need for parks and open space, especially in the densely populated areas like Rosslyn.

Specifically we recommend: 1) Consider moving the fire station out of the study area, and if this is not possible, rebuild on the existing site. This option would cost less (\$11 million for a free standing fire station versus \$23 million required to build the station under another building) and would leave more usable open space. 2) Minimize the width of the road and extend Pierce Street along the eastern edge of the County-owned property, and adjacent to the current Penzance parcel, thereby permitting more contiguous open space. 3) Ensure joint use agreements with Arlington County Public Schools to make facilities at the new school more available to local residents (currently residents are relegated to tier 4 use of school facilities, which results in access on a very limited and costly basis).

We believe that a long-term vision for preserving and increasing our open space, parks and recreation facilities commensurate with our growing population is absolutely key to maintaining the environmental, economic and health benefits that underpin our quality of life in Arlington and should be a critical element to any planning process. Thank you for this opportunity to share our views with you.

Sincerely,

A handwritten signature in black ink that reads "Caroline Haynes". The signature is written in a cursive, flowing style.

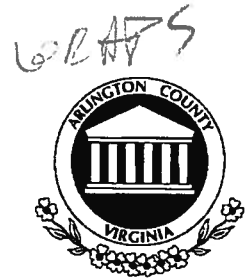
Caroline Haynes, Chairman  
Park and Recreation Commission

cc: Members, Arlington County Board  
Barbara Donnellan, Arlington County Manager  
Jane Rudolph, Director, Department of Parks and Recreation  
Planning Commission



# ARLINGTON COUNTY URBAN FORESTRY COMMISSION

2700 South Taylor Street  
Arlington, VA 22206



March 1, 2015

The Honorable Mary Hynes, Chair  
Arlington County Board  
2100 Clarendon Blvd., Suite 300  
Arlington, VA 22201

Subject: The Western Rosslyn Area Planning Study

Dear Chair Hynes:

Several members of the Urban Forestry Commission (UFC) have attended public meetings of the Western Rosslyn Area Planning Study (WRAPS) and sessions of the working group. We have actively followed the planning process.

Overall, the UFC is quite disappointed by the lack of responsiveness by the County to the preferences expressed by the community. In the County Board charge, insufficient value is placed on providing adequate outdoor open space for the growing population in this part of Arlington. Consequently, the potential for adequate tree canopy is also severely limited.

According to County staff's WRAPS site analysis, it is estimated that the tree canopy in the area is currently 28%. This study also indicates that the WRAPS area is considered urban-residential and that its development should be guided by the specific goal of at least 25% area tree cover. UFC recommends that analysis of the estimated area of tree canopy cover should be included in any subsequent concept plan created for the WRAPS site.

After studying the latest concept plan presented by staff at the February 19<sup>th</sup> WRAPS working group meeting, it will be extremely challenging to achieve the above canopy goals:

- The potential for siting trees on the APS site is low due to the space required for the school building and the playing field. Also, student drop-off/pickup areas will necessarily interfere with the usual spacing of street trees.
- If the County Park is limited to only 11,000 square feet, there would be room only to shoehorn in a small playground and basketball court. This would restrict tree canopy potential, since there would be no opportunity for passive space in a park this size.
- The proposed public plaza could potentially be successful and include relatively significant tree cover. Since this narrow space would be surrounded by two large

buildings, there is great potential for a “heat-island” effect, particularly at midday (and at other times depending on the reflectivity of the building and its windows and the ability for air to circulate). Groves of trees are one of the most effective ways to mitigate solar heat build-up. This space would also have the interests of retail tenants to satisfy, which often conflict with tree canopy.

- One means of increasing tree canopy in the study area would be to plant trees on building rooftops. Considering budget limitations and the plans of APAH and APS for their sites, it seems this possibility would only be feasible for the developer’s property.
- Another opportunity to increase tree canopy is to require developers of the property to go off site and plant canopy trees along streets in the vicinity where there are gaps in the tree line.

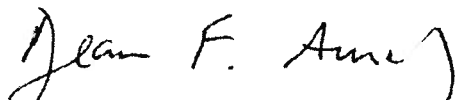
UFC encourages the County Board to revisit the charge specifically with the goal of increasing the County park area to a minimum of 30,000 square feet. Every possibility should be considered, including: 1) Make any new thru-street as narrow as possible, one-way only, with no parking lanes; 2) Follow the overwhelming public opinion and use the Ode Street option for the new street; 3) If a Pierce Street extension is absolutely necessary, ask APS to consider siting the bus drop-off and its adjacent sidewalk on their own property; and 4) Reduce the overall large property footprint being allocated to the developer by having the County fully fund the new fire station with capital improvement bonds or by siting the station outside of the WRAPS area.

A larger County park would help address residents’ need for open space and create a true community gathering place. This larger park area would also potentially make a more significant contribution to increasing WRAPS-area tree canopy. (Guiding principles 16, 20, and 25 of the WRAPS working group include goals to maximize tree canopy and natural areas and to minimize the heat-island effect.) Further, a larger County park would be more in keeping with open space plans being envisioned in the Realize Rosslyn process.

One positive outcome of WRAPS is that current street sections show 6.5 foot planting strips. Making these strips wider than the standard 5 feet would provide additional soil space for street trees and allow them to develop fuller canopies.

The UFC will continue to actively engage with WRAPS in hopes that the final plan will provide sufficient open space to allow for canopy trees and recreational area for residents.

Sincerely,



Dean Amel, Chair  
Urban Forestry Commission

February 26, 2015

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[knwhitmore@venable.com](mailto:knwhitmore@venable.com)

COUNTY BOARD OFFICE  
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Dear Board Chair Hynes:

This firm represents the Arlington Partnership for Affordable Housing ("APAH"), owner of the Queen's Court Apartments in Rosslyn. APAH has worked diligently with other stakeholders as part of the Western Rosslyn Area Planning Study ("WRAPS") in order to determine a plan for coordinated development of the area around the Wilson School, including Queen's Court.

In order to maximize affordable housing at this site, APAH proposes redevelopment of the property into a 12-story multifamily building with approximately 250 affordable units and a 9,000 sf public park (the "APAH Proposal"). This height and level of density could be achieved through a WRAPS recommendation to either (a) change the GLUP designation to "High Residential" or (b) change the GLUP designation to "High-Medium Residential" and transfer density from another, publicly owned property to the Queen's Court site.

**The APAH Proposal should be accepted and implemented through WRAPS, because it (1) reflects the preferences of the WRAPS working group, (2) achieves multiple County goals for affordable housing, and (3) achieves County open space goals.**

**1. WRAPS Working Group Preferences**

The WRAPS working group strongly supports the APAH Proposal. In fact, at the last working group meeting on February 19<sup>th</sup>, every member of the stakeholder group expressed a preference for APAH Proposal over other potential development schemes.

**2. Affordable Housing Objectives**

The APAH Proposal will further several of the County's affordable housing objectives. Many of these objectives are articulated in a draft of the Affordable Housing Study (see Exhibit A):

- A. Affordable rental units in transit corridors/close to transit (Obj. 1.1.8 & 3.2). The Queen's Court site is approximately 1,500 feet from the Rosslyn Metro station, making it an ideal location for maximizing affordable housing development near transit.
- B. Encourage family-sized affordable units (Obj. 1.1.7). In contrast to market moves toward smaller units, average unit size in the APAH Proposal will be over 1,000 sf, suitable for families. Any reduction in allowable density will force APAH to reduce unit size to create a unit mix that makes development feasible, limiting the opportunity for family-sized units.
- C. Land use policies should be used to encourage affordable housing (Obj. 1.1.1), and affordable housing policies should be incorporated into other plans (Obj. 3.5). The APAH Proposal requests that the WRAPS process make recommendations to change the GLUP and take other steps to maximize affordable housing.

Although the above reflect some of the draft goals of the Affordable Housing Study, this study and the associated recommendations have not been completed by Staff or adopted by the Board. Any limitation on potential development density at Queen's Court before the study is finalized will foreclose opportunities for the APAH Proposal to meet the goals of the study.

In addition, the Queen's Court development presents a rare opportunity to develop affordable housing in an area where such housing is not typically available, further evidence that the density of affordable housing in this location should be maximized.

### **3. Open Space**

The APAH Proposal includes a large public park, which both provides desperately needed open space to an underserved community and also frames the western edge of the critical 18<sup>th</sup> Street corridor. If heights lower than those in the APAH Proposal were mandated, a larger building footprint would be necessary, limiting and potentially prohibiting the creation of this open space.

### **Staff Recommendation**

Staff has recommended that the Queen's Court site be limited to development of only 150 units and a height of 6 stories. A building of this size would be out of character with the surrounding area - buildings on the other side of N. Quinn Street reach heights of 8 stories, while the nearby Penzance development will be up to 24 stories. Further, the grade of the Queen's Court site is lower than that of the surrounding area, meaning that the heights under the APAH Proposal will appear even lower than 12 stories. In any event, the achievement of the multiple policy goals stated above provides ample justification for the requested density at this site.

Although APAH has previously expressed concurrence with the density level recommended by staff, it has become clear through the initial findings of the Affordable Housing Study that density at this site is critical to meeting the County's housing needs. The strong support of the WRAPS working group discussed above has reinforced the need to achieve these higher density levels.

Staff has expressed concern that the density in the APAH Proposal would require a disproportionately large AHIF subsidy from the County. While the development's AHIF allocation might require that it take place in lieu of two smaller transactions in a given cycle, this rare opportunity to bring new affordable units to Rosslyn warrants the investment. It would be a terrible loss if the WRAPS recommendations did not provide flexibility for additional density at the site should the County eventually determine it has the AHIF resources to support the APAH Proposal. While APAH has publicly stated 2017 as the target to submit for a Low Income Housing Tax deal on Queen's Court, this timeline can be flexible to allow for the funding availability of the County to meet the number of units in the APAH Proposal.

### **Conclusion**

It is rare that a development site in Arlington presents the opportunity to fulfill multiple community goals, and rarer still when these opportunities are matched with overwhelming community support. The APAH Proposal presents just such a scenario. **We request that the WRAPS plan recommend sufficient density to allow for the APAH Proposal to move forward, whether through (a) a GLUP change to "High Residential" or (b) a GLUP change to "High-Medium Residential" combined with a transfer of density to the site from another publicly owned property, fulfilling the recommendations of the working group and multiple affordable housing and open space goals.** We appreciate your consideration of this request.

Sincerely,



Kedrick N. Whitmore

**EXHIBIT A**



**GOAL 1: Arlington County shall have an adequate supply of housing available to meet community needs.**

**Objective 1.1: Produce and preserve a sufficient supply of affordable rental housing to meet current and future needs.**

*By 2040, CAFs will need to account for 17.7% of the County's housing stock in order to achieve a sufficient supply of rental housing that is affordable to households with incomes at or below 60% AMI*

- 1.1.1 Encourage the construction and preservation of affordable rental housing through land use/zoning policy, financial and technical assistance.
- 1.1.2 Prevent the loss of committed affordable housing.
- 1.1.3 Make every reasonable effort to prevent the loss of market-rate affordable rental housing.
- 1.1.4 Encourage affordability periods of 60 years or more for committed affordable rental projects where the County provides financial assistance.
- 1.1.5 Incentivize affordability below 60% AMI in committed affordable rental projects.
- 1.1.6 Remove barriers to the production of moderately-priced rental housing, including non-subsidized housing.
- 1.1.7 Encourage production and preservation of family-sized (e.g. 3+ bedroom) market-rate and committed affordable rental units.
- 1.1.8 Produce committed affordable rental units within transit corridors consistent with the County's adopted land use plans and policies.
- 1.1.9 Allow for flexibility in housing types and residential uses in single-family neighborhoods.

**Objective 1.2: Produce and preserve a sufficient supply of affordable ownership housing to meet future needs.**

*2,700 ownership units affordable to households between 80% and 120% AMI will need to be created by 2040 to fulfill the forecasted need.*

- 1.2.1 Incentivize the production of moderately-priced ownership housing through land use and zoning policy.
- 1.2.2 Encourage production and preservation of family-sized (e.g. 3+bedroom) moderately-priced ownership units.
- 1.2.3 Allow for flexibility in housing types and residential uses in single-family neighborhoods.

**GOAL 2: Arlington County shall ensure that all segments of the community have access to housing.**

**Objective 2.1: Affirmatively further fair housing**

- 2.1.3 Eliminate housing discrimination.
- 2.1.4 Allow for flexibility in the definitions of family and household for occupancy purposes.

**Objective 2.2: Ensure low- and moderate-income individuals and families can access housing.**

- 2.2.1 Enable access to housing through direct rental assistance to create access to housing for households with incomes below 40 percent of the area median income.
- 2.2.2 Avoid displacement of low-income residents out of the community during construction and redevelopment of CAF projects.
- 2.2.3 For private projects, encourage owners/developers to provide assistance to displaced tenants and provide County assistance to affected tenants.
- 2.2.4 Incentivize landlords to provide housing to individuals and families with leasing barriers.
- 2.2.5 Provide assistance to create access to ownership housing for moderate-income first-time homebuyers.

**Objective 2.3: Prevent and end homelessness**

- 2.3.1 Proactively pursue access to affordable housing for homeless individuals and families using an approach that centers on providing housing quickly. When temporary shelter is necessary as an interim step, provide individual housing-oriented services to move homeless persons to permanent housing as quickly as possible.
- 2.3.2 Provide permanent supportive housing (PSH) for persons with disabilities who are homeless or at-risk of homelessness.
- 2.3.3 Prevent homelessness through safety net supports and social services to enable residents to maintain their housing.

**Objective 2.4: Enable Arlington residents to age in the community.**

- 2.4.1 Provide support so that older adults can age in place or age in community through a combination of affordable and accessible housing with linkages to services.
- 2.4.2 Incorporate universal design principles in new and rehabilitated housing to facilitate access for aging adults.

**Objective 2.5: Enable persons with disabilities to live as independently as possible in the community. *By 2040 10% of all CAFs will be accessible to and occupied by person with disabilities.***

- 2.5.1 Provide support so that individuals with disabilities can live in community through a combination of affordable and accessible housing with linkages to services.
- 2.5.2 Use Committed Affordable (CAF) units to provide permanent supportive housing (PSH) for persons with disabilities.
- 2.5.3 Maintain a sufficient supply of committed affordable housing that are accessible for persons with physical and sensory disabilities.

**GOAL 3: Arlington County shall ensure that its housing efforts contribute to a sustainable community.****Objective 3.1: Ensure that all housing is safe and code compliant.**

- 3.1.1 Fully enforce housing and property maintenance codes.
- 3.1.2 Ensure that all Committed Affordable (CAF) housing is code compliant.
- 3.1.3 Foster greater awareness and understanding of tenant and landlord rights and responsibilities, and housing safety.
- 3.1.4 Provide education and financial assistance to landlords and homeowners for the maintenance of low- and moderate-income housing.

**Objective 3.2: Promote affordable housing close to transit.**

- 3.2.1 Coordinate transportation, land use and Affordable Housing Master Planning efforts.
- 3.2.2 Ensure that committed affordable rental units have high levels of access to transportation options consistent with the Master Transportation Plan and transit-oriented development.

**Objective 3.3: Ensure energy and water efficiency in affordable housing.**

- 3.3.1 Encourage energy efficiency in new and renovated affordable housing to advance the goals of the Community Energy Plan (CEP).
- 3.3.2 Encourage water conservation in affordable housing.
- 3.3.3 Encourage the conservation of natural resources by reducing or eliminating waste throughout the building's entire life cycle, including the development phase, the usage phase and the building's end-of-life stage.
- 3.3.4 Provide education to landlords, tenants and homeowners on energy efficiency, water conservation, recycling, and waste reduction activities.

**Objective 3.4: Promote long term affordability and financial feasibility of Committed Affordable Units.**

- 3.4.3 Implement affordability restrictions for the maximum length of time that is feasible on a project-by-project basis.
- 3.4.4 Ensure financial feasibility in the underwriting of County loans for affordable housing.

**Objective 3.5: Ensure that the County's affordable housing goals are integrated into other County plans and policies where appropriate.**

- 3.5.1 Integrate affordable housing goals and policies into County sector plans, economic development strategies, Master Transportation Plan and other County planning efforts.
- 3.5.2 Consider affordable housing needs and goals when planning for major capital investment in new or redeveloping existing major community facilities.
- 3.5.3 Develop work plans and metrics to ensure implementation of affordable housing goals and to evaluate the success of implementation efforts.

**Jeanine Finch**

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WRAP

**From:** Laura Saul Edwards <laurasedwards@me.com>  
**Sent:** Sunday, March 01, 2015 10:01 PM  
**To:** CountyBoard  
**Cc:** Meredith Wadman; kristen colston  
**Subject:** Letter from H-B Woodlawn PAC  
**Attachments:** 15\_County\_Board\_Letter\_0301.docx; ATT00001.htm

Attached is a letter for the members of the County Board, regarding issues on the agenda for the March 4 work session. We'd be grateful if you distributed our letter to the individual County Board members. Thank you.

Sincerely,  
Meredith Wadman and Laura Saul Edwards  
Co-Chairs, H-B Woodlawn Secondary Program PAC

Kristen Colston  
Chair, Capacity Committee, H-B Woodlawn Secondary Program PAC

Laura Saul Edwards  
4801 North 24th Road  
Arlington, VA 22207-2616  
Cell: 571-296-0009  
Home: 703-908-9512  
Email: [laurasedwards@me.com](mailto:laurasedwards@me.com)

March 1, 2015

Arlington County Board

2100 Clarendon Boulevard, Suite #300

Arlington, VA 22201

Dear Chairman Hynes and Members of the Arlington County Board,

We are contacting you on behalf of the H-B Woodlawn and Stratford programs. As you know, we will be moving from our current home in the Stratford building to a new facility on the Wilson site in 2019. We have concerns regarding how the location for the new school building on the Wilson site will be determined. We're also concerned with the availability of contiguous open space in the Western Rosslyn Area Planning Study (WRAPS) locale. Both of these issues are being considered as part of the WRAPS process and have a direct impact on instruction, student athletics, and recreation. These factors clearly affect the ability of the new school facility to provide an optimal learning environment that meets the needs of the whole student.

We have two key "asks" of you. First, we urge you to use the Building Level Planning Committee (BLPC) and Public Facilities Review Committee (PFRC) processes to determine the location of the new school building on the Wilson site. Second, we urge you to preserve the maximum amount of contiguous open space in the WRAPS study area. If a new service street is deemed necessary, we urge you to locate it at the far eastern edge of the WRAPS study area, or to configure it in a way that does not obstruct the new school's access to adjacent, off-site open space for use by the Ultimate Frisbee program.

The Wilson site is challenging for a number of reasons, not the least of which is its small size, topography, and the presence of other structures on the site. Opinion is divided with respect to whether the new school facility should be built on Wilson Boulevard or on 18<sup>th</sup> Street. In order to achieve the best possible result for the H-B Woodlawn and Stratford program and other stakeholders, we believe this important siting decision should be made during the BLPC and PFRC processes, and not outside of them. We therefore urge you not to make a siting decision for the new school facility now, but rather to permit the siting decision to be made as part of the BLPC and PFRC processes.

As you may know, the Wilson site is not large enough for a full size Ultimate Frisbee field. Ultimate Frisbee is the school sport of the H-B Woodlawn program and an essential part of our identity and culture. Our vibrant and growing Ultimate Frisbee program will be shifting from two fields at the Stratford site to only one significantly smaller field at the Wilson site. This downsizing affects not only the H-B Woodlawn Ultimate Frisbee program but also all Ultimate Frisbee programs in the Arlington Public School system, for there are a rapidly increasing number of secondary school students participating in this fast-paced, exhilarating sport. All of them depend upon access to full-size fields for practice sessions and competition.

The ability to “borrow” adjacent open space in the Rosslyn Highlands Park to extend the new school building’s athletic field to a full-size Ultimate Frisbee field during practice sessions and competitions will be obstructed if a new service road or private development borders the Wilson site, or else is in very close proximity to it. For the benefit of all stakeholders, we urge you to preserve the maximum amount of open space in the WRAPS study area and ensure that this open space is contiguous. If a new service street is deemed necessary, we urge you to locate it at the far eastern edge of the WRAPS study area, or to configure it in a way that does not obstruct the new school’s access to adjacent, off-site open space for use by the Ultimate Frisbee program.

Please do not hesitate in contacting Kristen Colston ([kristenmcolston@gmail.com](mailto:kristenmcolston@gmail.com) or 703/351-4481) or Laura Saul Edwards ([laurasedwards@me.com](mailto:laurasedwards@me.com) or 571/296-0009) if you have any questions or would like to discuss our position in more detail.

Thank you for considering our requests on these matters of such importance to the H-B Woodlawn and Stratford programs.

Sincerely,

Meredith Wadman and Laura Saul Edwards

Co-Chairs, H-B Woodlawn Secondary Program PAC

Kristen M. Colston

Chair, Capacity Committee, H-B Woodlawn Secondary Program PAC

cc: Members of the Arlington County Board

Members of the Arlington County School Board

Betsy Cody, Commissioner, Youth Ultimate League of Arlington

Members of the Western Rosslyn Area Planning Study (WRAPS) Group

Dr. Patrick Murphy, Superintendent, Arlington Public Schools (APS)

John Chadwick, Assistant Superintendent, APS Facilities & Operations

Frank Haltiwanger, Principal, H-B Woodlawn Secondary Program

Casey Robinson, Assistant Principal, H-B Woodlawn Secondary Program

Graham McBride, Assistant Principal, H-B Woodlawn Secondary Program

**Jeanine Finch**

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**From:** Whitmore, Kedrick N. <KNWhitmore@Venable.com>  
**Sent:** Thursday, February 26, 2015 3:40 PM  
**To:** Mary Hynes  
**Subject:** Letter on WRAPS  
**Attachments:** 9255083-v1-Letter to M. Hynes.PDF

**Mary – attached please find a letter with some comments on behalf of my client, APAH, in advance of the WRAPS worksession.**

**Thank you.**

Kedrick N. Whitmore, Esq. | Venable LLP  
t 202.344.4455 | f 202.344.8300 | m 703.598.7266  
575 7th Street, NW, Washington, DC 20004

[KNWhitmore@Venable.com](mailto:KNWhitmore@Venable.com) | [www.Venable.com](http://www.Venable.com)

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\*\*\*\*\*



February 26, 2015

T 202.344.4455  
F 202.344.8300  
[knwhitmore@venable.com](mailto:knwhitmore@venable.com)

Dear Board Chair Hynes:

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In addition, the Queen's Court development presents a rare opportunity to develop affordable housing in an area where such housing is not typically available, further evidence that the density of affordable housing in this location should be maximized.

### 3. Open Space

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### Staff Recommendation

Staff has recommended that the Queen's Court site be limited to development of only 150 units and a height of 6 stories. A building of this size would be out of character with the surrounding area - buildings on the other side of N. Quinn Street reach heights of 8 stories, while the nearby Penzance development will be up to 24 stories. Further, the grade of the Queen's Court site is lower than that of the surrounding area, meaning that the heights under the APAH Proposal will appear even lower than 12 stories. In any event, the achievement of the multiple policy goals stated above provides ample justification for the requested density at this site.

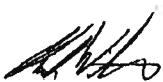
Although APAH has previously expressed concurrence with the density level recommended by staff, it has become clear through the initial findings of the Affordable Housing Study that density at this site is critical to meeting the County's housing needs. The strong support of the WRAPS working group discussed above has reinforced the need to achieve these higher density levels.

Staff has expressed concern that the density in the APAH Proposal would require a disproportionately large AHIF subsidy from the County. While the development's AHIF allocation might require that it take place in lieu of two smaller transactions in a given cycle, this rare opportunity to bring new affordable units to Rosslyn warrants the investment. It would be a terrible loss if the WRAPS recommendations did not provide flexibility for additional density at the site should the County eventually determine it has the AHIF resources to support the APAH Proposal. While APAH has publicly stated 2017 as the target to submit for a Low Income Housing Tax deal on Queen's Court, this timeline can be flexible to allow for the funding availability of the County to meet the number of units in the APAH Proposal.

### Conclusion

It is rare that a development site in Arlington presents the opportunity to fulfill multiple community goals, and rarer still when these opportunities are matched with overwhelming community support. The APAH Proposal presents just such a scenario. **We request that the WRAPS plan recommend sufficient density to allow for the APAH Proposal to move forward, whether through (a) a GLUP change to "High Residential" or (b) a GLUP change to "High-Medium Residential" combined with a transfer of density to the site from another publicly owned property, fulfilling the recommendations of the working group and multiple affordable housing and open space goals.** We appreciate your consideration of this request.

Sincerely,



Kedrick N. Whitmore

**EXHIBIT A**

**GOAL 1: Arlington County shall have an adequate supply of housing available to meet community needs.**

**Objective 1.1: Produce and preserve a sufficient supply of affordable rental housing to meet current and future needs.**

*By 2040, CAFs will need to account for 17.7% of the County's housing stock in order to achieve a sufficient supply of rental housing that is affordable to households with incomes at or below 60% AMI*

- 1.1.1 Encourage the construction and preservation of affordable rental housing through land use/zoning policy, financial and technical assistance.
- 1.1.2 Prevent the loss of committed affordable housing.
- 1.1.3 Make every reasonable effort to prevent the loss of market-rate affordable rental housing.
- 1.1.4 Encourage affordability periods of 60 years or more for committed affordable rental projects where the County provides financial assistance.
- 1.1.5 Incentivize affordability below 60% AMI in committed affordable rental projects.
- 1.1.6 Remove barriers to the production of moderately-priced rental housing, including non-subsidized housing.
- 1.1.7 Encourage production and preservation of family-sized (e.g. 3+ bedroom) market-rate and committed affordable rental units.
- 1.1.8 Produce committed affordable rental units within transit corridors consistent with the County's adopted land use plans and policies.
- 1.1.9 Allow for flexibility in housing types and residential uses in single-family neighborhoods.

**Objective 1.2: Produce and preserve a sufficient supply of affordable ownership housing to meet future needs.**

*2,700 ownership units affordable to households between 80% and 120% AMI will need to be created by 2040 to fulfill the forecasted need.*

- 1.2.1 Incentivize the production of moderately-priced ownership housing through land use and zoning policy.
- 1.2.2 Encourage production and preservation of family-sized (e.g. 3+bedroom) moderately-priced ownership units.
- 1.2.3 Allow for flexibility in housing types and residential uses in single-family neighborhoods.

**GOAL 2: Arlington County shall ensure that all segments of the community have access to housing.**

**Objective 2.1: Affirmatively further fair housing**

- 2.1.3 Eliminate housing discrimination.
- 2.1.4 Allow for flexibility in the definitions of family and household for occupancy purposes.

**Objective 2.2: Ensure low- and moderate-income individuals and families can access housing.**

- 2.2.1 Enable access to housing through direct rental assistance to create access to housing for households with incomes below 40 percent of the area median income.
- 2.2.2 Avoid displacement of low-income residents out of the community during construction and redevelopment of CAF projects.
- 2.2.3 For private projects, encourage owners/developers to provide assistance to displaced tenants and provide County assistance to affected tenants.
- 2.2.4 Incentivize landlords to provide housing to individuals and families with leasing barriers.
- 2.2.5 Provide assistance to create access to ownership housing for moderate-income first-time homebuyers.

**Objective 2.3: Prevent and end homelessness**

- 2.3.1 Proactively pursue access to affordable housing for homeless individuals and families using an approach that centers on providing housing quickly. When temporary shelter is necessary as an interim step, provide individual housing-oriented services to move homeless persons to permanent housing as quickly as possible.
- 2.3.2 Provide permanent supportive housing (PSH) for persons with disabilities who are homeless or at-risk of homelessness.
- 2.3.3 Prevent homelessness through safety net supports and social services to enable residents to maintain their housing.

**Objective 2.4: Enable Arlington residents to age in the community.**

- 2.4.1 Provide support so that older adults can age in place or age in community through a combination of affordable and accessible housing with linkages to services.
- 2.4.2 Incorporate universal design principles in new and rehabilitated housing to facilitate access for aging adults.

**Objective 2.5: Enable persons with disabilities to live as independently as possible in the community.**  
*By 2040 10% of all CAFs will be accessible to and occupied by person with disabilities.*

- 2.5.1 Provide support so that individuals with disabilities can live in community through a combination of affordable and accessible housing with linkages to services.
- 2.5.2 Use Committed Affordable (CAF) units to provide permanent supportive housing (PSH) for persons with disabilities.
- 2.5.3 Maintain a sufficient supply of committed affordable housing that are accessible for persons with physical and sensory disabilities.

**GOAL 3: Arlington County shall ensure that its housing efforts contribute to a sustainable community.****Objective 3.1: Ensure that all housing is safe and code compliant.**

- 3.1.1 Fully enforce housing and property maintenance codes.
- 3.1.2 Ensure that all Committed Affordable (CAF) housing is code compliant.
- 3.1.3 Foster greater awareness and understanding of tenant and landlord rights and responsibilities, and housing safety.
- 3.1.4 Provide education and financial assistance to landlords and homeowners for the maintenance of low- and moderate-income housing.

**Objective 3.2: Promote affordable housing close to transit.**

- 3.2.1 Coordinate transportation, land use and Affordable Housing Master Planning efforts.
- 3.2.2 Ensure that committed affordable rental units have high levels of access to transportation options consistent with the Master Transportation Plan and transit-oriented development.

**Objective 3.3: Ensure energy and water efficiency in affordable housing.**

- 3.3.1 Encourage energy efficiency in new and renovated affordable housing to advance the goals of the Community Energy Plan (CEP).
- 3.3.2 Encourage water conservation in affordable housing.
- 3.3.3 Encourage the conservation of natural resources by reducing or eliminating waste throughout the building's entire life cycle, including the development phase, the usage phase and the building's end-of-life stage.
- 3.3.4 Provide education to landlords, tenants and homeowners on energy efficiency, water conservation, recycling, and waste reduction activities.

**Objective 3.4: Promote long term affordability and financial feasibility of Committed Affordable Units.**

- 3.4.3 Implement affordability restrictions for the maximum length of time that is feasible on a project-by-project basis.
- 3.4.4 Ensure financial feasibility in the underwriting of County loans for affordable housing.

**Objective 3.5: Ensure that the County's affordable housing goals are integrated into other County plans and policies where appropriate.**

- 3.5.1 Integrate affordable housing goals and policies into County sector plans, economic development strategies, Master Transportation Plan and other County planning efforts.
- 3.5.2 Consider affordable housing needs and goals when planning for major capital investment in new or redeveloping existing major community facilities.
- 3.5.3 Develop work plans and metrics to ensure implementation of affordable housing goals and to evaluate the success of implementation efforts.