ASF | ARLINGTONIANS FOR OUR SUSTAINABLE FUTURE

March 21, 2025

| TO: | Arlington Planning Commission |
|----------|--|
| FROM: | Arlingtonians for Our Sustainable Future |
| SUBJECT: | Vote on Redevelopment of 2480 S. Glebe Rd. (RPC# 31-034-024, -025) Site Plan Amendment #111, March 24, 2025 |

Dear Chair Peterson and Commissioners:

ASF asks the Planning Commission to (1) **review** the concerns raised below, (2) **reject** the applicant's request on the above-referenced site plan amendment that is scheduled to go to the Arlington County Board on April 5, 2025, and (3) instead **consider** our eight alternatives. ASF has followed County land use issues since ASF's founding in 2019. This project raises some of the gravest concerns over equity, transparency, and in the lack of a fair deal for any neighborhood we have seen.

The problems with this project fall mainly into three areas. The project will likely:

- 1. densify and further gentrify perhaps our most iconic historic African-American neighborhood beyond the tipping point;
- 2. promote opaque tactics of applicants/developers/attorneys and County staff, especially on the extraordinary granting of a GLUP change; and
- 3. shatter the core tenet of Arlington's transit-oriented development model.

Alternate ideas, like we propose below, are thus appropriate, and should be explored.

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ASF's 10 Key Project Concerns

Housing & Equity

- 1) **Appallingly few affordable homes:** Only <u>7</u> affordable units* out of <u>531</u> total units, and only ONE affordable 3-bedroom unit, compared to **80** affordable units we should expect with a change to the General Land Use Plan ("GLUP") like this (*with 10 more possible);
 - a. **Zero** units affordable at 50% and below of AMI, the only income level with a current deficit of units;
 - b. Thus, it's not responsive to County's 2022 Housing Needs Assessment and AHMP;
- 2) **Zero ownership units**, despite desperate need for them as a gateway to generational wealth and narrowing Arlington's racial wealth gap;

- 3) Hardly any family-sized units (<9%), despite County stated needs and priorities Applicant proposes 14 studios, 364 1-bedrooms and 107 2-bedrooms; and 46 3-bedrooms;
- 4) **Unreasonably high risk of exacerbating years of gentrification and displacement** this one project increases by 23% of the number of housing units in Green Valley;
 - a. New units won't be affordable to Arlington median Black and Hispanic households;
 - b. Given current racial/ethnic profile of this area, new units will be gentrifying;

Process

- 5) Multiple process irregularities:
 - a. Irregularities with proposal of a GLUP change for one of the parcels;
 - b. Lack of clarity on base density;
 - c. Bizarre lack of an applicant request for a GLUP change, instead the County just giving away more profitable development potential;
 - d. Extreme level of density/development exclusions without sufficient benefits for Green Valley;
 - e. Allows a 30% plus-up in lot coverage;
 - f. Lowers lot area per unit by 32.7%, allowing for a minimum unit size of only 425 sqft;
 - g. Is not consistent with the Four Mile Run Area Plan design guidelines for Area D;

Infrastructure / Transportation

- 6) Unfair deal: Doesn't require sufficient infrastructure for a 23% increase in housing units;
- 7) **Inequitable traffic changes:** Dumps all traffic into historically Black neighborhood, while bypassing the major arterial of S. Glebe;
 - a. Includes an easement for possible future egress/ingress route as a benefit, but improperly highlights this as a "current" benefit to ease traffic now; and
- 8) More housing, more people, but fewer bus riders: Ignores data showing a 56% *decline* in public transit use (ART bus ridership) in this area despite recent years of development;
- 9) **Unrealistic parking:** Includes a parking ratio reduced by 8.2% in an area constrained by I-395, Glebe Rd (neither controlled by Arlington), a church, and minimal on-street parking, meaning new residents will be walking far and competing with existing neighbors to park.
 - a. 33% reduction in loading areas;
- 10) **Trivial trees:** 11% tree canopy is cited as benefit, but the law already requires 10%. Thus, this "benefit" is just an additional **1%** (in 20 years) that may or may not materialize. Likewise, the 10,311 sqft of privately-owned public space is only 4.3% of the 240,335 sqft site, hardly a "concession" or a compensation without like additions from the County's own funds.

Overall, the project fails any reasonable equity analysis – if approved, the County will give the developer the extraordinary level of potential development yield that – even pursuant to any existing land use plan – must be compensated by correspondingly extraordinary contributions to the community. It instead offers very minimal benefits for a community that has long been denied them.



In light of the above problems, ASF proposes the following eight alternative concepts.

ASF's 8 Alternative Concepts

- 1. **Right-sizing:** Develop the larger site that has proper GLUP and zoning (parcel 024) with 300 housing units and 24 townhomes via site plan redevelopment, focusing on **ownership and family-sized units**;
- 2. **Triple+ onsite affordable housing, and at lower-income ranges:** Developer provides 12+ units at 60% of AMI, and 12+ units at 50%;
- 3. **Dialogue:** County launches community dialogue about gentrification and economic investment;
- 4. **Community benefits:** County consideration of park/community center/arts center options for the 2nd site after negotiating purchase of this smaller parcel (which is designated service-industrial.)
- Better roads: County/developer assume partial easements for future transportation access to and improvements along Shirlington Rd. and provide curb/gutter improvement on S. Glebe between I-395 interchange and S. 24th Rd.;
- 6. **Better road access:** Developer improves road for egress onto S. 24th Rd. and keeps a curb cut on S. Glebe;
- 7. **Realistic parking:** Maintain standard parking ratios.
- 8. **15% tree canopy:** Developer may develop at 65% lot coverage on the larger parcel but needs to provide 15% tree canopy in 20 years (allowed with GLUP change but not pursued by staff);

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I. Housing Needs, Equity and Gentrification

A. Housing Goals

The County Board <u>report</u> for April 5, 2025 (page 3) says this project is "advancing the goals and objectives of the <u>Affordable Housing Master Plan</u>" ("AHMP") of 2015. However, the report does not address whether this project is responsive to the housing income levels identified in the latest <u>AHMP 2022 Implementation Plan</u>. That report (excerpt below) indicates that our housing gaps are **all** at the median income of **50% of AMI and below**, which for a household of 4, currently falls at \$77,350. In 2022, we had a gap of approximately 9,500 units for incomes below this level, and a surplus of approximately 9,500 at higher AMI levels. If we consider ASF discussion below on price points and staff recommendations that the board accept only 7-17 units affordable even at 60% AMI level, the project is NOT responsive to the AHMP goals.

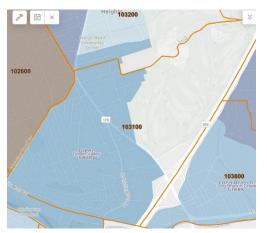
| | | Renter Households | Rental Units | Surplus/(Deficit) of units by affordability |
|-------------------------|----------------|----------------------|-----------------|---|
| nd Level | Up to 30% AMI | 8,077 | 1,585 | (6,492) |
| - ai | 30% to 50% AMI | 5,210 | 2,197 | (3,013) |
| Income al ordability | 50% to 60% AMI | 3,332 | 3,597 | 265 |
| Incor Affordal | 60% to 80% AMI | 6,075 | 13,655 | 7,580 |
| Aff | Above 80% AMI | 36,395 | 38,055 | 1,660 |

Source: 2016-2018 American Community Survey (microdata)



ASF therefore also rejects comments by the Transportation Commission chair at the meeting on March 13, 2025, that "it is welcome we're getting 500 housing units given the cost of housing." This argument – repeated by others to justify a decade of upzoning and GLUP changes – has become a through line for simplistic approvals of more density without proper planning for impacts, and it renders the site plan process untenable and imbalanced.

B. Housing Units and Prices in Green Valley and Census Tract



For all intents and purposes, this project adds 100% market-rate units, because the number of Affordable Housing (AH) units proposed is irrelevant, less than 3% (and that's if we get 17 onsite units, rather than the minimum required 7).

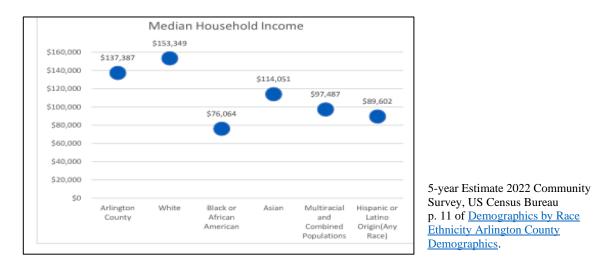
Looking at "Towns of 24" (across the street from this proposed development), these homes sold for about \$800,000 in the past 3 years, which would require a monthly mortgage of \$4,257 (the new townhomes at this site are expected to be rentals but monthly payments would be the same).

Assuming 30% of one's income goes to pay rent, you would need an annual income of **\$170,280** to afford such a unit. Zillow shows listings for new 2-bedroom apartments in the area start at \$2,900/month, requiring an annual income of \$116,000. Census Tract 103100 median household income is \$119,300. So, the townhomes will likely rent for 42% above median income of the area, and the 2-bedroom apartments will rent just below the median income of the area.

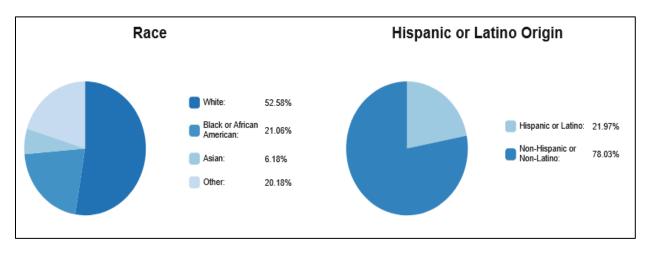
C. Equity

It's a different story if we look at this project in equity terms. The chart below shows Median household income in Arlington by race/ethnicity for a 5-year period ending 2022: for Black households its \$76,064, Hispanic households at \$89,602, and White households at \$153,34. So the two-bedroom units will be 52% more than median Black household income in Arlington, and 29% above the median Hispanic household income.





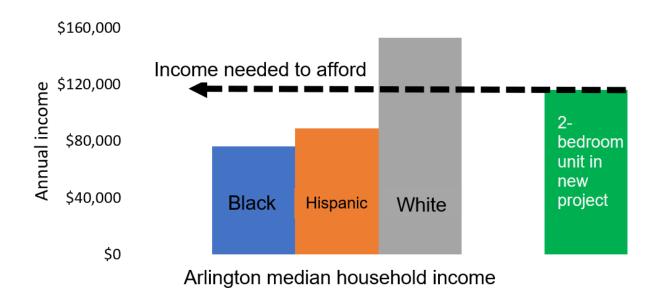
Currently, <u>Arlington is 65% white</u>. Census <u>tract 103100 is 52.6% white</u>, (see below) while Green Valley is 48% white.



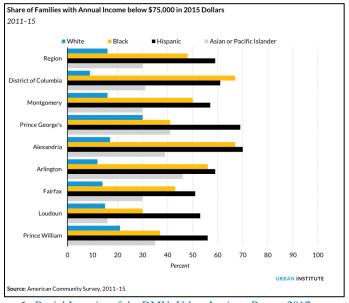
Therefore, adding 23% more household units at the income level that tracks most closely with countywide White households will have a substantial gentrifying effect in one of our most diverse areas, and in a neighborhood with a deep legacy of African-American (and more recently, Hispanic) homeownership.

We can see the likely gentrifying effects in the chart below. It compares the likely rents for the new 2-bedroom units (in green at far right) to median Arlington incomes of Black, Hispanic and White households.





Arlington's race and ethnicity dashboard further informs us that <u>Black or African American</u> <u>households have the lowest owner-occupancy rate in the county of 22%</u>. Putting 100% rental units in this area hardly seems responsive to equity goals of homeownership. What we need to consider, and our County rarely considers, is why are diverse existing populations not thriving as more wealthy individuals move here? Arlington is 2nd only to DC in terms of gentrification in the DMV area, looking at the largest gap between Whites and other racial/ethnic groups in populations earning below \$75,000 annually.



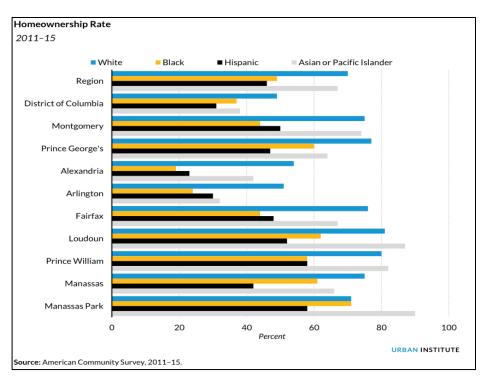
p. 10, figure 6, Racial Inequity of the DMV, Urban Institute Report 2017

This chart, from the Urban Institute in 2017, shows that "income inequities between white and black families with incomes below \$75,000 were largest in the District of Columbia (67 versus



9%)" but Arlington comes in second in terms of this racial disparity. The report advises "In an equitable DC region, an additional 82,400 black families, 63,500 Hispanic families, and 18,000 Asian or Pacific Islander families would have annual incomes above \$75,000."

The Urban Institute also notes that Arlington has the lowest black home ownership rate of any jurisdiction except Alexandria.



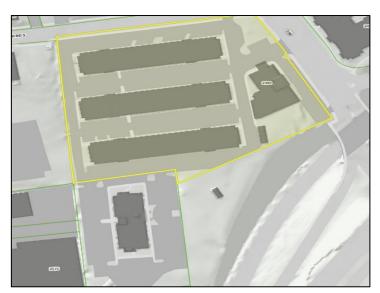
II. Process

A. Effecting GLUP Change

1. Applicant Fails to Apply for GLUP Change

The first item being considered for the PC and the County Board is a GLUP change for one of the two parcels of this lot. Namely, parcel <u>RPC #31-034-025</u>, which is 62,962 sqft and zoned RA-H for multifamily residential/hotel development; but with a land use designation (serviceindustrial) that precludes residential redevelopment. The County assessed this parcel at \$6 million (land value) in 2025. It is the smaller shaded area at bottom on the map.

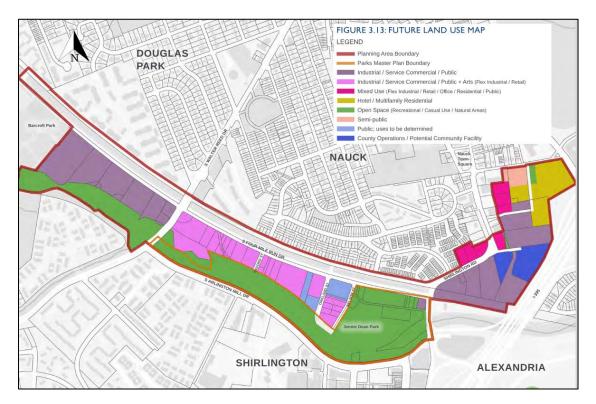
The second parcel <u>RPC #31-024-024</u>, in yellow on this map and just north of the parcel needing a GLUP change, is larger at



177,391 sqft and is properly GLUPped and zoned for multifamily residential at RA-H. The County assessed this parcel at \$9.95 million (land value) in 2025. Together, the County assessed the land (excluding improvements) at \$15.9 million.



An ASF member (Anne Bodine, not speaking for ASF) noted apparent improprieties with the proposed GLUP change at the March 13 Transportation Commission; namely, that the County may not change the GLUP designation on a property outside an area or sector plan or a special GLUP. Bodine followed up with CPHD staff lead for the project Kevin Lam on March 14 due to these concerns which the Transportation Commission did not address. Mr. Lam clarified that the site was eligible for a GLUP change via the "Four Mile Run Valley Area Plan," (4MRVAP) approved November 2018, and the Board report now reflects that enabling framework. Mr. Lam also told Bodine that the plan envisioned this site as potentially having a "multifamily residential" land use (mustard yellow at far right, from p. 63 of <u>4MRVAP</u>). However, ASF notes other anomalies relating to the proposed amendment to the land designation of this site.



2. No Applicant Request for Revised Land Use?

On March 14, Mr. Lam also told Ms. Bodine that the *applicant had not requested a GLUP change and the County was just changing the GLUP to align with the zoning that had probably occurred in earlier redevelopment*. ASF followed up and discovered that indeed, the applicant has not SOUGHT a GLUP change. (See <u>November 1 2024 revised letter</u> of Justification from Venable to Arlington Zoning Administrator, <u>February 28, 2025 revised letter</u> of Justification, <u>February 3, 2025, revised letter</u> of Justification, and August 21, 2024 revised letter of justification.) ASF therefore asks how can the county offer a GLUP change to any parcel if the applicant does not request it?



Furthermore, pursuant to section 15.5.8.H of the Arlington County Zoning Code (ACZO), there is an expectation of an additional [20%] affordable housing units or [CAFs] with a land use change. This is routinely noted for GLUP changes made via Special GLUPs and it is explicitly noted in the 2024 Area Plan for Langston Blvd. The ACZO citation is provided below, but County staff **did not mention this zoning requirement in its briefing to the Transportation Commission and Mr. Lam could not explain this omission in the follow up**. Why hasn't this been addressed as part of the site plan process, which is where the area plan must comport with the zoning code if any GLUP change is effected?

H. Proposals for change of GLUP designation

Site plan applications that include an application to change the GLUP designation of the site may be subject to an affordable housing requirement in addition to the above ADU requirement. Such affordable housing requirements shall be addressed separately in the process of the County Board's consideration of the approval of the site plan.

3. Calculation of Base Density

Related to the calculation of additional units pursuant to Section 15.5.8.H cited above, why would County staff use – if they were properly applying the assumed 20% contribution – the "special exception" development standard to calculate the potential 20% affordable housing units?

County staff reported (and the draft Board report for April 5 indicates) that 400 units is the current "base density" of this site, if using a site plan, while the "by-right" "base density" is only 133 units (see excerpt below from Major Site Plan Amendment Request to Arlington Zoning Administrator by development standards letter). *Is the "special exception" standard being used simply because the site has an existing site plan which the applicant seeks to amend?*

Please find below a tabulation in chart form of the by-right development capacity of the abovereferenced property and site plan development. The property is presently zoned to the "RA-H" Zoning District and a rezoning is not proposed. For the desired residential development, site plan approval is required.

| Zoning | Site Plan | Density Permitted By-Right | By-Right Development |
|----------------|-------------|-----------------------------------|-----------------------------|
| Classification | Area | | Capacity |
| RA-H | 240,353 sf | 1du/1,800sf | 133 units |
| | 5.517 acres | | |
| Zoning | Site Plan | Density Permitted By | Special Exception Base |
| Classification | Area | Special Exception | Development Capacity |
| RA-H | 240,353 sf | 1du/600sf | 400 units |
| | 5.517 acres | | |

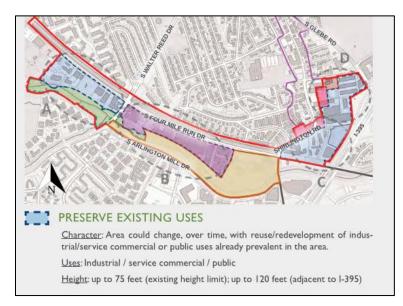
If we accept a base density of 400 units for "special exception" development for RPC #31-034-025 which has an appropriate land use designation for redevelopment, ASF nonetheless asserts that the base density for parcel <u>RPC #31-034-025</u> is zero, as the land use DOES NOT ALLOW residential redevelopment at all. This issue, and the requirement of ACZO 15.5.8.H. must be resolved before any further discussion of this site's redevelopment.



B. Design Elements of the Four Mile Run Area Plan

<u>4FMRV Design</u> Guidelines (p. 77) aim to "reinforce the pedestrian realm and a community vision for industrial character infused with arts." The guidelines "can inform and shape new development in the area, as well as building and site design improvements that accompany the reuse and retrofit of existing structure."

The figure below shows this site, in area D in the eastern planning area, and the plan notes intent proposes to "preserve" existing use.



Two-thirds of the parcel is already designated for multifamily use, so ASF would propose leaving that as designated and allowing the proper site plan redevelopment.

Even if only 325 units were developed (e.g., 300 apartments and 25 townhomes), that alone would necessitate new public space, as per the County's Public Spaces Master Plan.

ASF proposes that the County NOT approve the GLUP change for the second parcel and it be subdivided

for possible future purchase by the County. The County could preserve this area for future development for County priorities and investments, such as a community/arts/rec center, or retain the property's service/industrial land use and look at other options. This seems wise given possible headwinds in the residential market that are coming with federal workforce and federal contracting reductions.

III. Infrastructure

This project will produce a 23% increase in the number of housing units in Green Valley. Such a surge screams for new or expanded community services like rec centers, libraries, schools, traffic adjustments, greenspace, parks, and all associated services. However, the most glaring problem with this development is how this area of Arlington in recent years breaks from transit-oriented development, the hallmark of Arlington since the 1970s.

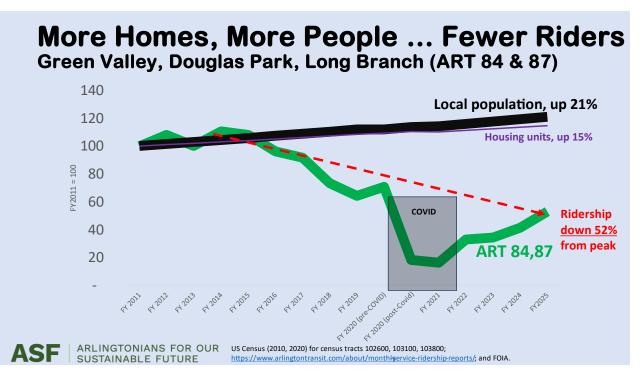
A. Transportation

Public data on population, housing, and bus use in this area runs counter to the popular trope of density and transit—i.e., that more density necessarily means more public transit use, which also



helps the environment. In this area of Arlington, however, the data shows it has been *more homes, more people, but fewer public transit users*.

Specifically, since 2010, the local population in the three surrounding U.S. Census tracts rose about 21%, the number of housing units in that area rose 15%, but **bus ridership declined 52%** from its peak around 2014. Even pre-COVID (which began in March 2020), local bus ridership declined 36% as wealthier residents rushed to buy or rent new homes in the area, replacing and displacing residents who used to reliably use public transit.



We estimate approx. 700 working adults, of which approximately 630 (90%) will be white (see above on price points and demographics). Even using the countywide average (which is low, given distance to Metrorail), we assume 267 cars twice a day (using a 42.4% ratio for "drive alone" mode for Arlington's white residents (per below). That's a projected 534 trips daily, solely for commuting, all using solely 24th Rd. S., which is NOT an arterial. To ease traffic, egress via S. Glebe needs to be maintained, even if constrained, as proposed by ASF.

| Demographics by Race/Ethnicity 2022 American Community Survey 5-Year Estimates U.S. Census Bureau | | | | | | | | | | | |
|---|---------------------------------|------------|---------|---------------------------------|------|-----------------------|-------|----------|-------------|--------|-------|
| | MEANS OF TRANSPORTATION TO WORK | | | | | | | | | | |
| | Population Age 16 and older | Drove | e Alone | Carpooled Public Transportation | | Other Wor | | Worked / | ked At Home | | |
| Arlington County | 148,246 | 60,954 | 41.1% | 7,996 | 5.4% | 27,496 | 18.5% | 11,791 | 8.0% | 40,009 | 27.0% |
| White | 100,978 | 42,794 | 42.4% | 4,457 | 4.4% | 17,820 | 17.6% | 7,670 | 7.6% | 28,237 | 28.0% |
| Black or African American | 12,080 | 4,834 | 40.0% | 930 | 7.7% | 2,644 | 21.9% | 863 | 7.1% | 2,809 | 23.3% |
| Asian | 15,426 | 5,672 | 36.8% | 1,126 | 7.3% | 3,332 | 21.6% | 1,133 | 7.3% | 4,163 | 27.0% |
| Multiracial and Combined Populations | 19,762 | 7,654 | 38.7% | 1,483 | 7.5% | 3,700 | 18.7% | 2,125 | 10.8% | 4,800 | 24.3% |
| Hispanic or Latino Origin(Any Race) | 20,765 | 9,164 | 44.1% | 1,968 | 9.5% | 4,130 | 19.9% | 1,877 | 9.0% | 3,626 | 17.5% |
| 50.0V | - | Drove Alon | | s of Transpor | | 'ork ■Worked At He | ome | | | | |



B. Insufficient Parking

The site plan documents note this site is 11,600 feet to the nearest Metrorail stop. And 25 feet to the nearest Metrobus or ART Bus stop. The project is virtually all market rate housing, and as we noted is likely to yield very few public transit users for the purposes of commuting, shopping, or entertainment in either Shirlington or along S. Glebe or Columbia Pike. There are few options for these activities inside Green Valley, for example only convenience stores for groceries, and few restaurants/bars.

The zoning code requirement for this site is

- 2 parking spaces for every townhome $(2 \times 37 = 74)$
- Plus 1/5 per unit for townhome visitors (.20 x 37 = 7.4)
- 1 and 1/8 parking spots for the first 200 units of MF residential (1.125 x 200 = 225)
- 1 for each unit above 200 (1 x 294 = 294)

So, the project requires 600 parking spaces to meet current code. The developer is requesting only 549 (all above ground which explains the project's huge mass and will secure more profit for the developer). This is an 8.5% reduction in required parking ratio.

C. Disproportionate Impact of Single Egress/Access to Property

The owner intends to create a new access road exiting onto 24th Rd. S., just adjacent Lomax Cemetery to accommodate all traffic into and out of the development. Currently, traffic for the two hotels enters and exits via S. Glebe Rd., with two curb cuts, near the intersection with I-395.

The image below shows one of the existing curb cuts at middle left.



In an ironic twist, the County Transportation Commission on March 13 agreed with staff that the county should not cut certain bus routes due to equity concerns.



But that same commission 20 minutes later voted unanimously to dump significant new volume into the historically-Black, still-diverse neighborhood of Green Valley and not onto the commuter route that would share the transportation burden more equitably, as is NOW THE CASE.

At a minimum, ASF suggests the developer provide ONE curb cut onto S. Glebe, from the property, that allows right turns only. This is a change from the current set-up, and will require curb/gutter improvement along the short stretch of S. Glebe between S. 24th and the underpass under I-395 (or the exit onto I-395 South). This will prevent drivers exiting the property from turning left onto S. Glebe or drivers from turning right into the property from S. Glebe. Thus, it partially alleviates the chokepoint this development will create if it results in a single ingress/egress point into the neighborhood.

D. Inadequate Correction of Traffic Flow Issues

The intersection needs a better radius for traffic turning right onto 24th Rd. S. from S. Glebe. The NW corner is currently an obtuse angle which requires significant deceleration for cars turning right onto 24th Rd. The county or the developer should address this issue to reduce the impact of very heavy increase in car traffic expected.



E. Future Development is Not a Benefit/Solution for Transportation

Several Transportation commissioners mentioned possible future redevelopment of the industrial area to the rear of this property and the developer is providing an easement to permit a possible future connector through to Shirlington Rd. This may produce a new public road and could allow drivers to enter/exit through the back of the new property, but again into Green Valley instead of onto S. Glebe. Such redevelopment is unlikely to be imminent, however, so this "outlet" can only be cited in terms of a future benefit, not a current traffic release.

IV. Development Standards

Sections 7.4.3.A and 7.4.3.B of the Zoning Code determine the development of these parcels.



B. Special exception

Development allowed by special exception in the RA-H district shall comply with the following standards, except as otherwise approved by the County Board.

| Type of Standard | Low or Moderate Income Housing | Multiple- family and Hotels | Elder Care Uses |
|--|---|-----------------------------------|---------------------|
| Site area, minimum (sq. ft.) | | 100,000 | 100,000 |
| Lot, minimum (sq. ft.) Lot area Lot area per dwelling unit Lot area per guest room Lot width, minimum average (feet) Lot width Lot width per dwelling unit | See §12.3.7 | 100,000 600 600 200 | 100,000 |
| Height Maximum (feet) Maximum (stories) | | 125 12 | 125 |
| Floor area, minimum (sq. ft.) Floor area per dwelling unit or sleeping room | | _ | 1.5 |
| Lot coverage, maximum (percent) | | 50 | |

A. Maximum Lot Coverage

The maximum lot coverage for this property is 50%, as seen in the above standard for "special exception" development. The application is seeking 65%, or a 30% bonus. That is an exceptional addition of GFA. While the developer is offering 10,000 sqft of open space, ASF questions such expansive lot coverage. Even though the site will see reduced impervious surface, it is underserved in terms of tree canopy and should have a minimum of 15% canopy and no more than 55% lot coverage.

B. Lot Area per Dwelling Unit

The ACZO requires a minimum lot area of 600 sf per unit. The staff recommends a lot area of 452 sqft per unit, or a 32.7% increase.

C. Loading Areas

ACZO requires three loading areas for such a large site and the developer proposes only two. ASF believes the developer must contribute all loading zones to compensate for the absolute constraints on I-395, S. Glebe and Lomax Church sides of the property, there can be no on-street loading and deliveries.

D. Community Benefits.

The November 21, 2024 letter of Justification from Venable on behalf of the applicant stated:

The Applicant proposes to achieve bonus density in consideration of a community benefits package to be developed in coordination with Arlington County Staff. The proposed development will achieve the goals of the Four Mile Run Area Plan by implementing new residential buildings as well as a variety of site improvements in the Four Mile Run neighborhood.



Notwithstanding that promise, ASF sees no evidence that the "applicant" has followed up on that promise of "consideration of a community benefits package" developed with staff, as evidenced by the staff presentation to the Transportation Commission on March 13, 2025 (and the draft Board Report we have reviewed). Nor do we see any evidence of the "variety of site improvements to the Four Mile Run Neighborhood" that are apparently foretold by Venable.

ASF agrees that affordable Housing can be an important community benefit and was cited by Mr. Lam to Ms. Bodine as the main benefit. However, the applicant initially only offered to provide 2 AH units out of a total of 503! They are not providing the 20% of AH units necessitated by a GLUP change discussed above. ASF advises that the PC should not take a vote on this until these questions are resolved.¹

With 7 (or 17) affordable units, all above 50% of AMI, ASF strongly believes this project cannot be approved by the County Board on the basis of providing Affordable Housing, neither in terms of ACZO 15.5.8.H (GLUP change requirement) nor in terms of the housing affordability needs cited by the county, that target lower income groups and also project that 17% of all housing units should be "affordable."

This project – even while it is not maximizing height allowed via special exception planning that may be available for the larger parcel -- is proposing the highest number of units outside one of the county's four approved transit corridors that ASF has ever seen, and it is providing perhaps the lowest imaginable community benefits of any project we have ever weighed in on.

We recommend the Commission defer a vote on tis project and recommend the board require from staff a clarification on the GLUP change elements, that you recommend the Board consider ASF's alternate planning guidance, that you recommend the County negotiate a purchase for <u>RPC #31-034-025</u> for possible future community investment, and that you recommend a County effort (via planning or other tools) to staunch gentrification in Green Valley and other affected areas.

Appendix: Links to Key Documents

¹ By March 2025, the project proposes a maximum possible onsite number of 17 AH units out of 531 (of which only 7 are guaranteed). 17 units is only 3.2% of the total units being built. ASF – contrary to staff's assertion -- believes the base density is only 133 units, so a 20% AH contribution would yield **80** affordable units ($531 - 133 \times .20$) = 79.6).



APPENDIX A – 2480 South Glebe Road Project Background

A. GP-368-25-1 GENERAL LAND USE PLAN AMENDMENT to change the land use designation for an approximately 1.44-acre parcel located at 2480 South Glebe Road (RPC #31-034-025) from "Service Industry" to "Medium" Residential;

B. Master Transportation Plan Map Amendment to add a new segment of South Garfield Street, new segment of 25th Court South, and a new street titled South Fillmore Court, located in the vicinity of 2480 South Glebe Road (RPC #31-034-024, -025);

C. SPLA23-00053 SITE PLAN AMENDMENT (SP #111) to construct up to 531 residential units, with modifications for

- 1. additional density
- 2. lot area per unit
- 3. lot coverage
- 4. reduced residential parking ratios
- 5. required loading spaces
- 6. density exclusions
- 7. and other modifications necessary to achieve the proposed development;

Key Documents:

- <u>SPLA 25-00053</u>
- Draft Board Report for April 5, 2025
- project home page
- Slip sheets (drawings, canopy plan, etc.) accessed Mar 18 2025
- Four Mile Run Valley Area Plan November 2018
- Affordable Housing Master Plan 2015

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