

North Rosslyn Civic Association

1902 N Ode St
Arlington, VA 22209-1412

October 21, 2010

Mr. John Welsh, Director
Multifamily Division
AHC Inc.
2230 N. Fairfax Drive
Arlington VA 22201

Dear Mr. Welsh:

The North Rosslyn Civic Association appreciates your time in presenting AHC, Inc.'s "updated proposal" dated September 9, 2010 for the redevelopment of Key Boulevard Apartments to us. Your proposal would replace 41 affordable housing units in three low-rise buildings grouped around a central landscaped lawn with a single high-rise building incorporating 170 units, 82 of them affordable. While NRCA fully supports and encourages affordable housing in our community, it is the consensus of our community that the scale of AHC's proposal is entirely inconsistent with the surrounding neighborhood and, as such, will place burdens on our infrastructure, resources and residents that are disproportionate to the 41 additional affordable housing units your proposal offers.

The purpose of this letter is to acquaint you with the content and tenor of the feedback NRCA received from our community respecting your updated development plan. In passing, we also identify areas where we feel your proposal lacks essential details.

You claim in your presentation that the redevelopment "fits the current zoning envelope." Actually, by more than quadrupling the number of units presently on the site, your proposal more than doubles the density allowed by current zoning as measured in allowable housing units. At present, the site has no additional available density.¹ According to AHC, 74 units would be permissible on this 1.24 acre parcel zoned RA 6-

¹ We understand that density from this parcel was transferred to the Atrium in the mid-1980s. Your development thus requires: (1) reinstatement of the full 48 units originally on the site prior to the 1980s-era conversion; (2) transfer of development rights for 88 units from your property "Gates of Ballston" (formerly the Buckingham) in another part of the county; and (3) addition of 34 "bonus" units for affordable housing.

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15, inclusive of a 25 percent bonus for affordable housing.² Your proposed 170 units are more than twice that allowance, and less than half of the units would be affordable housing – the majority would be market rate condominiums. A host of problems flow from this excessive density.

First, our community has long been opposed to the doughnut shape of the proposed building that features limited set-backs and hides its limited green space from public view, thereby contributing to the fortress-like appearance of the building. The building would sit at the crest of the hill, thus emphasizing its height in respect to the surrounding neighborhood. Immediately adjacent to your parcel are much lower single-family homes, two and three-level townhomes, and the community garden.³

Setbacks should be appropriate to a residential area. The setback of your proposed building from the Rosslyn Mews condominiums on Ode Street remains inadequate in view of its height relative to those homes. Frontages on the Key Boulevard and 19th St. sides of the parcel need to be adequate to provide landscaping and preserve the existing tree canopy, thereby contributing toward an appropriate transition to the surrounding neighborhood.⁴

Second, the redevelopment will generate an unacceptable increase in the pressure on area traffic and parking. Based on your previous statements, this 170 unit-building can be expected to place a minimum of 170 additional cars onto neighborhood streets.⁵

We appreciate your response to NRCA's concern with your original proposal, which located the building's garage entrance on 19th St. and would have meant unacceptable additional traffic on Ode St., the only exit from the Colonial Terrace area.

² In an April document, you calculated that, without transfer of development rights, a by-right development on this parcel would yield 59.52 units plus a 25 percent bonus for affordable housing, for a total of 74 units.

³ You have yet to provide elevation renderings, however preliminary, or views that would reveal its building's height, location, and massing against the surrounding topography, existing structures and the community garden. Shadowing on the community garden has been of particular concern to NRCA, as this would interfere with citizen use of the garden to raise flowers, fruits, and vegetables.

⁴ The proposal shows 25-foot setbacks on the east and west sides of the building but does not indicate setbacks from 19th St. and Key Boulevard, which affect the relationship of the building to the surrounding community.

⁵ Your present proposal fails to specify the number of parking spaces, a measure of anticipated vehicular impact to the neighborhood. In December 2009, you stated that the building would provide underground parking for .7 cars per affordable housing rental unit and 1.1 to 1.2 cars per market-rate condominium, which equates to between 155 and 163 cars. At that time, you also said that the ratio would be one-to-one overall, which would result in 170 cars. Those calculations do not provide for guest vehicles and excess vehicles of residents, which contribute to traffic and compete for timed, zoned, and metered parking slots on local streets.

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Your current proposal, however, still places the loading dock and garbage dumpsters on 19th St. We believe there should be no vehicular access to the building from 19th St. at all. Narrow community streets are not appropriate for large trucks. A single large moving truck maneuvering or discharging on 19th St. has the potential to block the only vehicular exit for all homes in the Colonial Terrace neighborhood located west of Ode St.

We believe that your proposed development should provide for all parking needs of its residents and their guests on site. Assigning less than one off-street slot per unit to the affordable housing portion of the building will place pressure on curbside parking, which is already nearly non-existent. The proposal also makes no provision for guest parking, which will likewise be forced onto nearby streets. Parking opportunities on Key Blvd. and the Colonial Terrace cul-de-sac are even now insufficient to accommodate guest parking. Indeed, no on-street parking whatsoever is permitted on North Colonial Court, which houses a substantial fraction of the cul-de-sac's residents.

Third, the neighborhood anticipates that a large number of infants and children will live in the development, and we are concerned that adequate outdoor play space will not be available for them. This is a particularly acute problem in view of the small amount of green space and park area in our immediate community.⁶ Our green space assets have dwindled and deteriorated in recent years. At the same time, the resident housing stock has trended towards high rise structures having little or no on-site green space, and the resident population, notably families with children, has grown exponentially, placing increasing burdens on the open space that remains. AHC's development would exacerbate this already severe problem. Providing on-site indoor space, educational programs, or electronic equipment such as computer terminals, as you suggested verbally in the September 9th meeting, in no way meets this need. Interior play space is no substitute for facilities allowing outdoor activities.

At the end of the day, your updated proposal, while reducing building height and answering the most serious traffic concerns, still represents an enormous increase in density on the site while adding only 41 units to affordable housing stock. Locating such a densely-populated, massive structure in the Colonial Terrace enclave would greatly alter the character of our community and place undue burdens on its infrastructure, resources, and residents.

⁶ In the September 9 meeting, NRCA members questioned you extensively on this point. You suggested that the building's interior courtyard might be used for play, but this would in all likelihood be unacceptable to residents as the courtyard area is small and noise from children at play would reverberate throughout the interior of the building. You also pointed to other developments where AHC provided interior community space and programs for children. Neither of these alternatives has been fully specified for this site.

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NRCA wants to work with you to further our joint commitment to providing quality affordable housing on this site. While we recognize your “updated” proposal represents a solution that you consider economically viable owing to its density and the contribution it expects to receive from the sale of market rate condominiums, we encourage you to examine other alternatives that may generate adequate revenues for AHC while lowering density on the parcel to acceptable levels. We certainly do not want to tell AHC how to design its buildings; however, we strongly encourage you to broaden your paradigm of what might constitute a financially-viable development on this site. To that end, we wish to arrange a meeting with you to present and discuss several alternatives. Please contact Mr. Brad Nierenberg to arrange a convenient time for NRCA to meet with you.

Very truly yours,

A handwritten signature in black ink, appearing to read 'J. Zeien', with a stylized flourish at the end.

Jennifer J. Zeien
North Rosslyn Civic Association

cc: Arlington County Board
Rosslyn Renaissance Board