

Questions for Met Park SPRC

Retail on Eads and 15th:

- What is the retail plan? What retail equivalents are you considering?
- What happens if you don't lease up? Are you considering temporary uses? Free community uses?
- Can we get more detail about the Flexible Retail space on 15th St. Do you anticipate uses other than retail (e.g. office)?
- What are the long-term plans for the east side of Eads? Right now on that side, with mostly driveways for hotels/apartments, there is an aesthetic mismatch with the planned retail on the west side.

Daycare

- Will the site plan stipulate that the daycare will be open to beyond Amazon daycare be open to the community? Does, or should, density exclusion for the daycare have any bearing on this? Better yet, will the plan stipulate that slots are not set aside for Amazon employees?

Building layout

- Entrances: According to the Met Park Design Guidelines, "*Residential buildings shall have major entrances on interior secondary and tertiary streets, with dual access to primary streets.*" The plans do not show a lobby for Met Park 6 on Eads. Would it make more sense for the 7/8 building to have its lobby on 15th or Eads?

Architecture

- Have they done shadow studies on Eads Street? Will those buildings block afternoon sun of residents? How much difference does the 60-foot difference between 22 residential and 22 office stories make?
- Height vs. stories: What are the regulations on how tall an office story can be?
- Architecture lacks distinctiveness and seems very blocky.
- Sculpting of building tops is lacking. What can be done to bring it into better conformity with the Met Park design guidelines in this regard? *The building crown shall define the building at the skyline and shall incorporate as appropriate architectural elements to create a memorable image.*
- Skyline: Do the very long tall towers do enough to vary the skyline as called for in the CC Sector Plan?
- Can they provide more renders from further away, showing the site lines down the streets?

Park space

- Is there an agreement between Kettler and JBG to redesign the whole central park space, which encompasses the existing Met Park quad?

- How does the size of proposed open space in Metropolitan Park compare with what was previously planned for Met Park 6?
- Why is the small slice of the park they plan to build not part of this site plan?

Transportation

- Bikes: Can you clarify how much bike parking there will be for the community and where?
- Loading docks: The loading docks take up quite a bit of space. Can the size be reduced? Is it possible to have just one loading dock for the two buildings?
- Parking garage: Could the garages of the two buildings be accessed by a single entrance/exit? Could traffic exiting the garage(s) be directed to the main street only (e.g. 15th or Eads) to reduce traffic through the central park spaces?
- What is the rationale for having the “entryway” to the site on 14th St., which has no continuation east of Eads or west of Fern?

Community benefits

- What community benefits are they proposing? Will they include transit investments? I am concerned about the capacity on the PC metro, considering most workers will come from there.



**ARLINGTON RIDGE CIVIC ASSOCIATION
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To: Planning Commission
Fm: Arthur Fox
Re: Pentagon City PDSP #105 amendment
to Accommodate Amazon

July 12, 2019

Given that only a single LRPC meeting has been scheduled to consider amendment of the PDSP in order to permit the construction of Amazon's first two HQ2 buildings on MetPark, I write to share with you information relevant to your consideration that would be impossible to impart verbally during the course of informal discussion among meeting participants.

This matter concerns JBG Smith's application to build two 300 foot tall office buildings containing two million square feet along the southeast edge of Pentagon City, surrounded by residential neighbors, on MetPark (Parcel 3) whose PDSP currently only allows for construction of three significantly shorter and less dense residential apartment buildings. Meanwhile, it's important not to lose sight of the fact that Amazon also owns the vacant land on adjacent PenPlace (Parcel 1D) where the PDSP actually allows for construction of four tall office buildings totaling 1.8 million square feet plus a hotel, bringing the total to 2.1 million square feet. All indications are that Amazon will locate the other half of its HQ2 campus on that property and that, together, they will house the 25,000 employees Amazon has promised to hire and locate on its new campus. Given that the LRPC will only be focused upon height, massing and density, we turn to each topic in turn.

HEIGHT & MASSING

Both the Pentagon City PDSP and the Crystal City Sector Plan (CCSP) leave no doubt that 22202's most tall and dense commercial buildings were to be built on the east side of Route 1 in Crystal City. The Sector Plan stresses the importance of maintaining "height and bulk transitions, i.e., tapering down building heights and scale from Crystal City to the lower density residential neighborhoods to the west." CCSP pp. 15, 27. Moreover, the subsequently adopted GLUP (p. 22) singled out and adopted one of the Sector Plan's primary goals: "Preservation of the integrity of the single-family neighborhoods to the west." Further, the original 1976 PDSP called for the greatest heights and densities to be in the northeast portion of Pentagon City (today's PenPlace) where there is access to major traffic arteries and for the lowest densities to be in the southern portion of the tract adjacent to single-family neighborhoods. This objective has never been modified.

This strong preference was repeated in the 1997 Planning Task Force Report (p.11) calling for building heights to taper down to the south with “lower buildings and open space along 15th Street.” Moreover, PDSP Condition #54 limits building heights up to just 22 stories for no more than five *apartment buildings* (whose heights are significantly lower than office buildings) and specifies that even these tallest of Pentagon City’s buildings should be solely “for the purpose of improving the overall [skyline] design ***without increasing density.***” Emphasis added.

At 300-plus feet tall, these two massive office buildings on the southern edge of Pentagon City, surrounded on all four sides by residences, will tower head and shoulders over all existing real estate west of Route 1.

DENSITY

Despite its evolution over the years, the Pentagon City PDSP has always called for CO 2.5 zoning and, with the exception of MetPark (Parcel 3) and PenPlace (Parcel 1D), Pentagon City is fully built-out at present. And, given that developers of several of its other Parcels, including for example the Fashion Center (Parcel 1B & 2B), Pentagon Row (Parcel 1A & 2A) and townhouse Parcel 5 did not use all 2.5 of their allocated FAR (floor area ratio) density, County staff contend that their unused density can and has allegedly been transferred to other Parcels, namely for our purposes MetPark (currently zoned for 5.21 FAR) and PenPlace (currently zoned for 4.58 FAR). And by averaging the density actually built out and allocated among all Parcels, staff inform us that Pentagon City’s total density currently stands at only 2.23 FAR. Hence, we presume that County staff will contend that despite the fact that the current PDSP ceiling on MetPark’s density is more than twice that permitted elsewhere in Pentagon City, given that the overall average density is only 2.23 FAR, there is room for still more density on MetPark as JBG Smith (a/k/a Amazon) is seeking in this proceeding. ***However ---***

(1) We have yet to be informed exactly how much additional density Amazon’s two million square foot buildings in MetPark would add to that Parcel’s current 5.21 ceiling, or to the overall density in Pentagon City and whether it would lift the current 2.23 average FAR above the 2.50 overall ceiling.

(2) Nor has the County assured us that those Pentagon City property owners that built less than 2.5 FAR density on their Parcels legally transferred to the County the right to transfer their unused density to other Parcels, notably MetPark and PenPlace such that if, in future years, they might wish to demolish their existing buildings and build larger ones, they could not legally do so without the County’s raising Pentagon City’s CO-2.5 ceiling. Absent such legal proof, these land owners will be legally entitled to build larger buildings in the coming years that would push the overall density of Pentagon City way through and beyond its 2.5 ceiling.

(3) Indeed, the County has not informed us how it calculated its 2.23 overall average density figure in Pentagon City, nor assured us that it did not take into account and include the undeveloped square footage lying in Parcel 4 (Virginia Highlands Park) as well as in public rights-of-way (interior streets and sidewalks) which would artificially lower its density numbers in violation of Va. Code §15.2-2283 which requires that only buildable surface area may be used when calculating density in urban development zones. (We know for a fact that when calculating the density approved for PenPlace, County staff included significant portions of its surrounding streets. This fact also makes us wonder if the County has been enforcing Condition #43 of the PDSP requiring developers “to convey to the county land in adjacent streets.”)

(4) The County currently has before it an ARCA resolution (attached to transmission email) which the Planning Commission supported in 2015 that calls for an independent study of 22202's transportation and other critical infrastructure by a reputable urban studies think tank to determine how it may accommodate additional density in 22202. And at the County Board's recent Planning Work Session with staff the Board called for such a study to be undertaken given that staff are both understaffed and unequipped to perform such a study. In light of Amazon's arrival and now the inevitability of fast, new growth in 22202, the performance of that study has become both critical and urgent in order to enable the County to insure that that growth will be Smart Growth that will not overwhelm its infrastructure and deny 22202's visitors and residents a livable environment in the coming years.¹

ARCA's Position

By putting Amazon's HQ2 construction process on a fast track in spite of its promise to proceed deliberately – which should include consideration of this project in light of the independent study's findings – the County is effectively putting the Amazon cart in front of its horse. Of course, we recognize that delivering on its promises to Amazon is important, particularly from the County's overriding \$\$\$ perspective. And we have it on good authority that the County promised Amazon that it could locate its four million square foot HQ2 campus on MetPark and PenPlace. Accordingly, this Planning Commission process about to get underway is essentially window dressing on an unstoppable project even though locating a portion of Amazon's campus – and density – in Crystal City's vacant office space would have been preferable. So be it!!

However, we draw a bright line on the far side of Amazon's HQ2, 4-million square foot addition to Pentagon City's density, at least for now and until that truly independent study's findings, analysis and recommendations are available to guide development of any additional density, whatsoever, in Pentagon City. And, we expect Amazon to invest heavily in 22202 community benefits to be identified by its residents in the coming years, and in the immediate future by funding, without influencing the conduct of, the aforementioned independent infrastructure study.

1. The County has long recognized the need for such a study. Thus, the 1997 Report of the PC Planning Task Force foresaw the need to study “traffic and pedestrian circulation” (p. 3), as well as a need to “Protect nearby neighborhoods from spillover traffic by **restricting the size and locations of any new ‘magnet’ uses** (p. 8).” Emphasis added. And subsequently when adopting the CCSP in 2010, the County recognized that its implementation would create “an ever expanding demand on transportation infrastructure (p. 25)” needed “to accommodate future planned growth in the area (p. 29)” given that “the projected local and regional growth will far exceed existing and planned capacity of streets and intersections . . . [and] such **congestion could have a negative impact upon the quality of life and business climate in Crystal City and surrounding areas** (p. 73).” Emphasis added.