

Donaldson Run Civic Association

February 20, 2025

Takis P. Karantonis, Chair
Arlington County Board
2100 Clarendon Boulevard, Suite 300
Arlington, VA 22201

Re: Melwood Special GLUP Study and Site Plan

Dear Chair Karantonis and Board Members:

Please accept these comments on behalf of the Executive Board of the Donaldson Run Civic Association (DRCA) on the above-referenced proposal.

While DRCA is located far away from the site of this particular project, we strongly support the concerns of the Aurora Highlands Civic Association (Aurora Highlands) about the way in which this proposal threatens to eviscerate the well established contours of the General Land Use Plan (GLUP). Together with an increasing number of other proposals that do so, itemized by Aurora Highlands, this one appears to make Swiss cheese of the GLUP. The impacts of this approach could well have similar implications in applying Plan Langston Boulevard or other guidance in our neighborhood.

We would like to make three points in connection with your consideration of this proposal.

Importance of the GLUP. There is what has often been referred to as an important “social compact” embodied in the GLUP. That is to concentrate high-density residential and other development within designated and established transportation corridors, with a wide variety of housing types in and near Metro Station Areas, while “[p]reserving and enhanc[ing] existing single-family and apartment neighborhoods.”

To be sure, it may now be appropriate to amend the GLUP, but that should be in an open and transparent fashion with full participation by all Arlington residents, and not by creating multiple ad hoc case-by-case exceptions to it. As Aurora Highlands points out, Section 7.0 of the GLUP identifies two ways of amending the GLUP. One is not to collapse “special GLUP” studies together with individual site-specific proposals in an artificial “phase I” and “phase II,” but to adopt through extensive studies a more “comprehensive framework” for more general “community improvement” throughout an entire area. The example given in the GLUP is sector plans, which do not apply here.

The second way to amend the GLUP is a very limited one, subject to a 2008 policy statement addressing “unanticipated” situations. As Aurora Highlands notes, to say that a site plan proponent would like to introduce a new use, which thereby qualifies as “unanticipated,” proves too much. Any project could apply under that theory. In fact, the 2008 policy statement applies a very strong presumption against such site-specific GLUP amendments: the County Board will be “particularly unlikely” to grant such requests “when the property has not been the subject of planning studies conducted outside the context of a specific development application with an opportunity to objectively assess the implications of the

proposed changes and whether they comport with the County's long term planning principles and goals." This is the Board-established standard that should be applied fairly to this site-specific proposal.

Deference to Neighborhood Conservation Programs. In "assess[ing] the implications" of the proposal consistent with the 2008 policy statement, and in the absence of any applicable sector plan, the Board should accord great deference to a Board-approved Neighborhood Conservation Plan (or, as renamed recently, an "Arlington Neighborhoods Program" plan) that is based on a survey of the considered and overwhelming preferences of civic association residents. Here, for example, Aurora Highlands points out that its residents "overwhelmingly opposed the upzoning, citing that the proposed use is inappropriate, the building is too large for the site, and significant unresolved concerns exist regarding traffic, parking, and environmental impact." What would be the point of the County's long investment in neighborhood "conservation" plans if they count for so little? How does this square with the County's endorsement of such "conservation" plans?

The Cart Before the Horse. There is no better indication of arbitrary government action than shooting first and asking questions later. Whatever courses of action federal administrative agencies may choose to take in this regard, Arlington County should be different. As noted in the February 3 comments of the Historical Affairs and Landmark Review Board, the decision on this site should *follow*, not *precede*, completion of a study and its evaluation and recommendations by that Board as to whether the site warrants protection as a local historic district, as required by the Zoning Ordinance.

Thank you very much for your consideration of these comments.

Sincerely yours,



Bill Richardson
President
Donaldson Run Civic Association

cc: County Board Members