

March 31, 2025

TO: Arlington County Board

FROM: Arlingtonians for our Sustainable Future

SUBJECT: Redevelopment of 2480 S. Glebe Rd. (RPC# 31-034-024, -025)  
Site Plan Amendment #111, April 5, 2025 – **ITEM 21**

Dear Chair Karantonis and Board Members:

ASF asks the County Board to (1) **review** the concerns raised below, (2) **reject** the applicant’s request on the above-referenced site plan amendment, and (3) **consider** our eight alternatives and **engage** Green Valley residents. ASF has followed County land use issues since ASF’s founding in 2019. This project – valued at \$250-300 million -- raises some of the gravest concerns we’ve yet seen regarding equity, transparency, and insufficient benefits for the affected neighborhood.

Rev. Dr. Adrian Nelson of the Lomax AME Zion Church (where [Dr. Martin Luther King, Jr. visited](#) the day before his “I Have a Dream Speech”) in Green Valley implored the Planning Commission to pause and get it right, stating it [feels like “David and Goliath.”](#) Tellingly, for Green Valley residents often forgotten by County government, the [project materials](#) ignore them again with **no reference to their neighborhood plan**. Nor does it mention Dr. King’s connection.

Principally, ASF disagrees with the [Staff Report](#) (p.3) that this Project “advanc[es]” affordable housing goals. It’s the opposite. An objective report would show you the identified housing *needs* versus what the project will do. The Staff Report does not. We do. Below, you see **none** of the proposed units are affordable where we have a deficit. **None** of them are ownership, to help bridge the racial wealth gap. Only **one** is an affordable family-sized unit. Instead, **98%** are market-rate (unaffordable), and **91%** are studio or 1- or 2-bedrooms.

[Page 7](#), Affordable Housing Master Plan Implementation Plan (2022)

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

Source: 2016-2018 American Community Survey (microdata)

As Rev. Dr. Nelson concluded, this project shows “[the County does not care about affordable housing](#); we’ve increased the units from 7 to 9 out of 531, **it’s laughable, it’s upsetting.**” Relatedly, the County’s Comprehensive Plan vision leads with “Arlington will be a diverse and

inclusive world-class urban community,” but this project is 98% market rate and not affordable to most Arlingtonians who are not White, as detailed below.

More broadly, ASF hopes for a solution that does not:

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.

Below, we identify 10 specific concerns followed by a proposal of alternate ideas to explore.

\* \* \* \* \*

### **ASF’s 10 Key Project Concerns**

#### Housing & Equity

- 1) **Appallingly few affordable homes: Only 9 onsite affordable units out of 531 total units** (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;
  - a. **Zero units affordable at 50% and below of AMI, the only income level where Arlington has insufficient supply;**
  - b. 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 contrary to the developers claims to the Housing Commission March 27) – Applicant proposes 14 studios, 364 1-bedrooms and 107 2-bedrooms; and 46 3-bedrooms;
- 4) **Very 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 not 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. **Ignores** Green Valley Neighborhood Plan and is not consistent with the Four Mile Run Area Plan design guidelines;
  - b. Irregularities with proposal of a GLUP change for one of the parcels;
  - c. Lack of clarity on base density;

- d. Bizarre lack of an applicant request for a GLUP change, instead the County says its bestowing this to “fix” a “clerical error” from prior rezoning;
- e. Extreme level of density/development exclusions without sufficient benefits for Green Valley;
- f. Allows a 30% plus-up in lot coverage;
- g. Lowers lot area per unit by 32.7%, for a *minimum unit size of only 425 sqft*;
- h. Introduced new process whereby the County doesn’t negotiate conditions but forces the public to do so on their own;

Infrastructure / Transportation

- 6) **Unfair deal:** Doesn’t require sufficient infrastructure for 23% more housing units;
- 7) **Inequitable traffic changes:** Dumps all traffic into historically Black neighborhood, while bypassing the major arterial of S. Glebe;
  - a. Increases bedrooms on site 61%, but cuts egress 67%;
  - b. Includes an easement for possible future egress/ingress route as a benefit, but improperly highlights this as a “current” benefit to ease traffic now;
- 8) **More housing, more people, but fewer bus riders:** Ignores data showing a **56% decline** in public transit use in this area despite recent years of development;
- 9) **Unrealistic parking:** Includes a parking ratio reduced by 4% 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; 33% reduction in loading docks;
- 10) **Trivial trees:** 11% tree canopy is cited as a benefit, but the law requires 10%. Thus, this “benefit” is just an additional **1%** (in 20 years). 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 extraordinary **private profit without equal community benefit**. 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 on gentrification;
- 4. **Community benefits:** County consideration of park/community center/arts center options for the 2<sup>nd</sup> site after negotiating purchase of this smaller parcel (which is

designated service-industrial); and consideration of Green Valley Civic Association role controlling a community center;

5. **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. 24<sup>th</sup> Rd.;
6. **Better road access:** Developer improves road for egress onto S. 24<sup>th</sup> Rd. and keeps a curb cut on S. Glebe;
7. **Realistic parking:** Maintain standard parking ratios as per ACZO, whether developing one or both parcels;
8. **15% tree canopy:** Developer may develop at 65% lot coverage on the larger parcel but must provide 15% tree canopy (allowed with GLUP change but not pursued by staff).

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## I. Housing Needs, Equity and Gentrification

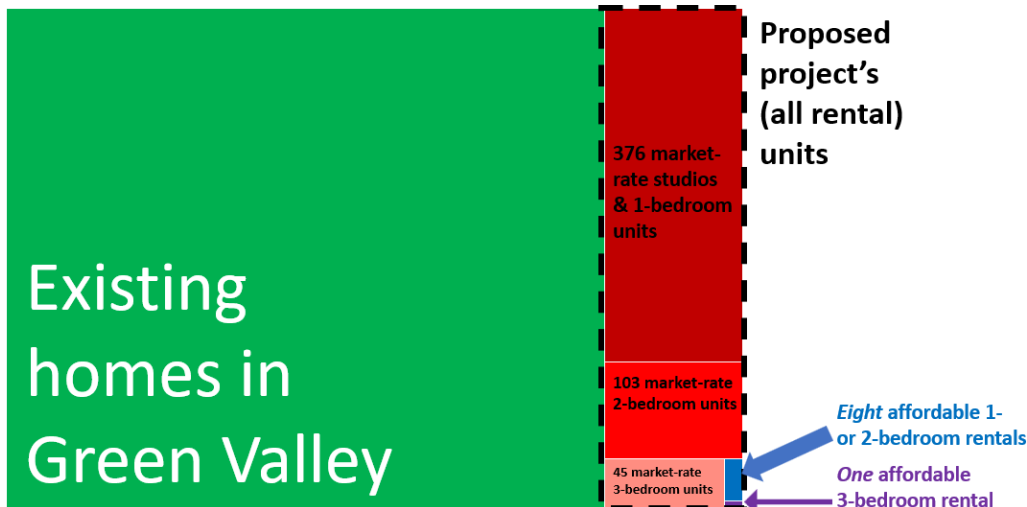
This project’s 531 units will produce a 23% increase in the number of housing units in Green Valley. Such a surge screams for new or expanded community services like rec centers, libraries, schools, traffic adjustments, greenspace, parks, and all associated services. All the more so given Green Valley’s historic role.

### A. Housing Goals

**Affordable.** The County Board [Staff report](#) (version accessed March 30, 2025, page 3) says this project is “advancing the goals and objectives of the [Affordable Housing Master Plan](#)” (“AHMP”) of 2015. However, the report sidesteps the fact that this project **IS NOT RESPONSIVE** to the actual housing income levels in need as identified in the [AHMP 2022 Implementation Plan](#). As shown on page 1 of this letter, that report says **our housing gaps are at 50% of Area Median Income (AMI) and below**, which for a household of 4, currently falls at \$77,350/year. In 2022, we had a gap of approximately 9,500 units for incomes below this level, but a *surplus* of approximately 9,500 at higher AMI levels, which is what this project adds.

The project’s stark reality is counter to the platitudes by County commissioners. The Transportation Commission chair on March 13, 2025, said “it is welcome we’re getting 500 housing units given the cost of housing.” The applicant – with apparent acceptance by the Housing Commission at its meeting March 27, 2025 – said it’s a great fit for our needs in terms of “family-friendly” units. ***But it is 91% studios or 1- or 2-bedroom units.***

The reality is shown below. The 2,278 existing Green Valley homes are shown in green to the left. The column to the right proportionally shows what the new project will contribute if approved—376 market-rate studios and 1-bedroom, 103 2-bedroom, and 45 3-bedroom. But only **eight** onsite affordable units and **only one affordable 3-bedroom unit**.



**Ownership:** The project has **ZERO** ownership units, counter to County goals. [Per the County's](#) 2024 Homeownership Study, the County aims to “reduce racial homeownership gaps,” and “increase the production of homeownership housing supply.” The Urban Institute recognizes that “[Homeownership is the primary tool for building wealth, especially for Black households.](#)” Yet this project has no ownership.

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

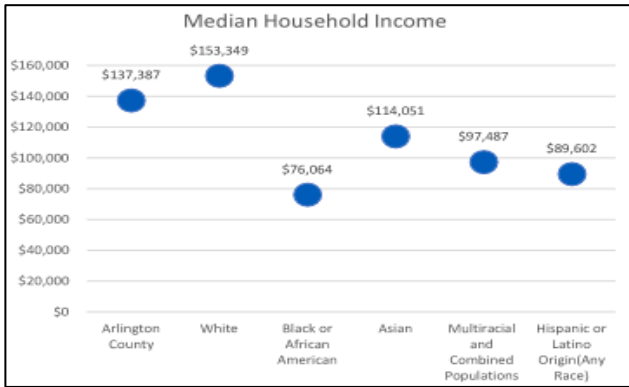
This project essentially adds 100% market-rate units, because the number of affordable onsite units – 9 of 531 or 1.7% – is irrelevant. [Planning Commissioner Berkey](#) (a recent chair of Arlington’s Housing Commission) noted before voting for the plan, “this is as much as the county can require.” ASF disagrees, please see Section II.A below relating to the smaller parcel requiring a GLUP change.

Looking at “Towns of 24” (on 24<sup>th</sup> Rd.), townhomes sold for about \$800,000 recently, which would require a mortgage of \$4,257/mo. Monthly rents at 2480 S. Glebe would likely be comparable.

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 may likely rent for 42% above median income of the area, and the 2-bedroom apartments may rent just below median income of the area.**

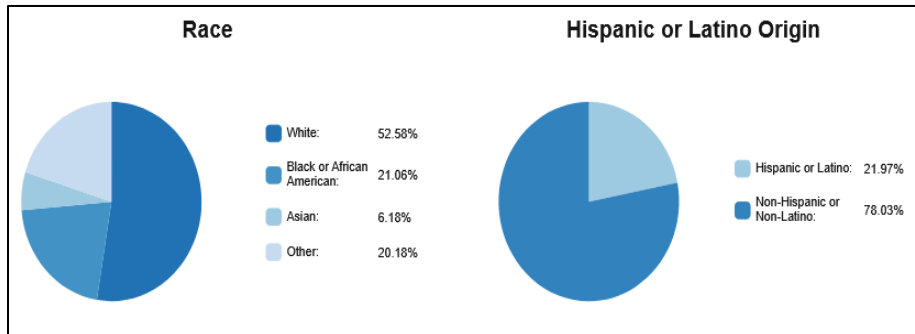
### C. Equity

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.



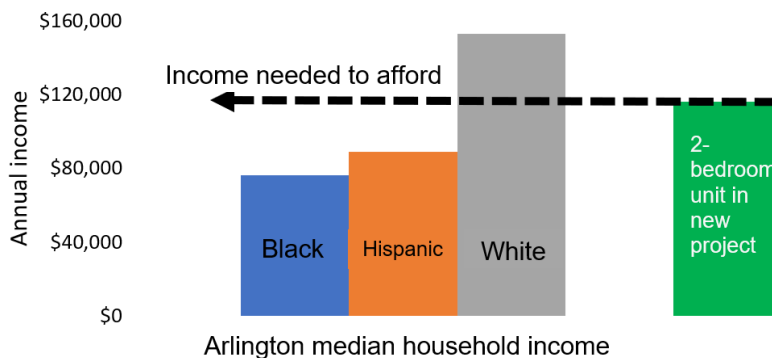
5-year Estimate 2022 Community Survey, US Census Bureau, p. 1 of [Demographics by Race Ethnicity Arlington County Demographics](#).

Currently, [Arlington is 65% white](#). Census [tract 103100 is 52.6% white](#), (see excerpt from relevant page 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 very likely 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. [ASF mentioned both displacement and gentrification in its comments to the Planning Commission](#). Yet Planning Commissioner Lantelme expressed apparent satisfaction, “no one is being displaced with this development.”

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



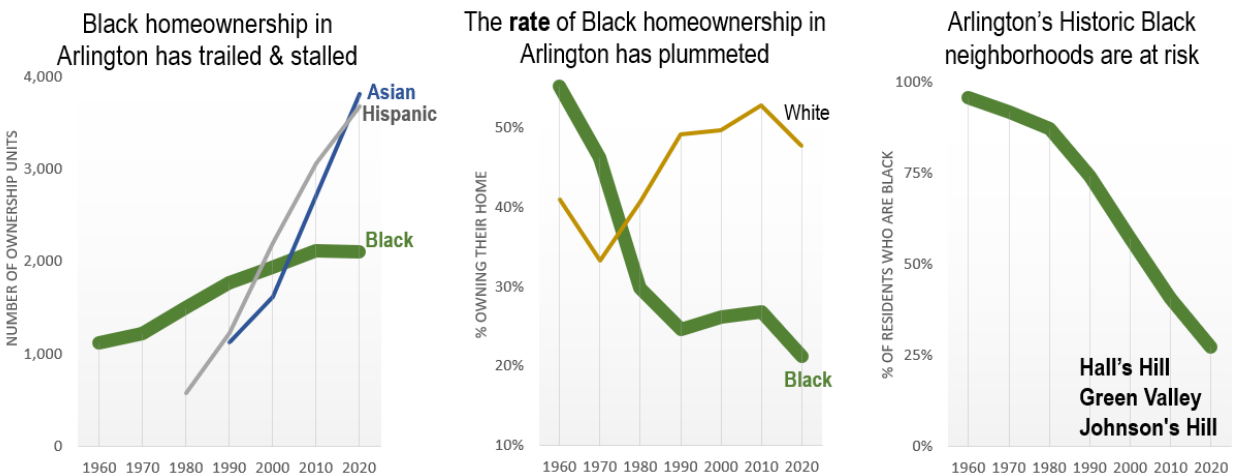
Arlington’s race and ethnicity dashboard informs us that [Black or African American households have the lowest owner-occupancy rate in the county of 22%](#). Putting 100% rental units in this area is not responsive either to home ownership goals nor goals for equity.

## D. Ignoring Reality

After the George Floyd murder by Minneapolis police in 2020, the Arlington Planning Commission issued an [“Equity Statement.”](#) It pledged it “must consistently choose to specifically and deliberately question and work against ... systemic inequities, or they will inevitably and necessarily adopt policies shaped by them.”

Yet at the Planning Commission, [Vice Chair Bagley \(as noted in ARLNow\)](#) noted: “I can empathize with the [Lomax AME] Church,” “It is distressing for me as a planning commissioner to have so many projects come in that are market rate, which right away excludes a lot of folks who have been excluded in the past. I wish I had the answer to that, *but I don’t.*” **The answer is simple: Vote “NO”** on projects that fail to meet community needs.

Arlington faces critical homeownership challenges and this project has **no ownership units**. The Urban Institute found [Arlington has the lowest black home ownership rate](#) of any local jurisdiction, except Alexandria. As ASF and others have [documented](#), the number of Black Arlington homeowners has trailed other groups and now stalled (left chart below) as the *rate* of Black ownership here has plummeted (middle chart below). Consequently, our three historically majority-Black Arlington neighborhoods went from 57% Black in 2000 to just 27% in 2020.



**Yet only two commissioners across three commissions** (Housing, Transportation and Planning) voted against “business as usual.” Planning Commissioners Guevara and Striner called for a County study of gentrified/marginalized areas. While the Planning commission voted it down, Guevara’s words may echo in the minds of the County Board: “It always seems incumbent on the residents being displaced to be the teachers, the welcomers, even though their spaces are the ones being encroached upon,” said Guevara. “I’d say it’s upon the applicant and the county to make those inroads rather than the community.”

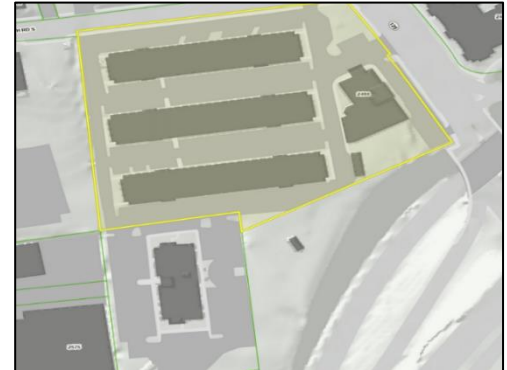


## II. Process

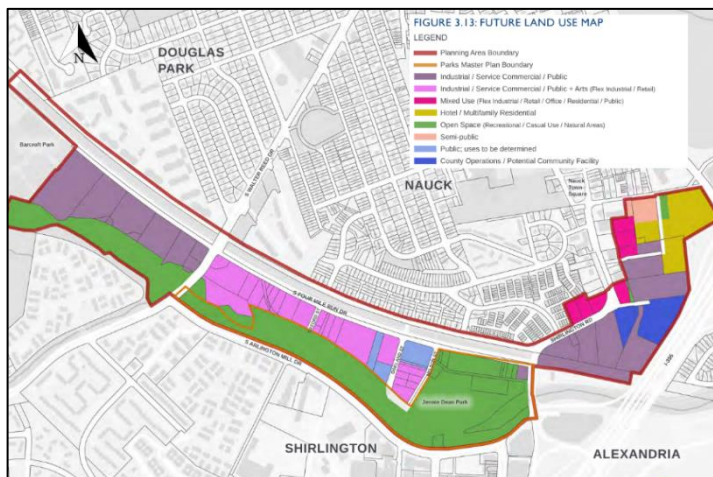
### A. Effecting the General Land Use Plan (GLUP) Change

#### 1. Applicant Fails to Apply for GLUP Change

The first item the County Board will consider is a GLUP change for one of the two parcels at 2480 S. Glebe. Namely, parcel [RPC #31-034-025](#), which is 62,962 sqft and zoned RA-H for multifamily residential/hotel development; but with a land use designation (service-industrial) that precludes residential redevelopment. The County assessed this smaller parcel at \$6 million (land value) in 2025.



The second parcel [RPC #31-024-024](#), in yellow on this map; it does not need a GLUP change. It is 177,391 sqft (75% of the total parcel) and has a GLUP designation of multifamily residential (also zoned 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, in her individual capacity) 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. (See [GLUP booklet p. 4](#)). The CPHD staff project lead on March 14 clarified the site was eligible for a GLUP change via the “Four Mile Run Valley Area Plan,” (4MRVAP) approved November 2018, and the draft Board report was later updated to reflect

that. Staff said the plan envisioned this site as potentially having a “multifamily residential” land use (mustard yellow at far right, from p. 63 of [4MRVAP](#)). 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, County Staff 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 not been done property in earlier redevelopment. ASF followed up and discovered that indeed, the applicant has not SOUGHT a GLUP change. (See Applicant’s [November 1 2024 letter](#), [February 28, 2025 letter](#), [February 3, 2025 letter](#), and August 21, 2024 letter.) Although



partially addressed in Commission meetings, ASF has not received a satisfactory explanation to this “simple fix-it” theory of GLUP change, nor how an applicant can receive one without specifically seeking it, since it is a legal requirement to notify the community of GLUP changes.

Furthermore, pursuant to section 15.5.8.H of the Arlington County Zoning Code (ACZO) and County practice, we understand 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 Staff could not explain this omission in the follow up.** More troubling, Planning Commissioner Lantelme and Staff blanketly asserted the developer didn’t need the GLUP change to develop. If true, why bother with all this change?

### 3. Calculation of Base Density

Related to the calculation of additional units pursuant to Section 15.5.8.H, why would County Staff use – if they were properly applying the assumed 20% contribution – the “special

Please find below a tabulation in chart form of the by-right development capacity of the above-referenced 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 Classification	Site Plan Area	Density Permitted By-Right	By-Right Development Capacity
RA-H	240,353 sf 5.517 acres	1du/1,800sf	133 units
Zoning Classification	Site Plan Area	Density Permitted By Special Exception	Special Exception Base Development Capacity
RA-H	240,353 sf 5.517 acres	1du/600sf	400 units

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?*

If one accepts 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 asserts that the base density for parcel [RPC #31-034-025](#) is zero, as the land use does not allow residential redevelopment. This issue, and the requirement of ACZO 15.5.8.H. must be resolved.

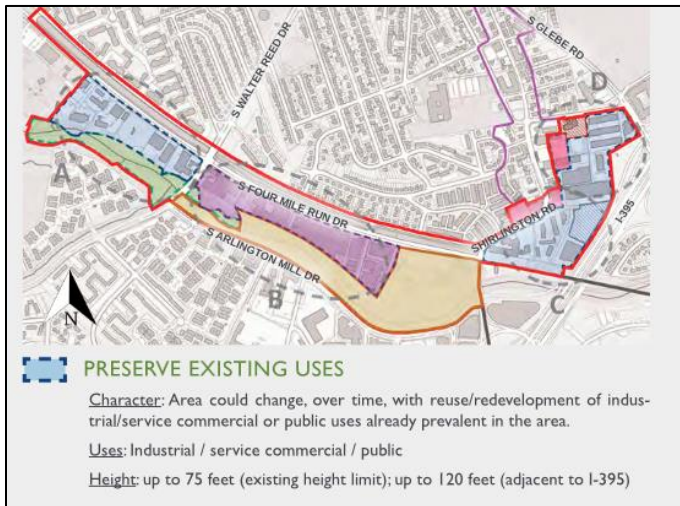
### B. Green Valley Plan and the Four Mile Run Area Plan

This project is in Green Valley but the [Staff Report](#) ignores the [Green Valley Comprehensive Action Plan](#) (1998). (Worse yet, the County website version of the Plan omits its images).

In the **Green Valley Plan, which the County Board “approved,”** residents declared their desire to keep Green Valley “a primarily single-family neighborhood and to minimize negative impacts of bordering commercial and industrial establishments.” They also sought “to build on the neighborhood’s unique sense of community and history” as well as “to address social and economic concerns, such as community service program and facility needs, home ownership and

economic opportunities for youth and adults.” This project cannot reasonably be said to advance those goals, approved by the Board.

Relatedly, the project site is covered by the Four Mile Run Valley Area Plan. The [4FMRV Area Plan](#)’s Design 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...” The figure below shows this site, in area D (at right). The Plan notes intent proposes to “preserve” existing use. There is no “industrial-arts” element for the community here, only for residents, further cementing likely racial/ethnic divides. There is no “preservation of existing use” either, as the project is currently a hotel/motel.



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 should necessitate new public space for the residents, with additional space allocated to mitigate the density on surrounding properties.

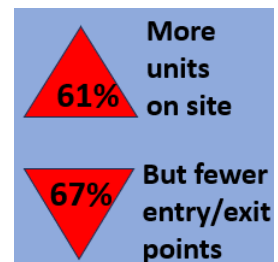
ASF proposes that the County not approve the GLUP change for the second parcel and it be subdivided for purchase by the County. The County could preserve this area for County priorities and investments, such as a community/arts/rec center, or retain the property’s service/industrial land use.

### C. Transferring “Community Benefits” Outside of Site Planning

The Planning and Housing Commissions told the community the public should negotiate benefits or mitigation on their own. ASF believes that is improper, pus inordinate burden on community members, and strips all transparency that comes with the site plan process. We request the Board make clear benefits/mitigations are properly included inside the AZCO 4.1 process.

## III. Infrastructure

A glaring conceptual problem is how, by placing high density so far from Metrorail, it breaks from transit-oriented development. The basic math on traffic also defies common sense—**Increase** economic units by 61% (from 329 hotel rooms to 531 housing units), but **decrease** access points by 67% (from 3 to 1) by shutting off access to Glebe. Planning Commissioners noted that the curb cuts on Glebe might make sense here (few pedestrians walk near I-395), but staff has not amended this to ensure a future throughway from S. Glebe to Shirlington Road, which should be the main axis through this development.



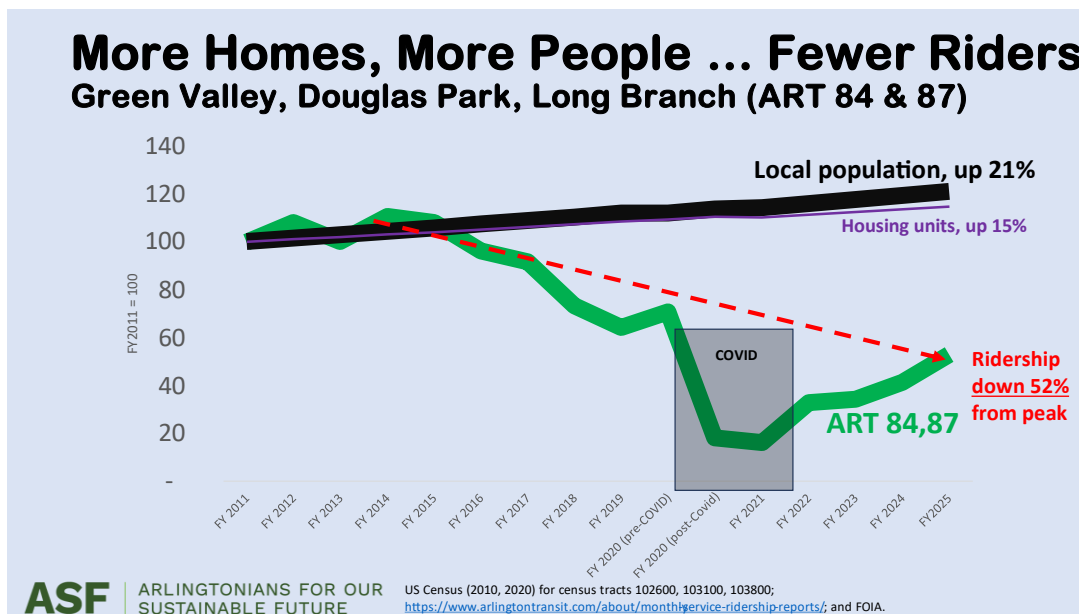
As the Rev. Dr. Nelson told the Planning Commission: “**We are just amazed** that [County] professionals tell us that a 531-unit build will not impact the traffic in a negative way.... You’re going to add 531 units, that many cars, plus, you’ve taken away the entrance[s] ... from Glebe Road. [A]nd you tell us that it’s going to be better? Common sense tells us there’s absolutely no way it can be better.”

## A. Transportation

The applicant says that of its 531 units with 732 bedrooms, only ~236 people (32% of the bedrooms) will leave in the AM peak period. Will 68% of residents really just stay home?

The applicant also says 28% of residents will take public transit. Yet public data on population, housing, and bus use in this area runs counter to the popular density-transit trope—i.e., that more density necessarily means more public transit use. In this area of Arlington, however, the data shows it has been *more homes, more people, but fewer public transit users*.

Specifically, as shown in the chart below, since 2010 for the three nearby U.S. Census tracts, the local population rose about 21%, the number of housing units 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.



Based on the data, it is folly to think a *further* influx of wealthier residents will abandon cars in large numbers. Yet the project has 549 parking spaces—22 *fewer* than the base zoning requires.

The project may add about 750 residents (using Census rates of population:bedrooms). That is *hundreds, perhaps a few thousand, car trips per day*. And, as noted above, it’s a 61% *increase*

from current conditions (assuming 100% hotel occupancy, which is unrealistically high, meaning the actual increase in cars is much higher).

[Data from VDOT](#) shows this area is already **the most heavily travelled part of Glebe Road** in Arlington. In 2023, the most recent year available, 22,000-27,000 cars per day traveled on Glebe just North and South of 395; on 24th Rd S (from Shirlington Rd. to Glebe), it's about 6,800 cars. Notably, **Staff has not provided this data to the community** or commissions; so there was no discussion of these impacts.

To ease traffic, some egress via S. Glebe needs to be maintained.

### B. Insufficient Parking

The site is 11,600 feet to the nearest Metrorail stop, and 25 feet to the nearest bus stop. It is virtually all market rate housing, and as we noted is likely to yield very few public transit users. Under current zoning, Applicant says 571 parking spaces are required; it seeks to have only 549. This is an 4% reduction in required parking ratio and not compatible with the data above showing more houses, more people, yet *less* public transit use in this area.

### C. Disproportionate Impact of Site Access



**From 3 access points to 1.** The developer plans to create a new access road exiting onto 24<sup>th</sup> Rd. S., next to Lomax Cemetery **for all traffic** into and out of the site. Currently, traffic there has 3 options -- two curb cuts onto Glebe and one on 24th, as shown on the nearby image.

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 traffic 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, reflecting existing traffic patterns.

At a minimum, ASF suggests the developer provide ONE curb cut onto S. Glebe from the site and allow right turns only onto Glebe. This would partially alleviate the chokepoint.

### D. Inadequate Traffic Flow

The intersection needs a better radius for traffic turning right onto 24<sup>th</sup> Rd. S. from S. Glebe. The NW corner is an obtuse angle which requires significant deceleration for cars turning. The County or developer should address this given the increase in car traffic expected.





## E. Possible Future Development is Not a Benefit/Solution for Today

Transportation commissioners mentioned possible *future* ingress/egress at the rear of the property. This, however, would still route traffic *into* Green Valley instead of onto Glebe. It remains a possible future benefit, not a current traffic solution.

## IV. Development Standards

Sections 7.4.3.A and 7.4.3.B of the Zoning Code (shown at right) determine the development of these parcels.

### A. Lot Coverage & Lot Area

The maximum lot coverage for this site is 50%. Applicant seeks 65%, or an **exceptional 30% bonus**. While the Applicant offers 10,000 sqft of open space, a more balanced approach would cover more area with trees than impervious surface. Especially given [Green Valley's tree inequities](#). ASF recommends a minimum 15% tree canopy and no more than 55% lot coverage.

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 25% decrease.

### B. Loading Areas

ACZO requires three loading areas for such a large site. The developer wants only two. Given the local traffic constraints, the Board should enforce the existing requirement of three.

### C. Community Benefits

The November 21, 2024 letter of Justification from 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.

ASF sees no evidence of the “community benefits package” in the County Staff presentations or reports. Nor do we see the “variety of site improvements to the Four Mile Run Neighborhood”.

#### 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		100,000	100,000
Lot area per dwelling unit		600	--
Lot area per guest room		600	--
Lot width, minimum average (feet)	See §12.3.7		
Lot width		200	--
Lot width per dwelling unit		--	--
Height			
Maximum (feet)		125	125
Maximum (stories)		12	--
Floor area, minimum (sq. ft.)			
Floor area per dwelling unit or sleeping room		--	1.5
Lot coverage, maximum (percent)		50	

ASF agrees affordable housing can be a community benefit (and was cited by Mr. Lam to Ms. Bodine as the main benefit). However, the applicant initially offered just 2 affordable units out of 503! They are far below the 20% ratio of affordable units a GLUP change should bring.<sup>1</sup>

**With only 9 onsite affordable units, all above 50% of AMI, ASF believes this project cannot be approved by the County Board as advancing affordable housing goals.** It fails ACZO 15.5.8.H (GLUP change requirement) and fails affordability needs cited by the County, e.g., to target lower income groups and that 17% of all housing should be “affordable.”

This project – even while it is not maximizing height – is proposing the highest number of units outside one of the County’s four transit corridors that ASF has seen, and it is providing perhaps the lowest community benefits of any project in recent history.

## V. Conclusion

For these reasons, we recommend the County Board *defer* a vote on this project and:

- *Engage* Green Valley residents;
- *Require* Staff to clarify the GLUP and zoning issues raised herein (require the letter of justification request a GLUP change; a 20% affordable housing contribution for a GLUP change for the smaller parcel, and reduction in base density for the smaller parcel);
- *Consider* ASF’s alternate planning guidance;
- *Buy* [RPC #31-034-025](#) for future community investment; and
- *Adopt* Planning Commission Guevara’s recommendation to study and address (via planning or other tools) gentrification in Green Valley and other affected areas;
- *Ensure* Community Benefits adequately reflect the level of zoning exceptions sought.

[Rev. Dr. Nelson put this project in the context of the County’s history of discrimination](#) in Green Valley, referring to “laws in place that restricted African Americans into this space and here, we do it again . . . . we do it again with smiles . . . and we should not be doing it again.”

Thank you.

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<sup>1</sup> By March 29 2025, the project proposes a maximum possible onsite number of 9 affordable housing units out of 531 (plus \$2 million to AHIF). 9 units is 1.7% of the total. ASF – contrary to Staff’s assertion – believes the proper base density is only 133 units/acre.



## APPENDIX A – 2480 South Glebe Road Project Background

### Issues of review for County Board

**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:

- [SPLA 25-00053](#)
- [Draft County Board Report](#) as of March 19, 2025 (for Planning Commission)
- [Project home page](#)
- [Slip sheets](#) (drawings, canopy plan, etc.) accessed Mar 18 2025
- [Green Valley Plan](#) of 1998
- [Four Mile Run Valley Area Plan](#) November 2018
- [Affordable Housing Master Plan](#) 2015
- [Arlington Transportation Commission Review and Vote](#) on 2480 S. Glebe Rd., March 13, 2025 (not yet posted)
- [Arlington Planning Commission Review and Vote](#) on 2480 S. Glebe Rd., March 24, 2025
- Arlington Housing Commission Vote on 2480 S. Glebe Rd., March 27, 2025, not yet posted
- [Lomax AME Zion Church Letter to the Planning Commission](#), March 18, 2025