

**From:** pro.wordsmith@verizon.net,

**To:** cdorsey@arlingtonva.us, kcrystal@arlingtonva.us, lgarvey@arlingtonva.us, tkarantonis@arlingtonva.us, mdeferranti@arlingtonva.us,

**Cc:** countyboard@arlingtonva.us, kjacobs@arlingtonva.us, mkushnir@arlingtonva.us, mschwartz@arlingtonva.us, johnsautter@gmail.com, exec@bluemontcivic.org, WWCAemail@gmail.com, hcc19@aol.com, michaelbruce21@verizon.net, jts@mtnzephyr.com, annebodine@yahoo.com, mhall@goldsteinhall.com, toddtruitt@yahoo.com, mglassmail1@gmail.com, susanjland@yahoo.com, pro.wordsmith@verizon.net,

**Subject:** Comments: Agenda Item 34 - 2000 N. Glebe Road (Sunrise Senior Living) Special GLUP Study Document

**Date:** Tue, May 9, 2023 4:29 pm

**Attachments:**

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May 9, 2023

Dear Chair Dorsey and members of the Arlington County Board:

Please review and add my comments below to the public record for Agenda Item 34: Consideration of the 2000 N. Glebe Road (Sunrise Senior Living) Special GLUP Study Document. These are supplementary comments in addition to those I have already submitted to the County Board on 4-28-2023, see below.

I ask the County Board to defer approval of the study document, the resolution pertaining to it and the proposed up-GLUPing to "low-medium" residential density/zoning, and the request to advertise the GLUP changes. I join attorney and native Arlingtonian Barnes Lawson in asking the County Board to restore the elder-care (formerly "institutional home") permitted use for R-6 and other residential districts that was permitted prior to 2013, when the Zoning Ordinance was amended allegedly only to "reformat" and "reorganize" the ordinance but which also eliminated the permitted use for elder-care facilities: <https://www.arlingtonva.us/Government/Programs/Building/Codes-Ordinances/Zoning/Amendments>

This [amendment](#) is a comprehensive reformat of the Zoning Ordinance, with an effective date of July 1, 2013. The new Ordinance is reorganized and reformatted, but does not incorporate any changes to policy.

**A tripling of density in a low-density residential neighborhood is a significant "policy" change. The elimination of a significant heretofore permitted use should have been clearly advertised at the time. And the impacts of such a change on low-density neighborhoods should have been thoroughly discussed and evaluated before these changes to the Zoning Ordinance were approved in 2013.**

Restoring the elder-care "institutional home" use in R-6 would provide the applicant with a way to redevelop while providing greater flexibility in site development — in a way that is more compatible with the surrounding residential neighborhood and more consistent with elements of Arlington's Comprehensive Plan (see 4-28-2023 comments below). A rehab of the 29-year-old existing building, which is attractive, and preserving all the embodied energy it contains (adding onto it, if more beds are warranted) would be the "[greenest](#)" option — far greener with a far smaller carbon footprint than disposing of the existing building in landfill and replacing it with new materials/construction.

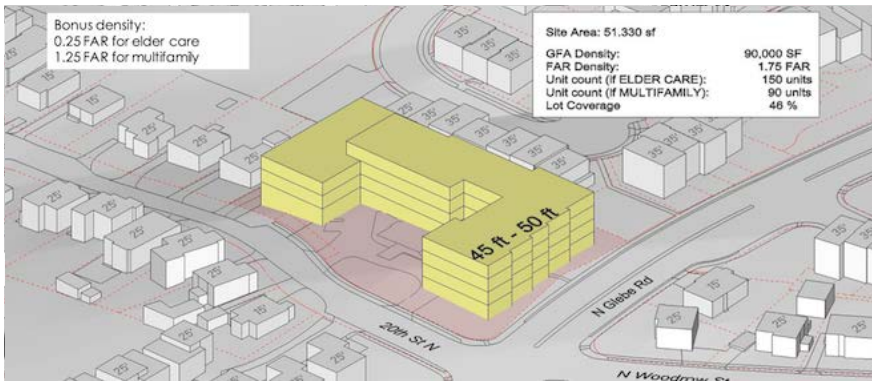
Given that this is a low-density residential neighborhood (currently R-6), staff's proposal to increase the number housing units/beds from 57 to 150 on a 1-acre site (with 50% existing tree canopy and pervious ground) is unreasonable. Such excessive up-GLUPing and upzoning

- **produces** a huge monolith with a height and footprint that will NEVER be "compatible" with the surrounding low-density residential area;
- **reduces** the 50% percent tree canopy and pervious ground (where replacement trees could be planted) down to almost ZERO, thus making a mockery of the use of the word "conservation";
- **offers** ZERO "connectivity" — as this site is too small to contain anything more than a private driveway — and will dump more vehicular traffic onto a narrow residential street that creates hazardous conditions for elementary school student-pedestrians/cyclists using 20th Street North as a [safer route](#) to reach Glebe Elementary School;
- **generates** exponentially greater stormwater runoff volume due to the near doubling of [impervious surfaces](#) on the site, which cannot be deemed "sustainable" in any meaningful way; and
- **fails** to ensure that the site will actually be redeveloped as senior housing instead of market-rate multifamily housing — a choice enabled by this proposed up-GLUPing/upzoning. (see [p. 16](#) of the staff report)

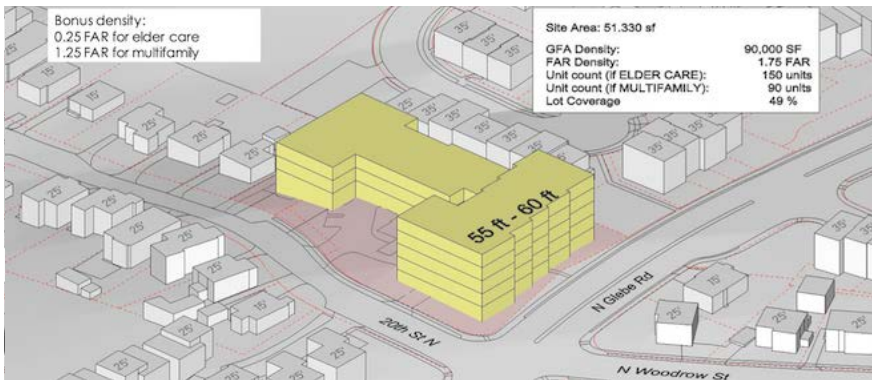
Though some have alleged that this is just the "first step" and that these problems can be worked out in the Site Plan Review Committee (SPRC) process, this presumption is factually incorrect. Before the first public SPRC meeting is ever held, staff meets privately with the applicant to determine the plan's density. The public has no meaningful input into the determination of density, and this is especially true now that staff has essentially green-lighted the up-GLUPing and upzoning requested by the applicant in this "study" document. (The staff report recommends an even larger number of units/beds than the applicant requested.)

It is the permitted density that drives both the main structure's footprint and height and which drives the impacts experienced by the neighborhood *and the larger community*. In this case, the staff report's own visuals illustrate that building footprint/lot coverage actually INCREASES when greater building height is permitted:

4-story massing and height (lot coverage 46%):



5-story massing/height (lot coverage 49%):



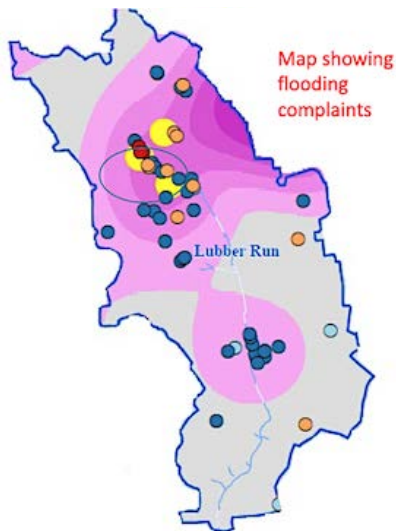
This huge increase in density on a small site also ensures that there is inadequate step-down or taper in massing as the building approaches adjacent attached and detached single-family homes. There is absolutely no way to design a building of this size to "minimize shadows" being cast on neighbors' (Becket Glen) townhomes and any solar panels that will be on the north side of the building. And this is especially true if "bonus" density further increases building height. Likewise there is insufficient at-grade open space to provide a meaningful buffer, landscaping and adequate soil volume, light and the other requirements needed to grow mature replacement trees.

Moreover, the huge density increase comes with a huge increase in heat-trapping, water-shedding impervious surface area —as you can clearly see by comparing the layouts above with the layout of the existing site below:



As the staff report correctly notes "very little stormwater conveyance infrastructure adjacent to the site." Though viewed as a negative in the staff report, keeping stormwater runoff onsite (disconnected from the larger stormwater management system) and using natural infrastructure to infiltrate runoff back into the ground supports the county's sustainability goals while also preventing additional volume from reaching the overloaded Lubber Run stormwater management system:

<https://www.arlingtonva.us/files/sharedassets/public/Environment/Documents/Lubber-Run-Stormwater-Improvements-Waycroft-Woodlawn-Civic-Association-October-2020.pdf>



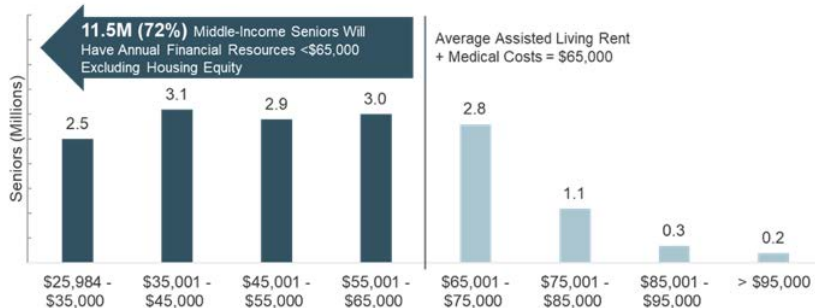
Increasing the site's imperviousness by up-GLUPing and upzoning the Sunrise site, as the staff report proposes, and removing all or nearly all mature trees from the site (required if an underground garage is dug) will generate an exponentially larger volume of runoff and will place additional strain on Lubber Run's existing stormwater management infrastructure, which is already inadequate for the task. It should be noted that the rehab of the Ballston's stormwater pond (downstream) is not designed to increase the volume of stormwater it can detain. It is not a flood-mitigation or flood-management structure, and excess water is sent downstream, where as you can see in the image above, flooding is frequent.

The county should be identifying ways to reduce or eliminate downstream flooding whether or not this site is redeveloped — other natural means of stormwater management are readily available. The goal should be to reduce the strain on existing gray infrastructure and Arlington's beleaguered streams. More impervious redevelopment will only make matters worse once the site's new, gray stormwater facility connects to an already overwhelmed system.

Finally, though the staff report justifies this up-GLUPing/upzoning by way of pitching it as bolstering Arlington's senior housing, there is no shortage of expensive, market-rate senior housing units (costing upward of nearly \$5,000 to \$7,000 or more per month), which are abundant (see below). It's critical to understand that 72% of middle-income seniors lack the resources to afford assisted living costs: <https://www.norc.org/NewsEventsPublications/PressReleases/Pages/many-middle-income-seniors-will-not-be-able-to-pay-for-long-term-care-and-housing-in-10-years.aspx>

## Excluding home equity, 72% of middle-income seniors will have insufficient resources to pay for assisted living

Projected Financial Resources of Middle-Income Seniors Excluding Housing Equity Compared to Assisted Living Costs, 75+ 2033



More information at [www.norc.org](http://www.norc.org). Average private-pay assisted living rent for 2018 supplied by the National Investment Center for Seniors Housing & Care. Average out-of-pocket medical costs from Kaiser Family Foundation.



There is no easy way to include affordable housing/beds in assisted living facilities (ALFs) in the State of Virginia. Virginia does not support Medicaid spending/subsidies for ALFs: <https://www.medicaidplanningassistance.org/assisted-living/>. And Medicare doesn't cover the costs of living in an ALF bed.

Moreover, [Brookfield Asset Management](https://www.brookfieldassetmanagement.com/) (dba Sunrise) has never stated that the redevelopment would include any affordable senior housing units.

A contribution to affordable housing is likely to be made offsite and will not likely benefit Arlington's senior population. Moreover, this proposed up-GLUPing/upzoning provides the property owner with a new opportunity/incentive to redevelop the site as luxury multifamily in place of senior housing. If adding affordable senior housing is truly the goal, then this GLUP change won't help Arlington reach that goal. And it could easily prompt Brookfield to sell the property to a market-rate multifamily developer, and we could lose the existing units.

In summary, the 2000 N. Glebe Road (Sunrise Senior Living) Special GLUP Study document is not ready for acceptance. This document contains too much wishful thinking not grounded in reality. As outlined above and below, the density in the proposed up-GLUPing/upzoning combined with the site's own limits renders the "Guiding Principles" (see [p. 16](#)) for subsequent redevelopment null and void. It simply is impossible to place this much density on this small a site and still meet those "principles."

Likewise, the large increase in density being proposed on such a small site also ensures that the resulting redevelopment will conflict with goals and principles in multiple elements of Arlington's Comprehensive Plan, as outlined below.

I call on the Arlington County Board to defer the 2000 N. Glebe Road (Sunrise Senior Living) Special GLUP Study document, the related resolution and request to advertise the GLUP changes. Instead, I request that you send the study back to the County Manager and staff, asking them to "study" reestablishing the elder-care (formerly "institutional home") facility use in R-6 and similar low-density residential zoning districts. We need a better, more sustainable outcome than what is possible under this study's proposal.

Thank you for your time and attention.

Suzanne Smith Sundburg  
Arlington, Va.

-----Original Message-----

From: pro.wordsmith@verizon.net

To: cdorsey@arlingtonva.us <cdorsey@arlingtonva.us>; kcristol@arlingtonva.us <kcristol@arlingtonva.us>; lgarvey@arlingtonva.us <lgarvey@arlingtonva.us>; tkarantonis@arlingtonva.us <tkarantonis@arlingtonva.us>; mdeferranti@arlingtonva.us <mdeferranti@arlingtonva.us>; devanshi2005@gmail.com <devanshi2005@gmail.com>; arlpcsteinberger@gmail.com <arlpcsteinberger@gmail.com>; niabagley@yahoo.com <niabagley@yahoo.com>; egearin@egearin.com <egearin@egearin.com>; Stephen.T.hughes@gmail.com <Stephen.T.hughes@gmail.com>; jatel@me.com <jatel@me.com>; tenley.arlington@gmail.com <tenley.arlington@gmail.com>; lsarli@me.com <lsarli@me.com>; jmschroll@gmail.com <jmschroll@gmail.com>; danielweir22204@outlook.com <danielweir22204@outlook.com>

Cc: countyboard@arlingtonva.us <countyboard@arlingtonva.us>; kjacobs@arlingtonva.us <kjacobs@arlingtonva.us>; mkushnir@arlingtonva.us <mkushnir@arlingtonva.us>; gjohnson@arlingtonva.us <gjohnson@arlingtonva.us>; mschwartz@arlingtonva.us <mschwartz@arlingtonva.us>; hcc19@aol.com <hcc19@aol.com>; jts@mtnzephyr.com <jts@mtnzephyr.com>; annebodine@yahoo.com <annebodine@yahoo.com>; mhall@goldsteinhall.com <mhall@goldsteinhall.com>; mglassmail1@gmail.com <mglassmail1@gmail.com>; toddtruit@yahoo.com <toddtruit@yahoo.com>; Jdau@aarp.org <Jdau@aarp.org>; taarmao@aol.com <taarmao@aol.com>; pro.wordsmith@verizon.net

Sent: Fri, Apr 28, 2023 7:46 pm

Subject: Public Comments for 2000 N. Glebe Road (Sunrise Senior Living) Special GLUP Study Document

April 28, 2023

Dear Chair Dorsey and Arlington County Board Members and Chair Patel and Planning Commission Members:

Please consider these comments in your respective reviews of the **Special GLUP Study Document for the Sunrise senior living facility at 2000 N. Glebe Road**.

I'm very concerned about the proposal for the much larger facility planned for the Sunrise assisted living facility located at 2000 N. Glebe Road via a special GLUP study process. It represents a significant density giveaway without any clear community benefits being received in return. Quite the opposite, this project appears to conflict with numerous goals and objectives listed in multiple Comprehensive Plan elements as well as in other county plans and initiatives, as outlined below.

The site comprises a little more than 1 acre, so essentially this is a spot-zoning change. Continually amending the GLUP for such small sites undermines the integrity of the GLUP itself. Why have a GLUP if all spot-zoning-change requests are granted via a special GLUP process — thus subverting the county's overarching land-use planning and goals?

It is clear that the increased density requested in this land-use change is inconsistent with the existing zoning (R-6) and is also incompatible with the surrounding low-density residential housing. What might be feasible or even reasonable for a 6-acre site in South Arlington (where Sunrise is planning another redevelopment project) isn't suitable for a site that is only around 1 acre.

For one thing, a small site like the one at 2000 N. Glebe Road is too small to properly mass and meaningfully taper building height (where it faces or abuts low-density housing) to enable the new building to "complement rather than overwhelm the surrounding area" as an Arlington County Guiding Principle puts it. The new building will be a matter of feet from the back doors of Becket of Glen townhomes.

#### **Forestry & Natural Resources Master Plan / Flood Resilient Arlington / Stormwater Master Plan Amendments**

It is also clear that the site will be dug out to accommodate the underground garage, and all or nearly all existing pervious land and tree canopy will be replaced by impervious surfaces. So it's unclear how any tree "conservation" is possible, even though, as I understand it, the special GLUP process does (or could) include a 20% canopy coverage requirement. Replacement trees would need sufficient soil volume and light to survive; two elements that would seem to be lacking in this plan.

Moreover, digging out the site would likely result in the death of trees on adjacent parcels, as the change in the landscape will likely drop the existing water table and leave those remaining trees on nearby private property "stranded," without access to adequate groundwater resources. Acceptance of this Special GLUP Study, as currently envisioned conflicts with the draft **Forestry and Natural Resources Plan** to "maintain 40-percent tree canopy county-wide," among other things: <https://www.arlingtonva.us/files/sharedassets/public/forestry/arlington-county-forestry-and-natural-resources-plan.pdf>.

The loss of existing tree canopy (with adequate replacement unlikely or perhaps even impossible) coupled with the conversion of the site to nearly 100% impervious cover will generate more stormwater runoff than currently exists. Staff is aware of existing stormwater issues, resulting in the flooding of at least one nearby residence.

Given that the county's meager stormwater management requires only detention (and not infiltration/permanent detention) of a portion of stormwater runoff for brief periods, it is hard to imagine how the proposed development will improve the stormwater situation. This is especially true because this area lies in the Lubber Run watershed, where existing stormwater infrastructure is already overtaxed and inadequate — resulting in significant recurrent overland flooding: <https://arlingtonva.s3.amazonaws.com/wp-content/uploads/2019/11/Heat-map-Flood-calls.png>.

Moreover, converting over an acre of land to 100% impervious in a flood-prone watershed would seem to be in direct conflict with the county's stated goals in it **Flood Resilient Arlington** planning and associated **Stormwater Management Plan** amendments adopted in 2023: <https://www.arlingtonva.us/Government/Programs/Flooding>.

#### **Zero Waste Board Resolution / Solid Waste Master Plan / Community Energy Plan**

What's unclear to me is why a building that's just 35 years old must be razed. That seems excessive, wasteful and disregards the **embodied carbon and energy** in those existing materials, which will end up in landfill—running counter to the County Board's own 2015 zero waste resolution: <https://www.arlingtonva.us/Government/Departments/County-Board/Board-Actions/Resolutions/Zero-Waste-Resolution-2015>.

And it would appear to run counter to the county's intent to include zero waste principles in its 2024 update to the county's **Solid Waste Master Plan**: <https://www.arlingtonva.us/Government/Commissions-and-Advisory-Groups/Climate-Change-Energy-and-Environment-Commission-C2E2/Solid-Waste-Committee>.

Doubling the building's footprint on this site (and presumably adding more paved parking, etc.) will increase impervious, heat-trapping surfaces that likewise are inconsistent with the goals in Arlington's **Community Energy Plan**: <https://arlingtonva.s3.amazonaws.com/wp-content/uploads/sites/13/2019/10/Final-CEP-CLEAN-003.pdf>.

#### **Vision Zero Plan / Safer Routes to School**

With respect to traffic counts, it appears that no traffic study has been performed during business/school hours on both Glebe and 20th Street, as would be expected in order accurately assess the project's impact on traffic. Given that children attending APS who live up to 1 mile from school campuses are required to walk to school (with students using N. 20<sup>th</sup> Street as a major pedestrian route), such an oversight would seem to be antithetical to the County's **Vision Zero Action Plan**, which states, "Human life and health are prioritized within all aspects of transportation systems": [https://www.arlingtonva.us/files/sharedassets/public/Transportation/Documents/Action-Plan\\_revised\\_draft\\_v3.pdf](https://www.arlingtonva.us/files/sharedassets/public/Transportation/Documents/Action-Plan_revised_draft_v3.pdf). Not to mention the **Safer Routes to School** initiative: <https://www.arlingtonva.us/About-Arlington/Newsroom/Articles/2019/Safer-Routes-to-Arlingtons-Schools>

It is hard to imagine how adding this much density — and thus, this much additional vehicular traffic — to a neighborhood street this close to an elementary school, where there will be many children traveling on foot (including in the dark in early morning hours after daylight savings commences), has not been given greater priority in the decision-making process.

#### **Affordable Senior Housing / Action Plan for Ending Homelessness / Building an Age Friendly Community**

Given that current prices listed for the existing Sunrise facility at 2000 N. Glebe Road range from **\$5,233 to \$6,802/month**, the prices for the new facility are likely to be even higher (to recoup development costs): <https://www.seniorly.com/assisted-living/virginia/arlington/sunrise-of-arlington-2000-north-glebe-road-arlington>. According to this source, Virginia does not currently have a Medicaid program that helps to pay for assisted living": <https://www.payingforseniorcare.com/medicaid-waivers/assisted-living>.

Thus, justification using the Affordable Housing Master Plan (AHMP) does not apply to this study. Sunrise offers only market-rate housing, as even Sunrise has clearly stated. It does not offer affordable senior housing as defined by HUD as 30% of a household's income or as defined in the AHMP. There appears to be no GLUP and **no Arlington County requirement for Sunrise to add any affordable units whatsoever in exchange for more than doubling the density (going from 57 up to 128 units)**.

This, even though Arlington's **Action Plan for Ending Homelessness, 2021-2022 Annual Report** lists "more than 250 older adults (aged 55 and older)" as having been served by Arlington's continuum of care programs for the homeless in 2022: <https://www.arlingtonva.us/files/sharedassets/public/departments/documents/dhs/coc/arlv-coc-fy22-report.pdf>. And well over 100 of those 250 older adults were over 61 years of age. This means that roughly 1 out of every 4 Arlington residents who is facing homelessness is an older adult, with a large percentage of that group either already having reached retirement age or quickly approaching it.

Arlington's 2022 **Ownership Housing & Barriers to Homeownership** report concludes that nearly 1 in 4 senior homeowners is "cost-burdened" — and thus vulnerable to displacement — indicating a need for affordable senior housing options for existing residents: <https://www.arlingtonva.us/files/sharedassets/public/housing/documents/homeownership-study/homeownership-barriers-analysis-10.25.22.pdf>.

This demonstrable lack of planning for existing seniors runs opposite to sentiments expressed in Arlington's **Building an Age Friendly Community, Action Plan 2020–2023**: [https://arlingtonva.s3.amazonaws.com/wp-content/uploads/sites/5/2020/04/Age-Friendly-Plan\\_FINAL.pdf](https://arlingtonva.s3.amazonaws.com/wp-content/uploads/sites/5/2020/04/Age-Friendly-Plan_FINAL.pdf). I wonder what AARP would make of it?

In 2021, 78.3% of Arlington's population was under 55, so there is no reason to expect a large bump-up in the senior population for at least 10 years: [https://data.census.gov/table?q=Arlington+County,+Virginia&tid=ACSST1Y2021\\_S0101](https://data.census.gov/table?q=Arlington+County,+Virginia&tid=ACSST1Y2021_S0101). Sunrise operates The Jefferson, a nearby senior condominium building with **325 units** (plus another 57 skilled nursing beds and 31 nursing facility beds). Sunrise at Bluemont Park has **175 beds**. Sunrise of Falls Church has another 57 beds.

With Sunrise of Arlington's 57 beds, that's a total of **698 existing beds/units within a 3-mile radius**. And it doesn't include Culpepper Garden or The Carlin, both of which are nearby. Nor does it include the large facility Sunrise plans to build in South Arlington. ***It is reasonable to ask, therefore, precisely how many expensive, market-rate assisted living beds Arlington can absorb.***

Considering the acute labor shortage in the long-term care sector, this seems like a mighty strange time to be planning on adding more beds for which staffing is such an acute problem: [https://www.vhca.org/files/2022/12/VHCA-VCAL-Workforce-Survey\\_December-2022-1.pdf](https://www.vhca.org/files/2022/12/VHCA-VCAL-Workforce-Survey_December-2022-1.pdf). Today, Sunrise is advertising 286 open positions on Indeed.com that are within a 10-mile radius of Arlington: <https://www.indeed.com/jobs?q=Sunrise%20Senior%20Living&I=Arlington%2C%20VA&radius=10&start=30&vjk=42269df5038ab946>. ***It is reasonable to ask how Sunrise intends to staff all these new beds when it cannot fill positions for the ones it already has.***

#### **Emergency Services Planning & Response Times / CIP**

Moreover, the large number of senior facilities within a close proximity comes with a cost. Fire Station 2 (corner of Wilson and Geo. Mason) receives the largest number of EMS calls of any fire station in Arlington (over 3,000 calls annually per the 2012 TriData report): <https://arlingtonva.s3.dualstack.us-east-1.amazonaws.com/wp-content/uploads/sites/5/2015/04/Fire-Station-Locations-Risk-Assessment-FINAL-REPORT-12-14-12.pdf>

According to the report, Fire Station 2 could only meet its response-time goal (11 years ago) when there was a unit sitting in the bay, which frequently isn't the case. To my knowledge, Arlington has made no plans in the CIP or budget to expand EMS capacity at Fire Station 2 or anywhere else in Arlington.

In summary, this proposed Special GLUP Study seems to rubber-stamp a spot zoning that gives away significant density without any meaningful community benefit in return. Acceptance of this Special GLUP Study means that the County Board and Planning Commission are approving a land-use change that conflicts not only with established development principles, but also with multiple goals and objectives in several elements of the county's Comprehensive Plan as well as other county plans and initiatives.

We can do better. Arlingtonians deserve better planning. I strongly urge both the County Board and the Planning Commission to take a second look at this Special GLUP Study and send it back to LRPC and staff to come up with alternatives that better meet the Arlington community's goals and objectives. If this cannot be done, then it is time to review Arlington's planning processes.

I appreciate your time and consideration.

Suzanne Smith Sundburg  
Arlington, Va.