## **Donaldson Run Civic Association**

July 2, 2021

Natasha Alfonso-Ahmed Coordinator, Plan Lee Highway Department of Community Planning, Housing and Development 2100 Clarendon Blvd, Suite 700 Arlington, VA 22201

> Re: Comment on Proposed Land Use Scenarios Donaldson Run Civic Association

Dear Ms. Alfonso-Ahmed:

Donaldson Run Civic Association ("DRCA") submits the following comments with respect to the proposed Plan Lee Highway ("PLH") Land Use Scenarios ("Scenarios") as they relate to Area 3, in which the Donaldson Run neighborhood is located. These comments identify major issues of concern for our neighborhood and its residents. We anticipate submitting a more detailed critique following DRCA's fall membership meeting. Until now, DRCA residents have been provided no clear depiction of these Scenarios. However, DRCA is deeply concerned about the impact of the proposed Scenarios on quality of life in the entirety of Area 3.

Donaldson Run is a neighborhood of predominantly (though not exclusively) single family homes, primarily zoned R-8 and R-10. The neighborhood is characterized by its mature tree canopy and green spaces, which were identified in DRCA's Neighborhood Conservation Plan as among its most valuable assets. It is also notable for its hilly topography, perhaps less prized by residents but nonetheless relevant to future development. The neighborhood was initially comprised of homes built during the 1950s and 1960s – most commonly one-story ramblers and colonials. However, in recent years the neighborhood has seen the replacement of significant portions of this older, more affordable housing stock with far larger, taller homes encompassing greater lot coverage, with concomitant loss of tree canopy and increased stormwater runoff.

DRCA has been involved in the Lee Highway planning process for several years. Its members were involved in the formation of Lee Highway Alliance and the development of the nine Guiding Principles that were intended to steer the PLH effort. Residents participated in mini-charrettes sponsored by DRCA, in the County-sponsored Visioning Charrette that culminated in the 2016 Visioning Study, and in additional surveys, walking tours and other participatory events related to the PLH effort.

Sadly, the proposed Scenarios for Area 3 have broken faith with the premises of both the Guiding Principles and the Visioning Study, as well as the expressed viewpoints of Donaldson Run Civic Association and its residents.

Preservation of Neighborhood Character. If there was one consistent message coming from the DRCA mini-charrettes and other visioning efforts, it was that Donaldson Run residents opposed the "canyonization" of the Lee Highway corridor. The Guiding Principles called for "low to medium density building heights tapering to adjacent neighborhoods." One of the common themes we heard – which does not appear to have been reflected in any reports we have seen – is to ensure the preservation of the look and feel of and ease of access to the Lee Heights Shops. Yet Scenario B proposes 10-story development from the Thirsty Bernie's area through the Lee Heights Shops, continuing to the Artis site. DRCA opposes such extreme height and density. It is inimical to the character of the area and in direct opposition to the wishes of residents.

Parking/Transit Concerns. The radically increased proposed density will require increased parking, for which no provision seems to have be made. In addition to the need for parking to accommodate additional residents, adequate parking is essential to retail business sustainability, another Guiding Principle. The recent demise of local businesses like Lost Dog Cafe in the absence of parking on Columbia Pike is a cautionary tale. Failure to provide adequate parking will directly impact business viability. Lee Heights Shops are a valued community resource and a model for walkable, right-scaled streetscape that should be preserved. This includes ensuring the adequacy of parking, which has always been vital to these shops and neighborhood patronage of them.

Donaldson Run and the adjacent neighborhoods are car/parking-centric. There is no nearby Metro. Indeed, the Metro corridor development was sold to County residents as limited to that area. Hilly topography and distance render walking/biking options unrealistic for certain demographics and for certain types of errands/activities. The rapid bus transit on which density increases are premised remains hypothetical. Increased density will increase traffic both along the Lee Highway corridor and off-corridor. Spill-over parking will adversely affect surrounding neighborhoods.

Consequences for Schools, Parks and Other Facilities. Absent from the presentation of the proposed Scenarios, not just in Area 3 but all along the Lee Highway corridor, is any discussion of the impact of radically increased density on County schools, parks and other facilities. The burdens of increased development permitted under the current Code have not been addressed. Consideration of yet more increased density along the Lee Highway corridor should not proceed without prior rigorous analysis of its impact on all County facilities. For example, a critical question is the shortage of school seats in the County, evidenced by perennial reliance on trailers, even in the absence of what is contemplated in these Scenarios. More generally, DRCA would like to see a careful analysis and comparison of these and other costs (including tax impacts on residents) to the claimed benefits to the public.

Storm Water Management. Storm water management is primarily a County responsibility. New development that will exacerbate existing storm water issues should not be

approved without contracted remediation obligations by the developer. But these remediation obligations are a necessary but not sufficient approach. The County should not transfer to developers its own responsibility for remediating *current* stormwater deficiencies by trading some modest remediation efforts in exchange for bonus height/density. DRCA has consistently urged the County to recognize the need to revise its Zoning Ordinance and take other actions to provide more effective solutions to the increased frequency and severity of storms and associated runoff.

Senior Housing. Arlington has a growing senior population. Arlington's seniors, including many DRCA residents, wish to age in place in the community which they have supported for many years. For many seniors, aging in place means aging in their own homes. Affordable senior housing and memory care units in Arlington are sorely lacking. However, development of expensive market rate senior housing will not address the financial realities of seniors currently living in older, affordable homes.

Tree Canopy. PLH has identified as one of its policies and goals the "protection of natural resources including urban forestry and enhanced tree canopy." In addressing the key goal of "sustainability and resiliency," PLH's December 2019 "Existing Conditions Analysis Report" noted that while the "core" area under review along Lee Highway itself had less tree canopy, because of the very extensive canopy of mature trees in the surrounding neighborhoods the tree canopy of the study area as a whole is 39%. Indeed, this report singled out Donaldson Run by name as a neighborhood that has "a higher tree density than others."

While the Scenarios for Area 3 appear to contemplate the addition of street trees along Lee Highway itself, they make no effort to address the consequences for far more mature tree canopy in surrounding neighborhoods like Donaldson Run of what is cryptically referred to as "lot consolidation" and "infill development." As noted above, this is among the features of the DRCA neighborhood that its residents prize most highly. Equally important, they are vital safeguards against the increasing frequency and severity of stormwater flooding. The failure of these preliminary Scenarios to address their impact on this critical aspect of PLH's "sustainability and resiliency" goal also raises very serious concerns.

DRCA looks forward to continued participation in the evaluation of these proposed Scenarios.

Sincerely yours,

Bill Richardson President, DRCA

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