



Discussion:

Commissioner Koenig asked staff about the differences between Development Site Plan (DSP) and Development Special Use Permits (DSUP) reviews. Principal Planner Geratz responded that the final approval of DSPs are made by the Planning Commission, whereas DSUPs are approved by the City Council. Commissioner Koenig also asked if analysis was done for school sites that could accommodate affordable housing and that this was not considered as part of the FAR. Staff stated this was not.

Vice Chair McMahon asked staff for clarification on the FAR analysis and why staff recommended the text amendment as proposed, with an increase in the by-right option. Staff explained the increase was to address expansions of schools where a demolition and re-build wasn't necessary, trying to think creatively on ways to help schools address their needs for capacity. Staff noted that majority of school projects will require a DSUP approval. There was no upper limit proposed to allow more negotiation between parties and what is the appropriate school size needed, while addressing impacts to the surrounding areas.

Speakers:

Jeffery Reid, of 810 N. Overlook Dr., Alexandria, spoke about his conversation with the Mayor and felt that based on that conversation that the proposed text amendment is not needed, and referred to the correspondence he submitted to the Commission.

Kay Stimson, of 312 Mansion Drive, Alexandria, spoke on behalf of the Northridge Citizens Association, which wrote a letter to the commission against the text amendment. She expressed about the lack of public communication and the text amendment would impact low-density residential development, saying she is not in support of the proposed text amendment and thinks a more modest amendment should be considered.

Peter Benavage, of 5066 Fairbanks Avenue, Alexandria, a member of the Alexandria Federation of Civic Associations, spoke in opposition to the proposed text amendment. The reasons for their opposition was any text amendments that reduced public input is detrimental to the citizens of Alexandria. He felt it was necessary to postpone decision on the text amendment until more analysis and public input was had.

Reginald Brown, of 317 Mansion Drive, Alexandria, spoke about the importance of the public process, saying that the proposed text amendment would eliminate it and he is not in support of the proposed text amendment.

William Pfister, of 3718 Templeton Place, Alexandria, is the Seminary Hill Association representative for the Douglas MacArthur Modernization Advisory Group. He is in support of the text amendment in order to address the overcapacity issue and timeline for reconstruction of the MacArthur project.

Yvonne D Callahan, of 735 S Lee, Alexandria, spoke in opposition to the text amendment, talking about the lack of public input and information received from the City, the need for open

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space, school enrollment trends, impacts of text amendment for each school site and the associated neighbors.

Carter Flemming, of 1403 Bishop Lane, Alexandria, representing the Seminary Hill Association stated that her association as well as other associations wrote letters to the Planning Commission to vote against the text amendment. They felt the text amendment would have huge impacts on neighborhoods, reduce public input, lack of public outreach, should only address the MacArthur project and not be for all future school sites. She did not feel ACPS should be granted special exception.

Matt Heckel, of 2503 Taylor Avenue, Alexandria, asked questions about how the proposed text amendment would affect development at George Mason Elementary School, which is he is a neighbor. He spoke about how he needed to obtain approval of a SUP to rebuild his home, and that ACPS should have to do the same.

On a motion by Commissioner Koenig, and seconded by Commissioner Lyle, Chair Macek closed the public hearing on a vote 6-0.

Chair Macek asked staff to address Mr. Heckel's questions regarding the FAR for George Mason. ACPS Representative Erika Gulick confirmed includes the adjacent park, which is undevelopable due to the POS zoning but is included in the calculations for FAR. Chair Macek also asked if the inclusion of affordable housing on a school site would require approval of a SUP. Staff said that multi-family affordable housing could only apply for a SUP if the base zoning allowed for that use.

Commissioner Brown began the commissioner discussion with a proposal to change the zoning text by keeping the text language as it currently standing and adding or no greater than 0.75 when the property line of the school is shared with a City park. While he agreed with the public speakers that there was not enough public input, he disagreed with comments made that the text amendment is a power grab by the City or an effort to conceal. Commissioner feels that the increase in school densities should be reviewed on a case by case basis, and the public should be included in that analysis to understand why the amendments are being made. He believes that due to concerns with the impacts of the text amendment to other school properties and neighborhoods, limiting the language to largely address the Douglas MacArthur school proposal would allow that project to continue the process and staff could bring back another text amendment proposal when more information can be provided.

Commissioner Koenig agreed with Commissioner Brown's comments. He felt there is a fundamental need to address future school projects, but also more analysis needed, and supported Commissioner Brown's proposal.

Commissioner Lyle commented on the confusion of using FAR to determine design envelope. She spoke to the extent of community meetings for the MacArthur project, and anytime there is a school project, ACPS conducts community outreach to include the public in decisions. Commissioner Lyle sees the importance of this text amendment to move forward and is willing to compromise with Commissioner Brown's proposal if the rest of the Commission agreed.

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Vice Chair McMahon expressed her concerns with the proposed text amendment allowing an increased by-right FAR, and school projects reviewed and approved through a DSP process. She addressed the concern that there would not be community engagement with school proposals, which would not be loss with the proposed text amendment, and the concern of projects only being decided on by the Planning Commission. She was not concerned by the fact the text amendment did not include a FAR maximum, as the SUP review process that goes to City Council would work to design a school to the site and neighborhood, more than meeting a FAR, agreeing with Commissioner Lyle's comments.

Chair Macek felt more analysis and community outreach was needed and may have been addressed if the text amendment had not been delayed to the pandemic. He discussed the complexity of applying FAR to different sites and lack of space for school sites. The City should work to accommodate their schools but felt the as an important protection to the neighborhoods that a DSUP should be required for any increased development beyond the existing neighborhood zoning FAR, with final approval by the City Council. Chair Macek made suggestions for different options of how address the text amendment while also allowing the MacArthur project to proceed and thought Commissioner's proposal was supportable with some modification to address future school construction.

Commissioner Koenig agreed with Commissioner Lyle and Vice Chair McMahon's comments regarding the limitations of FAR for school projects. He also has concern with the increase to the by-right FAR, feeling that any increases to school size should be approved by the City Council and School Board, and the design of smaller projects is no less important to design and neighborhood impact than larger projects. Commissioner Koenig says he would agree to a text amendment which would allow for the MacArthur project to proceed while acting as a placeholder until a revised text amendment is brought back after further evaluation of other options and community outreach. He tasked ACPS to provide long-range information on what each school site will need to help direct the text amendment discussion.

Commissioners then discussed different options to revising the text amendment language proposal in a way that would allow that evening's school project to proceed, but would not result in significant change so staff could do further analysis and public outreach, and a refined text amendment could be brought back at a later time.

## **I. Issue**

The proposed zoning text amendment seeks to modify the allowable density for public schools located in a residential or mixed-use zone.

## **II. Background**

This amendment is part of the overall effort to more closely align the Zoning Ordinance with current planning strategies and emerging principles. This text amendment also follows the previous Practical Update where staff has recommended practical updates to streamline and modernize the zoning regulations of the City.

School enrollment has been growing significantly over the last several years and is expected to continue to grow in the foreseeable future. Since 2007, ACPS has faced rapid increases in enrollment and projects continued growth in its student population through FY 2029 – reaching over 18,000 students by that time.

The high school population itself is anticipated to reach 5,000 students within the next five years (current capacity of T.C. Williams King Street campus is 2,900 students, but existing enrollment is well above that).

Existing school facilities, most of which were constructed prior to 1960, are over capacity and require a relatively high level of maintenance and repair expenses just to keep basic systems operating and structures safe and sound.

ACPS is pursuing a modernization plan in order to address capacity issues, building conditions (aging facilities), educational inadequacy (buildings that do not meet current standards for learning environments), including planning for flexibility to address potential future fluctuations in enrollment (Modernization also means potential rebuilds).

In particular, ACPS is planning for multiple modernization / capacity projects in the next ten years, including but not limited to, Douglas MacArthur (currently before Council), George Mason, Cora Kelly, and Matthew Maury elementary schools.

ACPS is working on addressing this issue by either expanding existing schools or building new schools. However, ACPS is limited as to where new schools can be built due to the cost to purchase additional property and limited inventory of properties in Alexandria that are large enough to accommodate a new school. For these reasons ACPS is focusing on redeveloping properties they control and, in some cases, increasing capacity by replacing older schools with larger new ones.

City staff have studied elementary school sites located in residential districts to determine the extent these schools may require zoning amendments to support increased capacity. Staff quickly determined that several schools would need to receive approval for a larger floor area ratio (FAR) than is currently permitted under existing residential zoning or Zoning Ordinance Section 7-2100, which allows schools a 0.6 FAR with an SUP. ACPS has indicated that the average size of a new elementary school is approximately 150,000 square feet. Based on this information staff created the table below summarizing which school sites would require a change to the permitted FAR in order to expand an existing school or replace it with a larger school building. Six school sites would exceed the current FAR limit.

**III. Discussion of Proposed Text Changes**

Elementary School	Zone	FAR for a 150,000 sf School (Existing to Needed FAR)
Charles Barrett	R8	.42 to <u><b>1.0</b></u>
Mount Vernon	R2-5	.53 to <u><b>.75</b></u>
Lyles-Crouch	RM	.75 to <u><b>1.7</b></u>
John Adams	R12	.41 to .43
Cora Kelly	RB /POS	.35 to <u><b>.76</b></u>
Matthew Maury	R5	.45 to <u><b>.88</b></u>
George Mason	R8	.13 to .37
James Polk	R12 / R20	.14 to .26
William Ramsay	RA / R12	.31 to .45
Douglas MacArthur	R8	.27 to <u><b>.71</b></u>
Jefferson-Houston	RB	.45 (new school)
Patrick Henry	R12	.27 (new school)
		<u><b>.00</b></u> = FAR in excess of 0.6

The proposed text amendment seeks to modify Section 7-2100 to allow additional FAR for public schools. This code section currently allows public school uses to increase the FAR to 0.6 with a special use permit. Many of the ACPS schools exist in low density residential neighborhoods where the zoning standards are geared toward single family homes with low FAR limits. The current standard allows schools where the zoning limits the FAR to no more than 0.3 to seek an increase in the FAR to 0.6 with a special use permit.

However, staff has determined that even the 0.6 increase is not enough for the planned expansion of several existing school sites. Thus, staff proposes to amend Section 7-2100 to increase the current upper limit of the FAR from 0.6 to 0.75. This would still be subject to a special use permit. The height of 60 feet will remain *unchanged* as it allows a reasonable height suitable for ACPS's needs. Much of the density is expected to go into increasing one story schools up to three stories which would be well within the 60-foot height limit. Adding floor levels as opposed to expanding schools at one or two levels will also allow for maximum retention of open space for outdoor play and recreational activities and facilities.

The proposed amendment would allow at least three elementary schools that may need the FAR for expansion or replacement to do so. Though staff would have preferred a larger number than 0.75 to capture all the school sites, input from the public and Planning Commission demonstrated a level of discomfort in supporting a larger increase. Instead it was recommended by the Planning Commission that Planning staff continue to study this issue and return early next year with an update and recommendation.

The specific text change proposed is shown below:

**Sec. 7-2100 Increased density and height for public elementary and secondary schools.**

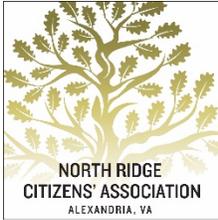
*Notwithstanding any contrary provision of this ordinance, a public elementary or secondary school, located in a residential or mixed use zone, may be constructed, expanded or reconstructed to a size which exceeds the density and height otherwise permitted by the regulations in such zone; provided, that a special use permit is approved, and, provided further, that no increase in floor area ratio greater than ~~.60~~ 0.75, and no increase in height greater than 60 feet, shall be approved.*

**Note:** *New text is underlined  
~~Deleted text is shown with a strikethrough~~*

**IV. Recommendation**

- Staff recommends that the text amendment be initiated and recommends approval of the Zoning Ordinance text changes. The additional FAR will:
  - Permit ACPS to expand school capacity at current school locations without having to purchase additional property;
  - Allow ACPS to meet current educational specifications;
  - Support the implementation of the Long Range Educational Facilities Plan endorsed by City Council.

Staff: Robert M Kerns, AICP, Division Chief, Development  
Dirk H. Geratz, AICP, Principal Planner, Development



August 19, 2020

ATTN: Alexandria Planning Commission  
c/o Mr. Dirk Geratz, Chief Planner  
301 King Street  
Alexandria, VA 22314

**Re: Docket Item Unfinished Business (September 1, 2020) - Zoning Text Amendment #2019-00007**

Dear Mr. Geratz and Members of the Planning Commission:

Thank you to the Planning Commission staff for providing a summary of Zoning Text Amendment #2019-00007 to the North Ridge Citizens' Association (NRCA). We appreciate your office's outreach efforts. Based on the various summary inputs supplied to our organization, NRCA's George Mason Community Task Force and its advisers have reviewed the proposed text amendment to Section 7-2100 and we strongly urge the Commission to recommend that the City Council reject this proposal.

**SUMMARY OF NRCA'S POSITION ON THE PROPOSED AMENDMENT TO SECTION 7-2100**

We recognize that Alexandria City Public Schools (ACPS) needs to enlarge and modernize school buildings across the City to accommodate the growth in the student population and to help address the more than \$230 million in deferred school building maintenance which has accrued, but these needs can be effectively accommodated under the current zoning framework. There is no adequate justification for amending Section 7-2100 to: (1) authorize very large increases in the floor to area ratio ("FAR") of schools *by right* – without mandating approval of those increases under the Special Use Permit hearing process; and, (2) exempt public schools from *any maximum* on the ratio of the floor area of the school building to the lot area.

Furthermore, no such zoning amendments are necessary in order to proceed with the Development Special Use Permit (DSUP) for the MacArthur Elementary School modernization project and other school building enlargements. The submitted DSUP application for MacArthur seeks approval for a new school building with a height of 46 feet and 0.65 floor to area ratio as part of the September 1 docket. With respect to the proposed height, Section 7-2100 already authorizes approval of schools up to 60 feet in

height pursuant to the SUP process. The existing standards are adequate to determine, after public hearings, whether the proposed 46-foot height is appropriate for the neighborhood.

With respect to the proposed floor to area ratio, the MacArthur school plan does exceed the 0.60 maximum established by Section 7-2100. Even if the City were convinced that the additional 0.05 FAR requested in the application is actually essential to the modernization of the school, it would only need to amend the existing floor to ratio maximum in Section 7-2100 from 0.60 to 0.65. Eliminating *any* ceiling on FAR and SUP requirements for large deviations from neighborhood density standards is *unnecessary*.

Adoption of the proposed amendment will result in adverse impacts on residential communities across the City of Alexandria which cannot justify any potential benefits to fast-tracking school building density decisions to potentially unlimited proportions.

The proposed amendments should be rejected for the following reasons:

**OBJECTION 1**

***The elimination of the Special Use Permit process for large deviations from neighborhood density standards now required by Section 7-2100 would undermine the core purposes of the zoning ordinance.***

A central purpose of the City’s zoning ordinance is to “protect the established character of existing residential neighborhoods.” (Section 1-102 (B)). That goal has long been advanced by establishing zones “to provide *and maintain* land areas for *low density* residential neighborhoods of single-family homes.” (See Section 3-301, describing the purposes of the R-8 zone.) In order to protect the “low density” and “character” of these residential neighborhoods, the regulations for these zones only give the School Board the right to build schools that conform to the floor to area ratio that governs all buildings located in the residential zone. (See *e.g.* Section 3-306(B) - establishing a uniform FAR maximum of 0.35 for all types of buildings located in the R-8 zone).

In 2004, Section 7-2100 was adopted to allow some leeway to build larger, taller schools subject to important limitations. Under that section, the School Board was given flexibility to exceed the standard limits on building height and FAR in that zone – subject to a fixed maximum – so long as the deviations are authorized pursuant to the standards and procedures established by the Special Use Permit process.

As the City recognized in adopting Section 7-2100, the Special Use Permit standards impose important constraints on the design process that serve to protect the character and density levels of the City’s single-family residential neighborhoods. An SUP can only be granted under Section 11-501 if the building “will be designed and operated” “so as to “avoid, minimize or mitigate any potentially adverse effects” on “the neighborhood as a whole or other properties in the vicinity.” In addition, a building that is “injurious to property... in the neighborhood” or that does not “substantially conform to the master plan of the City” cannot be approved under Section 11.504(A).

Of great importance here, these determinations must be made by the Planning Commission and the City Council after the conclusion of a full public hearing on the issues. Section 11-504(B) establishes a broad range of factors that can be considered in the hearing process, including whether the “height, mass and scale” of the building will “dominate the immediate vicinity,” whether it will “destroy” or “damage” any “significant... physical features of the site” and whether it will “increase the hazard to adjacent property from flood, increased run off or water damage.” The SUP process also protects the neighborhood by authorizing the City Council to impose “conditions and restrictions” on the project that serve to mitigate any adverse effects from authorizing the increased density (Section 11-505).

The procedures and substantive standards required by the SUP process have a very concrete impact on the scale and design of school buildings that can be approved. Notably, the recent modernization of the Patrick Henry school (DSUP16-0009) resulted in a new school building with 47.33 feet in height, which exceeded the by right standard of 40 feet for its R-12 residential zone, but did not seek an SUP for the proposed FAR of the building. The FAR for the new school was only .26, which conformed to the 0.30 FAR that applied to all buildings in its R-12 zone (p. C1).

In granting the 7.3-foot increase in height for Patrick Henry, the City determined that the added height would not be “injurious to property in the neighborhood.” The staff relied heavily on the fact that the building design used “tapered massing” so that “the height transitions from three stories to one story to integrate with the mass and scale of neighboring structures.” (See Staff Report DSUP #2016-0009; p. 14-16). It also emphasized that the school was built into a slope that would “help reduce the perceived height of the building” (p. 16).

What might have happened if Section 7-2100 had not required a SUP process when Patrick Henry was modernized? The proposed amendment allows for enormous increases in the FAR by allowing for jumps from the .25 and .35 limits to .60 or more. Would ACPS still have proposed the tapered building heights at Patrick Henry that assuaged concerns about the mass of the building? ACPS could have designed the school to exceed the FAR otherwise required for all buildings in its R-12 zone by 100 percent *without seeking any approval under the SUP process*. This represents a significant deviation from the prevailing density and scale in single-family residential neighborhoods. There is no basis to distinguish between the approval process for substantial deviations from neighborhood standards for height versus FAR. Neither should be allowed without the protections afforded by the SUP approval process on a case-by-case basis.

As the Virginia Supreme Court recognized in *Board of Supervisors v. Southland Corporation*, 224 VA 514, 521 (1982), it is appropriate for Virginia localities to require an SUP for uses which will have “a potentially greater impact upon neighboring properties or the public than those uses permitted as a matter of right.” The Court emphasized that the SUP provides important protections for the public because it requires “governmental scrutiny in each case” so as to “insure compliance with standards designed to protect neighboring properties” and allows for the imposition of “limitations and conditions” to mitigate adverse effects. The Planning Commission should not approve the elimination of the community’s right to a public

hearing and effective mitigation measures for large deviations from the prevailing floor to area ratio for schools built in low-density neighborhoods.

## **OBJECTION 2**

***The elimination of the Section 7-2100 mandatory maximum on the floor to area ratio (FAR) of public schools built in residential neighborhoods represents a radical and unsound departure from the City's well-established zoning rules.***

As set forth, Section 7-2100 grants the City discretion to allow a maximum FAR of 0.60 for school buildings constructed in residential neighborhoods subject to SUP standards. This discretionary level of density is already 100 percent higher than the maximum FAR for residential lots in the R-12 zone. The mandatory maximum accordingly serves to protect the character of the residential neighborhood, which is a core purpose of the zoning ordinance, by prohibiting even greater deviations from the scale of the neighborhood. The proposed amendment, however, would eliminate *any maximum FAR* for schools built in our city's residential neighborhoods. In other words, the City would be given the discretion to consider approval of a school designed to cover every inch of the lot.

From the standpoint of the City's zoning law, this change would constitute a dramatic departure from the prevailing use of mandatory FAR maximums to regulate density in the City. Mandatory maximums on floor to area ratio are not limited to Alexandria's single-family residential zones. They are, in fact, ubiquitous in local zoning ordinance. In the "mixed use" zones regulated by Article V of the ordinance, for example, every permissible use listed in Section 5-105 includes a maximum FAR even when a SUP is required for the development. Even the RC/High Density Apartment Zone establishes a maximum FAR of 1.25 in Section 3-906. The use of mandatory FAR maximums is a key element of regulatory limits on density. There is accordingly no reason why schools built in residential neighborhoods – which are designed to be the least dense areas of the City – should suddenly be exempt from this core regulatory constraint.

It also bears emphasis that the City's zoning ordinance affords special importance to the provisions establishing a maximum height and a maximum floor to area ratio for school buildings and other developments. Many of the limitations established in the zoning ordinance, such as minimum setbacks, are subject to "modification" upon application by the owner of a development under Section 11-416 (See MacArthur Elementary application on the docket seeking the elimination of a 45-foot rear yard setback). The maximum limit on FAR, however, is viewed as so central to our land use planning that Section 11-416 removes any discretion from the Planning Commission to grant relief from any FAR maximum. Yet the proposed amendment would give the City authority to permit construction of a public school building *no matter how extreme its floor to area ratio*. Keep in mind, a central purpose of the zoning ordinance is to "protect against the... overcrowding of land" (Section 1-102(I)).

In the case of the George Mason Elementary modernization project, consultants retained by ACPS advised earlier this year that the new school should be 100,815 square feet, representing a floor to area ratio of

0.25 – a size that would not even require a special use permit under the existing terms of Section 7-2100. [See report submitted to Alexandria School Board, January 2020; p. 7, 9.] The proposed amendment would nevertheless allow ACPS to potentially fill the entire 9.4-acre parcel with its school building.

### **Objection 3**

**The proposed amendments to Section 7-2100 conflict with provisions of the Master Plan requiring policies that promote preservation of low density and open space in single-family home neighborhoods, such as North Ridge/Rosemont.**

Virginia law requires the City to adopt a “comprehensive plan” for the “purpose of guiding and accomplishing a coordinated, adjusted and harmonious development” of the city (VA Code Section 15.2-2223(A)). Alexandria’s Master Plan incorporates a series of “Small Area Plans” that establish the principles that govern land use and zoning regulations in residential neighborhoods. The North Ridge/Rosemont Small Area Plan is illustrative. The Plan unequivocally establishes that the “goals of this plan are to protect and preserve existing residential areas” by protecting the “density and scale” of the “existing residential areas,” and “[e]nsur[ing] preservation of existing open space” (p. 26). These overarching principles are also incorporated into the Citywide chapters of the Master Plan. For example, the Master Plan establishes that one of the five goals of the plan is to “preserve and increase parkland... and open space” and that “nonresidential development adjacent to 1 or 2 family housing areas *should be limited to low density, low scale (say 3 ½ story) uses*” (p. 1-2). Compliance with this plan is not optional. The Virginia Code requires that no “public building... shall be... authorized” unless the “location” and “character” of the building is “substantially in accord” with the City’s comprehensive plan (VA Code Section 15.2-2232(A)).

The Small Area Plan itself establishes on its opening page that its purpose is to “serve as the basis for future City Council... actions affecting land use [and] zoning” in the North Ridge area. This plainly means that the City should not adopt amendments to the zoning ordinance that undermine the goals of the Master Plan.

The proposed amendment would nevertheless *eliminate any cap whatsoever* on the floor to area ratio for a school built on the George Mason Elementary site, even though the rest of the R-8 neighborhood is subject to a maximum FAR of 0.35. In other words, Section 7-2100 would potentially authorize the City to approve a school building 60 feet in height that occupied every inch of the site. It is no answer that the City would be unlikely to approve such a proposal under the SUP process (which would be required for buildings that exceed a .60 FAR). Maximum FAR is a core method of controlling “density and scale” and preserving open space – the central objectives of the Small Area Plan for residential neighborhoods.

### **Objection 4**

**The proposed amendments potentially undermine the City’s commitment to the preservation of recreational and open space in its Long Range Educational Facilities Plan.**

The City has unequivocally committed itself to the preservation of open space for the use of our schools and the broader residential community. With respect to schools, Section 3.2 of the 2010 Department of Education Guidelines establishes that a public elementary school in Virginia should provide adequate open space on its campus for outdoor physical education programs. In 2015, ACPS and the City issued its Long Range Educational Facilities Plan and adopted the goal of “meeting the [DOE] guidelines” governing the size of a campus needed for educational and recreational purposes (3.12). The Plan emphasizes that the campus must be large enough, because it is “important for students to recreate, have access to explore nature, and learn in an outdoor class room.” With respect to the neighborhood, the Long Range Plan further confirms that the ACPS goal is “no net loss of usable open space for the community” (3.12) and stresses the need to “maximize community use” of the “recreation program space” (3.13).

The zoning rules now embodied in Section 7-2100 represent an important method of promoting compliance with these open space requirements for school campuses. By requiring a SUP for large deviations from the neighborhood density and limiting the floor to area ratio to a maximum of 0.60, the rules effectively promote the preservation of open space. The proposed amendments, on the other hand, would authorize the potential loss of vast portions of the little open space remaining on school campuses in Alexandria. According to the Planning staff, it would impact up to 12 ACPS sites.

We recognize that ACPS and the Planning Commission still value open space and that proposals under the new amendment would hopefully seek to preserve open space for students by “stacking it” onto underground parking garages and other means, despite the elimination of the maximum FAR in Section 7-2100. But the purpose of a maximum FAR is to protect the public by eliminating any discretion to exceed reasonable limits on density that serve to protect open space. If the City is committed to the protection of open space, then it should not award itself the statutory authority under the proposed amendment to automatically double the FAR of a school, or to eliminate any maximum FAR whatsoever.

#### **Objection 5**

#### **The proposed amendments undermine achievement of the City’s environmental policies.**

Not long ago, the City prized protection of the environment over the quest for ever-increasing density. It proudly invested substantial resources towards comprehensive environmental plans to preserve the dwindling urban forest canopy and protect groundwater quality through dedicated stream and channel maintenance. There has never before been any suggestion that public schools should be exempt from these commitments. To the contrary, the Long Range Education Facilities Plan expressly adopts a policy to “maximize canopy coverage” and seeks to “fulfill the goals of the Urban Forestry Master Plan” (3.13). The City’s Master Plan in turn requires preservation of existing trees “to the maximum extent feasible.”

Sadly, these documented assurances ring hollow when the City seeks to amend Section 7-2100 to eliminate the cap on floor to area ratio in residential and mixed-used zones. *The authorization of larger buildings inevitably authorizes the destruction of more trees.* This is a serious concern for the North Ridge

community, which runs a dedicated Tree Canopy Restoration Program through its civic association, which the City has acknowledged through award recognition.

The George Mason Elementary School site, by way of example, is characterized by “remnant forest groves,” including Pignut Hickory trees that are designated City co-champions (March 2014 Natural Resources Technical Report 14-1; p. 8). If ACPS is given the *right* to increase the size of a school on the site by 70 percent without SUP approval under the proposed amendment, will it still be “feasible” to preserve these irreplaceable groves? If the City someday determines in its discretion that a huge school building on the George Mason site with a FAR of 2.0 is more necessary than the remnant forest groves, would the community have any meaningful legal recourse?

Large increases in the authorized density of schools in residential neighborhoods not only threaten the urban canopy, they also substantially increase the risk of flooding and detrimental groundwater flows. The George Mason Elementary site again provides an excellent example of the need to retain existing limits on the density of school buildings in residential neighborhoods. The City has recognized that the open athletic fields now found on the site – which would also be threatened by authorization of increased density—are “important for groundwater infiltration and recharge, as well as protecting water resources and waterways downslope” (March 2014 Natural Resources Technical Report 14-1; p. 8).

## **CONCLUSION**

The City has not offered a sound justification for removing the critical protections now afforded by Section 7-2100. It promotes compliance with our land use plans to preserve community open space, to save our remnant forests and to protect the character of low-density residential neighborhoods. The City does not need to eliminate any maximum on the floor to area ratio of City schools. Other buildings in the City remain subject to a maximum FAR. Schools should be, too. The City also does not need to abrogate the current requirement for public SUP hearings and approvals when ACPS wants to build schools with a much higher FAR than any other buildings in existing surrounds. The SUP process imposes important constraints on the design process, it has worked well and it should be retained for large deviations from neighborhood density – whether attributable to increased height or to FAR. ACPS modernization projects can be achieved under the existing framework, or with modest changes to maximum FAR in Section 7-2100. We accordingly urge the Commission to reject the proposed amendment.

Sincerely,

***Chuck Kent***

Chuck Kent, President

North Ridge Citizens’ Association (NRCA)

cc: City Council, Wilmer Hale, LLC

**[EXTERNAL]Zoning Text Amendment #2019-00007**

Katy Matthews <matthews.katy@gmail.com>

Thu 8/27/2020 9:39 AM

To: PlanComm <PlanComm@alexandriava.gov>

Dear Planning Commissioners,

I write in support of the Staff's recommendations regarding the Increased Density for Public School Sites. With the increase of school enrollment and the city's dated and dilapidated school buildings, this permit is needed for our city to thrive.

Thank you for your consideration,

Katy Matthews 707 N Paxton St, Alexandria, VA 22304

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Katy G. Matthews

[matthews.katy@gmail.com](mailto:matthews.katy@gmail.com)

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## [EXTERNAL]Zoning Text Amendment no. 2019-0007 - Comments of the Rosemont Citizens Association

Jol A.Silversmith <jol@thirdamendment.com>

Fri 8/28/2020 7:53 AM

To: PlanComm <PlanComm@alexandriava.gov>

Cc: Karl Moritz <Karl.Moritz@alexandriava.gov>; Robert Kerns <robert.kerns@alexandriava.gov>; Dirk Geratz <Dirk.Geratz@alexandriava.gov>



**ROSEMONT  
CITIZENS  
ASSOCIATION**

August 29, 2020

To the Planning Commission:

I write on behalf of the Board of the Rosemont Citizens Association (RCA). We understand that the Planning Commission at its September 1 meeting will consider an amendment (no. 2019-0007, to section 7-2100 of the zoning ordinance) that would allow greater density on school sites throughout Alexandria, under some circumstances without even a special use permit.

The RCA recognizes that to balance the demand for additional school capacity and the lack of space for new schools in Alexandria, in some cases increased density may be necessary. But this amendment would allow significant projects to proceed without public input - nor does it provide any assurance that the extra density would not be used for non-core purposes, such as housing. There is simply no justification for authorizing ACPS projects to proceed in the shadows; the current ordinance should remain as-is, to ensure that they can be fully scrutinized by neighborhood and other stakeholders.

The RCA understands that other civic organizations, such as the North Ridge Citizens Association, also have submitted or will submit comments to similar effect.

Additionally, the RCA is compelled to note that the staff report is deficient in that it does not include sufficient information needed to evaluate its findings and recommendations. The report notes that certain school modernization/capacity plans are anticipated in the next decade, including for Matthew Maury Elementary School in Rosemont. But there is no mention of which, if any, of these projects is actually expected to require extra density. Moreover, the staff report states that the amendment would apply to 12 of 18 existing ACPS properties, but fails to identify them. Simply put, the Planning Commission cannot do its job, and citizens cannot adequately evaluate and provide input on proposed changes to ordinances, if staff reports lack basic and important information. Apart from the policy issues discussed above, the current proposal also should be rejected because there is not an adequate record for review.

Best regards,

Jol Silversmith  
President, RCA

**[EXTERNAL]Proposed Zoning Text Amendment for School Density - Docket Item #9**

carol taylor <rcdt-va@msn.com>

Mon 8/31/2020 11:11 AM

To: PlanComm <PlanComm@alexandriava.gov>

I am a resident of North Ridge and I urge the Planning Commission to deny the proposed zoning text amendment for school density (Docket Item #9). I support the position and analysis of the North Ridge Citizens' Association. Thank you.

Carol Taylor

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**[EXTERNAL] Proposed Zoning Text Amendment for School Density - Docket Item #9**

Cari Hearn <Chearn@aba.com>

Mon 8/31/2020 1:26 PM

To: PlanComm <PlanComm@alexandriava.gov>

Hello –

I am a resident of North Ridge and I urge the Planning Commission to **deny** the proposed zoning text amendment for school density (Docket Item #9). I support the position and analysis of the North Ridge Citizens' Association. Thank you.

Cari & Patrick Hearn  
3103 Old Dominion Blvd

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**[EXTERNAL] Proposed Zoning Text Amendment for School Density - Docket Item #9**

Geoff Chester <gchester@comcast.net>

Mon 8/31/2020 10:46 AM

To: PlanComm <PlanComm@alexandriava.gov>

I am a resident of North Ridge and I urge the Planning Commission to deny the proposed zoning text amendment for school density (Docket Item #9). I support the position and analysis of the North Ridge Citizens' Association. Thank you.

Geoff Chester  
2417 Taylor Avenue  
Alexandria VA 22302

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**[EXTERNAL]Proposed Zoning Text Amendment for School Density - Docket Item #9**

Judy M. <mcjude@hotmail.com>

Sun 8/30/2020 1:07 PM

To: PlanComm <PlanComm@alexandriava.gov>

I am a resident of North Ridge and I urge the Planning Commission to deny the proposed zoning text amendment for school density (Docket Item #9). I support the position and analysis of the North Ridge Citizens' Association. Thank you.

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**[EXTERNAL]Proposed Zoning Text Amendment for School Density - Docket Item #9**

Laurie Rackas <lrackas1@gmail.com>

Mon 8/31/2020 12:54 PM

To: PlanComm <PlanComm@alexandriava.gov>

I am a resident of North Ridge and I urge the Planning Commission to deny the proposed zoning text amendment for school density (Docket Item #9). I support the position and analysis of the North Ridge Citizens' Association. Thank you.

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**[EXTERNAL]Proposed Zoning Text Amendment for School Density - Docket Item #9**

Meghan Rainey <raineymeghan@gmail.com>

Sun 8/30/2020 12:11 PM

To: PlanComm <PlanComm@alexandriava.gov>

I am a resident of North Ridge and I urge the Planning Commission to deny the proposed zoning text amendment for school density (Docket Item #9). I support the position and analysis of the North Ridge Citizens' Association. Thank you.

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August 30, 2020

ATTN: Alexandria Planning Commission  
301 King Street  
Alexandria, VA 22314

**Re: Docket Item #9 (September 1, 2020) - Zoning Text Amendment #2019-00007**

Dear Chair Macek and Members of the Planning Commission:

We urge the Planning Commission to deny the proposed zoning text amendment for school density (docket item #9) on September 1st. We support the analysis and conclusions supplied by the North Ridge Citizens' Association (NRCA). Additionally, we concur with the Rosemont Civic Association commentary that the staff report is largely deficient, and does not adequately support the proper evaluation of many of the claims and objectives that it references.

No one can argue that we don't need more school capacity in Alexandria. Larger schools stacked higher and wider may be a necessary long-term approach given the lack of surplus ACPS property and our growing school population, but we should retain our case-by-case review process, which ensures that significant increases in building size meet the character and needs of the neighborhoods they serve.

If approved, this proposal would give the city automatic allowance to build new schools with a FAR of .60 "by right," without a public hearing – even though such buildings could be more than double the size of any surrounding structures in low-density residential neighborhoods. For example, in an R20 zone that currently limits FAR to .25, this would allow for more than double the bulk.

A city council member indicated to us that the proposal would assist new school building projects in high-density areas, such as Landmark, Eisenhower and Potomac Yard. Yet as drafted, this change would also impact ACPS sites in single-family housing areas – where low-density zoning restrictions under the city's own Master Plan have served to protect and preserve what little remains of dwindling community open and green space areas.

There is simply no justification for doing away with a maximum limit for school building FAR, nor do we understand why schools would be altogether exempt from the same zoning rules that apply to other surrounding buildings.

In reviewing city approval applications for recent school building projects, the city has routinely approved school designs that satisfied “by right” zoning requirements. In practical terms, if the City moves ahead with this proposal, citizens will have little recourse to prevent the allowable doubling of school size.

There is also no assurance that the city wouldn’t take advantage of its expanded authority to seek potentially controversial uses for school buildings that go beyond the core educational mission of ACPS, such as the collocation of housing with schools.

We need to think creatively about ways to maximize space and services for our schools. As Alexandria continues to grow within its confined boundaries, it is more important than ever to involve residents in school zoning decisions and to maintain the process protections that exist for neighborhoods.

If the city is truly seeking a zoning change to help build bigger schools in higher-density areas of the city, why not seek a less sweeping modification of the zoning code to apply more narrowly to such projects?

In summary, the Commission should reject the proposed text Amendment for Zoning Code Section 7-2100 and retain the important constraints and limits that exist regarding school building design and approval. ACPS modernization projects can still be achieved with more reasonable and moderate changes to code.

Sincerely,  
Mr. John Fehrenbach, NRCA Vice President  
Mr. Lyn Gubser, Past President, NRCA  
Ms. Meghan Rainey, Past President, NRCA  
Ms. Kay Stimson, Past President, NRCA

**[EXTERNAL]Proposed Zoning Text Amendment for School Density - Docket Item #9**

Ronnie Yoder <ryhonron862@gmail.com>

Sun 8/30/2020 1:11 PM

To: PlanComm <PlanComm@alexandriava.gov>

Cc: ryhonron862@gmail.com <ryhonron862@gmail.com>

I am a resident of North Ridge and I urge the Planning Commission to deny the proposed zoning text amendment for school density (Docket Item #9). I support the position and analysis of the North Ridge Citizens' Association. Thank you. Ronnie A. Yoder

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**[EXTERNAL]Proposed Zoning Text Amendment for School Density - Docket Item #9**

Sarah Esser <sarahesser01@icloud.com>

Mon 8/31/2020 11:12 AM

To: PlanComm <PlanComm@alexandriava.gov>

I am a resident of North Ridge and I urge the Planning Commission to deny the proposed zoning text amendment for school density (Docket Item #9). I support the position and analysis of the North Ridge Citizens' Association.

Sarah Esser  
Norris Place.

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**[EXTERNAL]Proposed Zoning Text Amendment for School Density - Docket Item #9**

Suzanne Hellmann <snhellmann63@gmail.com>

Sun 8/30/2020 7:12 PM

To: PlanComm <PlanComm@alexandriava.gov>

I am a resident of North Ridge and I urge the Planning Commission to deny the proposed zoning text amendment for school density (Docket Item #9). I support the position and analysis of the North Ridge Citizens' Association. Thank you.

Suzanne Hellmann  
3310 Old Dominion Blvd.

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**[EXTERNAL]Objection to Proposed Zoning Text Amendment for School Density -  
Docket Item #9**

William J. Friedman <pedlarfarm@gmail.com>

Mon 8/31/2020 10:18 AM

To: PlanComm <PlanComm@alexandriava.gov>

I am a homeowner and resident of North Ridge and I urge the Planning Commission to deny the proposed zoning text amendment for school density (Docket Item #9). I support the position and analysis of the North Ridge Citizens' Association. I also believe the procedural practices of the City administration and the substantive outcome sought are in conflict with controlling Virginia law. Thank you.

William J. Friedman

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**[EXTERNAL]Reject the proposed text Amendment for Zoning Code Section 7-2100 - Let's protect open and green space - Let's work towards a reasonable process for contemplating larger schools**

Laura Humphrey <lauraphumphrey@gmail.com>

Mon 8/31/2020 4:55 PM

To: PlanComm <PlanComm@alexandriava.gov>

Cc: Stephen Humphrey <shumphrey@cameronllp.com>; Laura Humphrey <lauraphumphrey@gmail.com>

Good afternoon,

**Let's be sure our city protects and preserves what remains of dwindling community open space and green space for the benefit of all residents of Alexandria.**

We strongly urge you to reject the text amendment to Zoning Code Section 7-2100. Instead, let's find a reasonable approach for the consideration of larger schools.

Below is the statement submitted by Kay Stimson, Meghan Rainey, and Lyn Gubser on behalf of our neighbors and supporting the North Ridge Citizens' Association recommendation to reject the changes that would fast-track zoning approvals.

We strongly agree with the position stated below.

Please reject this proposed text Amendment.

Thank you for your consideration.

Laura and Stephen Humphrey, 321 Mansion Drive, Alexandria VA 22302

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**City Should Deny Proposed Amendment for School Zoning Decisions**

The Alexandria Planning Commission will consider a proposal on September 1 to fast-track zoning approvals for larger new school buildings, while eroding major protections that normally come with such projects. We support the North Ridge Citizens' Association recommendation to deny these changes.

No one can argue that we don't need more school capacity in Alexandria. Larger schools stacked higher and wider may be a necessary long-term approach given the lack of surplus ACPS property and our growing school population, but we should retain our case-by-case review process, which ensures that significant increases in building size meet the character and needs of the neighborhoods they serve.

If approved, the latest proposal would give the city automatic allowance to build new schools with a FAR of .60 "by right," without a public hearing – even though such buildings could be more than double the size of any surrounding structures in low-density residential neighborhoods. For example, in an R20 zone that currently limits FAR to .25, this would allow for more than double the bulk.

A city council member indicated to us that the proposal would assist new school building projects in high-density areas, such as Landmark, Eisenhower and Potomac Yard. Yet as drafted, this change would also impact ACPS sites in single-family housing areas – where low-density zoning restrictions under the city's own Master Plan have served to protect and preserve what little remains of dwindling community open and green space areas.

There is simply no justification for doing away with a maximum limit for school building FAR, nor do we understand why schools would be altogether exempt from the same zoning rules that apply to other surrounding buildings.

In reviewing city approval applications for recent school building projects, the city has routinely approved school designs that satisfied “by right” zoning requirements. In practical terms, if the City moves ahead with this proposal, citizens will have little recourse to prevent the allowable doubling of school size.

There is also no assurance that the city wouldn’t take advantage of its expanded authority to seek potentially controversial uses for school buildings that go beyond the core educational mission of ACPS, such as the collocation of housing with schools.

We need to think creatively about ways to maximize space and services for our schools. As Alexandria continues to grow within its confined boundaries, it is more important than ever to involve residents in school zoning decisions and to maintain the process protections that exist for neighborhoods.

If the city is truly seeking a zoning change to help build bigger schools in higher-density areas of the city, why not seek a less sweeping modification of the zoning code to apply more narrowly to such projects?

We urge other concerned residents to contact City Council and use Alexandria 311 to urge the Planning Commission to reject the proposed text Amendment for Zoning Code Section 7-2100. Instead, let’s work towards a proposal that includes a more reasonable process for contemplating larger schools, with a clear limit on school density and existing protections for residential zones.

*Kay Stimson, Meghan Rainey & Lyn Gubser are former presidents of the North Ridge Citizens’ Association.*

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Laura Humphrey  
[lauraphumphrey@gmail.com](mailto:lauraphumphrey@gmail.com)

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**Customer Comments:**

I oppose repealing FAR requirements for school construction because it sets a dangerous precedent whose logic could lead to eliminating FAR for other public projects and ultimately private developments as well. If the city deems FAR unworthy of regulation for schools, it will be more difficult to defend its salience for other kinds of developments. Retaining FAR restrictions, which a DSUP could waive, but only after assessing and addressing their impact on nearby properties, is more appropriate. This initiative may be driven by the school board's design for MacArthur School exceeding current zoning. Because the MacArthur School redesign clearly enjoys public support, the existing ordinance should only be "tweaked" to allow a FAR equivalent to that proposed for MacArthur School w/ DSUP.

**Staff Comments:**

Please view the complete case history and details in the Alex311 console and take the appropriate actions to complete this request by the estimated resolution date. **Use the Alex311 Console to contact the customer. Do not forward this email to the customer, or to any City staff who are Alex311 users.**

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**[EXTERNAL]Proposed Zoning Text Amendment for School Density - Docket Item #9**

Cindy Elkins <cindyelkins98@gmail.com>

Sun 8/30/2020 3:39 PM

To: PlanComm <PlanComm@alexandriava.gov>

I am a resident of North Ridge and I urge the Planning Commission to deny the proposed zoning text amendment for school density (Docket Item #9). I support the position and analysis of the North Ridge Citizens' Association. Thank you.

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**[EXTERNAL] Proposed Zoning Text Amendment for School Density - Docket Item #9**

andymimisaunders@verizon.net <andymimisaunders@verizon.net>

Mon 8/31/2020 9:17 PM

To: PlanComm <PlanComm@alexandriava.gov>

Dear Alexandria Planning Commission and City Council officials,

We STRONGLY oppose the proposed text Amendment for Zoning Code Section 7-2100 that is on the Planning Commission docket for September 1st. We believe the current case-by-case review process, which ensures that significant increases in building size meet the character and needs of the neighborhoods they serve, works well and allows input from all concerned citizens. We URGE you to vote against this proposal. We are long-time City of Alexandria residents who have lived in our current Jefferson Park house for 19 years (and previously lived in Beverley Hills for 7 years), have raised 3 children here, and are involved in many aspects of our wonderful, beautiful community. Please listen to our voices, and the voices of our neighbors.

Thank you,  
Andrew and Mimi Saunders  
2511 Clay St.

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August 31, 2020

Planning Commission  
City of Alexandria  
301 King Street  
Alexandria, Virginia 22314

Re: Zoning Text Amendment #2019-00007/Increased Density for Public School Sites

Dear Commissioners:

Thank you for this opportunity to comment on the proposal to fast-track zoning approvals for larger new school buildings. I also thank you for your service on the Planning Commission and to our community.

In 2017, the city adopted a strategic plan for FY 2017 to FY 2022. The vision adopted in the plan embodies the elements which have made Alexandria a special place to live and in which to raise a family:

#### **Alexandria's VISION**

*In 2022, Alexandria is a historic, inclusive city of kindness, with distinct, vibrant and safe neighborhoods, a well-managed government, flourishing arts, culture, and recreation, a strong economy, thriving children and youth, active and secure older adults, environmental sustainability, healthy residents of all ages, and multimodal transportation.*

Perhaps no commission in our city government carries more responsibility in seeing this vision realized than the Planning Commission. The impact of the decisions you make will be felt long after the 2022 target date. As we have seen in other jurisdictions, transformational zoning decisions are often irreversible, and bring with them unintended consequences. How to manage the need to accommodate our city's growing student population could be one such decision.

The strategic plan sets forth a vision and specific goals for our neighborhoods:

#### **Distinctive and Vibrant Neighborhoods**

*In 2022, Alexandria values its history, honors its diverse communities, and respects its distinct, vibrant and walkable neighborhoods. The city has a small-town feel and is committed to sustaining a high quality of life in its urban, suburban and commercial areas. . . Alexandria has complementary and varied architecture and a beautifully built environment, and the City ensures that new development and*

*infill are compatible with the character of Alexandria's neighborhoods, natural environment, and historic resources.*

The Zoning Amendment before the Commission is inconsistent with these visions for our city and our neighborhoods, and will make achieving the benchmarks for public support set forth in the strategic plan less likely, if not impossible.

### **1. Impact on Neighborhoods**

Despite the mandate that the city “ensures that new development and infill are compatible with the character of Alexandria’s neighborhoods, natural environment, and historic resources,” the amendment would permit massive expansion in schools located in single-family housing areas – where low-density zoning restrictions under the city’s own master plan have served to protect and preserve what few open and green space areas remain.

Specifically, the amendment would allow the construction of new schools with a FAR of .60. This represents a significant increase over the FAR in an R20 zone, which is currently limited to .25. The result could be buildings more than double the size of any surrounding structures in such zones, changing the character of neighborhoods and bringing with it traffic and congestion on roads unable to accommodate them.

### **2. Process**

One of the factors that makes Alexandria unique is our community. We are diverse. We are giving. We care about our neighbors. Maintaining that sense of community is not easy. Our city government has traditionally done its part by engaging citizens in the process of government, allowing for, and respecting, the impact of civic associations, and seeking to govern through consensus.

Yet, the Amendment would give the city automatic allowance to build new schools with a FAR of .60 “by right,” and without a public hearing. Residents will have little, if any, ability to prevent permanent changes to their neighborhoods. Conceivably, the City could use this new, expanded authority to implement highly controversial proposals such as the ones that surfaced earlier this year to build housing on top of MacArthur school, and eliminate environmentally sensitive greenspace behind George Mason school.

### **3. Community Support**

Under the goals set forth in its strategic plan, the city government is compelled to seek, maintain and build community support. Specifically, when it comes to neighborhoods, its goals include maintaining “the percentage of residents with a positive view of the overall quality of new development in Alexandria at or above 2016’s 64%,” and “the percentage of residents with a positive view of their neighborhood as a place to live at or above 2016’s 83%.”

The proposed amendment, by giving the city carte blanche to permanently and “by right” alter the character of neighborhoods, and do so without community involvement, will make it less likely, if not impossible for the city to meet these benchmarks for community support.

### **Conclusion**

The proposed amendment has far-reaching and likely permanent implications. It has the potential to impact the lives of Alexandria residents and do so perpetually. It runs counter to the strategic plan’s requirement the city respect its “distinct” neighborhoods and be “committed to sustaining a high quality of life in its urban, suburban and commercial areas.”

A change of this potential magnitude should not be pushed through in the midst of a pandemic where residents are unable to petition the board in person in a public session. Rather, efforts should be undertaken to work with the community to develop a consensus approach to the issues raised by our increasing student population. That is a better way to preserve the sense of community which has for decades defined our city, and to meet the goals set forth in the strategic plan.

Thank you for your consideration of my views.

Regards,

Darryl Nirenberg  
Alexandria, Virginia

**[EXTERNAL]Vote no to zoning ammendment****Beth Clark <bethbclark@gmail.com>**

Tue 9/1/2020 12:08 PM

**To:** PlanComm <PlanComm@alexandriava.gov>

Dear Alexandria Planning Commission and City Council officials,

I strongly oppose the proposed text Amendment for Zoning Code Section 7-2100 that is on the Planning Commission docket for September 1st. The current case-by-case review process, which ensures that significant increases in building size meet the character and needs of the neighborhoods they serve, works well and allows input from all concerned citizens. I URGE you to vote against this proposal.

The people need a say and each case needs careful review. This process works.

Elizabeth Clark  
Alexandria va 22302

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I am a resident of North Ridge.

I urge that the Planning Commission deny the proposed zoning text amendment included on Docket Item 9, unless it is amended.

The amendment should put an overall cap on the total density that can be approved a public school located in a residential, which could not be exceeded even with a special use permit.

There is no other instance in our City's zoning code where an SUP can establish an unlimited density for any use. This would be the first of its kind. It is being proposed for uses where such an unlimited threshold would be most undesirable. School sites are important elements of neighborhoods and should not be allowed to have unlimited densities.

The Planning Commission should therefore amend the proposal to establish some reasonable cap on the overall density standards for school sites. If need be, the proposal should be tabled until such a reasonable cap is evaluated with the ACP and proposed to the public for evaluation.

In addition, the language as proposed would effectively allow the City to permit high density residential development on school sites, and allow that development to be unburdened from any of the density that would otherwise be contributed by the school structures on the site because the school structures would benefit from unlimited density. The language of the Section 72100 should therefore be revised to make clear that a public school located in a residential zone should be reserved solely to public school and other public service amenities not incompatible with the use as a public school. The language should also expressly prohibit development of residential units on public school sites.

Jeffrey M. Reid  
810 North Overlook Drive  
Alexandria VA

**[EXTERNAL] Proposed Zoning Text Amendment for School Density - Docket Item #9**

John Biechman <jcbikeman@aol.com>

Mon 8/31/2020 9:34 PM

To: PlanComm <PlanComm@alexandriava.gov>

Cc: John Biechman <jcbikeman@aol.com>

August 31, 2020

To Members of the City of Alexandria Planning Commission:

I have been a resident of North Ridge for 29 years; prior to moving to Alexandria, I lived in Morgan Hill, Santa Clara County, California where I served on the City Council and the County Transportation Commission for four years, as well as serving on the school district affirmative action committee.

I urge the Planning Commission to deny the proposed zoning text amendment for school density (Docket Item #9). I support the position and analysis of the North Ridge Citizens' Association.

Thank you.

John Biechman  
1121 Allison St  
Alexandria, VA 22302  
703-501-1314

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**[EXTERNAL]Proposed Zoning Text Amendment for School Density - Docket Item #9**

Nancy Kelly <nanza13@msn.com>

Mon 8/31/2020 6:05 PM

To: PlanComm <PlanComm@alexandriava.gov>

I am a resident of North Ridge and I urge the Planning Commission to deny the proposed zoning text amendment for school density (Docket Item #9). I support the position and analysis of the North Ridge Citizens' Association. Thank you.

You're most likely aware that many of us have observed and learned to distrust the City of Alexandria's laughable "public input" regime. First, get mayor and staff and maybe council to write vague and over-reaching policy. Second, ask for public comment. Third, tell the public it's too late for their comment to have any genuine meaning.

In other locales, larger and smaller, there is actual genuine cooperation between citizens and government. Maybe the old "plantation South" lives on here with the belief that truly, you all know best and just have to lead along your little folks to understand that. How about, instead, working together from the get-go on city issues?

Respectfully,

Nancy Kelly  
2402 Cameron Mills Rd  
Alexandria 22302

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## FW: Proposed Amendment of Zoning Code Section 7-2100

David Vaughan <davaughan1@comcast.net>

Tue 9/1/2020 10:44 AM

To: PlanComm <PlanComm@alexandriava.gov>

Sent from [Mail](#) for Windows 10

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**From:**

**Sent:** Tuesday, September 1, 2020 10:26 AM

**To:** [karl.moritz@alexandriava.gov](mailto:karl.moritz@alexandriava.gov); [robert.kerns@alexandriava.gov](mailto:robert.kerns@alexandriava.gov); [dirk.geratz@alexandriava.gov](mailto:dirk.geratz@alexandriava.gov); [PlanComm@alexandriava.gov](mailto:PlanComm@alexandriava.gov);

Amendment to Zoning Code Section 7-2100

September 1, 2020

For: Alexandria Planning Commission & Alexandria City Council

We have been active citizens and voters of Alexandria for more than 52 years. During that time, we have enjoyed access with our governmental representatives on many issues. We have found them to be willing to listen and exchange views with us and thought that they enjoyed sharing views and learning from one another. We have believed that you volunteered to participate in public life because you also believe in making sure that our voices are considered before taking actions that may adversely affect us.

Reluctantly, we are increasingly concerned that our elected representatives and city officials are less and less receptive to public participation in government decision making—perhaps because you consider it a waste of time or that it complicates your decision making. Thus, we see increasing efforts to remove issues from public discussion or to backdoor them in ways that remove them from public view and discussion.

Our concerns have been recently highlighted by efforts to repurpose the use of our public schools and parks beyond their traditional core missions and to do it without public participation—making our local government less of a participatory democracy and more authoritarian.

The proposed amendments of Section 7-2100 would also result in removing another important issue from future public input. We recognize that the City and ACPS would hold various meetings with the public to discuss the design of school buildings if the amendments were adopted. But, that process is fundamentally different than the public process under the existing version of Section 7-2100, which only allows large increases in the mass of new schools contingent upon a public hearing and finding—subject to judicial review—that the increased density will not be injurious to neighboring properties. These are important protections for the public and there is no good reason why the City and ACPS cannot continue to build schools subject to the same procedures and public input that worked for decades.

For these reasons, we ask you to reject the proposed amendment and continue our democratic tradition of inclusive citizen participation in our local government.

Thank you for taking the time to consider our views,

Patricia and David Vaughan  
Davaughan1@comcast.net

**[EXTERNAL]Written Comments for Sept. 1 Hearing**

Moira <thebuzbys@comcast.net>

Mon 8/31/2020 7:04 PM

To: PlanComm <PlanComm@alexandriava.gov>

Cc: Moira Buzby <thebuzbys@comcast.net>; Timothy Buzby <tim\_buzby@comcast.net>

August 31, 2020

City of Alexandria Planning Commission  
301 King Street  
Alexandria, VA 22314

Dear Members of the Alexandria Planning Commission,

We are writing today in opposition to a proposed amendment to the city's zoning laws designed to allow increased density on school property. We urge you to reject the text amendment to Section 7-2100 that will be under review at the Planning Commission Meeting on September 1.

We are not legislative, zoning, or legal experts. We are simply homeowners who have lived in the city of Alexandria for the past 26 years. Recently, we have become increasingly concerned — not only with the city's attempts to increase density in single-family neighborhoods — but also with the city's attempts to accomplish this objective at all costs.

This year alone, we have commented on feasibility studies to co-locate housing on school property, recommendations to allow Accessory Dwelling Units, and now zoning amendments to permit construction of new, large-scale school buildings without the protections of a Special Use Permit hearing process. All of these new initiatives would significantly impact quality of life issues in our neighborhood, resulting in less open space, fewer recreational areas, a reduction of the tree canopy, and decreased permeable land for groundwater flow — while violating objectives designed to protect the density and scale in our neighborhoods as outlined in Alexandria's Master Plan.

Please leave the current zoning framework in place so that neighborhood residents can work collaboratively with city leaders, school board members, and parents to determine the best land-use for school properties on a case-by-case basis.

Sincerely,

Timothy and Moira Buzby  
308 Mansion Drive  
Alexandria, VA 22302  
thebuzbys@comcast.net

**[EXTERNAL]Reject the Proposed Text Amendment for Zoning Code Section 7-2100**

Jane Frazer <JaneZFrazer@hotmail.com>

Tue 9/1/2020 1:16 PM

To: PlanComm <PlanComm@alexandriava.gov>

Dear Members of the Planning Commission,

I urge you to reject the proposed text amendment for Zoning Code Section 7-2100.

For years, I've watched various city managers, city council members, and school board members wring their hands over the appalling conditions of our schools. Yet, year after year, these same city officials ignore the problem and choose to delay building maintenance.

I've seen the dangerous conditions myself. Earlier this year, the former principal at George Mason Elementary School gave me on a tour of the school—including the basement and attic. What I saw was appalling and a clear safety concern for the students and ACPS staff. I saw electrical panels in standing water, fire hazards. I also noted a lack of smoke detectors and carbon monoxide detectors, which is a particular danger in a wood frame building. I was also told the school's sewage tank regularly overflows, leaving open sewer on the floor of the basement.

Alexandria needs safe, clean, and larger schools to accommodate a growing population. But this text amendment is not the way to go about filling that desperate need.

There are several troubling issues with this text amendment, including but not limited to: fast tracking school buildings with potentially unlimited proportions without public hearings, which is in violation of Section 7-2100. The amendment also deviates from the city's zoning rules and conflicts with the city's own Master Plan. It also adds to the city's problems of citizens having limited recreational and open space.

This is why we need to have public hearings.

In addition, the Planning Commission needs to be honest with citizens and explain why the text amendment was originally listed on the docket as old business. A public statement on how and why this occurred would go a long way to re-establish the commission's credibility. **ACPS leadership, the city council, and city manager operate at a significant trust deficit in Alexandria. Please don't allow yourselves to join them.**

The current zoning standard is not only adequate for building safe, clean and larger schools, it also includes public hearings as part of the process. It is simply wrong to attempt to remove residents as part of the process.

The current SUP process offers protections to preserve the character of Alexandria's neighborhoods and natural environment, all the while allowing for schools to be rebuilt and/or renovated.

Reject this text amendment.

Jane Frazer

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**[EXTERNAL]Changes to City's zoning code to add density to school buildings**

Sue Gallagher <suegallagher.va@gmail.com>

Tue 9/1/2020 3:42 PM

To: PlanComm <PlanComm@alexandriava.gov>

Dear Planning Committee,

I have been a citizen of the City of Alexandria for 20+ years.

I am writing this email to state that I am NOT in support of adding density to Alexandria school buildings.

I understand that ACPS needs to enlarge and modernize school buildings but these needs can be effectively accommodated under the current zoning framework.

I request that the Planning Commission rejects this proposal amendment.

V/R,

Susan Gallagher  
1000 Virginia Ave  
Alexandria VA

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**[EXTERNAL] Proposed Zoning Text Amendment for School Density - Docket Item #9**

Patricia Bowman <pat.bowman5554@gmail.com>

Tue 9/1/2020 3:44 PM

To: PlanComm <PlanComm@alexandriava.gov>

I am a resident of North Ridge and I urge the Planning Commission to deny the proposed zoning text amendment for school density (Docket Item #9). I support the position and analysis of the North Ridge Citizens' Association. Thank you.

Patricia Bowman  
2415

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**[EXTERNAL]Zoning Text Amendment #2019-00007 (Increased Density at Public School Sites)**

Jesse O'Connell <oconnellj@gmail.com>

Tue 9/1/2020 5:25 PM

To: PlanComm <PlanComm@alexandriava.gov>

Cc: Nathan Macek <natemacek@hotmail.com>; Maria Wasowski <mariawasowski@comcast.net>

Chair Macek, Vice-Chair Wasowski, and Members of the Planning Commission,

I write tonight to encourage you to support Zoning Text Amendment #2019-00007, which would modify the allowable density for public schools located in residential or mixed-use zone.

In the mayor's newsletter this morning he shared the statistic that the 2019-20 school year was the thirteenth straight year of Alexandria City Public Schools (ACPS) enrollment growth; which represents an addition of 5,000 students during that period. It is impossible to deny that Alexandria is grappling with a school capacity crisis, and more classroom space is needed to serve the students in our public schools.

As a parent of an ACPS student, I experience this need firsthand when I enter the aging building and overcrowded classrooms of our (wonderful and beloved) neighborhood school. It is clear to me that we are managing an untenable situation through community support and determination to persevere; but that is not a sustainable long-term solution. We cannot paint and remodel our way out of this problem.

It is the plain truth that there are often limited options to site new school buildings other than on the site of existing schools. This limitation is a big part of why we have been slow to address our capacity crisis. It is hard (near impossible) to find a large enough parcel of land or an existing building suitable for conversion; let alone either one of those things that doesn't additionally provoke the opinions and ire of residents living nearby. Adding flexibility through changes to our zoning ordinance will empower us to build adequately sized schools at existing school sites, which will have the dual effect of addressing capacity needs while continuing to ensure that students can go to their neighborhood school.

As we deal with the fallout of the financial impact from the coronavirus public health crisis, which has caused and will cause the City to pause and revisit many capital improvement projects, we need as many tools at our disposal as possible. The more flexibility we can empower our City and Schools planners with, the more likely we are to see projects started and completed on a timeline that serves the urgent needs of our students and families.

Thank you for your consideration, and I urge you to support Text Amendment #2019-00007.

Warm regards,  
Jesse O'Connell

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**jmiles42@comcast.net**

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**From:** Justin M. Wilson <justin@justin.net>  
**Sent:** Tuesday, September 1, 2020 9:22 AM  
**To:** jmiles42@comcast.net  
**Cc:** mmacva@aol.com; mollywilkinson@yahoo.com; BeverleyHills@groups.io  
**Subject:** Re: [BeverleyHills] NRCA Alert: Proposed Zoning Amendment for School Density & More News

Technically true, but functionally not correct.

The provision retains the 60 foot height maximum on these sites, so while conceivably with an SUP you could go above 0.60 FAR, given the 60 foot max, it would be pretty hard to do that.

Once you meet setback requirements, open space requirements, etc, you would be hard pressed to design a school that gets a lot denser without hitting the 60-foot height max.

When you layer state rules about how tall elementary schools can be (to facilitate ingress/egress in an emergency) it makes it impossible.

The staff proposed this language to facilitate denser schools in some of the more urban areas of the City (particularly Potomac Yard where we are actively pursuing an "urban" school design, likely as a component of the ACPS High School plan).

As a practical matter, we have not built a school without going through the SUP process in decades, and that is unlikely to change, even with this language.

The specific text change proposed is shown below:

**Sec. 7-2100 Increased density and height for public elementary and secondary schools.**

*Notwithstanding any contrary provision of this ordinance, a public elementary or secondary school, located in a residential or mixed use zone, may be constructed, or reconstructed to a size which exceeds the density and height otherwise permitted by regulations in such zone; ~~provided, that a special use permit is approved, and, further, that no increase in floor area ratio is no greater than .60, and no in height greater than 60 feet, shall be approved.~~ With approval of a special use permit, the floor area ratio may be increased above .60 and the height may be increased up to 70 feet.*

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Justin M. Wilson  
justin@justin.net

On Sep 1, 2020, at 8:51 AM, jmiles42@comcast.net wrote:

What the Mayor failed to state is that the amendment doesn't just end the requirement for a separate Special Use Permit to go to a 0.60 FAR.

It also allows unlimited FAR with a Special Use Permit on school sites.

No other provision of the Zoning Code allows an SUP to override all density restriction on a site.