

## OLD TOWN NORTH SMALL AREA PLAN REVISION, 2015 – 2016

Comments from Carolyn Merck, 324 North Royal St., Nov. 19, 2015

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Overall: The characteristics of any development that takes place in Old Town North should be specified by the city, not by developers. In particular, the Bus Garage, the ARHA properties, and the Giant/ABC sites should be redeveloped to fulfill their planned role in the overall area, subject to density, use, height, and parking restrictions. The Giant/ABC site has been, and should continue to provide community-serving retail, but it might also incorporate public open space rather than being developed from sidewalk-to-sidewalk. Both the WMATA Bus Garage and the ARHA properties are situated in a section of the area designated for moderate density residential use and lower heights. Whatever site is to be developed, the city should insist that the underlying plan be respected and that developers adhere to the plan.

Affordable Housing: During the November Charrette, participants commented about providing “affordable housing” in the area. Affordable housing is typically achieved in Alexandria by granting higher density than sought in the plan/neighborhood. The economics of development drive this situation: if a developer is asked to sell housing units at below-market prices, the difference is made up by selling more units. Unfortunately, this approach often does not work in the long run in areas where market forces eventually drive up prices, leaving the area with high density, high-priced (and perhaps low quality) housing, contrary to the original plan. Old Town North would be an area where just this scenario could occur. It should be kept in mind that ARHA properties for low income residents already constitute a large share of housing in Old Town North, a fact that cannot be ignored as “not counting.” Two ideas should be considered: a) The plan should acknowledge the benefits of maintaining *moderate income* housing, such as Canal Place, Port Royal, and Harbor Terrace, and b) as ARHA seeks replacement units for Hopkins-Tancil Court, some of those units should be disbursed to other Old Town North sites, such as the Bus Garage and other new developments, thereby decreasing concentration of ARHA properties in keeping with “scattered site” objectives.

Canal Place Parking Lot: During the Charrette a suggestion was made to underground the surface parking lot that serves residents of the Canal Place condominiums (North Pitt Street) and make that space into something such as public open space. The drafters of the 1992 plan considered such an idea for this site and rejected it, for several reasons: a) residents of Canal Place find the lot convenient, safe, and accessible, minimizing their use of curb-side street parking; b) underground parking is never used as much as a fully visible, convenient surface lot, thus undergrounding the parking would lead to more on-street parking; c) someone would have to pay for the cost of the construction of underground parking, and if costs were to accrue to Canal Place units, the prices of those units would increase thereby undermining a goal of maintaining moderately priced housing; d) it is difficult to know what, if any, large increase in value would accrue to whom from such an undertaking; e) Canal Place already has open space courtyards.

Giant/ABC Site: The ostensible reason for retro-fitting underground parking for residents of Canal Place was to provide some kind of community open space on their existing surface parking lot. If such a space is sought, it would make much more sense to designate part of the Giant/ABC site for that purpose, since major reconstruction and underground parking is to occur there. Although this opportunity may have been missed, this site would be logical for community-focused use. Why would we advocate disrupting an established space and residential development when a nearby site is perfect for such a use and is already targeted for redevelopment?

Appropriate use of the CRMUX zone: **The purpose of the CRMUX high density SUP all-residential option was never, ever to substitute high- density residential development on sites designated for low or moderate residential development.** The CRMU zone was designed by the 1992 Old Town North Small Area Plan task force for specific sites. The zone did not previously exist in the city code. In the 1992 plan, CRMUX was placed precisely where higher-density mixed use development was sought to activate an area and provide for a good mix of uses. However, plan drafters recognized that in some cases future economic circumstances might

not support the commercial component of the zone, and in order not to dissipate the energy sought for those specific sites, the option for all-residential but high density development was permitted with an SUP. Unfortunately, there is misunderstanding of the very limited sites where the all-residential high density CRMUX zone should be used, and it has been wrongly used to increase density on sites designated only for moderate density residential use, such as the RM zone. Apparently the city did not understand that the CRMUX- high density/residential/SUP zone was not to be applied anywhere except where the underlying land use was “mixed use.” For example, the purchasers of the old Samuel Madden homes owned by ARHA went zone shopping, discovered the CRMUX zone, and the city permitted substitution of the CRMUX all-residential zone for the RM zone between Princess and Pendleton Streets. That area is now the high-density multifamily development of Chatham Square but neither the Old Town nor the Old Town North Small Area Plans designated that site for high density development.

Moderate Density Residential Sites: The blocks designated in the 1992 Plan for moderate density residential use (RM) are primarily south of Wythe Street. Designating this area as RM (with some existing nonresidential uses “grandfathered”) provides a transition from higher density and commercial uses in the central and north sections of Old Town North to the RM residential developments on the north side of Old Town. These RM blocks include the Bus Garage and the ARHA Hopkins-Tancil homes. On those sites, the RM zone as designated in the 1992 plan should be respected; the mistake should not be made of substituting the high density all-residential/SUP option of the CRMUX zone for the RM Zone such as was made in the rezoning for Chatham Square.

Parking: All required parking must be respected and not rationalized away. The plan should state that proposals by developers to seek waivers of required parking should be rejected.

Retail Focus Areas: Retail is hard! If it does not work, the result is dark, boarded-up space. Everybody wants nice shops and conveniences, but attracting appropriate retail even on King Street is a constant struggle. For every charming boutique sought, a tee-shirt shop is ready to jump in. Retail must not be allowed to “leak” into residential or other areas because it will dissipate the required concentration. Moreover, the plan should never set up the condition in which residents compete for parking with retail shoppers. Retail should be concentrated in areas where walking among businesses is easy and parking is provided in the immediate area. The 1992 plan coined the term “retail focus area” to indicate that retail sites must be carefully focused and targeted.

Building Heights: The height districts in the 1992 plan should be respected. The plan clearly laid out the concept of Alexandria House and Port Royal condominiums as the top of the tent pole, with heights descending from there, declining steeply, particularly to the south and north to 50 or 45 feet. The building heights in the 1992 plan seek to avoid creating shadowed canyons of the streets and sidewalks.

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December 1, 2015

Ms. Mary Lyman, Chair  
and Members of the Planning Commission  
c/o Mr. Karl Mortiz, Director  
Department of Planning & Zoning  
City Hall, Room 2100  
Alexandria, VA 22314

RE: Old Town North Small Area Plan Update, Docket Item No. 4

Dear Ms. Lyman and Members of Planning Commission:

On behalf of NRG, the leaseholder of the Potomac River Generating Station, Steven Arabia was appointed to the Old Town North Small Area Plan Advisory Group and he was an active participant in the Charrette Week. As you receive the Old Town North Small Area Plan ("OTN SAP") Update tonight on your public hearing docket, NRG would like to affirm their commitment to continuing to work with the City the extent possible, on this planning process. What was stressed at the Charrette Week on a number of occasions was the fact that this is very early in the process and that at this state, flexibility is key, as the City and the Advisory Group and the community as a whole work through all the phases of the OTNSAP process.

As the City moves forward to Phase II where you will study the plan framework elements, NRG expects the same will be true, that flexibility is key moving forward. There are some elements of the plan that are unknown at this time, and until those unknowns are determined, flexibility is essential. In addition, while the Potomac River Generating Station is the largest redevelopment parcel in the Old Town North area, it should not be the repository of a disproportionate share of the public benefits planned for the area.

Ms. Mary Lyman, Chair  
And Members of Planning Commission  
December 1, 2015  
Page 2

We look forward to continuing to work with the City through the OTN SAP process.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Mary Catherine Gibbs", with a stylized flourish at the end.

Mary Catherine Gibbs

cc: Mr. Steven Arabia, NRG