

# Joint Comments from Fairfax Healthy Communities Network on SSPA nominations

*March 2, 2023*

COALITION FOR SMARTER GROWTH • NATURE FORWARD • YIMBYs of NORTHERN VIRGINIA  
FAIRFAX ALLIANCE FOR BETTER BICYCLING • FAIRFAX NAACP  
FAITH ALLIANCE FOR CLIMATE SOLUTIONS • LEWINSVILLE FAITH IN ACTION  
NORTHERN VIRGINIA AFFORDABLE HOUSING ALLIANCE • SIERRA CLUB GREAT FALLS GROUP  
SOUTH COUNTY TASK FORCE WASHINGTON AREA BICYCLIST ASSOCIATION

Dear Chairman Niedzielski-Eichner and Planning Commissioners,

The above named organizations, as part of the **Fairfax Healthy Communities Network**, are providing the comments below on the current Site-Specific Comprehensive Plan Amendment (SSPA) nominations.

We ask you to consider these comments at the Planning Commission workshops beginning on March 2, 2023.

Our network partners envision a Fairfax County where people can live, work, and play in connected communities that are healthy, sustainable, and inclusive. In this vein, we have worked together to review the set of 70 SSPA nominations with the principles that they should provide more homes, be accessible to transit, be equitable, and provide good environmental sustainability and design. Our comments seek to lift up the nominations that propose land use changes with positive outcomes for residents and contribute to progress towards a variety of county goals, while also highlighting concerns about nominations we may not support or that need additional work.

## **Principles for Review**

We reviewed the nominations based on the following set of principles:

### *Housing and Equity*

The best nominations address the severe shortage of housing in Fairfax County by increasing residential density and repurposing underutilized office buildings and parking lots into housing. In particular, we support nominations that increase affordable and workforce housing near transit without displacing current low- and moderate-income residents.

Nominations with a strong equity component would ideally include a high percentage of additional housing near transit for families making up to 80% area median income (AMI), with designated housing at lower AMI levels. The general percentage of workforce units asked of a developer in exchange for additional density is 8 percent, but we feel this should be higher near transit as it is in some areas (e.g. Tysons, Huntington). This housing would be near necessities and amenities such as jobs, grocery stores, health care, recreation, and green spaces. Nominations with unacceptable equity considerations would permanently displace residents, or even whole communities, and

cause the loss of affordable housing. Nominations that potentially displace current residents should, at minimum, include the right of return and relocation assistance, with 1:1 replacement of units. During re-development residents should be re-housed in their community to minimize impacts, like changing school pyramids. Current residents should benefit from economic development, not be displaced by it.

### ***Access to Transit and Active Transportation***

The best nominations would have a strong transit-oriented development (TOD) component and ensure new housing be proximate to metro, bus rapid transit, and frequent bus routes. They should also provide consideration for safe and comfortable walking and biking in the overall plan. Focusing new housing and other development near existing or planned quality transit has multiple benefits for equity, public health, and the environment. For example, Fairfax's Community-Wide Energy and Climate Action Plan (CECAP) calls for increasing the share of trips made by walking, biking, transit and other alternatives to Single-Occupancy Vehicles to 30% by 2030.

### ***Green Infrastructure***

Nominations with strong green infrastructure considerations would include preservation or restoration of 100% of a property's Resource Protection Area (RPA), avoidance of a floodplain, minimization of impervious surface combined with strong stormwater controls, sufficient native tree canopy to mitigate heat island effects, and green spaces for public gathering. The ecosystem services on site would be maintained to the highest degree possible. Nominations with unacceptable environmental impacts would be those in direct opposition to both CECAP and Resilient Fairfax goals.

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Based on the principles above, we highlight a few example nominations with strong concepts worthy of further consideration and nominations with concerns.

## **Strong Concepts**

PR-007<sup>1</sup>: Prosperity Avenue Business Park (*Providence*)

***Why:*** *Thoughtfully comprehensive proposal near transit that respects current stream valley while providing public access*

Sequoia's proposal will add 2,173 housing units along with workforce dwelling within ¾ mile of a Metro station, preserve the nearby stream valley, and increase pedestrian access to the Metro station area for the residential area west of the stream. The project also has a good open space plan, with several pocket parks. The addition of publicly-accessible open space is vitally needed in Merrifield and Dunn Loring, which are underserved with natural open spaces.

It will be important to provide public access to the stream valley area, while also balancing this improved access with restoration of the stream banks and the best possible stormwater management practices for reducing runoff and erosion. We also recommend more retail and

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<sup>1</sup> PR-007: <https://ffxocr.virginiainteractive.org/sites/default/files/Assets/documents/PDFs/PR-007-web.pdf>

## Strong Concepts (continued)

commercial uses at this site to ensure a balance of uses essential to creating walkable communities and creating a two-way flow of eastbound and westbound use for the Orange Line.

MV-001<sup>2</sup>: Cityside Huntington (Mount Vernon)

**Why:** *TOD with significant affordable housing*

Lincoln Avenue Capitol of Alexandria, a well known local affordable housing builder, proposes to expand existing housing, close to Huntington Metro, by adding 225-375 new, multifamily units affordable to families making a lower wage of 40-60% AMI. This would expand the affordable workforce housing (569 multifamily-unit apartments) that they recently purchased with help from the Amazon Housing Equity Fund. This is a rare opportunity for significant investments in affordable housing in a transit-oriented development setting. Residents would benefit from being right on Richmond Highway, located near a proposed bus rapid transit station, a short bus ride or walk to metro, and near countless amenities such as grocery stores, health care, and parks.

LE-001<sup>3</sup> : Rose Hill Shopping Center (Franconia)

**Why:** *Improved land use to convert a strip mall into a walkable, mixed-use development on a bus line within 2-3 miles of two metro stations*

Combined Properties proposes to redevelop an aging strip mall with a significant and underutilized surface parking lot with a multi-story, mixed-use residential development. This corner lot is served by frequent bus service and is approximately 2 miles from the Van Dorn Metro Station and just over 3 miles from the Huntington Metro Station. The developer has been engaged with residents and responding to feedback to further evolve its proposal for at least one year.

Of cautionary note is that the amount of expected overall housing units or what percentage of workforce and affordable dwelling units would be provided is not currently addressed in the original proposal. While this number is no doubt in flux as the proposal evolves, we urge the nominator to maximize the number of units built, especially by including more workforce units which would allow for increased density. Making sure to provide a good mix of retail, particularly a grocery store, will support walkability goals by reducing the need to drive for needed services.

LE-008<sup>4</sup>: Frontier Plaza Center (Franconia)

**Why:** *Conversion of a commercial-centric plaza into a vibrant, mixed-use community near Metro*

David Gill's proposal is a redevelopment opportunity to convert a strip shopping center with large surface parking lots into a walkable mixed-use community with up to 634 new homes for a mix of incomes. Just one mile to the Franconia-Springfield Metro and near retail, this proposal would provide new opportunities to get around without always needing to drive, activating the town center

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<sup>2</sup> MV-001: <https://ffxocr.virginiainteractive.org/sites/default/files/Assets/documents/PDFs/MV-001-web.pdf>

<sup>3</sup> LE-001: <https://ffxocr.virginiainteractive.org/sites/default/files/Assets/documents/PDFs/LE-001-web.pdf>

<sup>4</sup> LE-008: <https://ffxocr.virginiainteractive.org/sites/default/files/Assets/documents/PDFs/LE-008-web.pdf>

## Strong Concepts *(continued)*

area, and having new residents to better support retail businesses on site where mainly strip shopping centers are struggling.

We recommend retaining the existing tree canopy on the eastern edge of the property and infusing the town center with additional native tree canopy and green infrastructure.

MA-007<sup>5</sup> Grand Mart and Pistone's *(Mason)*

**Why:** *Opportunity to begin to implement planned improvements for Seven Corners area*

Eakin Properties, Inc. proposes to revitalize the Seven Corners area by redeveloping aging commercial properties and surface parking lots with mixed-use residential with up to 450 units for a mix of incomes. This property is on a frequent bus route, and on the future Route 7 bus rapid transit route, and one mile to the East Falls Church Metro Station. It provides an opportunity to realize many planned improvements for the Seven Corners area including the Ring Road and Arlington Boulevard Trail. This is also an opportunity to infuse green infrastructure and significantly increase native tree canopy on a property almost 100% devoid of trees today.

## Nominations with Concerns

LE-007<sup>6</sup>: Sheridonna Lane *(Franconia)*

**Why:** *Near total Resource Protection Area (RPA) and significant floodplain incursion*

The Carr Companies proposes to build an independent living facility in an RPA, between two streams, directly adjacent to Huntley Meadows Park. The current Comprehensive Plan language recommends public acquisition for this area and for this area to be made available for wetland mitigation purposes, with development otherwise planned for the low end of the Plan's density range. This proposal is in direct opposition to both the environmental goals of the current Plan language and to the Adaptive Environments goals of Resilient Fairfax<sup>7</sup> to "Protect Natural Resources that Enhance Resilience" and "Restore Damaged Areas Through Nature Based and Natural Solutions". With precipitation in Fairfax County projected to continue increasing in frequency and intensity, building a berm to redirect streams in order to build in our most environmentally sensitive areas is antithetical to resilience planning.

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<sup>5</sup> MA-007: <https://ffxocr.virginiainteractive.org/sites/default/files/Assets/documents/PDFs/MA-007-web.pdf>

<sup>6</sup> LE-007: <https://ffxocr.virginiainteractive.org/sites/default/files/Assets/documents/PDFs/LE-007-web.pdf>

<sup>7</sup> Resilient Fairfax Adaptive Environments goals p. 78+:

[https://www.fairfaxcounty.gov/environment-energy-coordination/sites/environment-energy-coordination/files/Assets/documents/pdf/resilient%20fairfax%20final%20carp\\_ada\\_signed.pdf#page=78](https://www.fairfaxcounty.gov/environment-energy-coordination/sites/environment-energy-coordination/files/Assets/documents/pdf/resilient%20fairfax%20final%20carp_ada_signed.pdf#page=78)

## **Nominations with Concerns (continued)**

PR-008<sup>8</sup>: Merrifield at Dunn Loring Station (*Providence*)

**Why:** *Displacement of families in workforce housing with potential significant, permanent loss and/or displacement*

Fairfax Merrifield Associates II L.L.C proposes a redevelopment of their current property, with the potential permanent loss of the current 706 affordable, garden apartments built in 1968 renting from \$1,725 for a 1 bedroom to \$2,725 for a 3 bedroom unit. The current development would be considered workforce housing affordable to people making about 80% of AMI. The new proposal calls for 8 “blocks” with different mixed use and multi-family residential buildings in each, all within .5 miles of Dunn Loring Metro Station.

While we appreciate the proposal for added density near the Metro, we urge the county to address the equity concerns of this potential loss of affordable housing. We urge no net loss of affordable housing, including up to 80% AMI, right to return, and relocation assistance.

DR-002<sup>9</sup>: Metro District at Innovation Station (*Dranesville*) and  
MV-005<sup>10</sup>: 8850 Richmond Highway (*Mount Vernon*)

**Why:** *While these proposals would add a substantial amount of housing close to Metro or upcoming BRT, we have concerns regarding the impact on natural resources and RPAs*

DR-002: This high-rise development proposal at the Innovation Station Metro has a significant housing potential; however, the RPAs adjacent to the wetlands and north of the wetlands must be preserved in their natural state.

MV-005: This redevelopment would provide approximately 245 new units of housing within .5 miles of the planned Woodlawn BRT station. While the proposal offers to preserve space, this presents an opportunity to improve upon the current conditions and fully avoid the RPA on site. We also recommend replacing the surface parking lots in the proposal with structured parking with enhanced stormwater management.

MV-006<sup>11</sup>: West Ford Manor (*Mount Vernon*)

**Why:** *Significant opposition from Gum Springs the county’s last remaining historically Black community dating to 1833*

This proposal includes 65 townhouses at the corner of Richmond Highway and Sherwood Hall Lane in Gum Springs, the oldest historically Black community in the county. Gum Springs is beginning a Heritage Inventory which will lead to discussions and decisions about community land use planning. It is strongly opposed to high density development ahead of this plan and Mount Vernon Supervisor Storck has agreed to put the proposal on hold.

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<sup>8</sup> PR-008: <https://ffxocr.virginiainteractive.org/sites/default/files/Assets/documents/PDFs/PR-008-web.pdf>

<sup>9</sup> DR-002: <https://ffxocr.virginiainteractive.org/sites/default/files/Assets/documents/PDFs/DR-002-web.pdf>

<sup>10</sup> MV-005: <https://ffxocr.virginiainteractive.org/sites/default/files/Assets/documents/PDFs/MV-005-web.pdf>

<sup>11</sup> MV-006: <https://ffxocr.virginiainteractive.org/sites/default/files/Assets/documents/PDFs/MV-006-web.pdf>

## Additional Nominations of Concern

There are several nominations, particularly in the Sully District, that scored poorly in our assessment because they are proposing development in sprawl locations that are currently undeveloped, nowhere near transit, which means they will be auto-dependent, and will require clearing of forests and encroach on RPAs. We ask that you uphold the county's climate goals and either oppose these types of nominations or seek significant modifications.

## In conclusion

We urge the Planning Commission to consider the principles put forth above and to use the examples provided in this letter to spur similar considerations across **all** of the 70 nominations. As *exceptions* to current Comprehensive Plan guidance, each recommendation made to the Board of Supervisors for a Site-Specific Plan Amendment proposal to move forward should stand out in terms of excellence across a myriad of current Board policies in order to support Fairfax County in developing healthier, more sustainable communities.

We look forward to continuing to follow key applications as the SSPA process progresses.

Thank you for your consideration of our comments and recommendations.

Sincerely,

**Coalition for Smarter Growth**, Sonya Breehey, Northern Virginia Advocacy Manager

**Nature Forward**, Renee Grebe, Northern Virginia Conservation Advocate

**YIMBYs of Northern Virginia**, Aaron Wilkowitz, Fairfax Captain

**Fairfax Alliance for Better Bicycling**, Yvette White, Board Member

**Fairfax NAACP**, Michelle Leete, President

**Faith Alliance for Climate Solutions**, Andrea McGimsey, Executive Director

**Lewinsville Faith in Action**, Jack Calhoun and John Clewett, Co-leaders

**Northern Virginia Affordable Housing Alliance**, Jill Norcross, Executive Director

**Sierra Club Great Falls Group**, Ann Bennett, Land Use Chair

**South County Task Force**, Mary Paden, Chair

**Washington Area Bicyclist Association**, Kevin O'Brien, Virginia Organizer