



October 19, 2018

Arlington County Board
2100 Clarendon Boulevard
Suite 300
Arlington, Virginia 22201

Dear Chair Cristol:

The Arlington Chamber of Commerce offers our support for SP #438, the site plan amendment to amend site plan conditions to reduce the residential parking ratio, *inter alia*, for the site plan colloquially known as the Red Top Cab Site Plan. We believe that the Shooshan Company has made a good-faith effort to amend this plan in line with the Residential Parking Guidelines passed by the Board last November. Furthermore, we note that the County Manager concurs in our assessment and recommends approval of the site plan amendment.

The Chamber supported the Residential Parking Guidelines when they were adopted last year, noting that our developers should have the ability to park at their properties at the rate the market dictates. However, our member businesses are now expressing a sense of uncertainty and unease over how these guidelines are to be implemented in practice. This uncertainty creates an impediment to the development process, by adding costs to developers for designing alternative plans lest their optimal proposal, based on market research, be denied at the last minute. We cautioned last year against such uncertainty, noting that it may perversely incentivize developers to overbuild parking as a path of least resistance. We worry that denial of this amendment, despite its conformance with the guidelines, will send a message that developers are best advised to build extra, unnecessary parking, at additional cost, to secure site plan approval.

The Chamber is additionally concerned by discussion of public benefit trade-offs for approving the amendment, as we stated last year, "Businesses should not have to absorb additional costs to advance other County goals for their efforts to achieve this County priority [of reducing the number of cars on our roads]." Community members are citing the expected cost saving from the reduced parking as a reason to require payment of additional community benefits. This saving should be irrelevant to the calculation; the appropriate use of community benefit contributions should be to mitigate negative externalities of development. In this case, there are no such externalities. As noted on page 2 of the staff report, "The applicant has completed an addendum to the Traffic Impact Analysis (TIA) based on the lower parking ratio. Based on the proposal, additional analysis completed by the applicant, and staff evaluation, no undue adverse impacts are anticipated as a result of the reduction in the parking ratio."

The Shooshan Company has experience with multifamily residential buildings close to Metrorail stations, and has based its application on this experience and market research. Moreover, the proposed number of parking spaces is well above the minimum guideline set for this property (0.49 spaces/unit compared with a minimum of 0.2 spaces/unit), demonstrating that the applicant is responding to market conditions and not just asking for the minimum allowable. Moreover, the applicant has added to its transportation demand management program in this amendment, paying for the equivalent of 148 cards, compared with 117 in the original site plan. As the Shooshan Company has done its homework and finds that there will be no additional strain on our transportation resources, the transportation demand management plan remains sufficient – no additional public benefit is warranted

We therefore encourage the County Board to approve the site plan amendment at its October 20 meeting. We further encourage the Board to work with County Staff to establish an understanding for how these guidelines will work in practice to streamline future site plan developments.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Kate Bates". The signature is written in a cursive, flowing style.

Kate Bates
President & CEO

CC: Arlington County Board members Christian Dorsey, Libby Garvey, John Vihstadt, and Erik Gutshall; and County Manager Mark Schwartz