



January 18, 2019

Nancy Iacomini, Chair  
Long Range Planning Committee  
Arlington County Planning Commission  
2100 Clarendon Boulevard  
Arlington, VA 22201

Dear Chair Iacomini,

On behalf of the Arlington Chamber of Commerce, I write to encourage the Long Range Planning Committee (LPRC) of the Planning Commission to reject the County staff's proposed revision to the Special GLUP Study process (Option 3). This proposal, which has been made with insufficient input from the business community, will likely have the unintended consequence of hindering economic development in Arlington. Consequently, the Chamber encourages the County to continue the current Special GLUP Study process (Option 2) and to add the FTEs necessary to conduct the Special GLUP studies in a timely manner.

The proposed, multi-stage process for a Special GLUP Study will significantly add to the time and costs of such projects, leading to a negative impact on economic development in Arlington. The proposal will add significant risk to any applicants for Special GLUP Study projects. Under the proposal, a Special GLUP Study proposed in June of one year could be queued to be heard at the end of the following year and approved in the year after, possibly creating an almost two-year delay before even beginning the site plan process.

Although the proposed process streamlines the workflow for planning staff, it is more onerous for the other participants in the study process. All told, it could take four or five years for a site-plan project to go through the Special GLUP Study, a probable rezoning, the Site Plan Review process, and finally construction. Even for projects that are accepted, whether they are slotted toward the start or the end of the Planning Commission Work Plan could be a difference of up to 12 months in project timeline. The County Board's acceptance of the Planning Commission Work Plan also has the risk of becoming a political decision that the County Board will have to make each year with significant ramifications for applicants. The Chamber does not believe this proposed process adds any predictability to the Special GLUP Study process for the applicant. The difficulty that prospective developers would have in forecasting the market that their project would face with that timeline could have the unintended consequence of discouraging development.

Additionally, projects that miss the cut in one year are likely to continue to miss the cut in subsequent years as there will be new competition in each cycle; there is no guarantee that a project would not be deferred indefinitely. Nor is there currently any contingency for the possibility that the Planning Commission does not make it through its entire work plan in a given year and a project falls out. It is unclear whether an applicant whose project falls out will be automatically placed at the beginning of the next year, included at some point in the upcoming year's work plan, (but with the possibility of falling out again if far enough back), or forced to re-apply. These issues again undercut the notion of predictability for the applicant that staff believes their proposed process will ameliorate.

The proposal creates workflow certainty for staff at the cost of lost opportunities for Arlington. The proposed Special GLUP study lacks a mechanism to respond to an opportunity that arises during the year that merits immediate study. There is precedent for such a sudden opportunity, as seen in recent Special GLUP Study projects, such as DARPA expansion and the Air Force Memorial. While the proposed process allows for out of

cycle applicants to be accepted at the County Board's discretion, it is currently unclear if this means that projects will be able to enter next year's work plan or if they would jump straight into the Special GLUP Study process. As proposed, Option 3 could significantly hinder many new and innovative projects that the County might otherwise welcome.

The magnitude of the proposed change is out of step with the problem it seeks to address. The staff report identifies two "cons" of the present process, the first of which is, "No fees are being directly recouped for Special GLUP studies." However, staff recommends additional revisions to go with Option 3, including "A new and distinct line item for 'Special GLUP Studies' should be added. The structure and amount of the Special GLUP Study fees is still being discussed internally." As proposed, not recouping fees directly for Special GLUP studies is also a "con" for Option 3, as staff believes that both Options 2 and 3 would require such a fee. Staff could more easily change just the fee structure without changing the entire Special GLUP Study process, yet to our knowledge, Staff has not held any public discussion about additional fees with relevant stakeholder groups.

Staff's recommendation passes over simpler alternatives for a complete replacement of what they acknowledge is a "familiar" process. The Staff's second "con" for the current process is, "Certain refinements to the process could increase its efficiency and inclusivity." The Chamber is confounded how adding a possible two years to an already lengthy process could be considered efficient. The Chamber also wonders how a process so opaquely envisioned, without soliciting input from affected businesses or citizens, could lead to more inclusivity. Again, this proposed fix is out of scale with the issues it is hoping to remedy.

Arlington prides itself on being a community with a forward-looking, progressive planning policy but this proposal is clearly a step back. This recommendation prioritizes the Planning Commission and Staff's efficiency and work-load above the efficiency of the process itself. It is important to the economic competitiveness of Arlington to continue to allow year-round submittal of GLUP amendments, and we believe that this will be increasingly true as more projects are likely to use the Special GLUP Studies. Rather than adding an additional "pre-process", Special GLUP Studies should have the FTEs and staff necessary for a reasonable and timely process. Our economy is too vibrant and fast paced to do it any other way.

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: Planning Commission Chair James Schroll; Arlington County Board members Christian Dorsey, Libby Garvey, Katie Cristol, Matt de Ferranti, and Erik Gutshall; and County Manager Mark Schwartz