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**WALSH COLUCCI  
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September 20, 2017

**Via Email Only**

Maya Contreras  
Department of Planning and Zoning  
301 King Street  
Alexandria, VA 22314  
[maya.contreras@alexandriava.gov](mailto:maya.contreras@alexandriava.gov)

Re: DSUP#2016-0044  
Church of the Resurrection – Preliminary Plan

Dear Ms. Contreras,

Thank you for forwarding the Completeness submission for the ACH/Church of the Resurrection development proposal. We look forward to receiving staff comments once your review is complete, but thought it would be prudent to provide our input regarding the submitted materials sooner than later for consideration by Staff, BDAC and the Applicant prior to the next submission.

Goodwin House is disappointed that the most recent submission fails, yet again, to address the concerns that have been expressed repeatedly, both in writing and verbally, by both its leadership and residents in response to the development proposal. Contrary to the assertion in Rev. Jo Belser's September 18, 2017 letter to Kathy Anderson that "we trust that the improvements we have made in the plans since the last time we approached you on this subject will allow you to endorse our application," Goodwin House finds that its comments continue to be summarily ignored. It may make sense for the Applicant to reread Goodwin House's July 21, 2017 letter, but in case it was not clear, please see the following:

- **ACCESS TO PRIVATE ROADWAY:** The plan continues to reflect a grasscrete (or similar) area and mountable curb at the entrance to the upper parking lot, with improvements on Goodwin House's property, and retention of emergency vehicle access from Goodwin House's private road, despite the fact that Goodwin House has stated that the mountable curb is not a sufficient barrier to preclude vehicles from entering the parking lot at this location. In addition, Goodwin House has not seen evidence that emergency vehicles serving the Applicant's property cannot do so from the public right of way or the Applicant's private drive aisle. Finally, despite the note that remains on the plans, Goodwin House has not authorized any construction or temporary construction easements by the Applicant on Goodwin House property. COR/AHC must provide all vehicular access, including all emergency vehicles, from the public right of way or on its own property and needs to provide a more

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significant/substantial barrier between its surface parking lot and Goodwin House property to ensure that vehicles do not utilize Goodwin House's private drive to enter or exit the surface parking lot.

- **PARKING:** There have been no revisions to the amount of parking provided for either the church or the residential building. Goodwin House remains very concerned about the parking and continues to believe that the proposed parking is inadequate to serve both of the proposed uses on the Property.
  - **CHURCH PARKING:** The Traffic Impact Study states that the trips generated by the existing church will remain the same for the proposed church in the future. This is in direct conflict with previous statements by Ms. Belser that the Church of the Resurrection congregation is thriving and continues to grow. As such, the more accurate measure of anticipated traffic demand should be based not on the current trips, but on the ITE calculated trips generated by churches of similar size to the proposed new church. As reflected on the cover sheet of the site plan, the Sunday peak hour trip generation for the new church, based on ITE rates, includes 63 inbound trips and 66 outbound trips at the Sunday peak hour. Even if an allowance was made for a 25% mode split to account for attendees arriving by foot or transit, the anticipated trips would exceed the amount of parking proposed for the church. The City should not support any form of parking reduction for the Church and, instead, should require that the church add parking or reduce the number of seats/size of the church to provide sufficient parking for a church of that size. In addition, the turning movements in the upper parking lot remain tight and should continue to be studied.
  - **RESIDENTIAL PARKING:** While the residential building meets the technical parking requirements of the Zoning Ordinance, Goodwin House remains concerned that the amount of parking is practically insufficient to serve both the residents and visitors. The turning movements required to maneuver in and out of many of the spaces within the garage continue to be problematic. In addition, Goodwin House is concerned about the impact that trucks entering and exiting the proposed loading space will have on vehicles trying to enter or exit from Goodwin House along Fillmore Avenue. Finally, no information has been provided regarding what additional programming AHC intends to provide for its residents, nor has there been any confirmation that, unlike other AHC developments, no additional programming will be offered at this site. For these reasons, Goodwin House continues to believe that the amount of parking and the layout of the proposed garage are inadequate and that the number of parking spaces should be increased or the number of units reduced to ensure that there is adequate parking on site. In addition, restrictions should be placed on the hours of loading/unloading and trash pickup to avoid conflicts with traffic on Fillmore Avenue during peak hours.

- **ARCHITECTURE:** Goodwin House acknowledges that improvement has been made to the architecture through the addition of more masonry, simplification of window patterns and the removal of the distracting colored panels. However, Goodwin House maintains that these revisions have not gone far enough and fail to address concerns expressed by Goodwin House regarding the facades facing Goodwin House property. While the Beauregard and Fillmore elevations have gotten a lot of attention and revision in response to staff's comments, the elevations facing Goodwin House in the courtyard and adjacent to the private road still contain a significant amount of fiber cement. Revisions should be made to these elevations to reflect a similar proportion of red brick as is now shown on the Beauregard and Fillmore elevations. Similarly, the amount of fiber cement on the church should be reduced and replaced with masonry.
  
- **INFRASTRUCTURE:**
  - **8" Waterline Relocation:** Goodwin House repeats its request that the note stating "potential 8' waterline relocation (final disposition to be determined at final site plan)" be removed from the plan and that the relocation be shown as just that, a relocation, as is typically done, when necessary, during new construction. Given that the Applicant intends to proceed with construction of the residential building and the church together, there is no reason to have final disposition of this item determined at final site plan, as utility relocation necessitated by redevelopment is a standard developer responsibility. Once again, Goodwin House has no obligation nor does it intend to relocate the waterline that has been in place and serving Goodwin House since the 1960's.
  
  - **Undergrounding:** While the Preliminary plan appears to reflect undergrounding of most of the utilities and poles along the frontage on N. Beauregard Street, the Applicant's written responses regarding undergrounding in the comment/response letter to staff suggest that the Applicant is still requesting relief and/or assistance regarding the standard undergrounding requirement. Once again, to the extent that relief or assistance is provided to the Applicant regarding this standard development requirement, Goodwin House will expect the same when it moves forward with Phase II of its project along N. Beauregard Street.
  
  - **Beauregard Implementation Fund Contribution:** Based on the Applicant's response to standard cost/contribution items and their request to rezone to a zoning category other than CDD, it appears that the Applicant is trying to avoid paying the Beauregard Implementation Fund (the "Fund") contribution that is applicable to all development projects within the Beauregard Small Area Plan. Goodwin House and the Applicant's property are both within the Beauregard Small Area Plan and the expectation is that both parties will be required to make contributions to the Fund commensurate with those contributions set forth in condition 10 of CDD #23, regardless of whether the Applicant is in the CDD or not. To the extent that the

Applicant is afforded relief or assistance regarding this requirement, Goodwin House expects the same for Phase II of its project along N. Beauregard Street.

Goodwin House continues to appreciate the need for affordable housing in the City and acknowledges the development of an affordable housing project on the COR property, but also continues to be very concerned about the impacts of the proposed development on Goodwin House now and into the future. The lack of coordination and responsiveness on the part of the Applicant to repeated input by Goodwin House over the past two years is troubling. It is clear that changes have only been made as a last resort or when demanded by the City, not through thoughtful, collaborative coordination with Goodwin House. In addition, the continued expression by AHC of its precarious financial situation is even more troubling as the requirements they are now trying to avoid or put on the backs of the church or deem others unreasonable for continuing to hold them to (quality architecture, adequate parking and circulation, utility infrastructure, undergrounding, payment into the Beauregard Fund, etc) were clearly identifiable, quantifiable expectations prior to them entering into the deal.

At one point last fall, there was discussion by the Church of the Resurrection of potentially continuing the church's ministry but not from a new physical building on the property. If the Applicant cannot afford the proposed project in accordance with standard requirements and expectations, perhaps it should reduce the size or scope of its proposal by providing either a church or a residential building, not both. Goodwin House cannot accept a project that falls short of the standards expected of other developments in the City just because this Applicant's pro forma does not account for them.

Very truly yours,

WALSH, COLUCCI, LUBELEY & WALSH, P.C.



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Cc: Mark Jinks  
Rob Kerns  
Sara Brandt Vorel  
Helen McIlvaine  
Shanna Austin  
The Reverend Jo Belser  
Kat Turner  
Duncan Blair  
John Welsh  
The Reverend Deacon Edward Jones  
Kathy Anderson  
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