



February 24, 2021

Albemarle County Planning Commission
% Charles Rapp, Planning Director
410 McIntire Road, North Wing
Charlottesville, VA 22902
(Transmitted via email)

Re: ZMA202000007 RST Residences

Dear Members of the Planning Commission:

The Piedmont Environmental Council (PEC) submits these comments, regarding the RST Residences rezoning ([ZMA202000007](#)). The rezoning request does not conform to the recommendations contained in the Albemarle County Comprehensive Plan nor the Places 29 Master Plan.

The RST Residences rezoning (R-1 Residential to Planned Residential Development) proposes 370 units on 19.51 acres along Route 29 in the Places 29 North growth area. **PEC recommends the rezoning be denied in its current form**, as it does not: (1) effectively build upon the current growth area; (2) create affordable housing units that are sustainable for generational use; (3) conform to stepback requirements; (4) provide bike/pedestrian connectivity to nearby public transit nor essential services/stores required to create and sustain a livable community; (5) create beneficial public road infrastructure; (6) provide adequate proffers related to public schools; and (7) protect nor create beneficial tree canopies.

The Piedmont Environmental Council supports smart growth policies and specific projects that promote inclusive, walkable, public transit-oriented communities. Albemarle's approach to housing should meet anticipated future demand while providing sufficient affordable housing inventory. In order to be truly affordable, that housing should provide generational housing, be located in growth areas, and be within walking/biking distance to public transit, job centers, schools, and other essential services; otherwise, the total costs of living there will prove to be anything but affordable.

PEC raises the following concerns, in order to address our concerns with the proposed rezoning: (1) Comprehensive Planning, (2) Affordable Housing, (3) Special Exceptions, (4) Connectivity, (5) Private Roads, (6) Public Schools, and (7) Tree Canopy.

Comprehensive Planning

The Places 29 Master Plan defines the future land uses, including approximately 50 parcels planned for Urban Density within the Places 29 North growth area.¹ Based on the recommended Urban Density (6.01 to 34 housing units per acre), these additional parcels could provide between approximately 2,500 and 14,500 housing units.

The Draft Albemarle County Housing Policy states, "...the county must support the development of an additional 3,616 units to fully accommodate projected household growth through 2040..."² Since calculated in March 2020:

- Albemarle's population increased from 108,639 to an estimated 110,545, resulting in a population difference of 27,940 between 2020 and 2040;³
- Based on an estimated 2.54 persons per dwelling, approximately 11,000 residential units would be needed to accommodate this growth;⁴
- An additional 897 residential units have been approved by the county, resulting in a total of 9,031 residential units not yet built within the approved housing pipeline;⁵ and
- Therefore, the targeted housing inventory has been reduced from 3,616 to 1,969.

There is a huge difference between (A) what is available for potential free enterprise development via future development called for in the comprehensive plan (between approximately 2,500 and 14,500 units); and (B) what is targeted within the county's housing policy (3,616 units reduced to 1,969 units). This proposed rezoning would consume over 18% of the county's projected housing needs without appropriately connecting to core development areas. The county has the ability to be selective when approving the targeted housing units.

During the upcoming comprehensive plan update, it will be important for the county to clearly make this distinction. PEC recommends updating the overall Comprehensive Plan, including the Places 29 Master Plan, to appropriately address targeted housing via phased development efforts. The Comprehensive Plan recommends that the county should "Use Development Area land efficiently to prevent premature expansion of the Development Areas".⁶ How we develop within the development area will ultimately determine when the growth area may expand. Therefore, it is critical the county prioritize developing greyfields/brownfields and areas located within existing developed areas, with good access to services, prior to developing greenfields and areas located beyond reasonable connection to core areas in the developed areas.

¹ Albemarle County, Places 29 Master Plan, Future Land Use North, p. 89

² Albemarle County Draft Housing Policy, March 2020. p.13. Accessed online via <https://www.albemarle.org/home/showpublisheddocument?id=7098>

³ Weldon Cooper Center, Virginia Population, Cooper Center 2020 Estimates. Accessed online via <https://demographics.coopercenter.org/virginia-population-estimates/>

⁴ Albemarle County, 2019 Growth Management Report, pg. 7. Accessed online via <https://www.albemarle.org/home/showpublisheddocument?id=322>

⁵ Albemarle County Community Development Department (2019), Albemarle County Development Dashboards, Accessed online via <https://www.albemarle.org/department.asp?department=cdd&relpage=23323>. Accessed February 23, 2021.

⁶ Albemarle Comprehensive Plan, Objective 4. p. 35.



RST Residences is not located within or adjoining the core development area near Hollymead nor Forest Lakes Town Centers, nor does it have the supporting infrastructure to successfully connect it to existing development. At best, we believe this proposal is premature.

Affordable Housing

RST Residences is proposed on the former Ridgewood Mobile Home Park, which provided the community with 68 mobile homes and 10 efficiency apartments.^{7,8} Replacing 68 mobile homes with apartments that only offer 10-years worth of affordability is not a desirable outcome -- it would mean displacing residents with stable housing solutions with new affordable housing units that do not provide long term living solutions. This is not the generational stability we need.

The Applicant has proffered at least 50% of the units (185 units) as affordable housing via “for-sale units or rental units, or a combination thereof, in the owner’s discretion”.⁹ At first glance, 185 affordable units seems quite appealing; however, there is no stipulation on how many units must be sold as such, and the rental-units are term-limited for a 10-year rental period.¹⁰ Therefore, it is reasonable to believe that each of the 185 units could be used as rental-units for 10-years, converted to market-rate units afterwards, then permanently sold or rented as such. This outcome would provide ZERO affordable housing after 10 years and create the need for a new batch of affordable housing units.

The first *Action Step* stated in the Draft Albemarle County Housing Policy is to “Ensure a mixture of housing types are provided, with a minimum of 20% of the total number of housing units in new developments being provided as affordable housing.”¹¹ Yet the proposed approach to affordable housing would leave the county constantly playing catch-up to replace expired affordable housing units and residents would be forced to find new homes after the 10-year affordable housing period expired.

The county should place emphasis on home ownership, in order to help families build personal wealth and remove themselves from the perpetual rental cycle. Affordable rental units should be provided for a longer period to provide generational affordability -- 30 years as a standard, 99 years as an aspiration.

Special Exceptions

⁷ <https://www.cvilletomorrow.org/articles/development-digest-ridgewood-mobile-home-park-sold-to-virginia-beach-based-developer>

⁸ <https://tjpc.org/wp-content/uploads/2020/05/2018-2022-Consolidated-Plan-Adopted-by-TJPC.pdf>

⁹ Zoning Map Amendment for RST Residences. January 19, 2021.

¹⁰ Id sec

¹¹ Albemarle County Draft Housing Policy, March 2020. p.13. Accessed online via <https://www.albemarle.org/home/showpublisheddocument?id=7098>



The associated Special Exception ([SE202000003](#)) has requested 10 setback exceptions for Building 1 (two buildings connected by pedestrian walkways) and eight (8) townhouses, in conjunction with the proposed rezoning.

Building 1

The “Applicant estimates that strict application of a 15-foot setback to Building 1 would result in the loss of ten residential units. As a reduction in the number of residential units is contrary to the Comprehensive Plan’s recommendation for the Property, a special exception from the setback is warranted.”¹²

PEC emphasizes that the Comprehensive Plan and the Places 29 Master Plan depict the proposed site as Urban Density in the Future Land Use Map, which provides a density range between 6.01 and 34 units/acre. A reduction of 10 units would not substantially change the overall density (e.g., 18.96 units/acre reduced to 18.45 units/acre).

Eight (8) Townhouses

The Applicant states “waiving setback requirements [for the 8 townhouses] allows for additional living space in the Project. Given the Project’s focus of providing affordable housing to Albemarle County citizens, waiving the setback requirement would help balance the County’s design requirement with important housing priorities.”¹³

PEC emphasizes the importance of providing ample living space for affordable housing units; however, the applicant has not provided sufficient reasoning nor evidence to support the above claim. Therefore, PEC recommends the eight (8) townhouses adhere to the 15-foot setback requirement.

Connectivity

RST Residences does not provide sufficient connectivity to create a livable community in which residents can easily walk, bike, nor utilize public transportation to go to work, school, essential stores, and other everyday destinations. There are no bus stops, bike lanes, nor pedestrian crosswalks proffered in this rezoning to help residents move along and across Route 29, yet the Comprehensive Plan states that their inclusion is “considered necessary”,¹⁴ emphasizing the importance of expanding the transportation network via public transportation and bike/ped connectivity.^{15,16,17}

¹² SE202000003 Correspondence 2020-09-10, p.3

¹³ Id sec, p.2

¹⁴ Places 29 Master Plan, p.10. “Expansion of transit service (including hours of operation, headways, extension of service to unserved areas, and supporting infrastructure, such as sidewalks, crosswalks, and shelters)...It should be noted that all of the transportation improvements recommended in this Plan are considered necessary.”

¹⁵ Places 29 Master Plan, p. 67. “...the transportation network needs to expand the choices for movement within and through the area, while the pattern of development takes advantage of and facilitates those expanded choices.”

¹⁶ Places 29 Master Plan, p.87. “An expanded and enhanced transit system is recommended for the Places29 area. As new blocks and streets are created, it is important to include areas for transit. In order to attract passengers and provide needed services throughout the area, transit stops should be provided in strategic places and should incorporate amenities to make the system easy to use.”

¹⁷ Places 29 Master Plan, Figure 7. Parks and Green Systems Map, p. 91



Walking distances between $\frac{1}{4}$ to $\frac{1}{2}$ -mile are broadly considered within a comfortable walking distance from one's home.¹⁸ Despite the application stating that "Hollymead Town Center area is in the immediate vicinity of the Property,"¹⁹ RST Residences is located approximately:

- 1.2 miles from Hollymead Elementary School
- 1.2-miles from Harris Teeter
- 1.3-miles from Target
- 1.5-miles from CVS
- 1.6-miles from Food Lion
- 2.9-miles from Baker-Butler Elementary School
- 4.3-miles from Albemarle High School

Public transportation is not provided in this area by the Charlottesville Area Transit (CAT), with the nearest bus stop located approximately 1.5-miles away at Walmart.²⁰ JAUNT services are limited and do not operate on a recurring schedule and requires scheduling two (2) days in advance.²¹

A majority of offsite trips will require a vehicle or bicycle for transportation; however, public transportation is limited and bicycle facilities are not adequately developed for safe travel along Route 29. The Places 29 Master Plan highlights 12 principles for both new development and redevelopment in the Master Plan Area; the first three principles being:

- Pedestrian Orientation;
- Neighborhood Friendly Streets and Paths; and
- Interconnected Streets and Transportation Networks.²²

RST Residences is not located within a core development area of Places 29; therefore, it does not conform to nor provide opportunities for these principles. The county should not approve residential development in the growth area that does not have connectivity to create a livable community.

Private Roads

PEC raises the importance of including streets into the public road system. Private roads should be avoided, as they could cause significant fiscal impacts to future housing prices, create dangerous conditions for first response access, and hinder the public from comfortably using onside sidewalks due to the perception of private ownership. County planning staff has recommended onsite streets be developed and incorporated into the public road system.

¹⁸ Design Concepts, Walkability Standards, Robby Layton. October 12, 2017. Accessed online via <https://www.dcla.net/blog/walkability-standards>

¹⁹ RST Residences, Zoning Map Amendment, Application Narrative ZMA 2020-00007 (October 5, 2020), p. 2

²⁰ Charlottesville Area Transit, Riders Guide. Accessed online via <https://www.charlottesville.gov/DocumentCenter/View/1023/Riders-Guide-PDF>

²¹ JAUNT. Accessed online via <https://ridejaunt.org/how-to-ride/>

²² Places29 Master Plan, p.6

Public Schools

RST Residences will add approximately 84 school-age children,²³ causing Hollymead Elementary School to approach capacity and Albemarle High School to remain in an over-capacity status.²⁴ The county needs to ensure school capacity is addressed as development occurs and that associated proffers meet the needs to the greatest extent possible.

Tree Canopy

PEC calculated the approximate tree canopy in both Places 29 North and RST Residences, in order to understand their correlation and potential carbon sequestration values (**Attachment A** and **Attachment B**).

Results from these analyses suggest that both Places 29 North and RST Residences have a tree canopy coverage of approximately 50%, meaning that half of the land mass in each area is covered by tree canopy. Urban tree canopies provide many of the same benefits as rural tree canopies, including

- “Stormwater management functions;
- Reduction in the urban heat island effect, resulting in lower heating/cooling costs;
- Lowers air temperatures;
- Reduces air pollution;
- Increases property values;
- Provides wildlife habitat; and
- Provides aesthetic and community benefits such as improved quality of life.”²⁵

The current onsite tree canopy provides annual carbon sequestration of an estimated 46.74 tons CO₂, equivalent to the CO₂ emissions from 4.9 homes’ energy use for one year.²⁶ The current onsite carbon stored in tree mass is estimated to be 1,173.72 tons CO₂, equivalent to the CO₂ emissions from 123 homes’ energy use for one year.²⁷

Albemarle’s Climate Action Plan emphasizes the importance of providing urban tree canopies to all populations,²⁸ and includes Priority L.2.2 to ensure that “that overall tree canopy is not reduced by development in the Development Areas”.²⁹

²³ RST Residences, Albemarle Staff Review, ZMA202000007 RST Residences; 3rd Submittal, p.4

²⁴ Id sec

²⁵ Center for Watershed Protection, Urban Tree Canopy. Accessed online via <https://www.cwp.org/urban-tree-canopy/>

²⁶ Environmental Protection Agency, Greenhouse Gas Equivalency Calculator. Accessed online via <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

²⁷ Id sec

²⁸ Albemarle Climate Action Plan, p.46. “For local environmental stewardship to advance equity, the location and prioritization of projects like reforestation and tree planting are paramount. Urban tree canopies tend to be highly unequal, with tree canopy and income positively correlated. If improvements to local environmental health—including conservation and tree canopy increases—occur in more affluent areas but not in areas with lower income and historically marginalized populations, these inequities will persist. Attention to the effect on housing affordability of environmental improvements should also be monitored”.

²⁹ Albemarle Climate Action Plan, p. 48. “Evaluate a requirement that overall tree canopy is not reduced by development in the Development Areas. Pursue increases in tree canopy in new and existing developed areas.”



PEC recommends that future tree canopy estimates be provided for the site, and that the comprehensive plan and Climate Action Plan set target tree canopy coverage values for both the rural and urban areas.

It is for the above mentioned reasons that PEC recommends denial of this rezoning. PEC supports affordable housing, but the proposed rezoning does not provide:

- Meaningful or lasting contributions to the county's affordable housing needs;
- Density that fits within the site boundaries without requiring 10 stepback variances;
- Connectivity for public transit, pedestrians, nor bicyclists;
- Road infrastructure that addresses the impact of the development nor benefits the general public; and
- Retention nor replacement of the existing tree canopy.

Thank you for taking the time to review PEC's thoughts on this important matter. Please include this letter in the county's public submission forum, and feel free to contact me with any questions or requests for additional information.

Sincerely,

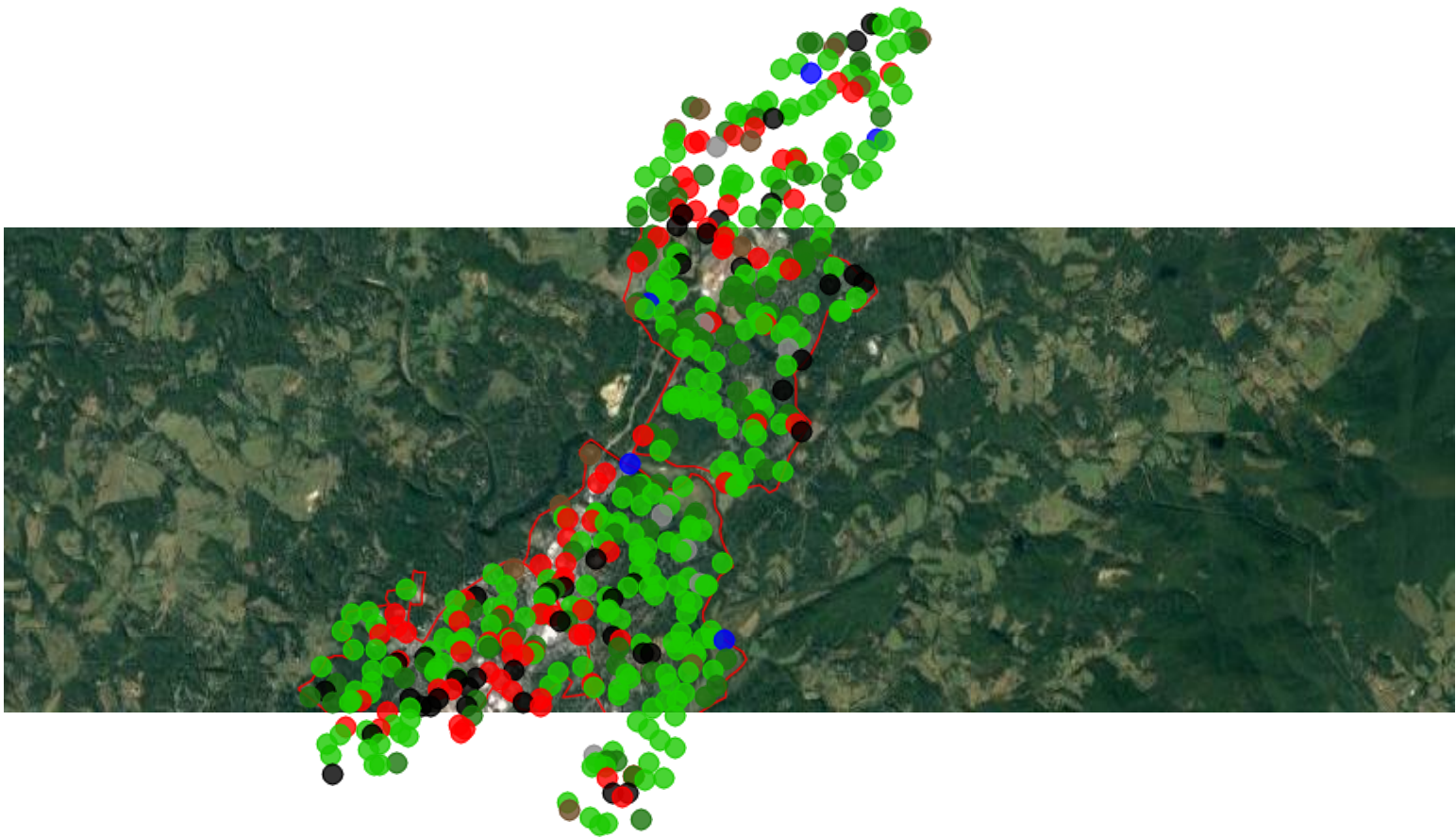
A handwritten signature in black ink, appearing to read "Chris Hawk", written in a cursive style.

Christopher Hawk

Land Use Representative - The Piedmont Environmental Council
(804)337-6716



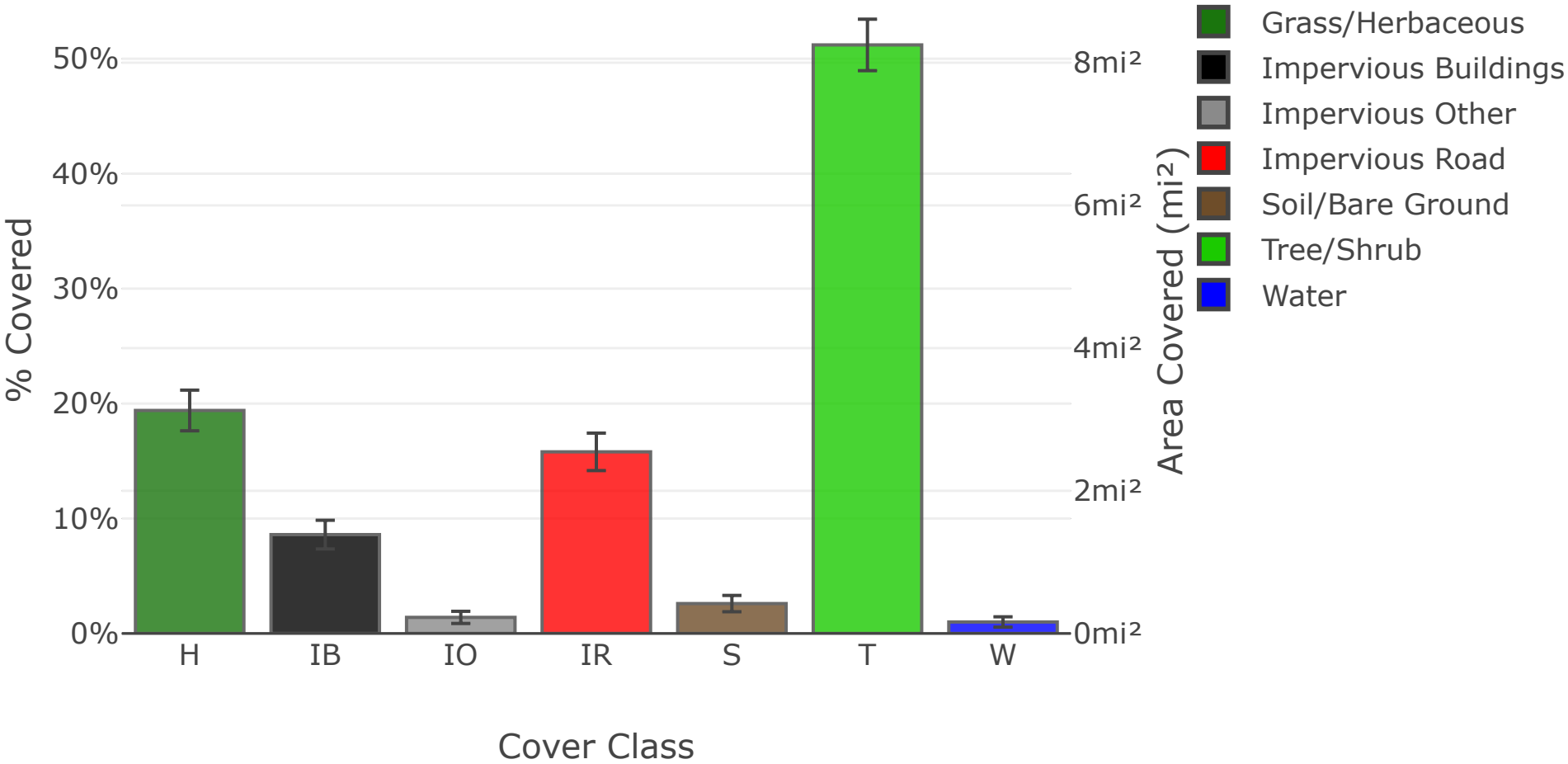
Attachment A
Tree Canopy Analysis
Places 29 North



Google

Imagery ©2020 TerraMetrics

Land Cover



Abbr.	Cover Class	Description	Points	% Cover ± SE	Area (mi²) ± SE
H	Grass/Herbaceous		97	19.40 ± 1.77	3.13 ± 0.29
IB	Impervious Buildings		43	8.60 ± 1.25	1.39 ± 0.20
IO	Impervious Other		7	1.40 ± 0.53	0.23 ± 0.09
IR	Impervious Road		79	15.80 ± 1.63	2.55 ± 0.26
S	Soil/Bare Ground		13	2.60 ± 0.71	0.42 ± 0.11
T	Tree/Shrub		256	51.20 ± 2.24	8.25 ± 0.36
W	Water		5	1.00 ± 0.45	0.16 ± 0.07
Total			500	100.00	16.12

Tree Benefit Estimates: Carbon (English units)

Description	Carbon (kT)	±SE	CO ₂ Equiv. (kT)	±SE	Value (USD)	±SE
Sequestered annually in trees	7.21	±0.31	26.43	±1.15	\$1,229,556	±53,683
Stored in trees (Note: this benefit is not an annual rate)	181.05	±7.90	663.86	±28.98	\$30,878,771	±1,348,186

Currency is in USD and rounded. Standard errors of removal and benefit amounts are based on standard errors of sampled and classified points. Amount sequestered is based on 0.874 kT of Carbon, or 3.203 kT of CO₂, per mi²/yr and rounded. Amount stored is based on 21.940 kT of Carbon, or 80.446 kT of CO₂, per mi² and rounded. Value (USD) is based on \$170,550.73/kT of Carbon, or \$46,513.84/kT of CO₂ and rounded. (English units: kT = kilotons (1,000 tons), mi² = square miles)

Tree Benefit Estimates: Air Pollution (English units)

Abbr.	Description	Amount (T)	±SE	Value (USD)	±SE
CO	Carbon Monoxide removed annually	2.38	±0.10	\$203	±9
NO2	Nitrogen Dioxide removed annually	12.98	±0.57	\$349	±15
O3	Ozone removed annually	129.31	±5.65	\$18,164	±793
SO2	Sulfur Dioxide removed annually	8.18	±0.36	\$61	±3
PM10*	Particulate Matter greater than 2.5 microns and less than 10 microns removed annually	43.31	±1.89	\$13,186	±576
PM2.5	Particulate Matter less than 2.5 microns removed annually	6.28	±0.27	\$37,548	±1,639
Total		202.46	±8.84	\$69,510	±3,035

Currency is in USD and rounded. Standard errors of removal and benefit amounts are based on standard errors of sampled and classified points. Air Pollution Estimates are based on these values in T/mi²/yr @ \$/T/yr and rounded:
CO 0.289 @ \$85.08 | NO2 1.573 @ \$26.86 | O3 15.670 @ \$140.47 | SO2 0.991 @ \$7.45 | PM10* 5.249 @ \$304.43 | PM2.5 0.761 @ \$5,975.67 (English units: T = tons (2,000 pounds), mi² = square miles)

Tree Benefit Estimates: Hydrological (English units)

Abbr.	Benefit	Amount (Kgal)	±SE	Value (USD)	±SE
AVRO	Avoided Runoff	2.73	±0.12	\$24	±1
E	Evaporation	225.48	±9.84	N/A	N/A
I	Interception	226.75	±9.90	N/A	N/A
T	Transpiration	305.11	±13.32	N/A	N/A
PE	Potential Evaporation	1,708.59	±74.60	N/A	N/A
PET	Potential Evapotranspiration	1,394.07	±60.87	N/A	N/A

Currency is in USD and rounded. Standard errors of removal and benefit amounts are based on standard errors of sampled and classified points. Hydrological Estimates are based on these values in Kgal/mi²/yr @ \$/Kgal/yr and rounded:
AVRO 0.331 @ \$8.94 | E 27.324 @ N/A | I 27.477 @ N/A | T 36.974 @ N/A | PE 207.046 @ N/A | PET 168.932 @ N/A (English units: Kgal = thousands of gallons, mi² = square miles)

About i-Tree Canopy

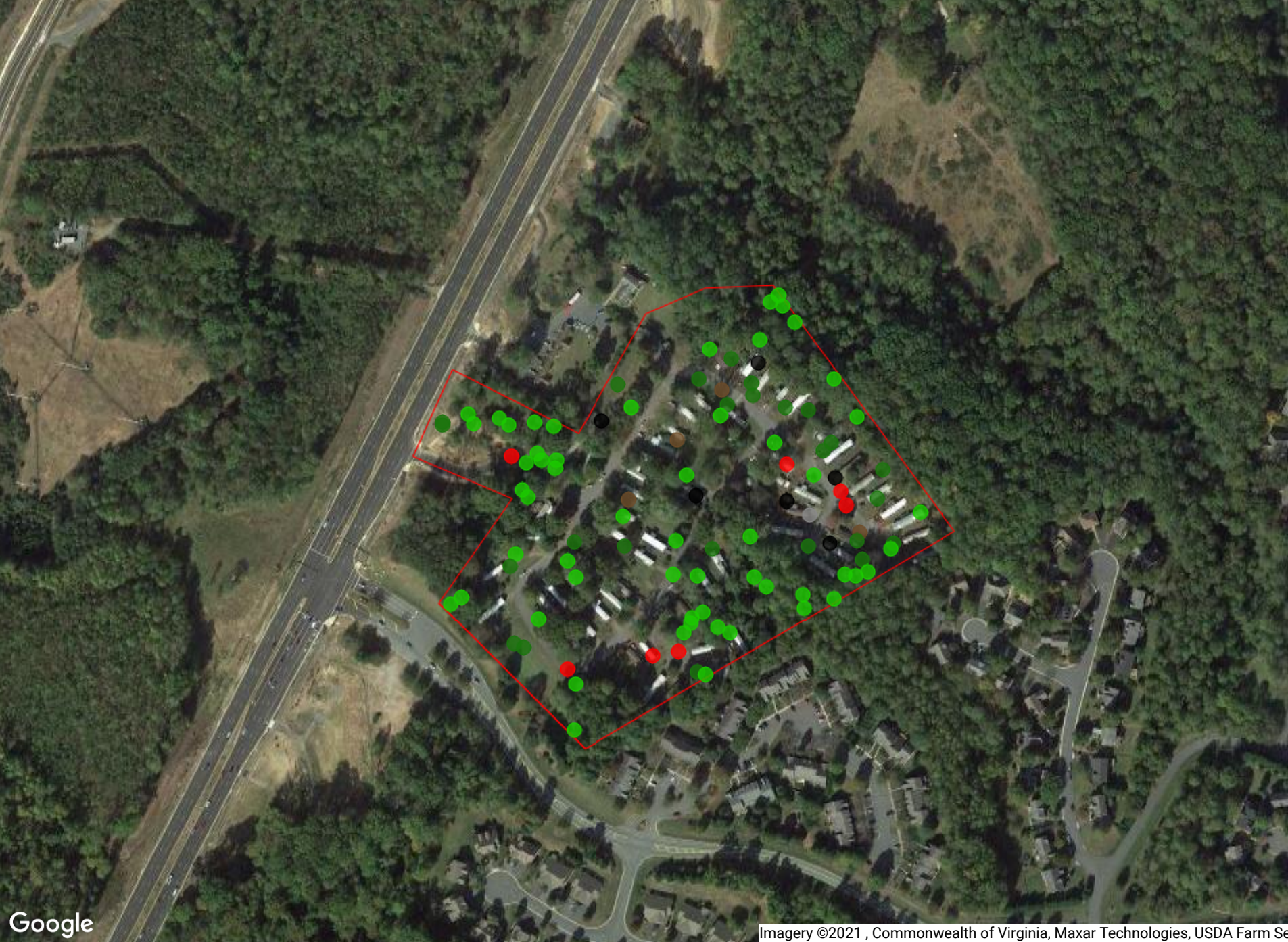
The concept and prototype of this program were developed by David J. Nowak, Jeffery T. Walton, and Eric J. Greenfield (USDA Forest Service). The current version of this program was developed and adapted to i-Tree by David Ellingsworth, Mike Binkley, and Scott Maco (The Davey Tree Expert Company)

Limitations of i-Tree Canopy

The accuracy of the analysis depends upon the ability of the user to correctly classify each point into its correct class. As the number of points increase, the precision of the estimate will increase as the standard error of the estimate will decrease. If too few points are classified, the standard error will be too high to have any real certainty of the estimate.

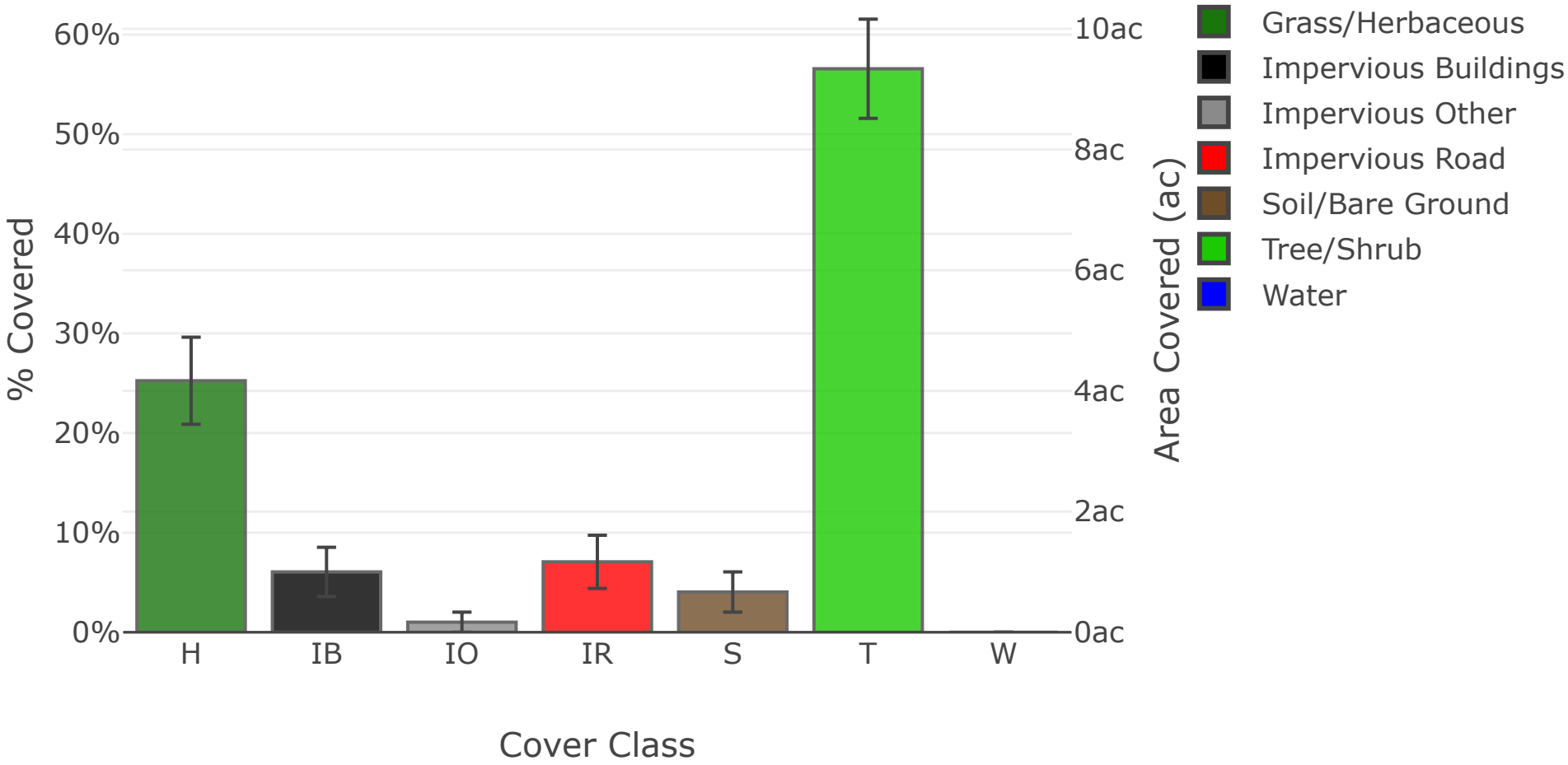


Attachment B
Tree Canopy Analysis
RST Residences



Imagery ©2021 , Commonwealth of Virginia, Maxar Technologies, USDA Farm Service Agency

Land Cover



Abbr.	Cover Class	Description	Points	% Cover ± SE	Area (ac) ± SE
H	Grass/Herbaceous		25	25.25 ± 4.37	4.17 ± 0.72
IB	Impervious Buildings		6	6.06 ± 2.47	1.00 ± 0.41
IO	Impervious Other		1	1.01 ± 1.01	0.17 ± 0.17
IR	Impervious Road		7	7.07 ± 2.67	1.17 ± 0.44
S	Soil/Bare Ground		4	4.04 ± 2.02	0.67 ± 0.33
T	Tree/Shrub		56	56.57 ± 4.98	9.34 ± 0.82
W	Water		0	0.00 ± 0.00	0.00 ± 0.00
Total			99	100.00	16.51

Tree Benefit Estimates: Carbon (English units)

Description	Carbon (T)	±SE	CO ₂ Equiv. (T)	±SE	Value (USD)	±SE
Sequestered annually in trees	12.75	±1.12	46.74	±4.12	\$2,174	±191
Stored in trees (Note: this benefit is not an annual rate)	320.11	±28.19	1,173.72	±103.37	\$54,594	±4,808

Currency is in USD and rounded. Standard errors of removal and benefit amounts are based on standard errors of sampled and classified points. Amount sequestered is based on 1.365 T of Carbon, or 5.005 T of CO₂, per ac/yr and rounded. Amount stored is based on 34.281 T of Carbon, or 125.697 T of CO₂, per ac and rounded. Value (USD) is based on \$170.55/T of Carbon, or \$46.51/T of CO₂ and rounded. (English units: T = tons (2,000 pounds), ac = acres)

Tree Benefit Estimates: Air Pollution (English units)

Abbr.	Description	Amount (lb)	±SE	Value (USD)	±SE
CO	Carbon Monoxide removed annually	8.42	±0.74	\$0	±0
NO2	Nitrogen Dioxide removed annually	45.91	±4.04	\$1	±0
O3	Ozone removed annually	457.25	±40.27	\$32	±3
SO2	Sulfur Dioxide removed annually	28.93	±2.55	\$0	±0
PM10*	Particulate Matter greater than 2.5 microns and less than 10 microns removed annually	153.16	±13.49	\$23	±2
PM2.5	Particulate Matter less than 2.5 microns removed annually	22.22	±1.96	\$66	±6
Total		715.89	±63.05	\$123	±11

Currency is in USD and rounded. Standard errors of removal and benefit amounts are based on standard errors of sampled and classified points. Air Pollution Estimates are based on these values in lb/ac/yr @ \$/lb/yr and rounded:
CO 0.902 @ \$0.04 | NO2 4.917 @ \$0.01 | O3 48.968 @ \$0.07 | SO2 3.098 @ \$0.00 | PM10* 16.403 @ \$0.15 | PM2.5 2.379 @ \$2.99 (English units: lb = pounds, ac = acres)

Tree Benefit Estimates: Hydrological (English units)

Abbr.	Benefit	Amount (gal)	±SE	Value (USD)	±SE
AVRO	Avoided Runoff	4.83	±0.43	\$0	±0
E	Evaporation	398.66	±35.11	N/A	N/A
I	Interception	400.89	±35.31	N/A	N/A
T	Transpiration	539.45	±47.51	N/A	N/A
PE	Potential Evaporation	3,020.82	±266.04	N/A	N/A
PET	Potential Evapotranspiration	2,464.74	±217.07	N/A	N/A

Currency is in USD and rounded. Standard errors of removal and benefit amounts are based on standard errors of sampled and classified points. Hydrological Estimates are based on these values in gal/ac/yr @ \$/gal/yr and rounded:
AVRO 0.517 @ \$0.01 | E 42.694 @ N/A | I 42.933 @ N/A | T 57.771 @ N/A | PE 323.509 @ N/A | PET 263.956 @ N/A (English units: gal = gallons, ac = acres)

About i-Tree Canopy

The concept and prototype of this program were developed by David J. Nowak, Jeffery T. Walton, and Eric J. Greenfield (USDA Forest Service). The current version of this program was developed and adapted to i-Tree by David Ellingsworth, Mike Binkley, and Scott Maco (The Davey Tree Expert Company)

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Use of this tool indicates acceptance of the [EULA](#).