

IN REPLY REFER TO:  
NCPC File No. 8326

October 21, 2021

Mr. Michael Cullen  
Principal Planner  
Department of Community Planning, Housing, & Development  
Planning Division  
2100 Clarendon Boulevard, Suite 700  
Arlington, VA 22201

RE: NCPC Staff Comments on the Marbella Apartments Redevelopment

Dear Mr. Cullen:

Thank you for the opportunity to comment on the redevelopment proposal for the Marbella Apartments (Marbella Apartments Redevelopment) located at 1251 N. Pierce Street and 1300 N. Pierce Street. The National Capital Planning Commission (NCPC) and Arlington County acknowledge that there is a shared responsibility regarding the stewardship of the national capital including views to and from the monumental core. Arlington County is a particularly important contributor to the character of the monumental core and its setting, where some of the nation's most important cultural resources are located. The form and character of the built and natural elements within and around the monumental core – and views to and from this setting – are an important part of how the public experiences our nation's most beloved memorials and public buildings. The Arlington County Board recognized the importance of the relationship between the County and the National Mall in the *Resolution of Concern Regarding Building Heights Related to the National Capitol Mall Axis*, which it adopted in 1982.

The proposed Marbella Apartments Redevelopment sits within the primary east-west vista from the National Mall to the western horizon, as outlined in the Federal Urban Design Element Technical Addendum of the *Comprehensive Plan for the National Capital*. This viewshed contains numerous important and visually prominent national structures, including the Washington Monument and the Lincoln Memorial. Arlington County's Courthouse neighborhood, with its consistent prevailing building height, forms the background of the viewshed. The project site is located in the middle of this background.

NCPC staff completed a visual analysis to assess the impacts of the proposed project on the east-west vista of the National Mall (see appendix). NCPC staff combined a 3-D model of the National Mall viewshed area from its GIS and CAD repository with a model of the proposed Marbella Apartments Redevelopment based on the permit submission drawings. Staff analyzed views of the composite model against existing elevation, topography, and building heights. The model views were applied to photo visualizations from the U.S. Capitol, Washington Monument, Lincoln Memorial, and Iwo Jima Memorial to illustrate the proposed massing and urban design impacts to

Mr. Michael Cullen

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the National Mall viewshed. NCPC staff used this methodology on several previous projects in Arlington County including Courthouse Square, Key Bridge Marriot, and 1501 Arlington Boulevard. Future request for project comments from Arlington County planning staff will incorporate this approach.

As seen in the visual analysis, due to the height of the existing Prospect House building (shown in blue), the proposed Marbella Apartment redevelopment (shown in pink) would not be visible from the U.S. Capitol, Washington Monument, Lincoln Memorial, and Iwo Jima Memorial. Our analysis concludes that the proposed building height of the redevelopment have no significant impact on the viewshed.

NCPC staff appreciates the consideration afforded to the form, order, and character of the monumental core skyline in the proposed project for the Marbella Apartments Redevelopment. Thank you for your time and the opportunity to comment. We look forward to working with you to identify development projects that may impact the east-west vista from the National Mall. If you have any questions, please have a member of your staff contact Angela Dupont at 202-482-7232 or [angela.dupont@ncpc.gov](mailto:angela.dupont@ncpc.gov).

Sincerely,

*Michael A. Sherman*

Michael A. Sherman  
Director, Policy and Research

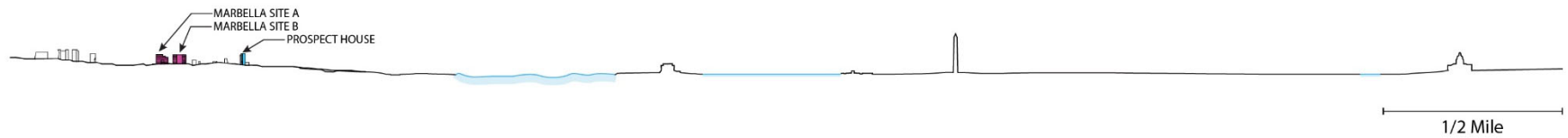
# NCPC Staff Analysis: Conceptual Renderings for Proposed Marbella Apartments Redevelopment

## Section Drawing

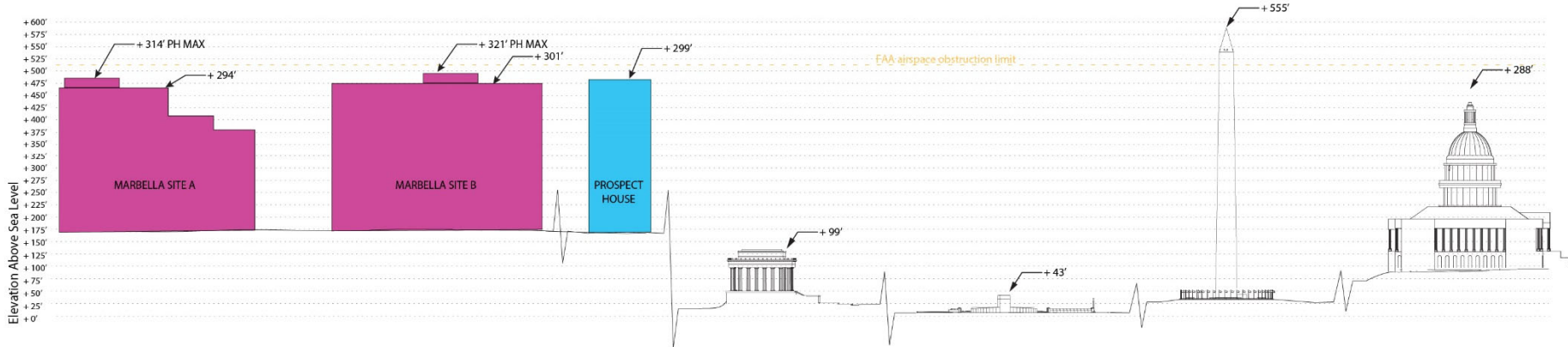
PLAN VIEW



SECTION DRAWING | Approximately 3.8 Mile Distance from US Capitol to Marbella



RELATIVE ELEVATIONS AND BUILDING HEIGHTS WITH MARBELLA BUILDINGS AND PROSPECT HOUSE



NCPC staff modeled the visual impact of the building height in 3D using CAD and GIS data. The maps and visuals in this presentation are provided for information and illustrative purposes only. It does not reflect an official position or conclusion of the National Capital Planning Commission. No conclusions or decisions to act or refrain from acting should be made based on the maps in this packet without conducting an independent analysis with reference to the original source information.

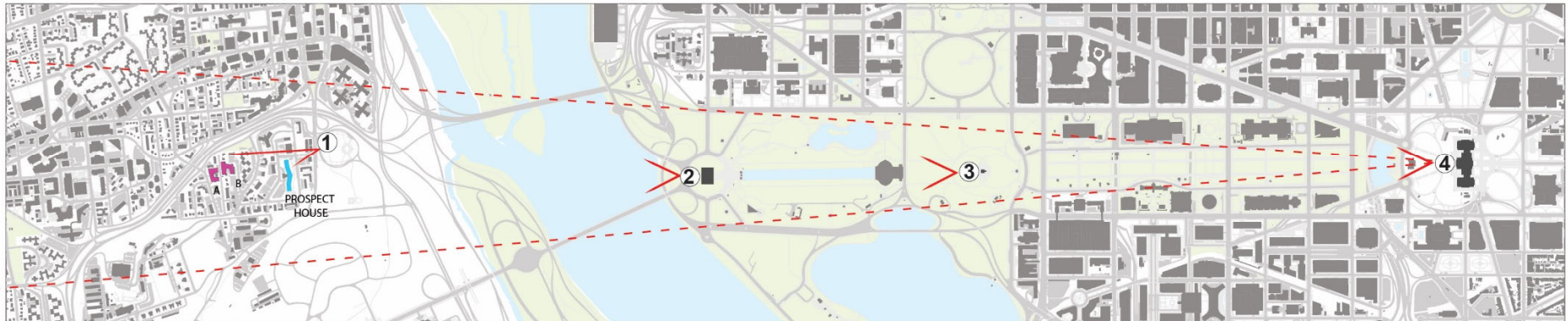
## Photo Simulation Observation Points

The modeling simulations to follow are viewed from four observation points. The markers below show the location where each picture used in the simulations was taken. All photos were taken at eye-level.

### Photo Locations

1. Standing at the base of the Iwo Jima Memorial
2. Standing on the west portico of the Lincoln Memorial
3. Standing at the base of the Washington Monument on the west side
4. Standing at the base of the U.S. Capitol Staircase on the west lawn

### PLAN VIEW



Existing Prospect House shaded in **blue**

Proposed Marbella Apartments Redevelopment shaded in **pink**

NCPD staff modeled the visual impact of the building height in 3D using CAD and GIS data. The maps and visuals in this presentation are provided for information and illustrative purposes only. It does not reflect an official position or conclusion of the National Capital Planning Commission. No conclusions or decisions to act or refrain from acting should be made based on the maps in this packet without conducting an independent analysis with reference to the original source information.

Photo 1: View from Iwo Jima Memorial in summer



Existing Prospect House shaded in blue

Proposed Marbella Apartments Redevelopment dashed in pink

NGPC staff modeled the visual impact of the building height in 3D using CAD and GIS data. The maps and visuals in this presentation are provided for information and illustrative purposes only. It does not reflect an official position or conclusion of the National Capital Planning Commission. No conclusions or decisions to act or refrain from acting should be made based on the maps in this packet without conducting an independent analysis with reference to the original source information.

Photo 2: View from the west side of the Lincoln Memorial in summer



Existing Prospect House shaded in **blue**

Proposed Marbella Apartments Redevelopment dashed in **pink**, not visible behind Prospect House

NCPG staff modeled the visual impact of the building height in 3D using CAD and GIS data. The maps and visuals in this presentation are provided for information and illustrative purposes only. It does not reflect an official position or conclusion of the National Capital Planning Commission. No conclusions or decisions to act or refrain from acting should be made based on the maps in this packet without conducting an independent analysis with reference to the original source information.

Photo 3: View from the west side of the Washington Monument in summer



Existing Prospect House shaded in blue

Proposed Marbella Apartments Redevelopment not visible

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Photo 4: View from the Capitol steps in winter



Existing Prospect House shaded in blue  
Proposed Marbella Apartments Redevelopment not visible

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