

July 28, 2020

Dear Board Chair Garvey and Members of the Board:

Last December, the County Manager reviewed with the Board a “[Missing Middle Housing Study Framework](#)” that proposed a process to consider new land-use tools to increase the supply and diversity of various types of housing. The framework also indicated that staff would next seek advisory body input to develop a scope and timelines for a Missing Middle study which was “envisioned in turn to commence in the 2nd Quarter of 2020.”

The County’s press release at the time quoted then-Board Vice Chair Dorsey:

“We look forward to a robust, thoughtful conversation with the community about missing middle housing, and whether and how this type of housing might work for Arlington.... **The community will be involved from the beginning**, helping [to] determine the scope and charge for this study, and there will be several months of engagement and discussion before any specific proposals emerge.” (**Emphasis added**)

On January 15, 2020 the County issued a *draft* [Missing Middle Housing Study, Scope, Charge, and Timeline](#) (the "Missing Middle Draft Scope of Work") that laid out the planned expanse of the effort. Presumably, this was the operative document designed to become the "final study scope for the Board" in April. This document indicated that “pre-planning... focuses on developing the appropriate community collaboration process" and that staff would consider different models of focused community participation, including potentially a “Citizen Advisory Panel” or “Working Group.” This group would be "collaborating with staff on the process and content, ensuring that the process is equitable, thoughtful, and thorough.” The County also conducted a survey from February 12-March 15 to gain public inputs and sought community partners to provide feedback. (ASF submitted a request in March to become a community partner, but was never contacted.)

The County began and completed MM briefings to key commissions, including Long-Range Planning, Transportation, and Urban Forestry, from January through March. Some of those commissions also expressed reservations. As the community also expressed concerns and lack of awareness, Board members briefed some civic associations and other organizations to explain the purpose of the study, address questions and solicit input on the Missing Middle idea. During the course of these briefings, many residents questioned whether Arlington indeed lacks “Missing Middle” (MM) housing types, whether new units of MM would address the real problems here, whether other solutions could be explored, and why new zoning was advanced as the only solution. Unfortunately, Board member briefings necessarily ended in mid-March as Covid-19 contagion prompted the County to suspend or restrict much public engagement, and still does so today.

As it became clear that Covid would have major impact, on April 24, [ASF asked the Board](#) to "postpone further consideration as well as any study activity" until the Covid-19 emergency restrictions had passed, but [the Board demurred](#) on May 6 and noted that staff would continue research even while it "reevaluated the work plan." Still the Board assured ASF that "any action the Board may take on new policies connected to Missing Middle housing will be taken only after engaging with our community and conducting the study."

The Missing Middle Draft Scope of Work of January had specified that Phase 2 of the MM effort would contain "recommendations for new housing types" and Phase 3 was projected to "facilitate the development of new housing types through amendments to County plans and ordinances." As we were never engaged as a community partner, and had understood a Working Group would be created, ASF objects that it has had no opportunity to engage the County to meaningfully affect outcomes. At a minimum, the County should address questions such as those raised on our [website](#) before advancing to conclusions about new housing types.

We therefore object that the County has released (or announced that it will release) -- during the summer and the pandemic -- five “Bulletins” that point to narrow outcomes of new Missing Middle construction enabled by up-zoning. The bulletins reinforce January's Missing Middle Draft Scope of Work, notwithstanding the County's inability between January and mid-July to provide baseline factual information, including as to the types and numbers of categories of housing in Arlington, existing and projected market demand for types of housing, etc. as a predicate to determining whether we had a “missing middle housing” problem or any problem that could be solved only through new zoning tools.

Indeed, the County's May 6 letter to ASF couched the Missing Middle effort entirely in the framework of "development and zoning" -- whereas a necessary and thorough review of housing affordability or availability or other economic factors could point to outcomes that do not mandate new zoning.

ASF was naïve to have taken at face value then-Board Vice Chair Dorsey's claim that "The community will be involved from the beginning." If indeed the January *draft* has now become the operative document, ASF believes that the County has put the cart before the horse in assuming a needed "solution" of zoning changes.

ASF on July 24 again submitted a request to become a community partner on Missing Middle. We ask now that:

1. the Board notify ASF that it has been approved as a community partner;
2. once public engagement can recommence, Board members complete the suspended Member meetings with civic organizations, and the Missing Middle Draft Scope of Work be finalized. As noted above, phases 2 and 3 of the current January 15 draft should be dropped to show there are no preordained outcomes and any subsequent phases after Phase 1 be determined based on the outcome of that first phase.
3. further work on the bulletins be suspended until not only the Missing Middle Draft Scope of Work has been finalized but until a Community Working Group has been engaged, its members publicized, and its feedback incorporated into the "bulletins" in whatever form and content are determined between staff and the Working Group.

As noted in April, ASF believes it will be difficult to fully engage a Working Group virtually, but this is preferable to the current course of action. If the Board rejects our request it will demonstrate that more extensive development and up-zoning, as noted in the May 6 letter, are once again the only solutions on offer.

Sincerely,

Anne Bodine on behalf of ASF