

The Honorable Katie Cristol\  
Chair, Arlington County Board  
Vice Chair Dorsey  
Member Karontonis  
Member Garvey  
Member de Ferranti

I urge the County Board to reject current plans for Missing Middle zoning that is being readied for a vote some time in the next several weeks. Arlington's May 2 Missing Middle housing framework has been promoted to allow new housing "types" and major redevelopment of single-family neighborhoods. The proposed zoning amendments – if approved by the Board -- will result in one of three outcomes to allow "by-right" construction of:

- 4 plexes on all lots;
- 6 plexes on all lots;
- 8-plexes on all lots

Other draft code amendments could have dire impacts:

- **Reduced parking on-site.** By adding significant population and reducing on-site parking requirements by half, most options will add thousands of cars and these will quickly fill all on-street parking and turning many residential roads into one-way streets.
- **Cutting tree canopy** for newly-constructed homes in half, resulting in a loss of 584 acres and killing all hope of 40% tree canopy;
- **Increased energy demand** with new density, thwarting county goals of becoming a carbon neutral community by 2050;
- **Incentivizing 3-unit townhomes** with fee simple ownership, accelerating the complete conversion of single-family to three-family units more quickly than the county projects;

I am also concerns about the following likely outcomes:

- 1. An 8-fold density increase will negatively affect both the county's budget and livability.** Arlington County refuses to incorporate basic elements of planning into this effort. They have done no fiscal impact analysis. They are saying there is no need for added investments in schools, parks, transit and public facilities that will be needed to accommodate new arrivals and maintain quality of life for those who live here now. And the plan ignores the county's own admission (in its new draft Forestry Plan that we have "virtually no undeveloped land to accommodate future growth.")
- 2. Upzoning inflates land values and housing costs, harming Arlington's racial, ethnic, and socioeconomic diversity.** By favoring expensive new construction and incentivizing the loss of less expensive older housing, the plan reduces Arlington's remaining market-rate affordable housing stock. These new units WON'T be affordable to Arlington's median Black, Hispanic, or senior HOUSEHOLDS; [ASF has reported that](#) the units will be affordable only to households earning 118-273% of Area Median Income. Displacement will result from inflated tax bills and increased redevelopment pressure, especially on modest properties in our more diverse neighborhoods.
- 3. Increased density depletes critical environmental resources needed to fight climate change and protect the already-built environment.** Development under current zoning has generated huge losses of trees and green space, increased heat-trapping/water-shedding impervious surfaces, exacerbated heat islands and air/water pollution, and worsened flooding—with consequences that climate change will intensify. Missing Middle offers virtually no mitigation and will accelerate environmental degradation, with a 49% loss of tree

canopy vs. current zoning for new homes in residential neighborhoods.

**4. Missing Middle fails to deliver on key claims and needs.**

Among the county's avowed goals are family-sized," or 3-bedroom homes. The current county plans however show an actual loss in 3-bedroom units. The county has stressed ownership as a priority, but we have had only one session countywide to review implications of new "fee simple" ownership options. Until October, the zoning options would have resulted in 80% of the new properties being rental units, belying the goals most often cited by you, our elected officials. The plan may aim to offer housing for millennials, but fails to address why households earning 118% of our median household income cannot be accommodated in the Metro corridors, nor through currently-available rental units, which by the county's own accounting in March, is oversupplied at this income level.

In short, the risks have not been assessed nor evaluated against likely serious and unrecoverable costs. I encourage you to engage all residents, including analysts who have credibly challenged your own claims, before you move forward with this plan. Back to the drawing board!