

November 8, 2023

**November 11 County Board Vote –  
Langston Corridor to Become a “Major Transit Corridor but without Major Transit;  
Opaque Process Defers Changes to Zoning and Land Use and  
Breaks Promises to Residents on Height/Density Limits**

ASF is alerting you as a leader of a Civic Association along Langston Blvd—in advance of the November 11 County Board vote—to serious flaws we have uncovered in the [Langston Blvd. Area Plan \(LBAP\)](#). We hope you will take note of the deficiencies we describe and **tell the Board by November 9 to delay this vote until new Board members are seated in 2024. Write to [countyboard@arlingtonva.us](mailto:countyboard@arlingtonva.us) or [sign up to speak](#) at the meeting (no earlier than 9:00 am at 2100 Clarendon Blvd.)**

**Langston As the Next Rosslyn or Crystal City**

With the Plan adoption, the corridor will be designated a special planning area with the same status as our two Metrorail corridors.<sup>i</sup> Whereas development in those corridors is set by specific sections of the code, the Langston Plan will not offer this clarity. And, this plan projects Metro density along a *commuter road* that is controlled by the State’s Department of Transportation (VDOT), which has yet to agree to changes.

**Understanding Building Height and Density**

Some residents are vaguely aware that the plan has supposed “maximum” building heights of 5-15 stories, with the higher range at key “nodes.” However, County Staff clarified to ASF that the plan imposes no such maximum. Likewise, there appear to be no constraints on the density, other than those imposed by setbacks and stepbacks outlined in Chapter 4 of the code. Indeed, staff told ASF in late October that “density will be determined by building form” based on what can be built within these “form” envelopes of Chapter 4. This means that residents will have to fight, site-by-site, as each Langston property is re-developed.

**Density shows how much mass or square footage can go on any particular site; the county uses separate ways to set density for commercial vs. residential/hotel density.** At first glance, residents will see that the corridor will be considered for rezoning to residential in addition to the current commercial land use), with base densities of 1.5 floor area ratio in “lower density areas” and 2.5 floor area ratio in “higher density areas.” Specific details on the zoning and land use are provided here.<sup>ii</sup> Current zoning for most of the highway now allows a base density of 1.5 floor area ratio and

heights of 45 feet. You can see an example of that with the Children’s School at 4770 Langston Blvd.

**You might think 2.5 FAR is the maximum density that one could aim for or 2.5 FAR plus some small add-on of residential units. Yet staff told ASF we might expect FARs as high as 8.0 FAR, and the internal spreadsheet (which staff had to release under FOIA) shows the county is actually projecting up to 11.8 FAR at one unnamed site.<sup>iii</sup> It also shows residential density over 500 units per acre on another and over 200 units per acre on others (compare to pre-EHO residential density limits of 1-10 units per acre in the adjacent single-family neighborhoods!) These “plus-ups” are a factor of the “flexible zoning and land use determinations” being put forward for Langston, by the provisions of Zoning Code 15.5.9, and by the “bonus density” that can be sought over and above the “base density” that is approved for the site.**

Like density, **building heights are determined initially by the zoning. Mixed use buildings in C-O 1.5 areas are capped at 10 stories, and the C-O 2.5 zone has a cap of 16 stories (both zones exclude an additional story for HVAC). However, those caps apply “except as otherwise approved by the County Board.”** Note the loophole. County Staff confirmed to ASF on November 6, 2023 that caps for these two zones can be exceeded during the site plan negotiation pursuant to Zoning Code section 15.5.9, to allow additional height for affordable housing and/or community facilities being built as part of any development being developed by site plan.

### **Manipulative Zoning and Land Use Policy**

The Langston plan comes on top of the recent Expanded Housing Options (EHO) upzoning. The new EHO zoning – which went from allowing single family to 6-unit homes on each lot – was a **de facto change to land use** (see [the General Land Use Plan \(GLUP\) map](#)) from “low-residential” (capped at 10 units per acre in the residential “R” zones) to the “medium residential” category of 36-72 units per acre.<sup>iv</sup> The county chose NOT to reflect the actual, denser land use and stated that the new zoning would be effective *only after the higher densities became “facts on the ground.”* This nonsensical concept that “zoning only becomes effective upon development” is now being proposed for Langston Boulevard with much greater consequence.

**The county has told ASF that the new Area Plan does not legally change these land use designations or the actual zoning. Instead, the County claims that these legal changes will take effect ONLY if and when property owners submit a site plan to redevelop their properties and the County Board approves them. ASF objects to this concept which removes transparency from the density bargaining process, provides extreme county Board discretion to raise presumed limits, and requires much more effort from busy residents and civic associations.**

### **County Motivations**

The Board is likely voting with two key motivations in mind:

1. Increase tax assessments and thus revenues. However, the County failed to do any analysis to support this theory, and there is no evidence that the new density will yield enough tax income to cover the types of county-funded major infrastructure new residents will require.
2. Leveraging the opaque zoning framework to wrest more affordable housing benefits in a way that circumvents State restrictions on by-right or use permit development)<sup>v</sup>

ASF believes that floor area ratios and building heights the Plan could allow are completely out of proportion and character for an area without Metro service, that it will loom over and intrude well into low density areas and that it will not be responsive to well-known living, working, and retail patterns that define this key commuter corridor of Northern Virginia.

### **LBAP Is Not the Final Chapter**

Chapter 5 (beginning on p. 177 of [the plan](#)) lists additional implementation tools that staff and the board can consider to incentivize more development and additional “tradeoffs” of density for more community benefits, with the possibility of increasing density in the map’s “residential areas” (also known as “residential edges.”) County staff has already confirmed that the residential edges can expect to see commercial land use and development. If you do not fully understand these tools you should consider asking the Board for a delay.

### **Affordable Housing is a Bust**

The plan does not provide the clarity the community that the other transit corridors have delivered. The county is not leveling with residents on key goals and outcomes and likely fiscal outcomes. Nor is it being honest about gentrification. Its current vision will lead to major declines in affordable housing on the corridor. The county failed to even achieve the numeric goal of 2500 AH units it set for Langston Blvd. in 2015 (p. 42 of the [Affordable Housing Master Plan](#)). And this numeric goal does not account for the additional housing units this plan contemplates. If one takes those into consideration, Areas 2, 3, and 5 (i.e., the new Langston Blvd. Planning Area) will experience a **40% decline in the proportion of affordable units as a total of all housing units projected to be built by 2075.**

**Bottom line: Whatever density or heights you thought you could expect, guess again. Whatever zoning rules you understood, they may not apply. Whatever density you thought you were giving up to meet affordable housing needs, it failed to do the job.**

**What Can You Do?**

The Board seems keen to just vote on any Plan for Langston, including this one with so many loopholes and gaps. Join ASF in asking the County to change land use designations and zoning up front before site plans are submitted and to defer any votes until a new Board is seated and these changes have been fully shared with the community. Please contact ASF if you have questions at [ASF.virginia@gmail.com](mailto:ASF.virginia@gmail.com) and reach out to the Board today: [countyboard@arlingtonva.us](mailto:countyboard@arlingtonva.us).

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<sup>i</sup> However, both Rosslyn and Crystal City have specific land use designations in the GLUP and their zoning is carefully spelled out in the [Zoning Code](#) (Sections 7.15 and Section 7.16 respectively)

<sup>ii</sup> For the Langston Planning Area (Areas 2, 3, and 5), the county projects “areas of lesser change” where each parcel could be individually rezoned as C-O 1.5 ([Section 7.11](#) of the Zoning Ordinance) with a “base density” of 1.5 FAR.<sup>ii</sup> Current zoning is C-2, “service commercial” land use and development. However, staff is suggesting future land use designation of “low office apartment hotel” which means owners may also construct residential or hotel units whose density is computed in “units per acre.” The residential density is built as an addition to the “base density” for the commercial space.

The county also projects “areas of greater change” (the mixed use “nodes”) that would receive a new “base density” of 2.5 FAR ([Section 7.12](#) of the Zoning Ordinance.) This would give landowners in these denser nodes a 65% increase in their developable commercial property. It will also likely deliver land use of “medium office apartment hotel,” with the residential density expressed in units per acre; this residential density (and its attendant added value to the owners) will supplement the square footage for the commercial space if the site incorporates both uses.

<sup>iii</sup> Rosslyn’s Twin Towers (formerly the home of USA Today) built in 1980 and 1982 had an apparent FAR of 7.1 (and a [building height of 381 feet with 26/27 floors](#)), according to an [addendum](#) to the Rosslyn Station Area Plan in 1992.

<sup>iv</sup> Units per acre is the standard means to measure residential density in Arlington.

<sup>v</sup> Virginia limits the affordable housing requirements that can be leveraged for development by special use permit; Arlington has made liberal use of GLUP changes and site plan development to deftly dodge these limits. One developer told ASF that the county routinely expects developers to “deliver one half the difference between the approved floor area ratio and the base floor area ratio in the form of affordable housing units” which it cannot do if owners develop by right or via special use permit.