

## Public Comment: "Updated Draft Langston Boulevard Area Plan for RTA" for 10-14-2023

From: pro.wordsmith@verizon.net (pro.wordsmith@verizon.net)  
To: countyboard@arlingtonva.us  
Cc: cdorsey@arlingtonva.us; lgarvey@arlingtonva.us; mdeferranti@arlingtonva.us; tkarantonis@arlingtonva.us; ttalento@arlingtonva.us; kjacobs@arlingtonva.us; mkushnir@arlingtonva.us; mschwartz@arlingtonva.us; pro.wordsmith@verizon.net  
Date: Friday, October 6, 2023 at 04:47 PM EDT

**RE: Public Comments for the "Updated Draft Langston Boulevard Area Plan for RTA"**

To Arlington County Board Chair Dorsey and members of the Arlington County Board:

Please add these comments to the public record for the appropriate agenda item that the Arlington County Board will consider as a request to advertise, or RTA, at its upcoming board meeting (presumably on 10-14-2023).

After waiting a full 3 minutes to download this memory-intensive plan on a Wi-Fi connection, I can vouch for the fact that it has lots of pretty pictures, but not much substance. It lacks the serious, substantive data, analysis and implementation tools that one might expect to see in the redevelopment plan for a long, major east-west transportation arterial that links Washington, DC, to Virginia's suburbs, including Arlington.

The only "planning" I can discern seems to be the legalization of how much density the county intends to give away to developers. Unfortunately, that seems to be this document's only meaningful function.

Below are the three categories in which the "Updated Draft Langston Boulevard Area Plan" fails to meet the requirements for a legitimate planning document:

**I. Process Failures****II. Substantive Failures/Conflicts and Omissions****III. Logic/Justification Failures****I. Process Failures**

- a) This behemoth 200-page+ "updated" plan document wasn't updated and publicly released until September 28, 2023—after the 9-14-2023 Housing Commission meeting at which commissioners ostensibly "reviewed" an unfinalized draft and were expected "approve" a document they had never seen in order to support the request to advertise, or RTA, which is supposed to appear on the County Board's 10-14-2023 meeting agenda, which has yet to be published.
- b) Likewise, commissioners at the 9-7-2023 Transportation Commission meeting were not provided with the final "updated" plan to review before rubber-stamping approval of the request to advertise. This even though the significant density increase authorized by this plan will have a significant impact on transportation along this VDOT-controlled corridor.
- c) The Joint Facilities Advisory Commission—which is supposed to assist in the planning and review for facilities like schools—NEVER received a staff briefing on this document. Neither the older, June 2023 version nor the "updated" version. Thus, the County Board is advertising an "updated" plan that adds significant density in the absence of input from the board-appointed commission that is supposed to advise it on things like the plan's impact on school capacity, etc.
- d) Planning Commission members received this "updated" plan just 4 days prior to the commission's 10-2-2023. Given that at least 1,300 changes were made to the June 2023 version of the plan, which grew from about 190 pages in June to 209 pages in September per an analysis by community member Anne Bodine who performed a comparison, Planning Commissioners could hardly be expected to know what the changes were or how significant/relevant those changes might be. This is especially true as staff has provided no public version that tracks the changes that were made.
- e) I had to learn from another community volunteer that comments to the County Board for this agenda item must be submitted no later than Oct. 7, in order for my comments to be included in the agenda materials that will be given to County Board members for review in advance of their vote on the request to advertise. Many citizens won't be aware of that deadline. Since there is no board agenda yet posted for 10-14-2023, I cannot even be certain whether an RTA for this plan will be included.
- f) On February 20, 2020, I sent an email to PlanLeeHighway@arlingtonva.us feedback address and copied then-County Board members, the County Manager and other staff members. (See *the attached thread*.) In it, I listed questions and concerns about what was then dubbed the "Lee Highway Plan." The feedback tool was seriously flawed, so I was forced to use an alternate means of delivering my comments. I received a polite but perfunctory response from staff on February 27, 2020.
- g) On June 26, 2023, I sent another email (also *attached*), outlining queries and concerns to the staff member Natasha Alfonso-Ahmed, who has been working on the Lee Highway Plan/Langston Boulevard Area Plan since 2020. To date, I have not received a reply. Whereas some questions/concerns are addressed in the "update," others remain unaddressed. For example, whereas maximum building heights have been defined, sort of, in the "updated" plan, there is no discussion of the functional maximum building heights when the expected bonus density is added. Likewise, there is no computation of the expected increase in student enrollment generated by in-migration associated with this massive density increase. In the absence of hard numbers, it's unclear how APS can plan appropriately to meet demand. This is especially true, as APS is currently seeking to close Nottingham Elementary School and use it as "swing space," purportedly due to "underenrollment" even though Nottingham still has multiple temporary "relocatables" on site. Given the massive upzoning of the "updated" Langston plan, this makes no sense.
- h) Even though this consequential plan will radically alter almost every aspect of life along this major east-west transportation arterial, staff has informed at least one civic association (Donaldson Run) that it no longer provides presentations to civic associations. At the Donaldson Run Civic Association meeting on 10-4-2023, one participant noted that there were three different interpretations among the presenters as what the "updated" plan actually meant in practice with respect to the zoning changes that will be required to implement the Langston Blvd. Area Plan as well as to what the actual maximum height of new buildings will be. Without a staff member to clarify what the plan actually means, no one—even those who have been following the process most closely—

have a solid, unified understanding as to what the plan will deliver in actual practice.

**RECOMMENDATION:** Defer the request to advertise to give the commissions and staff more time to settle conflicting understandings of what this plan actually says and what it truly means with respect to the every-day impacts on residents' lives regarding important issues like the actual changes to the General Land Use Plan/GLUP and zoning that are being planned as well as the resulting impacts on things like daily commutes, school capacity, emergency response, flood risk and other critical services and infrastructure.

## II. Substantive Failures/Conflicts and Omissions

- a) In staff's apparent haste to roll out this "update" in time for the request to advertise to be added to the County Board's 10-14-2023 agenda (as far as I am aware, since this agenda isn't yet posted), there still appear to be multiple "holes" in the document. Some of the plan's apparent oversights/omissions are catalogued by architect James Schulman in a letter already sent to the County Board, which also is *attached for reference*. I will not repeat those issues here, but in a 200-page+ plus document with over 1,300 changes, there are likely to be other problems that should be addressed before the document/plan is approved for advertising.
- b) Nowhere in this "updated" plan can I find it clearly stated that Langston Blvd. is a VDOT-controlled road. It merely discusses that "close coordination" with VDOT will be necessary at some intersection. This lack of candor is disturbing. The plan's purported transportation "improvements" would necessitate lane reductions in order to widen sidewalks, add bike lanes or even a dedicated bus lane. Given today's vehicle counts and existing levels of roadway congestion (especially as you approach DC), VDOT will almost certainly refuse to reduce the number of travel lanes, as that would significantly slow traffic and increase congestion along not just a major regional arterial connecting Virginia to DC but also serves as a VDOT-identified, regional emergency evacuation route (Route 29). See Appendix 4 on p. 18: [https://vdot.virginia.gov/projects/resources/NorthernVirginia/Primary\\_Evacuation\\_Routes\\_Study\\_December\\_2021\\_acc121521.pdf](https://vdot.virginia.gov/projects/resources/NorthernVirginia/Primary_Evacuation_Routes_Study_December_2021_acc121521.pdf)
- c) Nowhere in this "updated" plan can I find projected vehicle/traffic counts for the increase in vehicular traffic that this massive increase in density will generate. The only reason I am aware of the increased vehicle/traffic counts is because I found a reference to it in a 7-27-2023 Climate Change, Energy and Environment Commission (C2E2) letter to CPHD staff (*attached for convenience*). The increased vehicle counts will definitely result in congestion (especially if any travel lane reductions are granted), which will generate an increase in tailpipe emissions and increased air pollution/reduced air quality for some distance on either side of the corridor: <https://iopscience.iop.org/article/10.1088/1757-899X/737/1/012146> and <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4243514/>.
- d) Nowhere in this "updated" plan can I find projected population increases, neither incremental increases nor the cumulative increase expected at full build-out. Why is anticipating the increased population important? Because infrastructure and many services are tied directly to population increases. Schools as noted above, have a pressing need for accurate predictions of the likely number of children that the density increases in this plan will generate. This is especially true when significant numbers of new committed affordable housing units (CAFs) will be added, as a recent county infographic notes that 28% of CAF residents are children under age 18. Adequate public safety and infrastructure also depends on accurate population forecasting. This is especially true since Arlington County has typically eschewed purchasing land prior to up-GLUPing/upzoning areas (after which land values become highly inflated) to reserve additional public space for things like new schools, fire/EMS stations, parks, recreation fields/facilities, libraries, etc. Arlington's ability to borrow is finite; it is bumping up against its credit limit for general obligation bonds over the next 10+ years. I can find no list in this "updated" plan as to which existing capital plans/projects would be deferred or foregone in order to create additional bond capacity to add/fund new capital projects to meet the increased needs for public infrastructure in this corridor.
- e) Nowhere in this "updated" plan can I find a reason for eliminating the housing conservation districts from this corridor—a move intended to preserve existing market-rate affordable housing units (MARKs). Nor is there any explanation as to why/how staff "assumes" that 705 (a fraction of existing MARKs) will remain post redevelopment of the corridor. Transfer of development rights (TDRs) can be useful. But there the increase in allowable density along the length of this long arterial means will simply flood the area with excess density, which makes TDRs less necessary and less appealing. Transferring density means that density must go somewhere, and it's unclear where the receiving sites would be located. The same is true for the preservation of other historic assets in this corridor—nowhere in this plan can I find a feasible, reality-driven mechanism (aka funding) to meaningfully incentivize the preservation existing historic assets or for their adaptive reuse for new purposes—despite the many aspirational claims of preservation being a high priority.
- f) Nowhere in this "updated" plan can I find any **new** stream of revenue to support an increase in housing grant funding to support any net increase in the number of CAF units along the Langston corridor. Arlington's new CAFs and rehabbed units are expensive (sometimes even more expensive than rents in comparable MARKs), so housing grant funding is essential. However, housing grants are, by necessity, budget limited, which means a new stream of dedicated revenue must be identified. Otherwise, there will be inadequate funds to further subsidize the more expensive rents in new CAF building and/or rehabbed MARK-to-CAF conversions.
- g) Nowhere in this "updated" plan can I find any reference to tax increment financing (TIF) for this corridor to reserve a significant portion of newly generated revenue from this massive up-GLUPing/upzoning to fund capital improvements in the corridor that will be needed. Columbia Pike has its own TIF, for example. Though it should be pointed out, that some TIF funds have subsequently been siphoned off for other uses in that corridor. It also should be noted that TIF funds reduce the amount of general, unrestricted revenue that is available for things like schools.
- h) Nowhere in this "updated" plan can I find acknowledgement that almost all of the Langston Blvd. corridor is too remote from the R-B corridor to support 15-story+ buildings. If people will not cross Glebe Road in Ballston to patronize the restaurants and shops on the west side, people will not walk to Metro from Langston. Moreover increased bus frequency/capacity is merely aspirational at this point, without any guarantee of critical infrastructure (like a dedicated bus lane) to come or any identified new, dedicated funding source to subsidize ridership. The excessive, Metrorail-level density increase described in this plan is wholly out of sync with Arlington's transit-oriented development (TOD), as described in Arlington Comprehensive Plan elements.
- i) Nowhere in this "updated" plan can I find any reference to the ultimate allowable maximum building height that includes bonus density. All the "maximum" building heights seem to refer only to by-right density increases without inclusion of "bonus" density on which so many of staff's aspirational goals depend. Now that the Arlington County Board (in its 2019 and 2021 amendments to the Zoning Ordinance) can grant UNLIMITED bonus density and thus height (even for the inclusion of a single onsite CAF or a modest contribution to the affordable housing fund), what is the absolute maximum building height(s) that will be permitted under this plan?
- j) Given the huge increases in by-right and bonus density in the "updated" plan as well as the increased use of underground parking, it is almost certain that building footprints will cover entire lots to achieve that density, resulting in a net **increase** in heat-trapping, water-shedding impervious surfaces—not the aspirational decrease that staff repeats throughout the plan. Nowhere in this "updated" plan can I find any reference to reducing lot-coverage allowance or expanding lot-coverage restrictions to multifamily, mixed-use or even commercial redevelopment, which would necessitate changes in the Zoning Ordinance. Only by reducing the percentage that developers may cover can the county expect to decrease impervious surfaces through redevelopment. But this reality is ignored in this "updated" plan.
- k) Despite the certain increase in heat-trapping, water-shedding impervious surfaces engineered by the excessive density increases being proposed in this

plan, I can find no reference to any projections of the increased stormwater runoff volume that will be generated at full build-out. How can we plan adequately for stormwater management in the absence of realistic projections of the additional runoff that must be managed?

l) Likewise, no matter how generous the county's tree canopy goals/requirements may be, concurrently granting too much density increases in the absence of much stricter lot coverage restrictions (restrictions that may be at odds with the permitted density) may render the county's canopy goals/requirements unachievable. I am reminded of a developer's recent explanation as to why it had impossible for his company to plant all of the trees required under site plan conditions (in the Clarendon-Courthouse area), complaining that other trees planted off-site by the company were not being counted as fulfilling the condition.

m) Nowhere in this "updated" plan can I find any reference to anti-displacement tools or funding to prevent the almost-certain displacement of existing, vulnerable MARK residents and seniors—despite the fact that this plan identifies the large number of existing MARKs and the larger than average percentage of residents age 65+.

I could go on and on citing more examples. But my point is clear: simply "monitoring" deteriorating conditions, ignoring known constraints or contraindications, establishing aspirational goals/requirements while ignoring reality or undercutting those goals/requirements with conflicting elements isn't an adequate substitute for responsible, proactive, reality-driven analysis and sustainable planning.

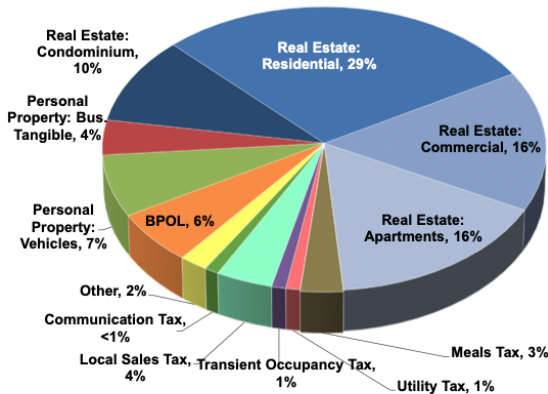
**RECOMMENDATION:** Defer the request to advertise to give the commissions and staff more time to come up with reliable data and analysis to better inform and support a more sustainable and financially feasible plan that is capable of achieving positive outcomes in the real world and includes reality-driven tools to eliminate or mitigate known or probably negative impacts as much as is possible.

**III. Logic/Justification Failures**

a) Nowhere in this "updated" plan can I find a reasonable justification that explains in concrete terms (pun intended) how this "plan's" outcomes are an improvement over the status quo. In fact, the lack of reality-driven tools and implementation strategies to offset known and easily predicted negative impacts/outcomes guarantees that this plan, as currently envisioned will make existing problems worse and more costly to deal with over the long term.

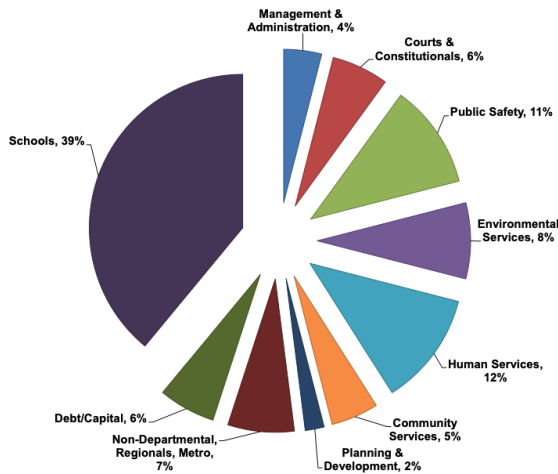
b) In the past, adding huge quantities of density in the Metro corridors guaranteed a net increase in revenues (over expenditures)—**BUT THAT WAS PREDICATED ON COMMERCIAL OFFICE AND HOTEL DENSITY.** Commercial office and hotel density is nearly always net-revenue positive (the county takes in more revenue than it spends on services and infrastructure). This is not true for residential development, which, on average, almost always results in more spending on expensive services and core infrastructure than this type of development contributes in revenue. Arlington's own budget consistently demonstrates this universal dynamic:

**FY 2024 Local Taxes**



I've bundled residential RE, condominium RE and personal property vehicle for revenue on the "residential" side: 46%. And I've bundled commercial RE, apartment RE, business tangible, BPOL and transient occupancy for revenue on the "commercial side": 43%. I'll split all the other revenue sources down the middle for convenience, as this revenue can likely be attributed to both: add 5.5% to each of the previous figures. **That means residential currently pulls in approx. 51.5% of local revenue whereas commercial pulls in approximately 48.5% of local revenue. Even if we shifted all apartment revenue to the residential side of the ledger, it still would not be enough to cover the spending on the residential side (as shown below).**

**FY 2024 Proposed Budget General Fund Expenditures**



As you can see in the graph above, schools (39%), community services (5%) and human services (12%) account for **56% of county spending (based on all sources of revenue), just for those items for which all or nearly all would be allocated to the residential side of the ledger.** Note: A significant portion of this spending (schools in particular) is attributable to apartment residents, even though the revenue generated from them is classified as "commercial." If you split the spending for all the other categories (management, courts & constitutionals, environmental services, public safety, etc.), then you add another 22% to the residential side of the ledger, for a **total of 78% of county spending on the residential side.**

c) The private sector will never foot the bills for needed public infrastructure and services. How do I know this? One hint is the fact that despite ALL the huge amount of commercial office and other density added in Rosslyn and Ballston, Arlington is only now finally replacing long-obsolete water and sewer infrastructure in these high-density areas: <https://www.arlnow.com/2023/04/25/county-board-approves-2-5m-to-replace-aging-water-main-below-n-glebe-road> and <https://www.arlnow.com/2022/03/18/county-board-to-consider-1-1-million-water-main-project-near-rosslyn/> and <https://www.arlnow.com/2023/09/25/county-to-battle-stormwater-runoff-and-rehabilitate-sewers-with-2-25-million-federal-grant/>.

Moreover, if large density increases (and community benefits from development) truly corrected overland flooding and stormwater infrastructure problems, then why is FLOODING along Columbia Pike continuing?



Flooding at Columbia Pike and S. Greenbrier Street on 9-16-2021: [https://twitter.com/News\\_MTorres/status/1438602239594094593](https://twitter.com/News_MTorres/status/1438602239594094593)



5500 Columbia Pike on 7-8-2019: <https://www.youtube.com/watch?v=rzdvsCjjwhg>



Flooding on Columbia Pike 6-17-2019: <https://www.arlnow.com/2019/06/18/reminder-dont-drive-through-flooded-streets/>

In summary, the Updated Draft Langston Boulevard Area Plan is not ready to be advertised. It needs significant revision and serious rethinking (based on more reliable data and analysis) to identify tools and implementation strategies that are more likely to produce positive outcomes.

Though it may be a swell marketing piece, it cannot be considered a "plan" in any meaningful sense of the word, as currently drafted.

**RECOMMENDATION:** Defer the request to advertise to give the commissions and staff more time to come up with reliable data and analysis to better inform and support a more sustainable and financially feasible plan that is capable of achieving positive outcomes in the real world and includes reality-driven tools to eliminate or mitigate known or probably negative impacts as much as is possible.

Thank you for your time and consideration.

Suzanne Smith Sunburg  
5300 8<sup>th</sup> Road North  
Arlington, Va.