

November 7, 2023

Arlington County Board
CountyBoard@arlingtonva.us

Dear County Board, Manager, and Attorney:

ASF has identified several disconnects in the [final Langston Blvd Area Plan](#) (LBAP). **In this letter, we submit five questions and seek a response from the Board by November 10.** These issues are very consequential to Langston Blvd and the 15 civic associations most directly impacted, indeed, for all residents who will have to meet whatever demographic, fiscal, and environmental consequences proceed from conferring Metro level density on a corridor that lacks Metro.

Until the answers to our questions are provided, ASF asks that the Board table this plan. We've recently met with and corresponded with CPHD Principal Planner for LBAP Alfonso-Ahmed and CPHD Planner White who helpfully clarified some issues. We also only last week received more of Staff's data underlying LBAP. **Strikingly, this data, which required us to submit a FOIA request to see, confirms that Staff's vision for LBAP will result in a 40% reduction in affordable housing in the areas of Langston Blvd that are changed, as a percentage of housing in those areas—dropping from 25% today to 15%.**

“Maximum” Height Not A “Maximum.” Density Far Denser.

Residents are perhaps most focused on building height caps. The County Board had extensive discussions on October 14 about the LBAP's supposed “maximum building height.” The LBAP uses the word “maximum” **60 times** to refer to what the public, and Board, seem to think is the highest that can be built. Yet the supposed “maximums,” for example, 15 stories or 170 feet at most, or 4 stories by Halls Hill now seem illusory.

Staff told ASF's Anne Bodine on October 24 (we were working off the September 28 version of the plan at that time, not the final October 24 version published October 24) that “we didn't set a cap numerically” on the building heights, and that “we are setting maximum density based on building form” [as spelled out in Chapter 4 of the LBAP]. Ms. Alfonso-Ahmed confirmed by email on November 1 that approving the LBAP results in **no building height caps**. She clarified that the “maximum” height in the LBAP is merely “what staff believes would be appropriate,” and **can easily be increased later**, stating (emphasis added):

ACZO provisions may allow the County Board to permit **something greater**.
The circumstance is determined at site plan review and **the Board will**

determine if additional height is appropriate (and how much) under the circumstance.

Respectfully, that is not what any reasonable person would understand a “maximum” height to mean in the LBAP. Instead, it will require residents to identify, track, and engage in dozens of site-by-site planning processes to re-argue building heights.

As to density, the LBAP speaks only of densities (a) between **2.5 and 5.0 FAR** for higher density areas and (b) below 2.5 FAR for the rest (LBAP at 189; image, right).¹ No other FAR figure is given for what could or might be built. But the hidden reality is **far denser**:

Future GLUP Map Showing GLUP Designation Alignments with Plan Goals

Within the Mixed-Use District and Residential District, there are areas of lesser change (i.e. allowance for up to 5 or 6 stories and densities generally up to 2.5 FAR) and areas of greater change (i.e. allowance for between 7 and 15 maximum stories and densities generally between 2.5 and 5.0 FAR).

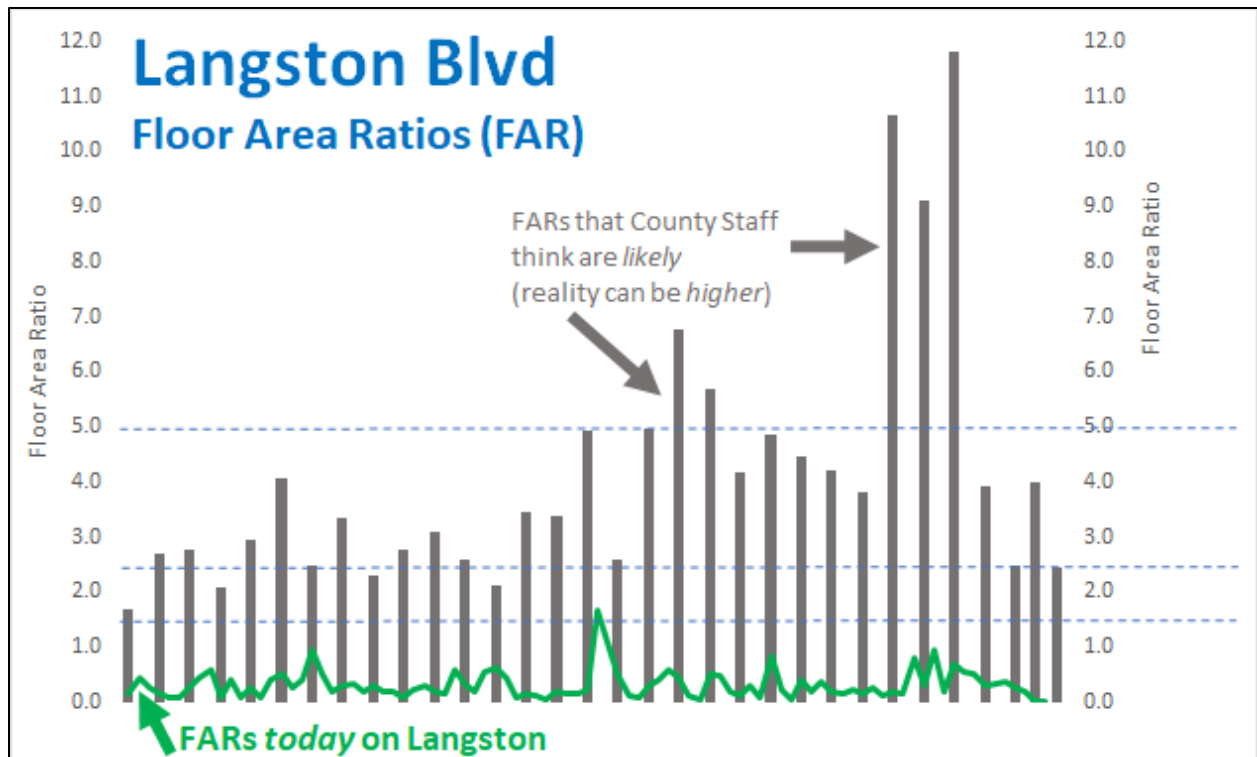
- CPHD told Bodine that densities might reach **7.0 or 8.0 FAR**. But that, too, greatly understated the reality of Staff’s own data.
- The spreadsheet used by Staff to create the LBAP (that the County had to release under FOIA) shows **FAR levels up to 11.82** (below), **136% higher than the largest figure used in the LBAP**. It also shows residential densities as high as **515 units/acre**, with 6 buildings above 200 units/acre.

	A	T	U
1		BELOW GROUND PARKING	
2	GIS Code (A#D#); Emily's Housin Data # (* outside)	Proposed Residential GFA (3D MODEL)	Proposed FAR (3D Model)
208	A5D81	423,000	10.67
209	A5D83 / 60	508,968	9.11
211	A5D82 / 61 and 62	693,990	11.82

Source: FOIA C003129-102023. The particular parcels to which these apply are unknown as Staff did not put addresses in its spreadsheet, but instead created a new identifier (Column A). A separate FOIA is pending for the document that translates Staff’s new coding to a meaningful identifier, like address, RPC#, or GIS parcel; the County said it needs 12 business days to find such document.

Using Staff’s spreadsheet, we charted below a “now and later” view of Langston Blvd densities. Existing FARs for buildings on Langston Blvd today are shown by the green line, moving from Area 1 (to the left) to Area 5 (to the right). The grey bars are the FARs staff thinks are likely for specific new buildings. The LBAP talks of “areas of lesser change” (up to 2.5 FAR) and “greater change” (2.5 – 5.0 FAR). Yet Staff estimates only *six* buildings would be below 2.5 FAR; the rest would average 4.6 FAR, with several reaching far above that up to 11.82 FAR. And, again, this does not purport to show *what is actually allowed or possible, which may be far denser*.

¹ “FAR” is Floor Area Ratio, which is the gross floor area of all buildings on a lot divided by the lot area. For example, a 60,000 sqft building on a 20,000 sqft lot is 3.0 FAR (60,000 / 20,000 = 3.0).



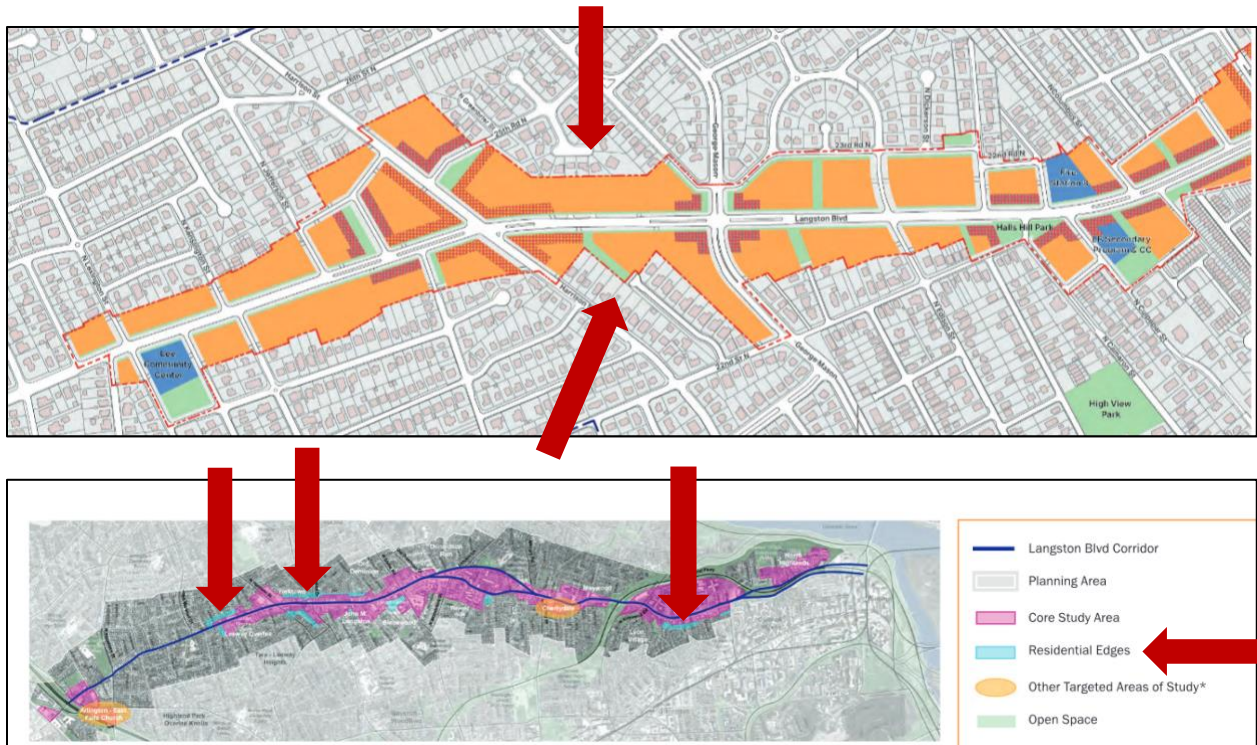
1. **Will the County tell public what the actual “maximum” building heights allowed will be in the Langston Blvd area and make those be true caps?** If not, please explain how you can claim broad public understanding and support of building heights, which was one of the main foci of public comment.

Unclear Treatment – “Residential Areas” vs. “Residential Edges”

The public focused on LBAP’s “areas of greater change” in the new “mixed use” hubs and zones. However, change is also projected for “residential areas,” or “residential edges,” terms seemingly used interchangeably without explanation. ASF suggests you standardize these terms and clarify what is meant.

Ms. Alfonso-Ahmed and Ms. White told Ms. Bodine that “in the ‘residential areas’ there will be some commercial development.” The LBAP states (p. 189): “The Plan promotes increased densities in both the ‘Residential District’ and ‘Mixed-Use District’ to expand housing choices ... and achieve other Plan goals.”

2. **What is envisioned to be allowed in the “Residential Areas” and “Edges” in terms of density, use, and building types?**
3. **Why do LBAP maps sometimes *not* show which homes are affected?** For example, why does the close-up map on p. 4 (below) not show any “residential area” or “edges” for Area 2, but the zoomed-out map on p. 5 (further below) shows affected “residential edges” for Area 2 (as well as Area 3 and 5)?



General Land Use Plan (GLUP) and Zoning Amendments

Staff indicated to Ms. Bodine that the LBAP essentially serves as a “GLUP Study” that will let land owners pursue special exception development of parcels in the new “mixed use areas.” They indicated that the GLUP itself will not be changed now and no new zoning will be approved unless land owners submit site plans pursuant to Section 4.1 of the [Arlington County Zoning Ordinance](#) (ACZO). This has implications for the type of analysis and study the County must perform under Virginia law.

4. What is the level of zoning purported to be appropriate for the sites listed below? Although LBAP purports to have a “Future GLUP Map,” p. 186, it reflects no zoning change, leaving it unclear what is recommended. P. 189 states it may be C-0-1.5 or C-0-2.5, so please specify zoning is projected for these sites:

- 5053 Langston Blvd – the Dominion Electric site
- 4901 Langston Blvd – the KFC/Taco Bell site
- 5222 Langston Blvd – SE corner of George Mason and Langston
- 4500 Cherry Hill Rd – Lee Heights Shops
- 3115 Langston Blvd – Lyon Village Shopping Center
- 2415 N Barton St – single family home

5. Does the County see the Langston Blvd Area Plan as a GLUP change for the types of uses allowed on any of the parcels within the plan area? (Excluding the Housing Conservation District changes.)

6. If the Langston Blvd Area Plan is *not* a GLUP or zoning change:

- a. **Why is it implied to be one?** In discussing the GLUP, p. 189 of the LBAP (below) contrasts “areas of greater change” with “lesser change”. It states for “lesser” areas, “no GLUP amendments are proposed with Plan adoption.” It then implies that upon Board approval of the LBAP, the areas of “greater change” *will be* recategorized pursuant to “the Future GLUP Map,” on p. 186. Similarly, Chair Dorsey on October 14 implied that, after approving the LBAP, builders will have the right to build at whatever heights/ densities are outlined in the Future GLUP Map. However, neither the “Future GLUP Map” (p. 186) nor the actual proposed [GLUP changes \(Attachment 3 to the October 14, 2023 staff report to the Board\)](#) show such GLUP changes, i.e., they do not show new land use categories.

In areas of greater change, consistent with the anticipated density levels of new development possible per the Plan’s building height recommendations, appropriate designations include “Low” Office-Apartment-Hotel (O-A-H) and “Medium” O-A-H. Rezoning to C-O-1.5, which provide for a base site plan density of 1.5 FAR for commercial uses and 72 units per acre for residential uses, and C-O-2.5, which provide for a base site plan density of 2.5 FAR for commercial uses and 115 units per acre for residential could be appropriate, aligning with the Low O-A-H and Medium O-A-H GLUP designations, respectively. Rezoning to these zoning districts would allow for achieving base site plan density levels, established by the Plan’s recommended Future GLUP designation (as shown on the Future GLUP Map), through improvements that align with the

In areas of lesser change, no GLUP amendments are proposed with Plan adoption. As a near-term implementation item after Plan

- b. **Is the Request to Advertise the new plan legal notice of a land use or zoning change pursuant to [Virginia Code 15.2-2204](#)?** Specifically, if, as Staff indicated, the land use and zoning are changed only with approval of a site plan by a developer, will the Board follow Virginia Code § 15.2-2204 (notice and hearings) for *EACH* of the dozens of Langston Blvd parcels, separately?

c. **When will the County make the case to residents on requirements of [Virginia Code 15.2-2284](#)?**

§ 15.2-2284. Matters to be considered in drawing and applying zoning ordinances and districts. Zoning ordinances and districts shall be drawn and applied with reasonable consideration for the existing use and character of property, the comprehensive plan, the suitability of property for various uses, the trends of growth or change, the current and future requirements of the community as to land for various purposes as determined by population and economic studies and other studies, the transportation requirements of the community, the requirements for airports, housing, schools, parks, playgrounds, recreation areas and other public services, the conservation of natural resources, the preservation of flood plains, the protection of life and property from impounding structure failures, the preservation of agricultural and forestal land, the conservation of properties and their values and the encouragement of the most appropriate use of land throughout the locality.

d. **When will the community get to weigh in on any “text setting forth the regulations applying in each district,” Virginia Code 15.2-2285?**

“§ 15.2-2285. Preparation and adoption of zoning ordinance and map and amendments thereto; appeal. A. *The planning commission ... at the direction of the governing body shall, prepare a proposed zoning ordinance including a map or maps showing the division of the territory into districts and a text setting forth the regulations applying in each district. The commission shall hold at least one public hearing*”

e. **How do you explain the addition of the Langston Blvd Area Plan as a new GLUP area and the proposed zoning amendment below, which seems to make C-O-2.5 as the new base density for developers?**

Article 7. Commercial/Mixed Use (C) Districts	
§7.12.	C-O-2.5, Mixed Use District
§7.12.1.	Purpose
	The purpose of the C-O-2.5, Mixed Use District is to provide for limited office building land use and, under appropriate conditions high-rise office building, hotel, commercial and/or multiple-family redevelopment within “Metro Transit Corridors” planning districts as designated by the County Board on the General Land Use Plan. Appropriate mixtures of use and densities under the terms of this district are to be determined in accordance with the conditional use provisions of this zoning ordinance and shall be consistent with the General Land Use Plan or approved plans for the area. Determinations as to the actual types and densities of uses to be allowed will be based on the characteristics of individual sites in their neighborhood and on the need for community facilities, open and landscaped areas, circulation and utilities.

Thank you for a quick reply or preferably, a decision by the Board to defer consideration of this Plan until these issues are more broadly known in the affected areas.

Sincerely,

Team ASF