

September 29, 2023

Arlington County Board
Arlington Planning Commission

Dear Board Members and Commissioners,

The County has been working on Plan Langston Boulevard at least since a [May 2016 visioning study](#), yet the vision is not ready for prime time. As with other major awards of density by the County Board since ASF's founding in 2019, we believe this plan needs a firmer foundation. A sound plan needs: (1) to commit capital resources to support the needs of new residents, (2) protections or more solid programs to protect existing low-income residents, (3) better environmental gains, including public space, tree canopy, heat island reductions and addressing carbon emissions from the massive amounts of density proposed.

These concerns have only grown since 2019, as Arlington continues to densify, lose diversity through gentrification, The County has reached its maximum bond capacity for its capital budget, and these County-induced building booms -- coupled with exogenous factors -- will put extensive pressure on residents' pocketbooks.

Below, we first give the historical context of our concerns. Next, we identify key failings in the process and substance. Last, we detail four new areas of concern. **NOTE:** The County only released [the version of the Plan that the County Board will vote to advertise on](#) September 28, 2023; improperly depriving all the commissions but the Planning Commission the ability to accurately weigh its merits. ASF analysis here refers to the [June 2023 plan](#). We could not review any of the 1400 changes released in the Request to Advertise just one day ago.

ASF's Inputs

[In ASF's September 2021 letter to the Board](#) we noted:

The process appears to aim for an early-Rosslyn vibe to the corridor . . . With one major difference. Unlike 1970s Rosslyn, Langston Boulevard is mostly a low-rise commercial strip one block wide on either side of the corridor. This makes "transitions" to neighboring single family areas impossible.

The County instead pushed ahead, adding even more density despite these very real physical limitations.

[ASF wrote again to the County Board in March 2022](#) about the then-revised version of PLB (copy attached below):

ASF believes that the County must promptly and adequately fund all new infrastructure and public services deriving from already-approved sector plans, land use designations, and denser zoning. That has not been done, and it appears the County intends to abdicate this fundamental obligation [with PLB].

The latest PLB iteration leaves these concerns unaddressed, and the plan will add 15,000 net new residents, almost doubling the population over 30 years. The County ignores that Arlington will require stormwater, mass transit, and key community facilities of schools, and parks that must come from the Capital Improvement Plan (CIP). PLB's total reliance on the private sector for core community needs also means we will miss key targets of several elements of our comprehensive plan (40% tree canopy, carbon neutral by 2050, 2500 affordable housing units on Langston Blvd.)

Since ASF sent those two letters, the County rolled back some building heights in the [August 2022 Preliminary Concept Plan or PCP](#), but raised them again with the [June 2023 plan](#). This iteration:

Fundamental shortcomings in scope

- Gives a "vision" but leaves out specifics on land use and zoning;
- Promises benefits that the County has ceded to private developers with no reasonable certainty of delivery and inadequate coverage of stormwater, schools, parks and rec, community centers, public safety facilities, transit;

- Without Cherrydale and East Falls Church, is not a "comprehensive" and leaves nearly half of Langston to uncertain future processes—and thus, notably, **leaves out the largely undeveloped Metro rail station from a plan supposedly about promoting public transit** (even as Fairfax County invests heavily to develop the West Falls Church and Dunn Loring areas);
- Fails to project or compare any development models that could be done by the public sector alone;

Process & engagement failures

- Fails to include the underlying data behind its assumptions and claims, and the County demanded **\$200+** in fees to release the data under FOIA;
- Was not offered up for briefings to Civic Associations despite several such requests to do so;
- Was the only one available up to and including on September 28, 2023 when all the commissions but Planning had already been briefed and public comments were made without the RTA version;
- Was briefed through late September 2023 to commissions who necessarily should be commenting **ONLY** on the final version

Housing failings

- Adds extreme building heights to justify more affordable housing but doesn't meet the Affordable Housing Master Plan goals, and will deliver a lower overall percentage of affordable units (i.e., gentrifies);
- Fails the MWCOG-advised benchmark for jurisdictions to limit new units for high-income households to 25% of the inventory built;

Transit and equity failures

- Is a transit-oriented project without mass transit;
- Reimagines one of two major connector corridors in Arlington that permits truck traffic (Rt 50 is the other) as a "Green Main Street" for bikers and walkers;
- Fails to conduct any Racial Equity Lens analysis on transit – favoring bicycle commuters who, in Arlington, are **95% white** with average incomes of \$275,000, over far more diverse groups who rely on cars;

- Fails to analyze any existing data on biking in Arlington, which in addition to its being a niche among wealthy, white Arlingtonians, has been declining from about 8 bikes/hour to around just 4 bikes/hour in far denser, flatter, and bike-friendly areas, like Ballston to Courthouse and in Crystal City; by comparison, about **46,000** people/day pass near the Langston & Kirkwood intersection, where the County wants to *remove* two lanes of traffic for bicycles;
- Offers glossy visions of community and vibrancy that previous Arlington development initiatives have failed to deliver (diversity, affordability, community-based decision making, trees, green space, stormwater, recreation, community centers, transition from high to low density);
- Centers a major zoning overhaul around a commuter and commercial artery that is controlled by the Commonwealth, which has not acceded to the plan;

Environmental challenges

- Adds public green space that doesn't belong to the public;¹
- Puts 15-story development on an environmentally sensitive site that likely cannot accommodate the substantial undergrounding of infrastructure as it sits atop Spout Run;
- Boasts of more tree canopy but doesn't answer how rooftops (where most new canopy is planned) can accommodate such additions;
- Prompted alarms about minimal tree canopy from the Parks and Rec Commission on September 19.

Four New Concerns

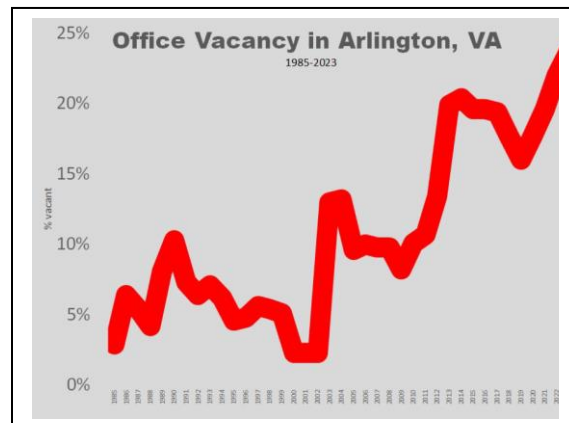
ASF urges the Board to delay the vote to do things right. In addition to our longstanding asks that the County assess the impact of new zoning on demographics, Arlington's budget, and the environment, as compared to existing zoning and land use, ASF adds the urgent requests below. We

¹ Parks and Recreation Commissioner Adam Rasmussen expressed important concerns in the [September 19 Commission discussion of the PLB Request to Advertise](#) that "If we don't set goals, those places will become hardscaped . . . and privately-owned public spaces are not parks" adding, "when you say 'green main street,' make it green, make it park space and not just public space."

also ask you to delay any votes until a new County Board is seated in January 2024 that will reflect electoral outcomes of November.

URGENT planning needs that should PRECEDE a PLB vote:

1. Commercial Vacancy and Demise of Local Retail. ASF seeks a compelling solution from the County to the now **20-year surge** in commercial vacancies. 50% of Arlington's revenues derive from commercial property taxes. The County's current vacancy rate is 23.7% as of earlier this year, and expected to grow. In fact, the amount of *vacant office space today is equal to every single square foot built in Arlington since 1999*. Types of properties projected for PLB are also vacant, as this Cherrydale modern mid-rise (below, left) with a vape shop and substantial vacancies. If we can't retain "attractive retail" now, why are we planning for more? Even the [Chamber of Commerce](#) admits PLB is weak on retail strategies. Options for Office-to-Residential conversions may also take up some of the slack to reduce development needs along Langston.



2. Metro Crisis. PLB should have been buttressed by major investments in transit as was done with Metro in the 1970s. Instead, Langston Blvd. will remain a major Northern Virginia connector and a *state highway which likely will retain current transit patterns where the car remains king* (car use on Langston Blvd shown in green, below right).

Other PLB concepts - lane narrowing and removal, fewer turn lanes, modest service and management improvements, thousands more daily users -- will create, not solve problems. (Further, VDOT has not approved PLB changes and the plan ignores Langston's emergency evacuation role

for DC and the region.) Most critically, PLB leaves unaddressed the County's current turn away from transit. Ridership at Arlington's Metro stations declined 20% from 2012-2018 (below left), even as County population rose 7%. Since Covid, daily ridership is down 45%. And we now have a regional \$750 million Metro funding gap! The County should address these two challenges -- transit financing and the primacy of car usage along this commuter/commercial corridor -- before approving PLB.



3. Missing Middle Assessment. The County asserts that PLB delivers "new types of housing"; such claims are outdated given that the County just rezoned over half its land area for "new types of housing." ASF requests that potential EHO buildout, based on current uptake via permit applications, be factored into the PLB framework and that staff report on the possible impacts of one plan on the other, before any vote is taken.

4. Planning Gaps. As with Missing Middle, the County has made assertions and promises for PLB that cannot be left to chance. We need more data to back up assertions about development patterns, infrastructure demand, population growth. We mistrust reassurances on complex "transitions" to low density neighborhoods such as the one from the 2016 Visioning effort. The Board likely will vote in November to give away public goods beyond current by-right limits for massing, height, tapering requirements, parking ratios, loading docks, but with zero intent of guarding against scenarios like this one emerging on Columbia Pike.



At key intersections, there are some larger “opportunity” parcels that could redevelop . . . *with mixed-use buildings that step down in scale toward residences*. One of the challenges . . . is the shallow depth and/or small size of many parcels that line the corridor. These could be consolidated to make sites large enough to accommodate a transition; if that is not workable, special design solutions will be needed.