

March 13, 2023

SUBJECT: Adoption of the following elements associated with the Missing Middle Housing Study:

A. GP-357-23-1 Amendments to the General Land Use Plan (GLUP) Booklet and Map; and

B. ZOA-2023-02 An ordinance to amend, reenact, and recodify the Arlington County Zoning Ordinance (ACZO), including Articles 3, 10, 12, 13, 14, 15, 16, and 18, to establish regulations for Expanded Housing Option Development for properties zoned R-20, R-10, R-8, R-6, or R-5

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Today I remember leaders of the last century who touted the Hindenburg and Titanic as marvels of modernity, what could go wrong? Those leaders suffered failures of imagination.

ASF has not lacked for imagination -- we reported our Missing Middle concerns to the board on September 12 2020 -- and were told "it's only a study" and we should read staff reports. Fast forward 2.5 years, it's not just a study, and your staff reports are now recommending huge change in Arlington on the bases of unproven hypothesis and distortions such as:

- *"Our Comp Plan is not affected" by a recommended sixfold increase in population across 47% of our total land mass' and that*
- *Rebranded EHO housing "may allow more households of color to remain or move in. . . , given that EHO MAY be less expensive and more attainable than . . . housing built under the status quo."*

We've read all the reports. And we've done OUR homework. Our data goes beyond staff claims and suppositions and shows the need to explain, narrow and improve accountability of this plan. It's not diverse, it's not attainable, it won't be affordable in 30 years, it won't provide ownership options, yards for toddlers or 3-bedroom units

- The [report we sent the board on January 18](#) shows the EHO out of compliance with key Comp Plan elements. Exhibit A? Staff's Attachment 2 showing the GLUP will preserve "low density residential" designation for R-zones even though you are zoning for five times the allowed density there.
- Staff claims the areas to be rezoned are now 70% white, but omits data showing 82% of Arlingtonians who earn the \$193,000 necessary to purchase one *unit of a six plex*ⁱⁱ are white.
- New housing will not "age into affordability" as advocates claim: home prices went up at 3 times the rate of inflation over the last 30 years
- Rather than improve diversity, "enhanced housing" in single family areas in historically Black Green Valley has raised prices and reduced the Black population by 50% over 20 years.



- Staff says the Affordable Housing Master Plan (AHMP) will pave the way for lower income groups left behind by EHO. But omits that last year's AHMP update unmask this effort as a lark because the market has a surplus of housing at these price points.
- We have our own exhibit A, where the "man on the street" thinks lower income groups need help more than those being helped w/EHO.



¿A quién debería ayudar el Gobierno con la vivienda?

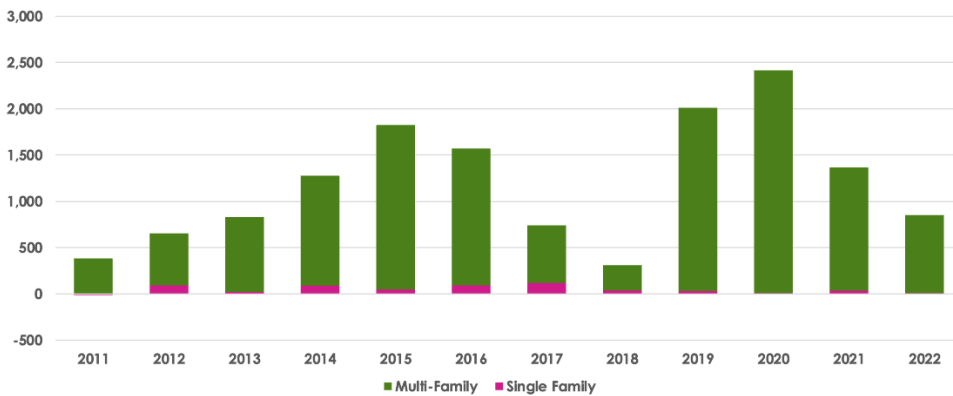
Who should the Government help with housing?

Family of 3 income
Familia de 3 ingresos

| | |
|---------------------------------------|---------------------|
| More than (mas que) \$151,000 | >118% AMI |
| \$151,000-108,000 | 84-118% AMI |
| \$108,000-\$77,001 | 60-84% AMI |
| \$77,000-\$38,000 | 30-60% AMI |
| Less than (menos que) \$38,000 | <30% AMI |

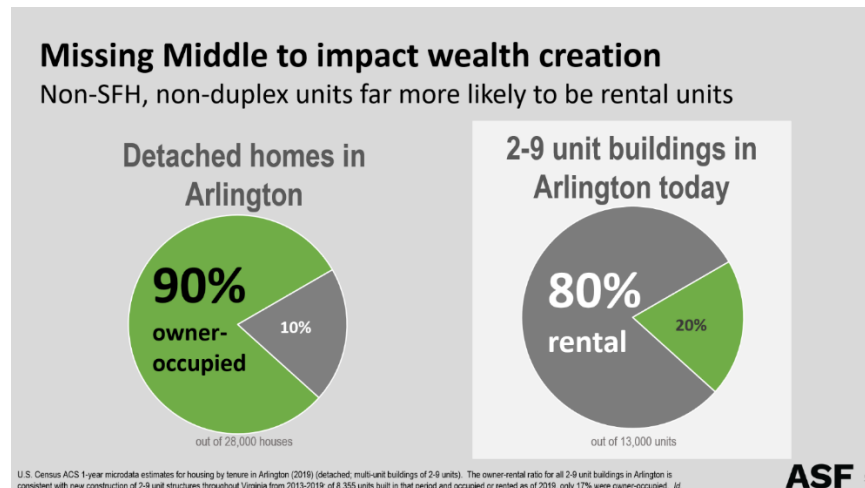
- Advocates and even board members say our "housing crisis" necessitates MM, they overlook how Arlington has met all its regional Council of Government goals. And from the looks of this chartⁱⁱⁱ, multifamily housing is definitely not "missing"!

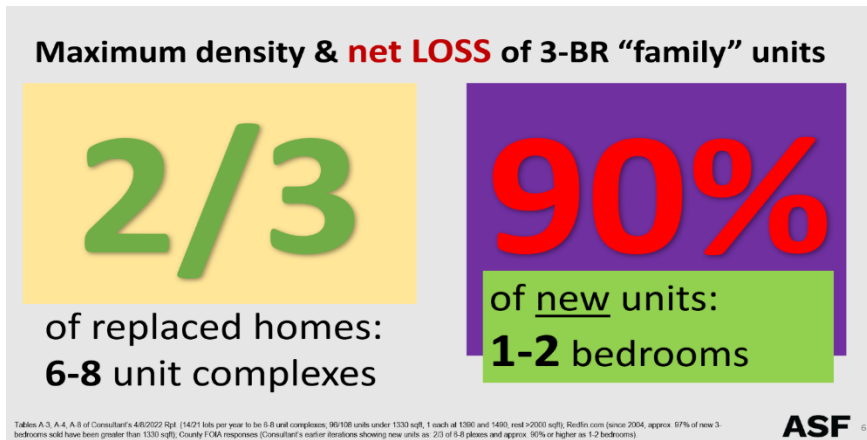
Net New Housing: Single Family and Multi-Family



Source: Arlington County, CPHD, Development Tracking Database

- Data shows that four to six plexes will create a net loss of ownership options, i.e., they will 90% rentals, despite repeated refrains of the Board saying this will boost ownership.
- Likewise with 3-bedroom units. First we allowed McMansions, and prices skyrocketed. We also hyper densified corridors, creating huge imbalance away from 3-bedroom homes. Now both chickens have come home to roost. More and more 3-bedroom homes will be razed for unaffordable McMansions or for EHO that will not exceed 2-bedrooms.
- Physics dictates that we have no room left to create the 3 bedrooms, especially for anything over three plexes. Virtually no 5 or 6 plex in R-5 or R-6 will have 3 bedrooms;^{iv} and these two zones are about 63% of the land in the study area.





- Virginia Supreme Court cases make us question the county attorney's claims that the board can revoke this up-zoning.^v

Caps, Sunsets, Conditions. ASF welcomes the addition of reporting requirements to the plan. We ask you that you remove any sunset clauses or ensure sunsets are made conditional on meeting key goals.

Reporting should cover the full scope of impacts, including race, ethnicity, age, disability and household income of those who move OUT for EHO production, as well as those who move in; and info to show whether tree canopy dips below the current 20% level or levels in a control area. You need a control area for comparison reports, we recommend an R-6 census block.

Overwhelmed by the Data. This plan and the staff report are overwhelming. Even expert commissioners got mixed up, or failed to exercise their assigned charge, or failed to take a position on several elements. Even the County Manager stayed mum on the most consequential elements of the plan!!! A sure sign we should reboot.

Delay of 3 months. ASF recommends you take 3 months to rework the benchmarks, convene civic groups and commissions one more time on the manager's recommendations, and bring it back for a vote in June.

We ask that you allow only 19 EHO teardowns per year, as per the county's analysis through the company PES in April 2023, and 30 conversions for the total 58. Let's get this plan shipshape, remembering the famous claims the Titanic was unsinkable.

ⁱ 7,820 acres out of 16,691 total.

ⁱⁱ under actual market conditions and the typical down payment

ⁱⁱⁱ briefed to JFAC in March

^{iv} https://arlington.granicus.com/MetaViewer.php?view_id=2&event_id=1844&meta_id=217182 (p. A51, A, 52, A56, A57, A 58 of Attachment 13)

^v <https://www.kaufcan.com/wp-content/uploads/2018/10/Zoning.pdf> (p. 11-21)