

October 13, 2023

Dear County Board Members:

On behalf of the Donaldson Run Civic Association (DRCA), I am writing to identify some concerns that I hope the Board will take the time to consider, prior to any decision to implement or revise the Langston Boulevard Area Plan (the Plan), as it may be approved for advertisement to the public for further comment.

As noted below, from the outset of this process years ago, DRCA residents have emphasized the need, particularly in the Lee Heights section of Area 3 most immediately adjacent to our neighborhood, to limit height to non-Metro corridor levels of five stories or less, and maximize ease of parking access from areas like DRCA that are inaccessible to shopping other than by car. While seeking to promote more “meaningful” development ostensibly consistent with community interests (p. 1), the various iterations of the Plan and its predecessor documents have consistently ignored such inputs as to actual community interests, from DRCA as well as others. The Plan appears instead to have been premised in large part on the contrary views of those *who do not live along the corridor*. Of the 214 online comments received, staff has recently reported to the Planning Commission that over half (50.5%) are from those who live “outside LB.”

I should note that this is not for lack of trying to inform staff of these strongly held views of Langston Boulevard area residents. As I noted in my July 2021 comments on behalf of DRCA on these “Land Use Scenarios,” the proposed “canyonization” of the corridor appears to take no account of the “consistent message coming from the DRCA mini-charrettes and other visioning efforts.” This message was clear: to restrict heights so as “to ensure the preservation of the look and feel of and ease of access to the Lee Heights Shops,” including easy parking access that has “always been vital to these shops and neighborhood patronage of them.” In my December 2021 letter, I also urged staff to follow the recommendation of many commenters to “conduct and provide data from objective, professional analyses of impacts to schools, infrastructure, transportation/parking, etc. before considering” the proposed changes. DRCA invited staff to its fall 2021 meeting to discuss these concerns, which invitation staff declined. Staff also declined a similar invitation to DRCA’s recent meeting devoted to this subject, held on October 4, 2023.

I strongly urge the County Board to take the time to engage with civic associations in considering the Plan as it may be advertised, and to focus in that process on the key considerations identified below, in order to demonstrate that it has engaged in reasoned decisionmaking on a project with such importance to the future of this very large portion of the County. As with the complex and highly controversial EHO proposal, proposed last fall and adopted this past spring, the Board should not be reluctant to take the time necessary to act on such significant changes to the comprehensive plan. In this respect, providing the opportunity for participation by new Board members informed by the most current views of Arlington residents would be highly beneficial.

The following are among the critical issues raised by the proposed Plan’s sweeping transformation of Langston Boulevard. With respect to building height and these other issues, the draft Plan recognizes that it is “inconsistent with the existing GLUP” (p. 180). Addressing these issues before rather than after acting to approve any version of the draft Plan is essential to ensuring acceptance by Langston Boulevard area residents of such an abrogation of the social compact long governing the

location of densification reflected in the County's existing comprehensive plan, upon which they have legitimately relied to plan where they now live.

Legal Status of the "Vision" Reflected in the Plan. The Plan is by no means clear about what the significance of its "vision" is for future commercial and residential development along Langston Boulevard. It purports to serve as "high level guidance" of those "considerations" that will inform future review of development (pp. 1, VIII). For those well versed in the County's approach to zoning, "special GLUP" studies, and site plan and "special exception" processes, perhaps this is unnecessary. For the rest of us, however, the Plan is confusing. Why, as the Arlington Chamber of Commerce points out, does the Plan note that followon Zoning Ordinance amendments to implement it will take up to three years? Are those amendments essentially foregone conclusions if the Plan is adopted, or are they just recommendations, as staff indicated to ZOCO on September 19 (before the draft Plan was made available)? For example, are the maximum heights suggested in the draft Plan to be taken as heights that developers may build to by right, or will there be site specific reviews to determine whether such heights are inappropriate at a particular site? Equally important, what "streamlining" of the special exception review process is contemplated (pp. 173, 184-85)? At what stage will neighbors and affected civic associations be invited to approve or otherwise participate in review of particular projects, what is the extent of those approval and participation rights, and what will be the standard of review of individual projects proposed for Langston Boulevard, under use permit, site plan, or other applicable processes? The issue of whether such processes amount to "upzoning" through special GLUP or other processes rather than Zoning Ordinance amendments is an important one that is currently of concern on other projects affecting a number of civic associations throughout Arlington.

Integration of Area 4. To assess whether the Plan meets its articulated goals for the entire corridor, it must include Cherrydale. What capacity does Cherrydale have to promote the affordable housing and other policies advanced in the Plan? Why should any proposed increase in building height not be reviewed for its impact on Cherrydale as well?

Building Heights. While the Plan raises similar issues in Areas 2 and 5 about maximum building height, the area of primary interest to DRCA residents has always been the Lee Heights Shops in Area 3, adjacent to our neighborhood. The Plan asserts that Lee Heights is "the heart of the corridor" (p. 56). Is this unexplained assertion the reason why the Plan would permit increased height for Lee Heights of 10 stories, in contrast to only 7 stories for the even larger hub in Area 2 at Lee Harrison Shopping Center? The canyonland effect of this proposal at Lee Heights is depicted more clearly in prior versions of the plan, but also on page 161 of this version of the Plan. The setbacks, designed to "mitigate the apparent mass" (p. 161), do not appear from this depiction to do so to any significant degree.

As noted above, it is very frustrating that this message continues to fall on deaf ears. Nor has the message changed since the onset of this project. In 2022-2023, DRCA conducted a survey to update its 2000 NC Plan, which included a number of different topics. Of those 261 households that responded, 72% noted that they used the local shops "all the time." Of 256 who responded, 75% want Lee Heights to be capped at 2-5 stories. Only 17% preferred a cap of 5-7 stories, and only 6% preferred a cap of 7-10 stories. Maintaining the small business framework (including continued capacity to provide for local restaurants) has always been of vital importance to DRCA residents.

Parking. The Plan must ensure that DRCA residents and others continue to shop along the corridor, and our neighborhood is simply too far away for most of our members to do that in the absence of abundant and easy to use parking. As currently drafted, the Plan appears simply to dismiss

this reality with a preference for disincentivizing use of cars. We can all agree that it would be ideal to promote alternatives to cars, but the Plan cannot be premised on a fantasy world. Ideological statements like this (p. 84) should form no basis for any final Plan for Langston Boulevard that the Board hopes to be successful: “Today’s car-centric design must change to enhance the transit experience and improve access for all.”

Affordable Housing. The key premise of the draft Plan (and its supporters) appears to be that densification along the corridor is necessary to hit a target of 2,500 affordable housing units that was once projected (*not* directed) in the 2015 Affordable Housing Master Plan for this corridor. Yet even now the draft Plan simply has blanks to fill in later about the estimates relevant to this issue, as to its undocumented “assessment of potential growth” and “envisioned” results, including the number of units that “could” result from the Plan (pp. 23, 60). Before weighing the tradeoffs associated with the Plan’s abrogation of the social compact for concentration of density along the Metro corridor reflected in the current comprehensive plan, the Board needs to do a much more comprehensive study of whether the Plan is likely to generate a number of affordable units that is acceptable in light of the anticipated likely gentrification that could dwarf the number of affordable units along the corridor. The Plan notes that as of FY 2021 there were already 800 affordable units along the corridor. What is the current projection? What is the likely *loss* of current market rate affordable units (MARKs) associated with future development following adoption of the Plan? I.e., would this be another example of redevelopment that extinguishes long established affordable housing apartments in Arlington? What is the basis for converting a 2015 Affordable Housing Master Plan projection of affordable units on the corridor into a “proportional share” (p. 13) that now appears to be the core of the Plan, eight years later? How would public vs. private investment compare in terms of likely construction of more affordable units? What role would or should bonus density play in promoting such construction, and how can the effects of such bonus density be predicted, particularly if the maximum building heights and other guidelines are prescribed as a matter of right rather than as incentives to construction of affordable units? Is the answer that projects can go *even higher* than these maximums in the Plan if they offer some number of affordable units? If so, under what review and approval process, as outlined above? Are there alternative ways of generating increases in affordable units along Langston Boulevard? What is the comparative likelihood of these alternatives in generating affordable units at 30% AMI as some commenters urge, as opposed to 60% or 80% AMI?

Infrastructure. As noted in my December 2021 letter, the transformative changes contemplated by the Plan will have significant impacts on school capacity, traffic, transportation routes governed by VDOT, parking, stormwater management, parks and recreation facilities, and other critical infrastructure. It appears that the Plan’s response is to punt all of these with the assurance reminiscent of *David Copperfield’s* Mr. Micawber that “something will turn up.” For example, instead of assessing now the potential impact of the Plan on school age population in the corridor, the Plan would simply “[m]onitor growth along the corridor” and “meet future needs through future capital and/or long-range public facility planning processes” (p. 63). As the resort to trailers in our schools demonstrates, this is the reverse of good public policy: the County should not be embarking on such a dramatic venture without first making sure that the venture can successfully surmount these significant obstacles, which others have repeatedly pointed out.

“Privately-Owned Public Spaces.” As pages 106-119 of the Plan make clear, this is the heart of the Plan. Rather than rely on public funding of what amount to public goods (parks and other open spaces), the Plan would primarily seek to incentivize private developers to do the job for us, to our liking as well as theirs, on a variety of the Plan goals. These include stormwater management, public facilities

and spaces, affordable housing, historic and cultural resources, transportation and connectivity, and sustainability and resiliency. For example, the Plan includes untested assumptions about the ability of private owners of proposed new 15-story buildings in the Lyon Village Shopping Center area adequately to address stormwater management problems in Areas 3 and 5. In DRCA's experience, such "public-private partnerships" or incentivization approaches rarely work out as anticipated. While many would like to see improvements to the corridor, we should not put virtually all our fate in the hands of the development community and what it may or may not promise to do, particularly to the extent the Plan ultimately (as the Arlington Chamber of Commerce urges) paves the way for extensive by right development.

Tree Canopy. As the Board is well aware, DRCA is second to none in its goal of preserving and expanding the County's tree canopy. Thus, in our recent NC survey described above, by far the largest features our members support for the future of Langston Boulevard (83%) would be "street trees and improved landscaping." But in protecting tree canopy, the County should concentrate on where the trees actually are or are likely to make major contributions. And as DRCA pointed out in its June 28, 2023, comments on the draft Forestry and Natural Resources plan, there are far more critical steps the County can take to maximize tree protection on private residential property, where most of our existing mature trees are located. In contrast, Langston Boulevard is and will remain largely hardscape with relatively little opportunity to contribute to the County's overall tree canopy, at least in the short term. In Area 3, for example, the August 2022 Preliminary Concept Plan Report anticipated (p. 95) a minimal 0.59 acre net change in potential tree canopy coverage associated with this plan. Thus, while DRCA members would like to promote street tree plantings on Langston Boulevard, the County should not overstate this factor in balancing the others outlined above.

Thank you very much for considering these views as you continue to analyze these questions in determining whether to adopt or revise any draft Plan that may be approved for advertisement to the public for further comment.

Sincerely yours,

Bill Richardson
President
Donaldson Run Civic Association