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CC: Ann Venezia; Arlington County & Ginger Brown; Lee Highway Alliance

SUBJECT: Comments on Plan Lee Highway Progress To-Date

To the Plan Lee Highway Coordinating Team:

I hope all is well. My name is Michael A. Spotts, and I am an Arlington resident; housing and community development policy research professional; and former Vice-Chair of the Affordable Housing Master Plan (AHMP) Working Group.<sup>1</sup> Though I am not a current resident of a neighborhood in the Lee Highway corridor I have longstanding connections to the Lee Highway study area, as I was formerly a renter in the corridor, my extended family lives there, and as a result my family frequents its business establishments, parks, and facilities. However, as I am not a resident I will mostly reserve comments on the specifics of Neighborhood Areas and instead offer bigger picture perspectives on how future planning and development in the Lee Highway can contribute to the County's overarching goals, particularly in the realm of housing attainability/affordability. My comments fall into three categories:

- Lee Highway and Arlington's broader vision for its future.
- Perspectives on best practices for achieving the County's and corridor's goals.
- Creating a more durable planning approach for Arlington's future.

Lee Highway and Arlington's broader vision for its future.

Put simply, Arlington will be hard-pressed to achieve its goals related to diversity, equity, and housing attainability without adopting a strong, forward-looking policy and planning framework for the Lee Highway corridor. Based on the [Metropolitan Washington Council of Government's published housing targets](#) for meeting demand within the region, Arlington needs to considerably increase its housing production. Though Arlington cannot achieve this regional vision alone, Arlington's actions are a prerequisite for improved housing affordability within the County. Given the County's limited development opportunities due to land constraints, the comprehensive visioning process for Lee Highway represents a significant opportunity for thoughtful policymaking and infrastructure coordination to meet this demand. Given the relatively low density of the corridor, there will likely be some pressure to adopt less aggressive growth targets. Though the specific, appropriate density level has yet to be determined and likely varies throughout the corridor, in general the County should be ambitious and prioritize increasing the supply and diversity of housing overall. Failure to do so will

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<sup>1</sup> Disclosure: I am a volunteer member of the Board of Directors for both the Arlington Partnership for Affordable Housing and Northern Virginia Affordable Housing Alliance. These comments are my own, and do not represent the perspective of those organizations.

further concentrate demand, driving up prices and putting additional market pressure on other higher-density corridors/planning areas such as the Rosslyn-Ballston Corridor, Columbia Pike, and the Route 1/Blue Line Corridor.

Increasing housing supply and diversity in the Lee Highway corridor is also critically important to achieving the specific goals of the Affordable Housing Master Plan, which is now under 5-year review. During that process, we identified considerable challenges related to the geographic distribution of affordable housing, with attainable housing opportunities (and Committed Affordable Units) more constrained in North Arlington and north of Lee Highway in particular. As such, the development opportunities brought on by the Plan Lee Highway process represent a critical opportunity for achieving a more balanced housing distribution. Failure to leverage this opportunity will only exacerbate a cycle in which market-rate housing becomes increasingly out-of-reach and rising land/property values reduce the reach of County affordable housing subsidies, widening discrepancies in income, wealth and opportunity (or put more bluntly, intensifying income segregation).

In developing this plan, the County will have to weigh competing priorities, each with its own set of trade-offs. Housing will not be the only priority, given other critical infrastructure and environmental needs. However, the County must be realistic and understand that the value created by redevelopment, while often substantial, cannot address every community benefit/preference, and that trying to expand the breadth of community benefits can detract from the ability to deliver on core priorities. Moving forward, the County should focus on the core purpose of neighborhoods – providing a safe, accessible, and sustainable place for people to live and meet their day-to-day needs. Housing (and by extension, affordability) is inseparable from that purpose, and should thus be among the most important considerations.

Perspectives on best practices for achieving the County's and corridor's goals.

The County has a broad toolkit for addressing housing and community development needs within the Lee Highway Corridor. Several of the specific considerations and policy approaches discussed in the past that were germane to the County's Call for Ideas (fall 2020; [prior comment letter](#)) and the AHMP 5-year review (spring 2021, [prior comment letter](#)) apply to the Lee Highway Corridor. As the Lee Highway planning process progresses, there should be continued engagement to identify more detailed suggestions for targeted policy issues. At a high level:

- ***Most importantly, policies resulting from the Plan Lee Highway process should ensure that there is sufficient height, density, and form flexibility to make affordable housing (and other prioritized community benefits) economically feasible.*** Restricting these elements in the interest of non-vital concerns (such as “eye-of-the-beholder” factors like specific aesthetics and “neighborhood character”) will likely reduce the integrative potential of development in the corridor and increase the per-unit cost of developing committed affordable housing.
- The County should reconsider its approach to the Arlington East Falls Church neighborhood. A recent Plan Lee Highway presentation suggested that there would not be testing of various land use plans given the previously-adopted plan for the neighborhood. The County should reverse this decision. The East Falls Church neighborhood has access to what is perhaps the corridor's best transportation asset – a Metro station that allows for a “one-seat ride” to critical centers such as Tysons, the Rosslyn-Ballston Corridor (and downtown Washington, DC), and the emerging node at Dunn Loring/Mosaic District. A stated goal of the Lee Highway planning effort

is to enable East Falls Church to be a transit-oriented and mixed-use district. Planning materials also describe the importance of expanding safe and equitable transit access. Though the current East Falls Church Plan points to these issues as well, it does not provide sufficient tools/incentives to accomplish these goals. This is in part due to an over-emphasis of “protecting” the single-family exclusive nature of a significant portion of the areas surrounding the Metro station. Recent development in the corridor (including a subdivision of detached single-family homes within feet of the station itself) illustrates that the current approach to land use in East Falls Church is incompatible with a transit-oriented vision, and an abdication of Arlington’s responsibility to maximize the potential of the entire region’s investment in the Metrorail system. Ending the County’s ban on apartments, attached single-family forms, and other more naturally affordable housing types in most of the low-density areas closest to the station is critical to achieving the County’s stated goals for housing affordability, transit access, and environmental sustainability. While this would likely result in some degree of change, such change is already happening (in the form of teardown/redevelopment of larger homes). High-land values and the high-quality of exiting homes are likely to make this change evolutionary, rather than radical. Prioritizing low-density housing (and thus making more attainable housing development less feasible) in an area where property values are boosted by the region’s investment in transit constitutes a wealth transfer from the tax-paying public to a small number of private property owners. This investment will be substantially more effective if more people have access to the neighborhood, which only can be accomplished through more housing units and more diverse housing types.

- The Plan calls for a Complete Streets approach. However, streets are rarely truly “complete” if multi-modal access is not prioritized. Adding a protected bike lane or a sidewalk to a 4-6 lane road is a marginal improvement at best, but does not fundamentally change the dynamic of automobile prioritization. If cars are able to proceed at a high rate of speed without robust traffic calming measures, pedestrians and bicyclists will always be at potentially deadly risk. Prioritizing transit and active transportation should be the County’s primary approach. Given the severe regional shortage of housing, there is excess demand for every transportation lifestyle – car-dependent, car-light, and car-free. As such, if County policies related to parking and transportation infrastructure continue to make car-oriented housing, commercial, and retail development the “path of least resistance,” that is what will get built, contrary to the County’s stated multi-modal goals and Vision Zero policy. In its policies, the County should alter the “path of least resistance” and enable the market to better respond to demand for car-light and car-free lifestyles. This will have benefits for the environment, transportation network, and housing affordability.
- Open space and environmental requirements should prioritize contiguous areas and public space. Environmental research suggests that contiguous (particularly forested) natural space yields the best outcomes for stormwater retention, habitat preservation, and tree cover maintenance. While private yards/open space may be better than impervious cover in many cases, they do not offer the same benefits and are subject to change by private property owners. As such, relevant requirements should be flexible and prioritize the expansion of land area available for public conservation efforts. For example, the County could allow (or incentivize) density/height transfers in exchange for conservation easements on lots adjacent to public space (or for the establishment of new public space).

## Creating a more durable planning approach for Arlington's future

The Plan Lee Highway effort is critical to meeting a variety of Arlington County's future development and infrastructure goals. However, as the County considers a new development paradigm for the corridor, it should consider why this robust planning effort is necessary in the first place. In a previous generation, County land use and zoning policies codified a specific vision of development – low density, single-use, predominantly auto oriented – across much (though not all) of the corridor. In creating a relatively inflexible policy, the County reduced the capacity for evolutionary change as markets shifted, existing building and infrastructure approached the end of its life cycle, and the mismatch between current conditions and current needs grew and grew. Prescriptive County policies created an illusion of stasis and a misleading expectation among some residents that neighborhoods do not (or should not) change over time. Despite this illusion, change occurred anyway, in the form of teardowns and redevelopment that lock out all but the wealthiest purchasers, and increased through-traffic as development was pushed to further-out locations.

I support the County's current priorities for redevelopment of the corridor. Mixed-use, denser, and multi-modal development/infrastructure is the better path at this stage of the County's life cycle, and I hope that the County will adopt policies that enable this path.

However, in enabling more efficient and affordable development patterns, the County should learn the lessons of past planning efforts. The "vision" for the corridor (and the County, for that matter) is not one single vision – it is the aggregate of the vision of the people that live, work, and play in the area. And as people change, so may that vision. The demographics, consumer preferences, development technology, financial systems, economies, or any of the other factors that influence neighborhoods are not static. Therefore, it is imperative that policies that result from the Plan Lee Highway effort are sufficiently flexible to enable, rather than tamp down, that evolution. There are practical approaches to achieving this goal, which can include:

- Minimizing restrictions on form/use outside of provisions related to health and safety and enabling low-impact neighborhood-serving retail and accessory commercial units (similar to accessory dwelling units) in all neighborhoods. This allows for new "nodes" to emerge if demand exists.
- Complementing increased height/density guidelines with flexibility that permits the next increment above prevailing density/height to proceed by right (enabling future incremental growth).
- Providing regulatory flexibility for "tactical" improvements (similar to expansions of restaurant "pop-up" outdoor seating in response to COVID).
- Conducting rapid, small-scale pilots to test innovative transportation, public space activation, micromobility, or other infrastructure and public realm improvements.

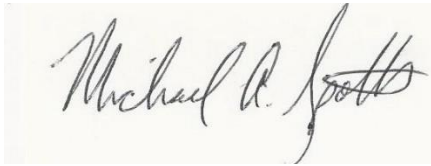
This list is incomplete, and not all of these ideas may make sense for the Lee Highway Corridor. The critical takeaway is that this is about a mindset rather than a specific tool:

- Neighborhoods (like ecosystems) are complex, interactive, and evolve by nature. Planning is an imperfect science. As such plans should avoid the tendency to micromanage and account for every scenario, and embrace flexibility and experimentation.

### Conclusion

Thank you for the opportunity to share these comments. These observations are based on my research of best practices in affordable housing and community development practice from around the country. I am happy to share additional information, examples, and supporting materials.

Sincerely,

A handwritten signature in black ink on a light-colored background. The signature reads "Michael A. Spotts" in a cursive, flowing script.

Michael A. Spotts

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