

October 22, 2022

To: Arlington County Board; Arlington Department of Community Planning, Housing & Development; Plan Langston Boulevard Planning Team; and the Langston Boulevard Alliance

Subject: Comments on the Plan Langston Boulevard Preliminary Concept Plan

Thank you for the opportunity to comment on the Plan Langston Boulevard Preliminary Concept Plan. I commend the County for its commitment to engaging with the broader community on this effort. Potential new development enabled by the Plan Langston Boulevard process is critical to achieving the County's housing production goals generally and affordable housing goals specifically.

Large-scale planning process such as this face a difficult balancing act of making sure that the initiative advances County-wide priorities while incorporating the perspectives of those living and working within the community in question. While the current Concept Plan would represent an improvement over the status quo strictly from an urban form perspective, there are two primary issues that need to be addressed to avoid undermining the very objectives set by the County's vision for growth and its Affordable Housing Master Plan (AHMP). ***Specifically, revisions to the plan should a) identify ways to reallocate the allowable density that was reduced in the latest iteration; and b) delineate a clear path to achieving the affordable housing targets set forth in the AHMP. This latter issue is of the upmost importance, given the County's stated commitments to equity and the legal duty to Affirmatively Further Fair Housing under the Fair Housing Act.***

Achieving Appropriate Density

The Preliminary Concept Plan includes the low-scale scenario from the original Land Use Scenario Analysis. Reductions in allowable density for a given geography will make it more difficult to achieve both Countywide goals for housing production as well as hinder the ability to create committed affordable housing in the corridor (see next section). This change was made in part due to feedback from neighborhood residents who did not conclusively support greater density. Accommodating the "macro-" level goals in the context of the "micro-" level vision is difficult, but not impossible. However, such balancing acts require trade-offs in other areas. The County could better support housing production within the neighborhood/corridor context by:

- *Allowing additional density where steel-and-concrete construction is already envisioned:* Incremental increases in height/density (1-2 stories, for example) that push development beyond the "stick-built" construction threshold are less likely to be beneficial in practice. More robust increases in density are necessary to justify the incremental construction cost of steel-concrete methods, and the market may not support such increases throughout the full corridor (even putting aside the lack of neighborhood support for such levels of density). Therefore, it may be beneficial to focus density where the market already supports this construction type.
- *Provide zoning flexibility to make smaller scale projects more viable:* Community feedback to limit height and provide open space does reduce the development potential of the corridor, all else being equal. However, all else does not need to be equal. The Plan could reduce barriers to development (such as parking requirements) that allow more units to fit within a given footprint and/or improve the feasibility of development on more marginal sites that are less accommodative to aggregation/large scale development. This approach would also have the benefit of providing more "fine grained" urbanism.

- *Marginally increase density over a wider area:* Rather than concentrating height/density in a smaller area, the Plan could incorporate additional marginal density increases over a wider geographic area. This could take several forms – allowing townhome/garden style density in the areas abutting the planning area; allowing more density further along the north/south arterials that intersect with Langston Boulevard; laying out a concrete process for planning for growth in additional adjacent neighborhoods (such as East Falls Church and Westover) once the “core” plan has been ratified, etc.

To this final point regarding the scope of the planning area, the Preliminary Concept Plan takes the opposite approach, removing some of the “edge” lower-density parcels. Again, this does mean that achieving the necessary level of density cannot be accomplished. However, doing so increases the importance of the following:

- Finding alternative pathways to increasing density elsewhere, AND
- Adopting the County’s proposed Missing Middle Housing changes, especially the higher-density options (6-8 units) currently included in the proposal.

Achieving Affordable Housing Goals

During the AHMP development process, County staff and the Working Group 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 Langston Boulevard in particular. To meet the County’s goals for affordable housing by 2040, the Langston Boulevard/East Falls Church corridor would need an increase of nearly 2,000 units affordable up to 60% AMI. Regrettably, the final targets projected a 50-unit loss of units in the nearby Westover neighborhood over the same time period.

Unfortunately, the current draft plan concedes failure on this point, in part due to community feedback that led to lower planned densities (with a commensurate reduction in the affordable housing production capacity) and a lack of prioritization of affordable housing among community engagement respondents in the corridor. The public outreach form even includes the question: “How important is it to you that the County reach its AHMP goal for Langston Boulevard?”

Arlington County went through a three-year process to set the goals for the AHMP, and some of the support for the AHMP was secured specifically because it included a commitment to provide more affordability in North Arlington. *Though community engagement specific to the Plan Langston Boulevard process should inform **how** the County achieves this target, the question of **whether** the County creates an actionable, viable plan to meet the target should not be up for debate.*

The development opportunities brought on by the Plan Langston Boulevard process represent the most significant, and perhaps the last, opportunity to produce affordable housing at scale in North Arlington and meet (or hopefully, exceed) the corridor’s geographic distribution targets established in the AHMP. As I wrote in my January 2022 comment letter on this subject:

*The County has taken robust action to expand and preserve affordable housing opportunities in in the Rosslyn-Ballston corridor and in South Arlington. Notable examples include the affordability incentives embedded in the Columbia Pike Neighborhoods Plan and Form-Based Code, and the recent investment in preserving the affordability of the Barcroft Apartments. To be clear, these actions are warranted, necessary, and consistent with the principles of equity and fair housing. **However, to affirmatively further fair housing it is critically***

necessary to show similar commitment to affordability everywhere in the County. The County has established a pattern in which it is willing to invest resources in areas that are already socioeconomically diverse and has made case-specific investments in certain higher-income neighborhoods. However, it has not established the same level of commitment to affirmatively confronting exclusionary zoning and taking proactive steps through zoning changes and financial investments to desegregating neighborhoods. If the County is to comply with the spirit (and potentially the letter) of the Fair Housing Act, it cannot commit to one-for-one preservation/replacement of affordable units along Columbia Pike, but plan for a loss of affordable units in Westover. It cannot abandon the commitment to affordability along Langston Boulevard established in the AHMP because of the concerns of opponents hoping to preserve low density in the County's wealthiest and least diverse neighborhoods. This is particularly important when placed in the context of the commitments made (and neighborhood change facilitated) along in the Columbia Pike corridor. Failure to prioritize housing affordability and diversity would at a minimum expose as hollow the County's stated commitment to equity. At a maximum, it could potentially and justifiably lead to regulatory action and litigation if HUD begins robust enforcement of the Affirmatively Furthering Fair Housing obligation.

If the neighborhood preference to adopt more modest increases in density results in lower committed affordable housing production, the final Langston Boulevard Concept Plan must compensate for this deficit in other ways. Importantly, it should be noted that this gap is one that is not too large to bridge. There are proven, viable concepts that when put together could achieve and potentially exceed the AHMP targets:

- *Utilize public sites and facilities for "joint development:"* The Preliminary Concept Plan already identifies several public sites (such as the Langston Brown and Lee Community Centers) that "could be redeveloped to incorporate new uses that meet community needs." The Plan could include more robust provisions/requirements that such sites be developed more intensely and that they include both community facilities and affordable housing (building upon the model of Arlington Mill and numerous other "public land for public good" efforts throughout the US.¹
- *Accelerate transit-oriented development at the East Falls Church Metro Station:* 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. 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. WMATA has recently undertaken a strategy to better utilize its transit station areas to generate revenue and ridership and (in some cases) expand affordability. Unfortunately, though the East Falls Church station has large surface

¹ See: Spotts, Michael A., Genevieve Hale-Case, and Ahmad Abu-Khalaf. "Public Benefit from Publicly Owned Parcels: Effective Practices in Affordable Housing Development." Washington, DC: Enterprise Community Partners, June 5, 2017. <https://community-wealth.org/content/public-benefit-publicly-owned-parcels-effective-practices-affordable-housing-development>.

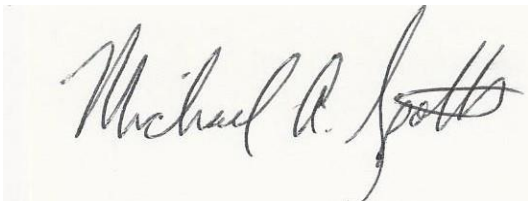
and <https://localhousingolutions.org/housing-policy-library/use-of-publicly-owned-property-for-affordable-housing/>

parking lots and plenty of development potential, WMATA has not identified this as a near-term priority given the County's lack of emphasis (as well as complications related to coordination with the Virginia DOT). However, the County could work with VDOT and WMATA to expeditiously remove barriers and prioritize this site to replace the park-and-ride lot with structured parking, affordable housing, and other community amenities (ground floor retail, open space, etc.).

- *Establish corridor-specific financing tools:* The County could leverage the increased economic growth brought on by redevelopment to support affordable housing financing/subsidy tools. For example, the County could adopt a special assessment/tax surcharge (if allowed under state law) that would be dedicated to providing affordable housing, through subsidies for the creation of committed affordable housing, rental assistance contracts to reserve units as affordable in market-rate properties, etc.
- *Provide deeper income targeting:* Given that the Langston Boulevard corridor (and the northern third of Arlington more generally) lag in terms of affordable housing, the final Concept Plan could include a commitment to leverage this opportunity and establish the Corridor as a new lead on meeting the most significant unmet housing needs in the County: housing affordable at the 30% and 40% of AMI levels (see analysis at: <https://www.arlcf.org/sharedprosperity/#targets>). These units tend to require additional subsidy/resources, but the Plan could leverage the tools identified in this letter (among others) to create units to expand economic mobility by building deeply affordable housing in the County's most prosperous neighborhoods.

For each of these options, there are trade-offs. Prioritizing public site for affordable housing could limit the potential for other community uses. Financing tools carry a real-world cost. However, these investments are important and necessary if stakeholders in the corridor choose to forgo additional density along Langston Boulevard. Ultimately, the specific path matters less than the final goal: ensuring that Plan Langston Boulevard results in the preservation and creation of affordable housing and expands the socioeconomic diversity of the neighborhoods. I stand ready to assist the County and the Plan Langston Boulevard stakeholders in achieving that goal in any way that I can. Once again, thank you for the opportunity to provide this public comment.

Sincerely,

A handwritten signature in black ink on a light-colored background. The signature is written in a cursive style and reads "Michael A. Spotts".

Michael A. Spotts