

October 28, 2021

Arlington Forestry and Natural Resources Commission,

Dear Commissioners,

Arlingtonians for our Sustainable Future (ASF) is concerned about what seems to be foreordained "yes" votes for new up-zoning for "Missing Middle" multiplexes and split lots across the county by 2022.

Changing land use and zoning in single-family areas upends the pact the county made with residents in 1979; namely, that county leaders would intensely develop the Metro corridors while leaving the remainder of the county relatively "suburban" with significant tracts of single-family housing. Such intense development along the Metro corridors made and still makes sense for denser populations given the presence of Metro. Adding density in the Metro corridors would be the most environmentally friendly option.

However, more recently the County has been aggressively adding more and more density in many areas outside the Metro corridors. Likewise, the Metropolitan Washington Council of Governments (MWCOG) has failed to prioritize mass transit; now they and several local jurisdictions including Arlington are looking at urban infill and new zoning as the most expedient solution.

These actions by Arlington and MWCOG are not a solution for our environment. These actions push tough political decisions to future boards (i.e. how to pay for infrastructure and for the environmental damage they inflict.) Most important, we remind you that Virginia's Constitution likely makes any rollback of up-zoning illegal. We find it ironic that county staff often cite county zoning decisions of 2005 (permitting much larger homes on single-family lots) as a reason we need missing middle units. The county knows it likely cannot undo the large home zoning it put in place, but it is now arguing for similar steps, that are irreversible, that will add builders' yields on each lot, encouraging teardowns and tree loss and home price inflation yet again.

We ask FNRC to ask some tough questions about Missing Middle plans:

- What are the maximum residential infill capacities for our Metro corridors, and how do they align with the MWCOG population projections for Arlington?
- How will COVID-19 affect both commercial real estate tax revenues and demand for new residences, if telecommuting continues?

- How will the county budget for new schools, parks, police and fire stations, water and wastewater, and roads/parking/transit? How will these projections square with the answers to the previous question? And what percent of these costs would be covered by added tax revenue from new residents?

ASF has been unable to get answers to these critical questions. We believe the county has failed to disclose substantive impacts of decisions to approve infill in neighborhoods.

ASF believes there is likely a negative fiscal impact of Missing Middle infill. We believe it will add to more school overcrowding/boundary shifts, and that specific plans for new school infrastructure should precede any new zoning. We believe MM will increase overall yields on any upzoned land, further exacerbating county-wide land inflation which will benefit (mostly white) current homeowners. Such up-zoning will likely spur loss of existing affordable housing, including *existing Missing Middle*. In fact, Missing Middle plus other multi-family housing types account for 50% of housing types in the "single-family neighborhoods" right now, meaning they are already denser than purely suburban models. (The County's [Missing Middle Research Bulletin Number 3](#) indicates that "within these residential neighborhoods today, nearly 50% of the housing stock is single-family detached housing, 30% is low-rise multifamily, and 13% is mid- and high-rise multifamily.") Preserving these older homes and encouraging remodeling vs. teardowns will do more to preserve true affordability and green space than denser zoning in these areas.

We believe the loss of trees and greenspace will cause more runoff and flooding, loss of critical habitat, poorer air quality and heat islands -- including in the historically African-American neighborhoods of Halls Hill, Highview Park, and Green Valley, and the diverse neighborhoods of Columbia Heights, Penrose. As noted in a [study last year by Arlington Analytics](#), these areas were also some of the only areas where it was thought new Missing Middle could be affordable to those making Area Median Income (the target zone when the MM initiative was launched, and one that would be laudable if credible.) The study indicates that "the only neighborhoods where an AMI household could afford a duplex sold at this minimum economically viable price are Arlington View (\$494K), Claremont (\$498K), Columbia Forest (\$455K), and Fairlington (\$498K), Green Valley (\$519K), and Shirlington (\$506K)."

That study projected MM units could be built at \$519,000 in Green Valley, affordable to households earning 80% of AMI. ASF has documented however, [that new MM units in Green Valley \(which already has permissive zoning for townhomes\), were selling this year at over \\$850,000](#). Like the zoning of 2005 effects in other areas, these townhomes are raising median prices in Green Valley and replacing minority and senior homeowners with younger, whiter populations. Loss of trees and green space -- [also documented by Arlington Analytics at Towns of 24 in Green Valley](#) -- are also negatively affecting the community. The developer of eight new townhomes at Towns of 24 -- effectively representing a new "Missing Middle" -- trimmed a large strand of screening Leyland Cypress trees -- and cut their roots to flatten out the common area around the new townhomes. Now the trees are dying, even though they were on the adjacent property, and those residents' complaints were futile. We know the effects on Arlington's natural resources of encouraging more teardowns: they are devastating.

Therefore, ASF asks that the county conduct analyses of effects on our budget, our environment, and on income inequality in Arlington before it takes any further steps to up-zone:

1. Perform site-specific fiscal impact analyses for new, multi-unit residential projects;
2. Release all existing long-term operating budget forecasts;

3. Prepare county forecasts comparing current zoning with up-zoning, regarding:
  - Long-term operating budget;
  - Long-term environmental impact;
  - Long-term household income by quintiles showing projected disparities among different household groups.

Thank you for your consideration,

Arlingtonians for Our Sustainable Future (ASF)

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