YIMBYS OF NOVA
yes to people, yes to housing
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October 22, 2026

Dear Members of the Committee,

The YIMBYs of NoVA supports the continued progress in the Special Land Use Tier II Study for the 1401 Langston Blvd Site. We look forward to an increased housing supply that will benefit Arlington and the entire region.

Regarding Land Use and Program, we believe all potential opportunities should be encouraged but not mandated on the site. Site flexibility is very important to allow for the site to grow over time and ensure feasibility to produce developable structures.

For Access and Circulation, we applaud considerations 1 through 3. Consideration 4 is unnecessary. Multimodal access can be achieved without extending the street grid. Mandated access and circulation criteria should not infringe on building layout that adversely affects building feasibility.

A landscaped buffer to the RPA should not be required. A landscaped buffer on the western edge of the site takes away potential greenspace on the eastern and southern portions of the site where there will be much easier access and more people.

For Open Space and Views, we support considerations 2 and 3. Public access to meaningful views will be difficult with the trees on the northern edge of the site. Public views should not be prioritized considering they will be blocked by the trees.

When it comes to Building Form and Placement, we have significant concerns that requiring an ‘urban edge’ along Langston will lock-in infeasible building placement. This mandate led to the previously failed site plan.

The consideration to “Limit any adverse impacts to air navigation and operations” must be removed. The Federal Aviation Administration (FAA) issued a “Determination of no hazard to air navigation” for building heights of 435 above

mean sea level (AMSL). This height should be the prevailing height allowed on the site. The empirical aeronautical record clearly demonstrates that building to 435 feet AMSL poses no hazard to navigable airspace:

Repeated FAA "Determinations of No Hazard": The Federal Aviation Administration (FAA), which is the sole federal agency empowered to evaluate and regulate navigable airspace safety under Title 14 CFR Part 77, has twice studied this site and determined that tall structures do not create a hazard to air navigation. In 2017, the FAA issued Determinations of No Hazard for an even taller proposal reaching 470 feet AMSL (Aeronautical Study Numbers 2017-AEA-4618 to 4635-OE). When MWAA and legacy carriers challenged that decision with formal petitions, the FAA affirmed its findings and denied discretionary review. In 2026, the FAA reiterated this conclusion by issuing Determinations of No Hazard for the currently proposed 435-foot AMSL profile.

Lower Than Existing Rosslyn Skyline: At 435 feet AMSL, the proposal is 35 feet lower than the previously cleared 2017 proposal and lower than multiple existing high-rise structures that have safely defined the Rosslyn ridgeline for decades. It introduces no new category of obstruction to the existing urban profile.
Misuse of One Engine Inoperative (OEI) Surfaces: MWAA's primary challenge relies on airline One Engine Inoperative (OEI) contingency surfaces. Unlike FAA Part 77 imaginary surfaces, OEI criteria are private, carrier-specific operational planning constructs governed by FAA Advisory Circular AC 120-91A, not land-use police powers or fixed public easements. Airlines routinely adapt their climb profiles, weights, and routes to existing city environments. Furthermore, during an actual OEI emergency, 14 CFR § 91.3(b) gives the Pilot in Command (PIC) complete emergency authority to deviate from preplanned routes, including traversing prohibited areas (P-56A/B) or flying straight to avoid losing airspeed, rendering MWAA's rigid corridor boundaries legally and operationally moot.

Clear of Protected Flyways and Approaches: The site sits approximately 350 feet from the Potomac River's edge and over 650 feet outside the protected boundary of VFR Helicopter Route 1 (which extends 250 feet on either side of the river centerline under FAA Order JO 7400.2L). Similarly, the FAA confirmed that the heights do not

degrade instrument departure procedures, runway safety areas, or approach minima for Runway 19 or Runway 1/33.

Zero Quantifiable Operational Data from MWAA: In testimony before Arlington's Long Range Planning Committee (LRPC) on June 24, 2026, MWAA representatives conceded that they could not identify a single procedure, flight, or quantified weight penalty that would be compromised by the 435-foot height. Vague assertions about "preserving airspace flexibility" do not supersede exhaustive, empirical FAA technical findings.

We hope that the Special Land Use Tier II process will maximize the realistic opportunity for redevelopment and increase Rosslyn's housing supply, for the benefit of all.

Sincerely,
YIMBYs of NoVA

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YIMBYs of Northern Virginia works to make housing affordable to all by enabling the development of more and denser housing. Attainable homes close to the amenities of daily life hold the promise of communities that are more socially connected, economically productive, and sustainable, environmentally and otherwise.
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