

Arlington County Planning Commission

11.9.2022 ZOCO Hybrid Meeting

Missing Middle Housing Study: Phase 3

Public Comments Received by 12:00pm on 11.9.2022

Public Comment #1

- Hi. I'm an Arlington resident -- I live on Williamsburg Boulevard in a perfectly nice single-family home. I am writing in favor of the missing middle plan; it seems crucial to the survival of this neighborhood to increase housing diversity, economic diversity, and demographic diversity. If we can build 9,000 square foot mansions, can't we build triplexes or quadplexes that might make the neighborhood a better place?

Public Comment #2

- As a 32-year Arlington resident, I implore you to reject this disastrous up-zoning of Arlington's single-family neighborhoods! Arlington has long been an exemplary model of urban planning, with a variety of densities and housing options. There must be a more sane, measured way to increase housing stock in targeted corridors without destroying the backbone of this county- our lovely, treed and family friendly neighborhoods. There is no mandate from Arlington voters to house everyone who moves to the DMV. On the contrary, if this passes many will vote out the County Board or vote with their feet and leave Arlington. Please, please do not proceed to destroy Arlington with this zoning proposal.

Public Comment #3

- I began living in Arlington when I was 17, renting an apartment in Clarendon with my mother. I am now 35 and renting in Courthouse. During this time rents have skyrocketed with no end in sight. I understand why the rents have increased, Arlington is an in-demand area and supply is constrained. Opponents of Missing Middle argue about tree loss and parking, but those concerns have now been addressed by the Committee's most recent revisions. In conversations with opponents of Missing Middle they always resort to an argument that people "don't deserve to live anywhere." Well to that cold and selfish argument, I say people don't deserve to live in an artificially sparse neighborhood next door to a major city. These opponents have to recognize that the area they chose to live in is changing and that allowing more people to live near jobs and economic opportunity will only improve living conditions and quality of life for all. If they don't like that fact then they are the ones who can move farther out. I applaud the Committee's work and encourage the County Board to approve the proposal.

Public Comment #4

- The zoning amendments are inconsistent with Arlington’s decades-old land use policy that focuses development along metro corridors and preserves single-family neighborhoods.

The process is flawed. It should include Arlington’s Joint Facilities Review Commission (JFAC) recommendation:

consider using information from the Missing Middle Housing Study to inform “an expanded long-range vision of the future of Arlington as a whole, including considerations for transportation, diversity, equity, parks, environmental conservation, sustainability, and schools and public facilities.”

Consistent with the Planning Commission’s purpose “to promote the orderly development of Arlington County,” the LRPC and Zoning Committee should recommend that the County Board not vote in December on zoning amendments and that the County should conduct a comprehensive and inclusive process about the long-range vision for Arlington’s future.

Public Comment #5

- The Missing Middle is really a radical restructuring of the long held vision for the County's future developed in an orderly fashion by the County Board decades ago. This included development along high transit corridors and single family housing in other areas. This proposal proposes to eliminate the last half of that vision. As such the Zoning Committee must stop this process until a long term study of the County's current vision is reconsidered by the many elements comprising Arlington County. This study should include a report by a neutral third party on the advantages and disadvantages of the Missing Middle. The Zoning Committee should have no political oar in this discussion. It should standup to an extremely politicized County Board and demand a new vision of Arlington's Future.

Public Comment #6

- I am writing in OPPOSITION to the proposed MIssing Middle. The County needs to undertake a more extensive review of this proposal, especially given the survey results showing the majority of survey respondents are against this proposal. The County needs to consider the costs of this proposal -- including climate change due to reduction in tree coverage, the creation of backyard parking lots, parking issues on already crowded streets, garbage and dumpster issues, and other potential overcrowding issues. The benefits of this proposal are unclear -- there is nothing that says the additional townhomes, condos, or apartments will meet the needs of missing middle. In all likelihood, they will be luxury homes and units -- more expensive than many of the single-family homes that would be torn down to build these units. Additionally, there is no need for these types of units. Thousands of apartments, condos, and townhomes are

being built along metro corridors throughout northern VA. I am AGAINST missing middle.

Public Comment #7

- Deep concerns with MMHS. The record shows serious opposition. The staff report even points out that further stormwater, tree analysis, lot coverage and other reviews are needed. Why change zoning in an unprecedented way before finishing necessary research. Why cart before horse? Why not complete the research &/or phase in changes to test out what success looks like. The stakes are very high and there is much opportunity for compromise. I hope the LRPC can make these recommendations.

Public Comment #8

- Upzoning all single family neighborhoods is a terrible idea opposed by the vast majority of Arlington residents who have participated in the County's various feedback mechanisms. The zoning amendments violate Arlington's land use policy focusing development along metro corridors to preserve single-family neighborhoods. The process is flawed and should consider JFAC's recommendation to use information from the Missing Middle Housing Study to inform "an expanded long-range vision of the future of Arlington as a whole, including transportation, diversity, equity, parks, environmental conservation, sustainability, and schools and public facilities." Since the Planning Commission's purpose is "to promote the orderly development of Arlington County," the LRPC and Zoning Committee should recommend that the County Board not vote in December on zoning amendments and that the County should conduct a comprehensive and inclusive process about the long-range vision for Arlington's future.

Public Comment #9

- Please answer: 1) Do the 42 pages of amendments really allow that small R5 and R6 lots can be further divided into 2 and 3 smaller fee simple lots? By right? 2) On my street there are 8 houses in a row that were built in the late 40's and 50's that would accommodate 8 units buildings according to the current MMH. So am I right to assume that given the MMH proposal there is nothing to prevent 8 unit building being built on these lots? By right? Please take the time to get this right.

Public Comment #10

- I am vehemently opposed to the MM proposal. This change in zoning laws would destroy the character and charm of Arlington neighborhoods. In particular, it would take away green space and destroy the tree canopy on our communities. This proposal would not solve housing for people with lower incomes in our community. Instead, it would be a great windfall for the developers who stand to make a huge profit.

Public Comment #11

- Hi, I am writing in favor of the Zoning Ordinance Draft incorporating elements of the missing middle housing framework. I continue to support expanded housing options, up to 8 units per lot. With regards to specific changes and choices in the zoning ordinance draft, I would like to highlight a few points:
Option 1: I support 1B, up to 8 units
Option 4: I support 4B, with reallocated coverage standards
Option 5: I support 5A, with reduced parking requirements. I would love to see an even greater reduction in requirements than provided in this option.
Option 7: I VERY STRONGLY support 7B. It is RIDICULOUS to put a limit on the amount of new housing to be built. If this is implemented, I DEMAND that the same permit restriction apply to single family home redevelopment as well.
Option 8: I support 8A

Public Comment #12

- I support the innovative and thoughtful framework that Arlington County staff drafted to end exclusionary zoning and restore diverse housing types to Arlington's low-density neighborhoods.

The draft changes to the General Land Use Plan, which is the visionary document for Arlington's growth, outline a new conception of low-density neighborhoods, one that embraces the value of diverse housing for a diverse community.

The draft zoning text still puts "missing middle" type homes at a disadvantage relative to single-detached homes, which will limit the creation of more attainable and more sustainable homes. I would like to see fewer or no design guidelines that put a greater burden on "expanded housing options" compared to single-detached homes.

I support allowing up to 8 units per dwelling, so that the most attainable homes can be built (Option 1B).

I support these expanded housing options without lot size tiering (Option 2A). Tiering would only prevent creative and innovative housing concepts. Let the market decide how many units and where.

I support allowing "expanded housing options" to have additional flexibility with their maximum lot coverage percentage, since they will likely not have detached garages (Option 4B).

I encourage staff to eliminate the parking requirement for lots near transit. Barring that, I support allowing a parking study to reduce the parking requirement (Option 5A).

I support the additional landscaping requirement of planting one shade tree per dwelling

unit (Option 6A).

I am very concerned about the prospect of a cap on the development of “expanded housing options.” We want this type of housing to thrive in Arlington. (Option 7B)

I want to encourage conversions of existing buildings into expanded housing options through a use permit. This would give current owners more flexibility and could be an alternative to teardowns. (Option 8A).

Public Comment #13

- I am a single-issue voter: that issue is housing. Dramatic deregulation is needed to allow housing supply to match demand. Missing Middle is a small but necessary first step.

I support the innovative and thoughtful framework that Arlington County staff drafted to end exclusionary zoning and restore diverse housing types to Arlington’s low-density neighborhoods.

The draft changes to the General Land Use Plan, which is the visionary document for Arlington’s growth, outline a new conception of low-density neighborhoods, one that embraces the value of diverse housing for a diverse community.

The staff drafted zoning ordinance amendments that re-legalize “missing middle” style homes through a parallel zoning tool, called “expanded housing options,” rather than a change to the underlying zoning. This gives the Board more options and control for regulating this land use.

The Zoning Ordinance Draft maintains the core elements of the Phase 2 framework. Up to 8 units could be allowed on any residential lot, as long as they fit within the same building size and style as a single-family home.

The draft still puts “missing middle” type homes at a disadvantage relative to single-detached homes, which will limit the creation of more attainable and more sustainable homes.

In the draft text, the staff gives the Board choice on how much flexibility “missing middle” style homes can have.

I support allowing up to 8 units per dwelling, so that the most attainable homes can be built (Option 1B).

I support these expanded housing options without lot size tiering (Option 2A), although the tiering scheme provided is generally in line with what the market would build.

I support allowing “expanded housing options” to have additional flexibility with their maximum lot coverage percentage, since they will likely not have detached garages (Option 4B).

I support allowing these homes to reduce their parking requirement through a parking study (Option 5A), although I encourage staff to eliminate the parking requirement for lots near transit.

I support the additional landscaping requirement of planting one shade tree per dwelling unit (Option 6A).

I am very concerned about the prospect of a cap on the development of “expanded housing options.” (Support Option 7B, no cap). We want this type of housing to thrive in Arlington.

I want to encourage conversions of existing buildings into expanded housing options through a use permit. This would give current owners more flexibility and could be an alternative to teardowns. (Option 8A).

Public Comment #14

- I support the innovative and thoughtful framework that Arlington County staff drafted to end exclusionary zoning and restore diverse housing types to Arlington’s low-density neighborhoods.

The draft changes to the General Land Use Plan, which is the visionary document for Arlington’s growth, outline a new conception of low-density neighborhoods, one that embraces the value of diverse housing for a diverse community.

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The Zoning Ordinance Draft maintains the core elements of the Phase 2 framework. Up to 8 units could be allowed on any residential lot, as long as they fit within the same building size and style as a single-family home.

The draft still puts “missing middle” type homes at a disadvantage relative to single-detached homes, which will limit the creation of more attainable and more sustainable homes.

In the draft text, the staff gives the Board choice on how much flexibility “missing middle” style homes can have.

I support allowing up to 8 units per dwelling, so that the most attainable homes can be built (Option 1B).

I support these expanded housing options without lot size tiering (Option 2A), although the tiering scheme provided is generally in line with what the market would build.

I support allowing “expanded housing options” to have additional flexibility with their maximum lot coverage percentage, since they will likely not have detached garages (Option 4B).

I support allowing these homes to reduce their parking requirement through a parking study (Option 5A), although I encourage staff to eliminate the parking requirement for lots near transit.

I support the additional landscaping requirement of planting one shade tree per dwelling unit (Option 6A).

I am very concerned about the prospect of a cap on the development of “expanded housing options.” (Support Option 7B, no cap). We want this type of housing to thrive in Arlington.

I want to encourage conversions of existing buildings into expanded housing options through a use permit. This would give current owners more flexibility and could be an alternative to teardowns. (Option 8A).

Allowing denser housing development is more environmentally sustainable and encourages more use of greener transportation options such as bicycling and mass transit. It also gives more housing options to all Arlingtonians.

Public Comment #15

- I support the innovative and thoughtful framework that Arlington County staff drafted to end exclusionary zoning and restore diverse housing types to Arlington’s low-density neighborhoods.

The draft changes to the General Land Use Plan, which is the visionary document for Arlington’s growth, outline a new conception of low-density neighborhoods, one that embraces the value of diverse housing for a diverse community.

The staff drafted zoning ordinance amendments that re-legalize “missing middle” style

homes through a parallel zoning tool, called “expanded housing options,” rather than a change to the underlying zoning. This gives the Board more options and control for regulating this land use.

The Zoning Ordinance Draft maintains the core elements of the Phase 2 framework. Up to 8 units could be allowed on any residential lot, as long as they fit within the same building size and style as a single-family home.

The draft still puts “missing middle” type homes at a disadvantage relative to single-detached homes, which will limit the creation of more attainable and more sustainable homes.

In the draft text, the staff gives the Board choice on how much flexibility “missing middle” style homes can have.

I support allowing up to 8 units per dwelling, so that the most attainable homes can be built (Option 1B).

I support these expanded housing options without lot size tiering (Option 2A), although the tiering scheme provided is generally in line with what the market would build.

I support allowing “expanded housing options” to have additional flexibility with their maximum lot coverage percentage, since they will likely not have detached garages (Option 4B).

I support allowing these homes to reduce their parking requirement through a parking study (Option 5A), although I encourage staff to eliminate the parking requirement for lots near transit.

I support the additional landscaping requirement of planting one shade tree per dwelling unit (Option 6A).

I am very concerned about the prospect of a cap on the development of “expanded housing options.” (Support Option 7B, no cap). We want this type of housing to thrive in Arlington.

I want to encourage conversions of existing buildings into expanded housing options through a use permit. This would give current owners more flexibility and could be an alternative to teardowns. (Option 8A).

Public Comment #16

- One basic suggestion: ZOCO should take responsibility for reviewing all future missing middle construction in the county--or as much as possible--by formally endorsing no by-right development in single-family neighborhoods. There is already limited public accountability. This is the very least ZOCO can do to contribute positively to this developer give-away adventure we call the missing middle.

Public Comment #17

- I support the effort by Arlington County staff drafted to end exclusionary zoning.

The draft changes to the General Land Use Plan, which is the visionary document for Arlington's growth, outline a new conception of low-density neighborhoods, one that embraces the value of diverse housing for a diverse community.

In the draft text, the staff gives the Board choice on how much flexibility "missing middle" style homes can have. I support the following options:

- *Allowing up to 8 units per dwelling, (Option 1B).
- *No size tiering (Option 2A).
- *Additional flexibility with maximum lot coverage percentage (Option 4B).
- *Reduced parking requirements (Option 5A).
- *Additional landscaping requirement of planting one shade tree per dwelling unit (Option 6A)
- *No cap
- *Flexibility in conversion of existing homes (Options 8A).

Public Comment #18

- I was born in Northern Virginia and grew up here. Now that I am a parent of two children, I would like to continue to live here. I would like to live near our transportation infrastructure, either within biking distance of the metro or improved bus corridors. However, these areas are increasingly unaffordable. The choice of homes is limited. My family cannot choose to make our home in an apartment, townhome, or multiplex in many places because these uses are banned or severely limited. Instead of allowing dynamic growth near our biggest transport hubs, our neighborhoods are stagnating in ways that increasingly push out all but the wealthiest residents. I currently live in Bluemont, renting an older house right next to Wilson with its shops and restaurants. I would be very saddened to see this old house replaced by another mansion allowed under the current code. Zoning updates would allow more people to make their home in this location with walking access to local businesses and biking access to the metro. This would strengthen our community through smart growth.

I support the innovative and thoughtful framework that Arlington County staff drafted to end exclusionary zoning and restore diverse housing types to Arlington's low-density neighborhoods.

The draft changes to the General Land Use Plan, which is the visionary document for Arlington's growth, outline a new conception of low-density neighborhoods, one that embraces the value of diverse housing for a diverse community.

The staff drafted zoning ordinance amendments that re-legalize "missing middle" style homes through a parallel zoning tool, called "expanded housing options," rather than a change to the underlying zoning. This gives the Board more options and control for regulating this land use.

The Zoning Ordinance Draft maintains the core elements of the Phase 2 framework. Up to 8 units could be allowed on any residential lot, as long as they fit within the same building size and style as a single-family home.

The draft still puts "missing middle" type homes at a disadvantage relative to single-detached homes, which will limit the creation of more attainable and more sustainable homes.

In the draft text, the staff gives the Board choice on how much flexibility "missing middle" style homes can have.

I support allowing up to 8 units per dwelling, so that the most attainable homes can be built (Option 1B).

I support these expanded housing options without lot size tiering (Option 2A), although the tiering scheme provided is generally in line with what the market would build.

I support allowing "expanded housing options" to have additional flexibility with their maximum lot coverage percentage, since they will likely not have detached garages (Option 4B).

I support allowing these homes to reduce their parking requirement through a parking study (Option 5A), although I encourage staff to eliminate the parking requirement for lots near transit.

I support the additional landscaping requirement of planting one shade tree per dwelling unit (Option 6A).

I am very concerned about the prospect of a cap on the development of “expanded housing options.” (Support Option 7B, no cap). We want this type of housing to thrive in Arlington.

I want to encourage conversions of existing buildings into expanded housing options through a use permit. This would give current owners more flexibility and could be an alternative to teardowns. (Option 8A).

Thank you for all the work on these important changes and for making our county better.

Public Comment #19

- I am a SFH owner and OVERWHELMINGLY support the Missing Middle framework.

I support the innovative and thoughtful framework that Arlington County staff drafted to end exclusionary zoning and restore diverse housing types to Arlington’s low-density neighborhoods.

The draft changes to the General Land Use Plan, which is the visionary document for Arlington’s growth, outline a new conception of low-density neighborhoods, one that embraces the value of diverse housing for a diverse community.

The staff drafted zoning ordinance amendments that re-legalize “missing middle” style homes through a parallel zoning tool, called “expanded housing options,” rather than a change to the underlying zoning. This gives the Board more options and control for regulating this land use.

The Zoning Ordinance Draft maintains the core elements of the Phase 2 framework. Up to 8 units could be allowed on any residential lot, as long as they fit within the same building size and style as a single-family home.

The draft still puts “missing middle” type homes at a disadvantage relative to single-detached homes, which will limit the creation of more attainable and more sustainable homes.

In the draft text, the staff gives the Board choice on how much flexibility “missing middle” style homes can have.

I support allowing up to 8 units per dwelling, so that the most attainable homes can be built (Option 1B).

I support these expanded housing options without lot size tiering (Option 2A), although the tiering scheme provided is generally in line with what the market would build.

I support allowing “expanded housing options” to have additional flexibility with their maximum lot coverage percentage, since they will likely not have detached garages (Option 4B).

I support allowing these homes to reduce their parking requirement through a parking study (Option 5A), although I encourage staff to eliminate the parking requirement for lots near transit.

I support the additional landscaping requirement of planting one shade tree per dwelling unit (Option 6A).

I am very concerned about the prospect of a cap on the development of “expanded housing options.” (Support Option 7B, no cap). We want this type of housing to thrive in Arlington.

I want to encourage conversions of existing buildings into expanded housing options through a use permit. This would give current owners more flexibility and could be an alternative to teardowns. (Option 8A).

Public Comment #20

- The Washington Post
Dateline December 2032

Ten years ago in December 2022 the Arlington County Board lead by Board Chair Katie Cristol and Board Members Dorsey, Garvey, Karantonis and de Ferranti voted unanimously to dramatically amend the zoning laws throughout Arlington County.

Zoning laws for streets and neighborhoods previously zoned for only single family homes were ammended so that lots could accommodate up to an 8-plex. Not a duplex, not a triplex but, yes, an 8-plex. A 6000 square foot lot could be subdivided into three 2000 square foot lots to accomodate three townhomes.

The County Board worked hard to give the impression that their processes and analyses were completely transparent and open for review, and that they were considering all viewpoints and including all stakeholders before making such a decision. An in-depth review shows this was not the case.

The process was flawed:

- 1) The Board should have included Arlington’s Joint Facilities Review Commission (JFAC) recommendation to consider using information from the Missing Middle Housing

Study to inform “an expanded long-range vision of the future of Arlington as a whole, including considerations for transportation, diversity, equity, parks, environmental conservation, sustainability, and schools and public facilities.”

2) It was inconsistent with the Planning Commission’s stated purpose “to promote the orderly development of Arlington County”.

3) In terms of transparency, it is clear that most members of the public were not aware of the Missing Middle Housing Study at all and, if they were, they thought that it was about housing for middle income residents. When people learned that it was about increasing density and housing types, and not for low or moderate income households, they were shocked. Not only that but many thought that it was on the November 8, 2022 ballot and it wasn't.

County Board Members talked about Missing Middle Housing being affordable for teachers, firefighters, senior citizens, and others, and it wasn't. It never was.

Despite enormous opposition and the fact that the proposed zoning amendments were counter to Arlington’s decades-old land use policy that focuses on preserving single family homes, the County Board moved forward in haste and voted to approve.

It's been ten years since that controversial decision was made. Let's take a look at Arlington today:

THE WINNERS: The county coffers continue to raise significantly more tax revenue due to the dramatic increase in housing density. Developers, contractors and realtors continue to cash in for the same reason.

THE LOSERS: Single family home owners, many of whom had lived in Arlington for decades and who helped make Arlington a great place to live and raise a family. They watched in horror as their streets and neighborhoods were overrun with duplexes, triplexes and, yes, 8-plexes. Once quiet streets are now busy thoroughfares. Street parking is nonexistent.

Those in need of "affordable" housing since there has not been any discernable increase in inventory.

Public schools, fields and parks (which were already crowded ten years ago) are unable to handle the current demand due to the dramatic increase in population.

The county of Arlington that existed ten years ago is hardly recognizable today. This reporter wonders if the five Board Members, Planning and Zoning Commissions would do things differently knowing what they know today.

Public Comment #21

- I believe generally and initially the Missing Middle Project should be limited to two unit Duplexes and three unit townhouses and all required to have off-street parking, one per unit space. This will eliminate the initial impact this may have on established communities and should satisfy the needs of Missing Middle buyers.

Public Comment #22

- Before taking any action, the ZOCO should obtain a recommendation from the JFRC. The proposed zoning amendment radically, and suddenly, deviates from Arlington's long-followed land use policy. The ZOCO should recommend to the Board to postpone any vote so that a thorough, and inclusive, outreach can be performed to obtain input from all County residents re. their vision of Arlington's future---its transportation, parks, natural environment, schools, and socioeconomic diversity and equity.

Public Comment #23

- What is the urgency in this campaign to change 50 years of land use? The devil is always in the details in these matters and there has certainly not been enough discussion or understanding of the details for the Missing Middle issue. I urge the Zoning Committee, LRPC and County Board to delay voting and allow more discussion on this important issue.

Public Comment #24

- Do not change zoning laws! You are destroying arlington with all this building leading to local road and highway traffic jams abd more crime and pollution. Furthermore the Democrats are responsible for climate change due to taking away our trees and open land and jamming in more illiterate low income people and buildings. Leave us alone and stop destroying our community! Crone is skyrocketing and it's too crowded! No more development!

Public Comment #25

- I am writing to register my strong opposition to the Missing Middle Housing proposal. A resident of Arlington County for nearly 25 years, I raised my family here and am deeply committed to the responsible development of our wonderful community.

The Missing Middle proposal will significantly damage the neighborhoods we love, including straining our infrastructure, further overcrowding our schools, displacing current populations, stimulating teardowns, shifting away from home ownership, and

eroding our green space, among other things. We are already seeing an extreme increase in density in areas that are already zoned for this type of development. Please do not employ this irreversible and harmful zoning measure.

Board members and proponents have plainly stated that this proposal does not ensure affordable housing. To the contrary, it will likely lead to more rapid displacement of the affordable properties in place. At a minimum, this decision should be delayed until populations move into the numerous dense developments already approved/underway, as well as into the commercial real estate that currently has a 21 percent vacancy rate, and it can be determined with far more certainty the strain on our county's infrastructure and disruption to our neighborhoods.

This is too much, too fast, without enough input from the residents that will be affected or time to see how existing approved projects will impact our communities. I plead with you to vote this down or vote to delay consideration.

Public Comment #26

- My brother, parents, and one grandparent all want to move to the area to be close to me and my nuclear family. My husband and I are really dedicated to making Arlington our forever home so our family wants to be here with us, especially my brother. He is a successful medical consultant with no student debt, yet he can't afford to live closer than an hour away from our Clarendon area home. Why? Simply because the demand for homes here is so much higher than supply.

We cannot pretend that by refusing to acknowledge change, we can force the status quo to continue indefinitely. Whether we like it or not, the population of Arlington keeps going up. Sticking our heads in the sand won't make the demand side pressure on our housing market disappear. By refusing to act as pressure builds, we create a dark future full of cost-burdened families, not a return to the idealized vision of the present and past that some residents believe they can will into being. The staff's proposed text is a necessary step in the right direction for changing with the world. There are a few options available and I adamantly support the most expansive, permissive version of every option presented:

- I support allowing up to 8 units per dwelling, so that the most attainable homes can be built (Option 1B).
- I oppose lot size tiering (Option 2A)
- I support maximum lot coverage flexibility because not everyone needs or wants a garage allowing (Option 4B).
- I support allowing homes to reduce parking these (Option 5A), but add that the parking requirement near transit is nonsensical and counter to exactly the demand that is highest near transit: non drivers.
- There should ABSOLUTELY NOT be a cap on expanded housing options (Support

Option 7B, no cap). The latest studies show that the country has underbuilt by nearly 6 million homes. We are in no danger of overbuilding, so allowing more supply will bring down the simply astronomical home prices.

- Expanding potential uses of existing buildings is also wise. Families change size, change needs, over time. Allowing people to stay in their homes but put the same square footage to broader use is a way to support aging in place, to support new families meshing with our existing community. (Option 8A).

My grandfather has outlived 3 spouses. He's alone in New Mexico where he lived with his last wife. He was recently hospitalized with COVID and there was literally nobody to call that could go get him from the hospital now that his wife died. But he's on a fixed income and VA healthcare. Please make room for people in need in our community. Right now there's only space for those at the top of the proverbial food chain. But think about what that teaches our children in public schools?? Will people graduating from Arlington schools have any concept of what it means to not be able to afford meals? Will they understand what sacrificing to be able to afford college looks like? Or will they live in a bubble where everyone is well-off? Please approve as much housing diversity as the market demands.

Public Comment #27

- This body has no doubt received plenty of feedback on the merits and drawbacks of the proposal. I believe that the Missing Middle zoning reform are a necessary change to help Arlington continue to prosper and share her wealth with a diverse community. I urge the Zoning Committee to consider the sensibilities of future Arlingtonians when adopting this new zoning code, and not to give in to the fears of some current residents. It is likely that this new code will be in effect for many years, if not decades, I hope that we look back on this moment as a triumph and not as a missed opportunity to secure a thriving Arlington for a long time to come.

I support the following options of the proposed zoning code:

I support allowing up to 8 units per dwelling, so that the most attainable homes can be built (Option 1B).

I support these expanded housing options without lot size tiering (Option 2A), although the tiering scheme provided is generally in line with what the market would build.

I support allowing “expanded housing options” to have additional flexibility with their maximum lot coverage percentage, since they will likely not have detached garages (Option 4B).

I support allowing these homes to reduce their parking requirement through a parking study (Option 5A), although I encourage staff to eliminate the parking requirement for

lots near transit, and lots where street parking utilization is less than 50%.

I am very concerned about the prospect of a cap on the development of “expanded housing options.” (Support Option 7B, no cap). We want this type of housing to thrive in Arlington.

I want to encourage conversions of existing buildings into expanded housing options through a use permit. This would give current owners more flexibility and could be an alternative to teardowns. (Option 8A).

Public Comment #28

- I am a Washington, DC resident and I wholeheartedly support the county's missing middle proposal, which will provide more housing options for young people throughout the region. I encourage you to consider by-right approval even on sites larger than 1 acre and to consider a 0.5 parking space per unit or lower requirement in as many places as possible, as this would make the housing feasible to build for the most amount of people.

Public Comment #29

- I'm a 20-year Arlington resident extremely concerned about the deceptively-titled Missing Middle Plan. I'm troubled as to why there's haste to jam-through zoning changes that are totally counter to Arlington's decades old development policy. I'm troubled as to why we're turning over Arlington's future to big-pocketed developers. I'm troubled as to what this change will mean for Arlington's schools, transportation, parks, public facilities, etc. Why the rush to shove-through such curious and short-sighted change that runs in complete opposition of the Planning Commission's purpose to “promote the orderly development of Arlington County?” As a result, I'm asking that the County Board not vote in December on zoning until greater vision and inclusion of thought is given to Arlington's future.

Public Comment #30

- I consider that a matter of such importance to Arlington residents should be the subject of a public referendum in which ALL Arlingtonians can vote, rather than just the members of the Long range Planning Committee, the Site Plan Review Committee, and the Zoning Committee. I am not aware of the legal basis giving these bodies alone the authority to decide these matters. The projected demand for affordable housing close to downtown DC can be met by all the housing being vacated in the Pentagon City area. And the County should not have allowed all the unnecessarily large houses to be built in North Arlington in the first place, so it cannot use them as justification for building up to 8-plexes in North Arlington.

Public Comment #31

- I write to express my strong opposition to the Missing Middle Housing Proposal. It would exacerbate many already existing problems in our already densely populated county.

First, Arlington schools are already overcrowded. Adding additional residential density will exacerbate an already existing problem and further erode public education in Arlington. Many APS students already attend classes in trailers and overcrowded classrooms. Why worsen this problem, at the expense of existing students, by adding more students to a system that is already too crowded? Second, many residential neighborhoods already have limited parking available. Adding additional residential density will worsen parking shortages, making it ever more difficult and frustrating for residents and their guests to find parking near their homes. Third, the county already acknowledges issues with water drainage in residential neighborhoods. Allowing multi-family units that will necessarily have larger and/or deeper footprints will cause further water drainage problems. Fourth, people who purchase real estate have a reasonable expectation of continuity in the nature of their neighborhoods and nearby structures. The Missing Middle proposal fundamentally undercuts that expectation and erodes confidence in real estate. There are many other reasons to oppose missing middle—these are just my top 4 for purposes of brevity.

I know of NO ONE in my mostly single-family neighborhood that supports Missing Middle. We are your constituents, we pay taxes that fund so much of the county's activities, and our voices should factor into your decisions. I urge you to consider the many voices like mine who oppose this proposal, and to instead prioritize fixing problems like overcrowded and under-performing schools, traffic congestion, pedestrian safety, etc.

Public Comment #32

- Nothing I have heard or read about the Missing Middle plan for upcoming has left me with a coherent understanding of the goal - what is the point of disrupting existing neighborhoods to build multiplexes that are expected to cost \$1 million per unit? Who benefits? Nor do I think that the consequences have been properly analyzed: How does the board know that upzoning would improve diversity? What would the impact be on schools, parks, parking, tree coverage? This needs a lot more study before we move forward.

Public Comment #33

- I STRONGLY OPPOSE MMH, an unlawful plan with no statutorily-required analysis of its impact on the County pre-enactment, opposed by a substantial majority of your constituents. Less expensive lots will be bought by private equity, generating rental units unaffordable by lower income families.

I STRONGLY OPPOSE Option 1B - NO 8PLEXES

I STRONGLY OPPOSE Option 2A and FAVOR 2B - bigger units ONLY on bigger lots.

In favor of Options 4A (lot coverage) and 6A (on site trees)

PLEASE LISTEN TO US!

Public Comment #34

- Arlington homeowner for over 40 years. Opposed to upzoning residential real estate.

Public Comment #35

- I AM OPPOSED TO MMH & having elected county board members ignore my rights as a SF homeowner. Our comments were ignored (evidenced by the LRPC's MMH current proposal after vehement community opposition to the plan). I OPPOSE Opt. 1B, & limit 1A to 4 units max. I OPPOSE Opt. 2A; 2B ONLY would be possible on these lot sizes. Opt. 4A must be kept; "tradition & varied design" should be contained within existing setbacks. Variances should NOT BE ALLOWED if MMH is forced upon us. PLEASE DON'T DO THIS!

Public Comment #36

- Consider: what if your data is wrong? In my view the assumptions you've presented, to defend the complete dismantling of zoning parameters in the name of "missing middle" in relation to population, school enrollment, resource demands, noise pollution, carbon emissions, traffic growth and tree-loss, represent gross (and perhaps strategically designed) underestimates. Moreover, the purported benefits of missing middle policies (i.e., to facilitate availability of a broader variety of housing types satisfactory to those of a cross-section of income levels) are underwhelmingly supported. I don't get your mathematical assessment or your clear desire to push this through via the process you have been using without regard to the likelihood of success.

The only clear outcome of proceeding with your planned radical zoning changes will be an increase in property values (and in tax revenues with no assurances to Arlington County's electorate and taxpayers as to how tax proceeds will be applied and what improvements will result) - with property assessment values that will push out existing homeowners of relatively modest means and those of us committed to preserving the very types of housing sought by this all too far-reaching plan from the areas in which we live. Oh, and one other outcome you must well know: a windfall for developers for whom profit is the primary goal. We have to rely on Arlington County Board Members not to be motivated primarily by tax revenue and that reliance is becoming more and more risky. I

have always given the board members the benefit of the doubt and relied upon them. That trust has been eroded and you must now earn it back.

Proceeding with these radical and sweeping zoning changes (even with the recent adjustments) will serve to confirm the growing view that the Arlington County Board believes itself to be beyond reasonable accountability in a protectionist selection system that blocks meaningful competition for seats and has resulted in a lack of balanced exchange and decision making among individuals with diverse views. Most towns and counties can look to a mayor or commissioner with individual responsibility for decisions. In contrast, we find we answer to group-think council “members” hiding behind pat answers attributed to data from “consultants” (that know who pays their invoices). Sadly, there is a growing crisis of confidence and loss of trust in this county.

Slow down! I understand that you had a 2 year “process” but most of us, working full time and caring for families through a pandemic, are shocked by the extreme conclusions announced only recently. We are also shocked at how many of our fellow taxpayers are unaware of the scope of the changes and the potential impact. The “process” is not an excuse to shove through your desired conclusions. It is a time for genuine and broad engagement and the board has failed to ensure this. Invite and treat seriously others’ views (rather than behaving as though you have all the answers, without the humility to recognize that your underlying data and assumptions may not stand up to scrutiny) and may not be broad enough. And most importantly, share the raw data supporting assumptions with an independent board with access to independent experts in community planning to assure those of us who will disproportionately bear the burden of the negative impacts of your conclusions that we have experienced due process, that the council has approached complex issues with an open mind and the resolve to respect what so many of us have worked so hard for that the creation of an adequate positive public good justifies what you intend to do to our cherished smaller neighborhoods.

Please reconsider what your role is relative to those whom you are supposed to serve. Just because there would be demand for increased housing supply does not mean that you must and should do away with impediments to housing supply growth. Demand is insatiable - the equilibrium price of desirable housing this close to DC will always be higher than we might like and will require that many of us work extremely hard in demanding jobs (that we might prefer to trade for non-profit or public service positions but cannot) to be able to pay for our homes over 30 years. Any solutions to mitigate this reality will require precision and balance - not this sweeping one-size-fits-all, adversarial and divisive fait accompli. You’ve failed to recognize the legitimate concerns of your constituents (with dismissive and insulting suggestions of NIMBY or worse) and have left many of us - including those who live in small red brick ramblers and both struggled to buy and continue to struggle to remain in our child-friendly, education-focused, liberal-minded and environmentally sound neighborhoods - struggling to understand how you can be so certain that the end (as you see it) justifies the means.

Please save the day by slowing down and allowing independent analysis.

Thank you.

Public Comment #37

- As a new Arlington resident, I'm writing in support of the missing middle plan for expanded housing choices, improved affordability, and to allow for climate-friendly development.

I applaud the Zoning Committee's careful consideration and work on this important issue.

Among the options sent to the Planning Commission on October 31st, I specifically support the following proposals:

Option 1B

Option 2A

Option 3A

Option 4B

Option 5A--even better I would like to see Arlington follow progressive decisions being adopted in localities across the country to eliminate parking requirements.

Option 6B

Option 7B

Option 8A

Option 9B

Outside of these options, I see what strike me as potentially important barriers to missing middle construction in the limitations on garage wall width in §10.4.6.C and building entrance orientation §10.4.6.D. I would encourage the adoption of zoning rules for missing middle that do not limit what may be attractive configurations of this typology for homebuilders and homebuyers based on purely aesthetic concerns. I urge the Committee to support rules that do not limit garage size or placement or the orientation of new missing middle housing.

Thank you for your consideration of my comments!

Public Comment #38

- The zoning amendments are inconsistent with Arlington's decades-old land use policy. The process is flawed. It should include Arlington's JFAC recommendation: consider using information from the Missing Middle Housing Study to inform "an expanded long-range vision of the future of Arlington as a whole. The LRPC and Zoning Committee should recommend that the Board not vote in

December on zoning amendments and conduct a comprehensive a process about the long-range vision for Arlington's future.

Public Comment #39

- The proposed zoning amendments would degrade existing single-family neighborhoods. The County Board and Zoning Committee should consider the adverse impact on transportation, parking, the environment, schools, and utilities. The proposed zoning changes would not result in increased affordability but could dramatically increase population density. Developers will not reduce prices and will be the only ones who benefit. The County Board should not vote in December on zoning amendments and the County should conduct a comprehensive and inclusive process about the long-range vision for Arlington's future. The concerns of Arlington residents have not been taken into account.

Public Comment #40

- Dear Members of the Zoning Committee:

“Core elements” of the Missing Middle Housing Draft Framework presented to the County Board on July 12, 2022 included:

“Duplicate single-detached standards (height, setbacks, lot coverage, stormwater management requirements).”

“Allow townhouses and buildings with 2 to 8 units in zoning districts currently limited to single-household development.” Limit townhouses to 3 units.

However, many of the provisions, or options for provisions, in the draft Zoning Ordinance amendments presented for the first time on October 31st are not consistent - or may not be consistent - with these “core elements” of the Framework. These include:

- Decrease the minimum lot area required for semi-detached units and townhouses to 1,300 square feet from 20,000 sf (R-20), 10,000 sf (R-10), 8,000 sf (R-8), 6,000 sf (R-6) and 5,000 sf (R-5) to allow fee-simple ownership. Does the maximum of three townhouses or up one 8-plex still apply, or could there be seven 1,300 sf lots with townhouses or semi-detached units in R-10, for example? How does this square with the subdivision section of the County Code?
- Decrease the minimum lot width required for semi-detached units to 24 feet and for townhouses to 16 feet from 100 feet (R-20), 80 feet (R-10), 70 feet (R-8), 60 feet (R-6) and 50 feet (R-5).
- Increase maximum lot coverage from 45% to 50% (R-5), 40% to 45% (R-6), 35% to

40% (R-8), 32% to 37% (R-10) and 25% to 30% (R-20) by removing the ability to get a 5% increase for lot coverage for providing a rear detached garage. This seems to create a disincentive to build garages to allow more lot coverage for the main building.

- For lots of one-acre or larger, County Board approval of a special use permit for expanded housing option development is required, applying current zoning standards with County Board discretion to modify these standards consistent with the purpose and intent of the proposed expanded housing option zoning (Option 3A). The chart on page 25 of the memo shows the 1,300 sf lot area and reduced lot width minimums for townhouses and semi-detached units on one-acre or larger lots. Does this mean that a one acre lot could have 33 townhouses?

- Requests for variances must be considered by the Board of Zoning Appeals, according to state law, allowing the possibility for developers to exceed the height, setback, and lot coverage requirements upon BZA approval.

Additional Concerns/Questions:

- Parking on cul-de-sacs reduced from 2 spaces per unit to 1 per unit.

- Parking location provision allows three surface parking spaces (four for corner lots).

Having seen the Joni Mitchell show at Signature recently, I have to say: “You don’t know what you’ve got ‘til it’s gone. You paved paradise and put up a parking lot.”

- Requirement of one shade tree per dwelling. Use the opportunity in the Expanded Housing Option Development to protect Arlington’s tree canopy, even if this creates a requirement that is more than R districts now have. Whether a McMansion or an 8-plex, lots will be clear cut, removing mature trees. Replacing them with one sapling is not consistent with the draft Forestry and Natural Resources Master Plan.

- Design standards should be developed before zoning changes are adopted. See Norfolk’s detailed Pattern Book for Missing Middle Housing, developed in part to help the community understand what missing middle housing would look like.

- Non-conforming lots – requirements are not clear.

Equity

- Zoning Amendments create two systems for development of multifamily housing:

The existing system where use permits or site plans are required in some residential districts that are not included in the Expanded Housing Option Development, and a new system for R-5 through R-20 districts with by-right development for multifamily housing. This raises equity concerns.

Community Input/Timing

- I appreciate that you have added two more Zoning Committee hearings (November 16th and 30th). But that still is an extremely compressed timeframe to work through a fundamental change to Arlington’s Zoning Ordinance, and one that is not consistent with Arlington’s decades-old land use policy as stated in the GLUP.

- I am still looking at the 42-page memo released on October 31st and trying to understand it.
- What's the rush? The Zoning Committee should recommend that the County Board not vote to advertise on December 17th so that the Zoning Committee, Long Range Planning Committee, Planning Commissions, other commissions, and residents can have sufficient time to understand and consider the implications of the proposed amendments to the Zoning Ordinance and GLUP.

Public Comment #41

- Any MMH amendment to the ACZO should not allow 5-8 unit buildings on all residential lots as a matter of right. The County Board and staff now concede that such buildings will just create an additional supply of 1 and 2 bedroom rental units, of which the County already has 70,000--they are not what is missing. Moreover, such buildings, if allowed away from transit and business corridors, will result in more cars on the road, meaning more traffic and air pollution. Given that such buildings will also reduce the tree canopy by half, they are not what is needed to help fight climate change. Arlington should take a hint from virtually all other jurisdictions that have adopted a MMH approach and limit MMH development to 3 or 4 unit buildings.

Public Comment #42

- While the final details of the plan have yet to be permitted I believe the intent to make the apply to all of Arlington is premature and badly thought out. In my area, Arlington Forest, we have had only two teardowns in over 20 years. Economic calculations we have given to board members demonstrate that developers will have an incentive to tear down and rebuild, with larger units than the County's plan estimated. This is a complicated subject. The county is acting on a theory. It should consider applying the plan in some selected portions of the county, giving it a trial period, perhaps two years, and then deciding about the rest of the county when you have tested the plan. Jumping from experience elsewhere and theory to a massive change for the whole country is extremely reckless. Thank you,.

Public Comment #43

- A complete change to Arlington zoning to add more density is not proper without more analysis and TRUE public participation. There should not be any changes at this time.

Public Comment #44

- Please ask the County Board to reconsider the timing of the Missing Middle housing proposal. It has not been thought through and would be a permanent change that would give developers even more incentive to tear our neighborhoods apart. The Board is basing their plans for "gentle density" on cities that have enacted MMH but do not have 6- or 8-

plexes, which are a radical addition to neighborhoods currently zoned for single-family. And this is not affordable housing. We don't need more luxury housing in Arlington -- we need real solutions that incorporate planning (schools, green space, tree canopy, traffic and parking, safety nets to avoid displacement of seniors and others) and encourage community engagement. There are so many who don't even know about this proposal, or who thought it was a ballot measure, who will be blindsided. How can they say this is for the good of Arlington when they are doing their best to keep the majority of Arlington from weighing in? At the very least, we deserve a good-faith communications effort like the Plan Langston Boulevard staff have made. Their process -- comment periods followed by plan revisions -- is inclusive of and responsive to all viewpoints, not just five people who have failed to represent those who elected them.

Public Comment #45

- The Missing Middle Housing Draft Framework and the Zoning Draft need to be harmonized, esp related to differences in lot coverage, set backs and similar. The county should provide estimates of the wealth increase to current single family homeowners as a result of the MM proposal and the increase in demand for SF lots that it will induce. Commitments for new park space and schools should be addressed as a fundamental equity issue.

Public Comment #46

- I am against this MMH plan. It changes the zoning across the county without considering what might happen if the density increases faster than expected. Please add some sort of regulations to the plan that would give the county some control over the growth, particularly for the number of 6 and 8 unit structures and where they may be built.

Public Comment #47

- NO TO MISSING IN THE MIDDLE!

Public Comment #48

- I attended one of the Board information/discussion sessions at Arlington Mill and came out with more questions than answers about the Missing Middle proposal. The Board member agreed that this would not be affordable housing - rather is will be market-based pricing on any new units. There were no answers to the many citizen concerns regarding environmental impacts, infrastructure questions, parking questions. A realtor present stated that this would not be a path to home ownership - that most of these units will likely be owned by an LLC and rented at market price and the Board member agreed with that assessment. Why are you considering this? As a resident and taxpayer I am against this proposal.

Public Comment #49

- Arlington is a county of communities. For communities to thrive, they must conserve for their members the opportunity to steer their own futures. Granting developers a "by right" option to build multi-unit dwellings anywhere across the county will deprive community members of the ability to influence their futures. Uncertain and insecure, they will cease to invest in their homes, they will stop volunteering, joining, and caring; they will drift away and Arlington's communities will wither.

Public Comment #50

- The 42-page October 31st memo contains a significant amount of nuanced content. For most Arlingtonians with an interest in this topic it will take time to digest and understand.

The County Board seems to be on a mission to advertise a vote on December 17th.
Why?

The Zoning Committee should recommend that the County Board not vote to advertise on that date so that the Zoning Committee, Long Range Planning Committee, Planning Commissions, other commissions, and residents can have sufficient time to understand and consider the implications of the proposed amendments to the Zoning Ordinance and GLUP and comment on them.

The Board should respect the important role of the Zoning Committee, the other committees, and Arlington citizens, in this process and not rush forward in contradiction of the County's historical approach to multi-generational land-use changes. That approach has been deliberate, thoughtful, and inclusive. A December 17th vote flies in the face of that. Please recommend against it.

Thank you.

Public Comment #51

- I am an Arlington County resident and I feel that the the Missing Middle Draft Framework is rushed and the design standards I have seen do not seem complete. From a zoning perspective, I live in a neighborhood that already has urban flood issues, and its hard to imagine how larger buildings and paved parking spots would not make this issue worse. These are big changes, what is the rush?

Public Comment #52

- The current plan is too comprehensive without assurance that it would achieve the desired goal. Instead thought should be given to implementation plan that is constrained in scope and assessments along to way to see that steps towards the goal are in fact being made. Restraint is necessary and assessments at stages can be made to proceed by steps.

Public Comment #53

- The proposed "upzoning" is an abandonment historical success of dialing in the denser development along metro corridors while also maintaining the family friendly neighborhoods of single-family homes.
The MM removes the CHOICE of every future Arlington resident to raise a family in single family neighborhood. People historically victims of "red lining" who now buy, would suddenly be at risk of their neighborhood changing by going multi-plex. You are effectively denying that group again!

Public Comment #54

- Arlington County decided to implement a pre-planning, a Phase 1, and a Phase 2 for possibly THE most complex initiative it has ever tackled (MMH). All these first phases were conducted during the COVID pandemic—hardly a time that Arlington citizens could participate. Therefore, it should be no surprise to Arlington leaders and management that so many citizens want more time to understand these complex issues and have all their questions answered. We have been dutifully paying taxes for years and have voted for leaders who express concern for the citizens and values Arlington has historically shared. Frankly, it is very disappointing that in Phase 3 a 42-page memo of complexity would become available to Arlington citizens with a five (5) business day response deadline (report dated 10-31-22 received 11-02-22 due noon 11-09-22). This deadline is disrespectful and dismissive. It reads like an insider report to an insider, and making sense of it requires time, research, and cross-checking. With so many fundamental changes to Arlington’s Zoning Ordinance, and inconsistencies with long-standing land use policy, it makes a citizen wonder, “What is going on and why is such a major project clearly obstructing and/or avoiding citizen review and concurrence?” I’d like to respectfully request that the Zoning Committee recommend to the County Board not to vote on December 17th. Postponing the vote allows the Zoning Committee, LRPC, other commissions, and county residents to have sufficient time to understand and consider the implications of the amendments proposed.

I am particularly concerned that Arlington has been touting itself as a “Green” community that supports and believes in environmental conservation, while this document sites a requirement of one shade tree per dwelling. Tearing down houses results in lots being clear-cut. Mature trees with deep root systems are removed, networks of vital, natural living “infrastructure” in nature is destroyed. Replacing them with one sapling is not consistent with the draft Forestry and Natural Resources Master Plan, and it certainly begs the entire issue of conservation as we now know it. Trees assist each other in underground networks, and removing mature trees is extremely destructive to their (and our) environment. I recommend to each of you the non-fiction book entitled Finding the Mother Tree by Suzanne Simard, as well as Richard Powell’s novel entitled The Overstory if you want to better understand why Arlington’s trees are so valuable and worthy of being preserved. Please re-think this destructive plan. The tree canopy Arlington currently has cannot be replaced even in a lifetime.

I have many other concerns, having read the 42 page memo, but wanted to emphasize the environmental damage that will occur if Arlington County officials approve MMH and Zoning Ordinances that do not fully protect our tree canopy and other gifts of nature that Arlington currently has and cannot replace.

Public Comment #55

- I am the President of Donaldson Run Civic Association. Our survey of our members a couple of months ago showed that a slight majority (51%) opposes the proposal, and that our members overwhelmingly (77% to 78%) believe it should not extend beyond duplexes or townhouses. (Indeed, other jurisdictions have not adopted 8-plex everywhere proposals.) Concerns about the proposal are well known but consistently ignored, which show the costs outweigh any supposed benefits. On the one hand, it would pose enormous costs to expanded opportunities (now afforded only to McMansions) for teardowns that destroy mature trees in our neighborhood, pose stormwater management issues, put enormous structures next to our members' homes in violation of the well established zoning principles of Euclid v. Ambler Realty Co. (which cannot be disregarded simply because they are almost 100 years old), and will serve as real challenges for schools, traffic and parking impacts. Of course, the extent of these costs depends on the reliability of the PES prediction that only 20 new teardowns will result each year, but the County staff acknowledges it has no data (and apparently sought none) on the assumptions behind this figure, which Arlington realtors indicate is belied by market interest in this proposal by developers already. On the benefits side, tearing down a \$600,000 property in Halls Hill to put up two \$1.2 million duplexes (one of many examples in the record) shows that increasing housing stock in this way will serve none of the ostensible goals of making homeownership more accessible. There are plenty of one to two bedroom homes being built in multifamily dwellings all over 22207 and other areas, and the likelihood is that this proposal will lead principally to more rentals of the kind we have plenty of, not home ownership.

Finally, a point of principal concern to DRCA. Lot coverage (the "McMansion issue") is key. No public policy maker on ZOCO, the Planning Commission, or the County Board should adopt the illogical principle behind MM, articulated throughout this debate: McMansions are bad, but why not extend the same opportunity to MM? In fact, the staff has now gone one further, and suggested that to fit more MM into Arlington, we should now EXPAND (by 5%) the footprints for MM over that for McMansions. DRCA has been on record since June in this proceeding that this problem must FIRST be addressed for both single family and any MM zoning. Stop it before you permit the continued destruction of our neighborhood, year by year, that has been irreparable. DRCA has been asking the County Board and the County Manager for years before MM to fix this McMansion issue. So did the late Erik Gutshall. So did the staff, in its 2018 Stormwater Management plan, which cited the primary cause of stormwater issues as the increased

pace of single-family development as the need for revisiting the 2005 limits on lot coverage. It is the height of insanity to expand this problem while using it as an excuse for doing so. A majority of the County Board have agreed to direct the Planning Division to study this recognized problem. That may well be a controversial issue, but no more so than MM itself. It should be done BEFORE, not after, considering this MM proposal.

Public Comment #56

- I am writing to express my concern regarding the current Missing Middle proposal and its application.

First, What's the rush? I appreciate that you have two hearings scheduled, but this major of a change to Arlington should not be rushed or artificially compressed. Once zoning changes are made, Arlington loses the ability to do meaningful planning. The Zoning Committee should recommend that the County Board not vote to advertise on December 17th so that the Zoning Committee, Long Range Planning Committee, Planning Commissions, other commissions, and residents can have sufficient time to understand and consider the implications of the proposed amendments to the Zoning Ordinance and GLUP and to make thoughtful changes.

Second, there are critical inconsistencies and ambiguities in the proposed solution. As recognized by a fellow citizen:

“Core elements” of the Missing Middle Housing Draft Framework presented to the County Board on July 12, 2022 included:

“Duplicate single-detached standards (height, setbacks, lot coverage, stormwater management requirements).”

“Allow townhouses and buildings with 2 to 8 units in zoning districts currently limited to single-household development.” Limit townhouses to 3 units.”

Many the provisions/recommendations, or options for provisions, in the draft Zoning Ordinance amendments presented for the first time on October 31st are not consistent - or may not be consistent - with these “core elements” of the Framework. These include:

- Decrease the minimum lot area required for semi-detached units and townhouses to 1,300 square feet from 20,000 sf (R-20), 10,000 sf (R-10), 8,000 sf (R-8), 6,000 sf (R-6) and 5,000 sf (R-5) to allow fee-simple ownership. Does the maximum of three townhouses or up one 8-plex still apply, or could there be seven 1,300 sf lots with townhouses or semi-detached units in R-10, for example? How does this square with the subdivision section of the County Code?

- Decrease the minimum lot width required for semi-detached units to 24 feet and for townhouses to 16 feet from 100 feet (R-20), 80 feet (R-10), 70 feet (R-8), 60 feet (R-6) and 50 feet (R-5).
- Increase maximum lot coverage from 45% to 50% (R-5), 40% to 45% (R-6), 35% to 40% (R-8), 32% to 37% (R-10) and 25% to 30% (R-20) by removing the ability to get a 5% increase for lot coverage for providing a rear detached garage. This seems to create a disincentive to build garages to allow more lot coverage for the main building.
- For lots of one-acre or larger, County Board approval of a special use permit for expanded housing option development is required, applying current zoning standards with County Board discretion to modify these standards consistent with the purpose and intent of the proposed expanded housing option zoning (Option 3A). The chart on page 25 of the memo shows the 1,300 sf lot area and reduced lot width minimums for townhouses and semi-detached units on one-acre or larger lots. Does this mean that a one acre lot could have 33 townhouses?
- Requests for variances must be considered by the Board of Zoning Appeals, according to state law, allowing the possibility for developers to exceed the height, setback, and lot coverage requirements upon BZA approval.
- Non-conforming and special zoning permits are too broad and could lead to massive deviations from the plans.

I believe other concerns are being missed in the rush to a solution.

Parking

The parking parameters are at best confusing and at worst will turn Arlington into DC, where you circle forever to find a place to park and can't have family (especially our parents) over because there is no place close to park. This does not take into account my elderly neighbors.

Tree Canopy. On a recent Uber-ride from the metro (since there is no real bus service in my area) the driver commented that he loved Arlington because of all the trees. I agree. In today's climate challenged world, they are more than just beautiful. They are essential. I urge you to use the opportunity in the Expanded Housing Option Development to protect Arlington's tree canopy, even if this creates a requirement that is more than R districts now have. This should apply in all cases (McMansion or an 8-plex). I am so disturbed the clear cutting I see, hundred year old trees (and everything else) chopped down to maximize the space. Please try to save the mature trees. Replacing them with

one sapling is not consistent with the draft Forestry and Natural Resources Master Plan.

Please slow down. Take the approach that has made Arlington a county that is admired and copied. Take the time to think through all the of consequences and that preserves the right to plan thoughtfully. Take into account the fact that we have no land to build new schools. That we need to preserve the sense of community and community involvement. There is no rush. The timeframe for decisions is extremely compressed and not appropriate to work through a fundamental change to Arlington's Zoning Ordinance, and one that is not consistent with Arlington's decades-old land use policy as stated in the GLUP. The Zoning Committee should recommend that the County Board not vote to advertise on December 17th.

Public Comment #57

- As 25-year owners of a single-family dwelling in a neighborhood of same, we implore the Board not to drastically alter the unique character of Arlington with an ineffective attempt to increase low-income ownership in the County.

Because Arlington is a bedroom community for Washington, DC, property values here are high and will always remain so. Note that small townhouse units and apartments such as those in Clarendon, etc., command prices similar to single-family dwellings elsewhere in the County.

The proposed changes will not make properties more affordable for low-income families. They will merely increase congestion, deplete tree canopy, increase street parking, increase rainwater runoff, and place a higher burden on infrastructure. An eight-unit multi-plex, for instance, would likely put 16 cars on the street where now there are two (or zero if they are in the garage as are ours).

There are plenty of places to install multi-family buildings, along the busy corridors where residents can walk or take public transportation to most destinations. Likewise, single-story storefronts can be converted to buildings with stores at street level and dwellings above, in the European-style. This is a proven recipe for attractive, walkable urban areas.

Sprinkling multiplexes in single-family neighborhoods without nearby transportation is a very bad idea. Who wants to live next to a towering, sunlight-blocking, tree-destroying, architecturally ugly monstrosity stuffed with as many people as developers can manage?

Draft section 5.4 of the GLUP is inconsistent with the goals in Section 4 to "preserve and enhance existing single-family and apartment neighborhoods" and to "increase the supply of housing by encouraging construction of a variety of housing types and prices at a range of heights and densities in and near Metro Station Areas."

At the very least, the citizenry ought to be able to consider this in a reasonable amount of time, which is inconsistent with a vote on December 17. Many citizens feel that this is being rammed through, probably driven by developers and the real estate industry.

Present single-family owners feel that this will be a “taking” of value by the County of value in their homes. Undoubtedly, there will be many lawsuits, in which the taxpayers will find their own tax money being used to defend lawsuits brought by themselves!

Please give this issue more time and include the citizenry more say in what happens in their own communities.

Public Comment #58

- In forty years in Arlington I do not recall the county being as deeply divided on any issue as we are on the Missing Middle proposal. MM is an unnecessarily drastic proposal with irrevocable costs, financial and in terms of quality of life, things that will affect current residents and the attractiveness of Arlington to commercial and residential buyers. Due diligence requires re-examination of assumptions that underlie many of its projected impacts.

The Board has pledged its commitment to preservation of single-family neighborhoods with dense development along public transit corridors, as reflected in long-range development plans. Please take the time to look for solutions consistent with these promises. Once betrayed, it may hard to re-win public trust on issues such as bond proposals.

I implore you to defer voting on the Missing Middle as currently proposed to clarify and develop broader agreement on the future of Arlington, and to weigh alternative approaches to achieving them.

Public Comment #59

- I urge you to advance language to allow property owners wide flexibility to build 2- to 8-unit housing that is compatible in scale with single-family homes. This is consistent with broad public sentiment favoring thoughtful planning that enables Arlington to evolve to preserve opportunity, diversity, relative affordability, and economic and environmental sustainability.

Public Comment #60

- County-wide upzoning? This is, without a doubt, the worst idea for Arlington that I have ever heard. We are already very densely packed in Arlington neighborhoods. And now 2-8 unit apartment buildings are going into single family home neighborhoods? The

Arlington County government can't keep up with the obligations that it already has. Further density will take our strained resources to the breaking point. Terrible! I say no to county-wide upzoning!

Public Comment #61

- To the County Board:
Please SLOW DOWN with this initiative. Our community is so divided over this and we don't need that right now, do we? I still don't know what the "middle" refers to or what the overall goals are or who this initiative is supposed to benefit, despite my attention to the subject.
Why this rush/push to decide? There are too many unknowns related to infrastructure and impact. If the Board thinks this is a falsehood, then they are out of touch with their constituents. There has been a "failure to communicate" in my opinion. The Board is not ready to make this decision. Arlington is not ready for this decision to be made.
Thank you.

Public Comment #62

- The latest draft I saw has one option that would allow 8 unit buildings on lots my size!?! (10,000 sqf) The proposal would also allow for only off street parking of .5 spaces per unit depending on analysis?!? I live on 3112 North Harrison, a bus route and busy street that already has a high volume of traffic. Too many people driving too fast with many small children. Any of the proposed complexes will only add to that congestion. This proposal creates an incentive for developers to aggressively tear down even more small homes in my neighborhood. It will accelerate the loss of mid-size homes that might meet the needs of many homeowners looking for something more reasonable in cost. Without any limits on # of developments this will drastically change the neighborhood. I am 2 miles from the closest metro. Anyone in my neighborhood would need a car. At the very least, consider limiting to duplexes on lots my size and ensure each new multi-unit has at least 1 spot of off street parking.

Public Comment #63

- The proposed zoning changes, a misguided attempt to increase lower income ownership in Arlington County, will not make properties more affordable for lower-income families. Rather, they will increase congestion and street parking, deplete tree canopy, increase rainwater runoff, and place a higher burden on infrastructure.

There are plenty of places to install multi-family buildings, along the busy corridors where residents can walk or take public transportation to most destinations. Draft section 5.4 of the GLUP is inconsistent with the goals in Section 4 to "preserve and enhance existing single-family and apartment neighborhoods" and to "increase the supply of housing by encouraging construction of a variety of housing types and prices at a range

of heights and densities in and near Metro Station Areas."

At the very least, citizens ought to be able to consider this in a reasonable amount of time, which is inconsistent with a vote on December 17. Many of us feel that this is being rammed through, probably driven by developers and the real estate industry.

Present single-family owners feel that this will be a "taking" of value by the County of value in their homes. Undoubtedly, there will be many lawsuits, in which the taxpayers will find their own tax money being used to defend lawsuits brought by themselves!

Please give this issue more time and allow the citizenry to have more say in what happens in our own communities.

Public Comment #64

- Please do not end single family zoning. That would increase traffic, noise, flooding, and pollution, and turn single family neighborhoods into a bizarre architectural patchwork with parking nightmares and reduced tree canopy. There's barely enough parking on our street now. Even a modest increase in residents would create an untenable parking situation. The board assumes we can all walk or bike to work, but that's not true for the vast majority. Targeted sites with higher density is a better approach. This will increase property taxes, and push out many current residents in smaller homes.

Public Comment #65

- We came to Arlington and invested in a single family home and neighborhood. Multi unit buildings will degrade and devalue the reasons we came here.

Public Comment #66

- I am against the up zoning proposals. They will not lead to more housing for the middle class as intended but will lead to more traffic and expenditures.

Public Comment #67

- The proposal as written is a giveaway to developers, and crams too much density into neighborhoods that don't want it. Please take the time to study this before changing Arlington forever!

Public Comment #68

- Dear Members of the Zoning Committee:

“Core elements” of the Missing Middle Housing Draft Framework presented to the County Board on July 12, 2022 included:

“Duplicate single-detached standards (height, setbacks, lot coverage, stormwater management requirements).”

“Allow townhouses and buildings with 2 to 8 units in zoning districts currently limited to single-household development.” Limit townhouses to 3 units.

However, many of the provisions, or options for provisions, in the draft Zoning Ordinance amendments presented for the first time on October 31st are not consistent - or may not be consistent - with these “core elements” of the Framework. These include:

- Decrease the minimum lot area required for semi-detached units and townhouses to 1,300 square feet from 20,000 sf (R-20), 10,000 sf (R-10), 8,000 sf (R-8), 6,000 sf (R-6) and 5,000 sf (R-5) to allow fee-simple ownership. Does the maximum of three townhouses or up one 8-plex still apply, or could there be seven 1,300 sf lots with townhouses or semi-detached units in R-10, for example? How does this square with the subdivision section of the County Code?
- Decrease the minimum lot width required for semi-detached units to 24 feet and for townhouses to 16 feet from 100 feet (R-20), 80 feet (R-10), 70 feet (R-8), 60 feet (R-6) and 50 feet (R-5).
- Increase maximum lot coverage from 45% to 50% (R-5), 40% to 45% (R-6), 35% to 40% (R-8), 32% to 37% (R-10) and 25% to 30% (R-20) by removing the ability to get a 5% increase for lot coverage for providing a rear detached garage. This seems to create a disincentive to build garages to allow more lot coverage for the main building.
- For lots of one-acre or larger, County Board approval of a special use permit for expanded housing option development is required, applying current zoning standards with County Board discretion to modify these standards consistent with the purpose and intent of the proposed expanded housing option zoning (Option 3A). The chart on page 25 of the memo shows the 1,300 sf lot area and reduced lot width minimums for townhouses and semi-detached units on one-acre or larger lots. Does this mean that a one acre lot could have 33 townhouses?
- Requests for variances must be considered by the Board of Zoning Appeals, according to state law, allowing the possibility for developers to exceed the height, setback, and lot coverage requirements upon BZA approval.

Additional Concerns/Questions:

- Parking on cul-de-sacs reduced from 2 spaces per unit to 1 per unit.
 - Parking location provision allows three surface parking spaces (four for corner lots).
- Having seen the Joni Mitchell show at Signature recently, I have to say: “You don’t know

what you've got 'til it's gone. You paved paradise and put up a parking lot.”

- Requirement of one shade tree per dwelling. Use the opportunity in the Expanded Housing Option Development to protect Arlington's tree canopy, even if this creates a requirement that is more than R districts now have. Whether a McMansion or an 8-plex, lots will be clear cut, removing mature trees. Replacing them with one sapling is not consistent with the draft Forestry and Natural Resources Master Plan.
- Design standards should be developed before zoning changes are adopted. See Norfolk's detailed Pattern Book for Missing Middle Housing, developed in part to help the community understand what missing middle housing would look like.
- Non-conforming lots – requirements are not clear.

Equity

- Zoning Amendments create two systems for development of multifamily housing: The existing system where use permits or site plans are required in some residential districts that are not included in the Expanded Housing Option Development, and a new system for R-5 through R-20 districts with by-right development for multifamily housing. This raises equity concerns.

Community Input/Timing

- I appreciate that you have added two more Zoning Committee hearings (November 16th and 30th). But that still is an extremely compressed timeframe to work through a fundamental change to Arlington's Zoning Ordinance, and one that is not consistent with Arlington's decades-old land use policy as stated in the GLUP.
- I am still looking at the 42-page memo released on October 31st and trying to understand it.
- What's the rush? The Zoning Committee should recommend that the County Board not vote to advertise on December 17th so that the Zoning Committee, Long Range Planning Committee, Planning Commissions, other commissions, and residents can have sufficient time to understand and consider the implications of the proposed amendments to the Zoning Ordinance and GLUP.

Public Comment #69

- I don't want a duplex much less an eightplex built next to my home. I have already lost sunlight formerly streaming into my kitchen and dining room because of the McMansion built next to me. At least that house has a three car garage so there isn't the parking problem there would be with a duplex or eightplex, as well as a traffic burden on the street. I bought my home in 22207 in 1991 because it was a quiet, single-family home neighborhood, wooded and uncongested. I'd like that to remain to be true.

Public Comment #70

- The voice of Arlington homeowners. That's what is missing from the Missing Middle Study. As an ARL homeowner for 20+ years, my wife and I have paid over \$100,000 in

property taxes. That's probably low compared to some others who've lived here. The fact that our opinions don't matter is absolutely galling. 9 out of 10 homeowners do NOT want more cars, more people, more noise or more density in their neighborhoods. Who would? We elect YOU to represent the voice of the majority. Clearly, that's not happening, in what should be a democratic environment. Please vote this down and listen to the people who actually PAY an overabundance of taxes to make this community such an attractive place to live.

Public Comment #71

- I am AGAINST the missing middle plan as currently proposed. I support a more thoughtful proposal that addresses the real issues of affordable housing and the reality that we need more density while also preserving the quality of life in an urban village. We need more time to achieve that.

Public Comment #72

- These 42 page staff report is a mess built on untested assumptions and potentially radically harmful ones. At a minimum, the process needs to slow down so we understand in a meaningful way the impact on the ARLINGTON community. Why the rush? There is a reason every progressive jurisdiction in this area has rejected similar proposals. I'd like to make sure we know why before doing something that is essentially irreversible

Public Comment #73

- The MM upzoning continues to be a predetermined solution in search of a compelling justification. It is the wrong solution that will not accomplish its purported goals of increased diversity, home ownership for families, public service workers, older residents, etc. and its restated goals of increased/different types of housing will yield more rentals of less than 3-4 units and/or housing for those above median income, i.e. gentrification, all while accelerating loss of modestly priced single family homes that are now more affordable while imposing irreversible negative impacts on existing communities. The County made a commitment, embodied in our Comprehensive Plan, to concentrate density in the metro corridors in exchange for preserving the physical character of our single family neighborhoods and your committee and the larger Planning Commission should be insisting that that fundamental planning concept be respected. This process needs to be halted now and Arlington's current and future housing needs reassessed by the community in the context of that longstanding commitment and a focus on what approaches will address those needs within that context, e.g. redevelopment of increasingly vacant commercial buildings for housing purposes. The proposed amendments, including "options". offered by staff in the just released document does not change the fundamental inappropriateness of this proposed upzoning of single family

neighborhoods, its proposed dramatic negative impacts on those neighborhoods, and in fact is an even worse proposal that previously indicated by staff and Board.

Public Comment #75

- This policy proposal has been constantly changing over the past year, and the underlying “need” is based upon pre-pandemic assumptions about working habits that are likely no longer relevant...and at the very least merit refreshed analysis. Arlington is the 4th smallest county in the US by land mass, and the 11th most densely populated. The idea that our current rate of growth doesn’t match the “need” to become more densely populated merits careful examination, but instead it is being treated as ground truth. We do not have space for unrestricted population growth, because there is nowhere to put new schools, and the availability of fields for kids sports and use by adults is already being maxed out. It is beyond irresponsible to rubber stamp and ram this policy through before essential questions about how growth will be managed in the medium and long term have been asked and adequately answered by proponents of this policy.

Public Comment #76

- I hope all is well. Following up on my prior comments to the planning commission, I would like to urge the commission to move forward with proposed missing middle policy changes in a deliberate manner but without further delay. We are approaching the end of a 3 year process that has provided ample opportunity for review and feedback, and the county did a commendable job of weighing the perspectives of all Arlingtonians, and not biasing the process in favor of wealthier homeowners (as is all too often the case). In closing, I offer these final comments:
 - The Missing Middle proposal already complements Arlington's long-range plans.
 - The proposal fundamentally respects the character of low-density neighborhoods by limiting the height and massing of buildings.
 - We have a housing crisis and a climate crisis and we can't afford to wait for equitable and sustainable zoning changes.
 - Missing Middle is about building for future generations. We need to allow our planning to evolve to meet these needs.
 - Renters and multifamily dwellers overwhelmingly support Missing Middle, but they are vastly underrepresented in public engagement.

Thank you for your time and consideration.

Public Comment #77

- An 8-fold increase in *by-right* allowable density, as proposed by Arlington County’s “Missing Middle” housing proposal, will most definitely result in gentrification and displacement of vulnerable Arlington County homeowners.

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Arlington County staff's refusal to track and document displacement among homeowners, especially those living on low, fixed or modest incomes doesn't mean that it isn't a problem or that this upzoning's inflation of land values won't negatively impact the county's senior, disabled and lower income population.

Most of the Real Estate Tax Relief (RETR) working group's recommendations made in 2017 (to make the program more accessible to struggling seniors) have yet to be adopted or implemented, thus limiting both the reach and utility of this program as a meaningful anti-displacement tool:

<https://arlingtonva.s3.dualstack.us-east-1.amazonaws.com/wp-content/uploads/sites/5/2017/05/Final-RETR-Program-Recommendations-Report-10-APR-2017.pdf>

Currently, Arlington County has no meaningful anti-displacement policies or programs in place to prevent the displacement of homeowners who purchased homes decades ago and who are attempting to age in place. The Real Estate Tax Relief (RETR) program is poorly funded, poorly advertised and serves only a small fraction of Arlington's senior/disabled population. See Table 1 at <https://arlingtonva.s3.dualstack.us-east-1.amazonaws.com/wp-content/uploads/sites/5/2017/05/Final-RETR-Program-Recommendations-Report-10-APR-2017.pdf>

For those who disingenuously dispute that upzoning (densification) results in the inflation of land values (and real estate tax assessments), whether or not a property is redeveloped, I urge you to read "**The Math of 'Missing Middle' Upzoning: It adds up to Gentrification [and Displacement]**":

<https://medium.com/@andrewdobbs/the-math-of-missing-middle-upzoning-b7003e05fe02>

We've already witnessed displacement first hand with the Form-Based Code (effectively, blanket upzoning on a more limited scale) along the Columbia Pike corridor, which holds 6 of the 10 *highest appreciating neighborhoods* in Arlington since 2000: <https://www.neighborhoodscout.com/va/arlington/real-estate>

The result? Newcomers to the Pike are *whiter, wealthier and better educated*, according to a 2019 demographic analysis:

https://arlington.granicus.com/MetaViewer.php?view_id=2&clip_id=3697&meta_id=190791.

In fact, everywhere we have seen significant upzoning and redevelopment at the neighborhood level (e.g., Arna Valley and Buckingham), we have witnessed displacement. It's unclear why staff continues to claim it won't occur with this so-called missing middle upzoning initiative.

The housing problem came to the fore in the late 1990s when a post-World War II housing complex called Arna Valley, home to 3,000 mostly Hispanic immigrants, was torn down. In its place came new luxury apartments.

And the trend continued as more high-rises and expensive townhouses went up. Wealthy, white 25- to 34-year-olds moved in and more blacks and Hispanics moved out. Census data show the combined black and Hispanic population shrank 7% from 2000 to 2010. The ranks of non-Hispanic whites grew by 16%.

<https://www.usatoday.com/story/news/nation/2014/11/10/northern-virginia-diversity-race/18079525>

Far from being NIBMYs or racists, seniors — just like other similarly vulnerable populations — recognize this misguided missing-middle upzoning proposal for the threat it is — unleashing destructive inflationary

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market forces that will result in the *exclusionary displacement* of Arlington's most vulnerable homeowners: <https://sites.utexas.edu/gentrificationproject/understanding-gentrification-and-displacement/>.

My primary concern is that this "Missing Middle" upzoning proposal will disproportionately impact the 1 in 10 Arlingtonian who is 65+:

https://www.arlingtonva.us/files/sharedassets/public/arlington/documents/profile_2021.pdf. In fact, Arlington's proposal appears to be intentionally designed to target older Arlingtonians for displacement from Arlington County so that the land held by long-time residents is freed up for redevelopment.

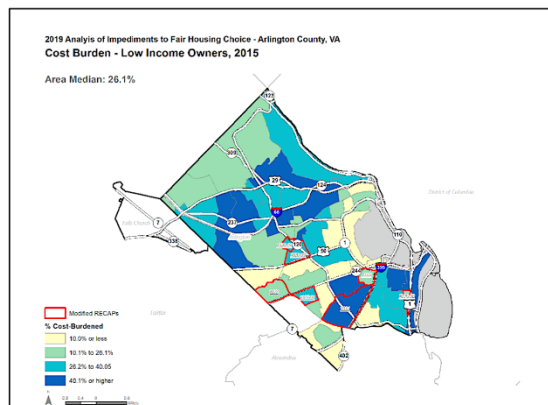
According to the Census Bureau, the median monthly housing cost w/out a mortgage in Arlington = \$985/mo. The median monthly housing cost for homeowners w/a mortgage = \$3,103/mo.:

<https://www.census.gov/quickfacts/arlingtoncountyvirginia>.

Where else in this county or in this region can a senior age in place for \$985/mo.? Where are seniors living on modest, fixed incomes supposed to go?

Arlington County staff and County Board members already know that Arlington's existing senior and disabled homeowners are cost-burdened and cannot absorb large increases in their tax bills, as this population is highlighted in the county's own 2019 **Analysis of Impediments to Fair Housing Choice**, which quantifies the widespread geographic distribution of struggling, cost-burdened homeowners countywide (shaded in dark blue, below): <https://arlingtonva.s3.amazonaws.com/wp-content/uploads/sites/15/2020/11/AI-draft-Arlington-analysis-September-2019.pdf>.

Map 35 Cost Burden Among Low-Income Owners, 2015



[Note: Map 35 shown. See Maps 33–36 for extremely low income through moderate income cost-burdened households, which illustrate the widespread distribution of cost-burdened homeowners (including seniors and the disabled).]

And whereas seniors living below the poverty line in Arlington are frequently found in pockets of South Arlington (zip code 22204, Columbia Pike has the highest percentage), poor seniors live in all parts of Arlington County:

<https://www.healthierarlington.org/indicators/index/view?indicatorId=343&periodId=4523&localeId=40714>

This is why 6 of Arlington's 11 charitable food sites serving adults age 65+ are located north of Rt. 50 (North Arlington): <https://www.urban.org/sites/default/files/2022->

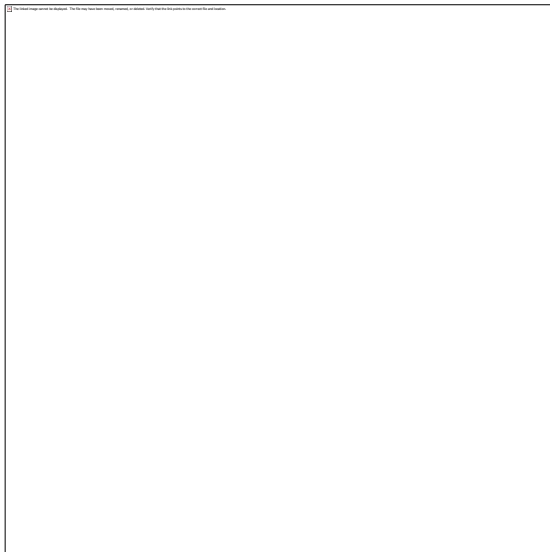
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[04/Improving%20Food%20Security%20and%20Access%20in%20Arlington%20County%2C%20Virginia.pdf](#)

Penn Wharton economist [Jon Huntley](#) recently analyzed Arlington County’s real estate database to isolate detached, single-family homes that were built 30+ years ago and have had the same owner for the past 20–30+ years. He identified over **5,400** households in Arlington that meet these criteria. These households, due to the length of ownership, are most likely to house homeowners who are retirees or nearing retirement, when incomes for most people drop.

Given that **5,400+** detached single-family households represent **19.6%** of all 27,500 detached single-family homes in Arlington, this upzoning and subsequent real estate tax hike would place a very large number of Arlington's senior homeowners at higher risk of displacement than those in their peak earning years.

The argument that this “Missing Middle” upzoning won’t displace seniors is completely without foundation. The new construction will be significantly MORE EXPENSIVE than the housing it is replacing. The new resulting units, especially the “multiplex” units, will require the navigation of stairs and won’t be built to universal design standards due to the additional cost. They will not be designed to accommodate seniors or the disabled any more than the detached accessory dwellings that are currently being built: https://www.zillow.com/homedetails/843-N-Buchanan-St-ADU-Arlington-VA-22203/2069326489_zpid/



ADU at 843 N. Buchanan Street - not designed to accommodate seniors or the disabled

Clearly, Arlington County’s “Missing Middle” upzoning proposal will disproportionately impact Arlington’s senior and disabled population. The inflation of land values for “single-family” properties will have a spillover impact on renters as well:

“... [I]n cities where home values are rising, rent is increasing, too”: <https://blog.apartmentsearch.com/city-living-2/do-renters-pay-property-taxes/>.

My question is to LRPC is this: *If discriminating against specific racial groups for housing is wrong, how can targeting Arlington County seniors and the disabled for exclusionary displacement from their home community be right?*

The impact of displacement should not be ignored. It is not something that can be easily mitigated (assuming that the county would be willing) after the fact. The missing middle upzoning proposal will produce housing whose design and affordability will be restricted to a tiny, wealthier slice of the population, which doesn't include Arlington's most cost-burdened and vulnerable residents.

I call on members of LRPC, ZOCO and the Planning Commission to appeal to the Arlington County Board to slow down this process in order to perform a more careful and comprehensive analysis of the likely negative impacts — displacement or impoverishment of seniors and the disabled; loss of tree canopy and concurrent increase in heat-trapping, water-shedding impervious surfaces; replacement of family-size ownership units with smaller rental units, etc. — and to develop, in advance, a mitigating regulatory framework before any density-related zoning changes are made.

Thank you in advance for your time and attention.

Public Comment #78

- I am writing to encourage the Planning Commission to continue forward with the Missing Middle Housing proposal. The community has had more than ample time for input and the commission should move forward.

As a single family home owner in 22202, I support the passing of MMH as the draft stands. In the next year or two, my family will begin to plan for renovations on our home. We will be taking into account the possibility of moving aging parents onto our property. They would like to remain autonomous and have more space than an ADU would allow for. Having the ability to build a duplex on our lot would be amazing! Once our parents are not able to live on their own, the space would be able to be rented out and provide an income stream for them. This income stream would allow for my husband and I to age in place as well.

I sincerely hope no restrictions on the number of MM projects per year is enacted. We need the housing. It would also put homeowners, like me, at a disadvantage. Homeowners, who live in their homes, do not have luxury of waiting for the next year to roll around to begin a project because the Missing Middle cap has been met. We have to move out of our homes, work with contractors' schedules, and stick to very tight budgets. Again, I would ask the Commission to NOT set a cap on permits issued.

Public Comment #79

- I am writing to offer my strong support for the Missing Middle housing proposal. I have lived in Arlington since 2005, and my husband and I own a single family home in 22205. I am shocked and saddened that many of my neighbors don't understand the benefits of

the MMH proposal and are advocating against it. Arlington desperately needs this solution, and there is no time to wait. Our housing needs are urgent, and the calls for patience and more study are delaying a solution that is on the table now. If we wait, I am terrified that Arlington will fill up with more 6000 sq. ft. mansions like the ones starting to surround us, and there will be fewer and fewer housing choices for anyone who can't or won't pay over \$1.5 million for a home.

I truly believe that the Missing Middle proposal complements Arlington's long-range plans for development, and helps to fulfill Arlington's goals and vision. I understand that some people are nervous about taller housing or more dense housing, but the proposal addresses those concerns to a great degree. I wish we could go further and have taller buildings and denser apartment buildings, but I'd rather get us closer to an increased housing supply with this proposal than wait any longer.

My neighborhood along Langston Blvd., as well as our entire county, metro area, and state, have a housing crisis. Our continuing reliance on cars and giant single family homes is exacerbating the climate crisis. We can't afford to wait any longer for these zoning changes. I am always surprised that Arlington hasn't grown denser in the 15+ years I've lived here -- it doesn't make any sense for a community connected to the nation's capital and a major economic hub to be holding tight to an old idea of single family homes without duplexes, triplexes, townhouses, and more. I am also surprised that many people don't notice that where these multi-family homes exist in Arlington, everything is fine. The infrastructure and the services work. I firmly believe that expanding missing middle housing must be part of Arlington's role in addressing the climate crisis.

To me, at its heart, Missing Middle housing is about welcoming more people to our community, building for the future, and making sure that people other than its longest-standing residents can live here. We should be able to look ahead and Arlington's planning can evolve to meet these needs. I am thinking of my son, his friends, and my nieces and nephews who are growing up in Arlington, but won't live here unless they live at home with their parents. I also think about my aging relatives, and how difficult it is to find them accessible housing -- they don't need single family homes and they want to live near us. But where?

As I've participated in meetings with County Board members, the neighborhood association, and other groups considering Missing Middle housing, I am always struck by who **isn't** participating. There are many renters who aren't plugged into the local dialogue or email group, single parents, my neighbors who don't speak great English, and people like my professor friend who used to live in an Arlington garden apartment but got priced out when her building was demolished. These renters and multifamily dwellers enthusiastically support Missing Middle housing access, but they are not in

these meetings, and the County Board and commissions like the one you lead may not be hearing from them.

Thank you for the dedication and thought you are putting into Arlington's development. Please feel free to contact me if you have any questions or if there's anything I can do to support the commission.

Public Comment #80

- Arlington's exclusionary zoning practices should end. We should relegalize the types of homes that once helped our neighborhoods thrive.

Do not delay the "expanded housing options" zoning tool in order to do more study in relation to Arlington's Master Plans. The proposal already makes significant compromises in order to respect the form and style of low-density neighborhoods.

Furthermore, when exclusionary zoning was enacted in the early 20th Century, no one asked if it aligned with master plans. No one considered whether it was equitable, or sustainable.

Arlington is facing an accelerating housing crisis. The planet is facing a climate catastrophe. Ending exclusionary zoning and relegalizing gentle density is one step we can take to make our housing more attainable and sustainable.

Please do not delay. The Expanded Housing Options tool is ready for consideration by the Zoning Committee and to move through Arlington's deliberative process.

Public Comment #81

- Just a note to tell you that I support Missing Middle. I'm white, and I live in North Arlington in an SFH. So, keep pushing for it.

Public Comment #82

- I strongly support progress towards Missing Middle, changing our current zoning and patterns. We need to address sprawl and livability in our community. The opponents of Arlington's efforts refuse to participate in providing solutions so delaying decisions enables them to further obstruct progress. Please, keep moving.

Public Comment #83

- I am extremely disappointed that the LRPC is complicit with the forces that are rushing approval of the changes to the comprehensive plan and zoning requirements to accommodate the misdirected Missing Middle rezoning plan. Not only has this whole movement been mostly opaque to the average citizen, but now that it is getting attention

public hearing are very limited for citizen comment. 45 minutes to discuss and understand the new requirements that were just released last week? What is the problem with giving Missing Middle zoning and the technical requirements a little more time for analysis and understanding? I am beginning to believe that the proponents were really hoping to slide the issue past the Community. Shame on the lot of you. What is the harm in a couple of more months of review?

Public Comment #84

- I am a resident of Arlington, and I am a strong supporter of the missing middle proposal. I urge you to move this proposal forward.

As a resident of Virginia Square, I've been engaged some of the recent local multifamily construction and our local GLUP and I am pleased to note that the Missing Middle proposal complements the long-range plans AND respects the character of low-density neighborhoods by limiting building height.

Like so many of my fellow Gen Xers/Millennials, homeownership was entirely out of reach for me until I was in my late 30s. Because of that, it is REALLY frustrating for me to see the most vocal opponents of missing middle tend to be older residents who didn't face those same market and generational barriers.

From this 2020 article:

"Close to half of Boomers were homeowners by age 34; today, 75 percent are. By contrast, only 37 percent of Millennials owned a home by age 34. Today, only 32 percent of us are homeowners."

One of the reasons why homeownership was so out of reach for me and others my age for so long was because these older homeowners are very effective at opposing density strategies in localities and thus decreasing housing supply and increasing their own property value. These older folks tend to be very loud and over-represented in public engagement.

I would have loved to own a home sooner than I did. My friends who are still renters feel exactly the same way. However, the current homeowner population, the same population that benefited from affordable homes and wider availability of housing stock, continues to slam the door behind them.

I urge the Planning Commission to not repeat the mistakes of prior community leaders by listening to this vocal, self-interested minority. As a current homeowner in a nice neighborhood I'll say it loud and proud: MISSING MIDDLE IS A GREAT IDEA. Unlike those other homeowners, I'm not interested in gatekeeping on the American dream.

Public Comment #85

- I am the President of the Westwind Homeowners Association, a townhouse community of 26-units. I have been following the development of the Missing Middle Housing (MMH) initiative since its inception three years ago. I have read most of the five volumes of the MMH staff study, attended many public meetings on the topic, wrote several letters to the County Board, and talked to all of the Board members personally.

My views on the MMH initiative are wholly positive. I support this long-awaited correction to lift the unfair and discriminatory zoning restrictions. The elimination of this chokehold on the growth of housing opportunities will alleviate the severe housing shortage Arlington has been experiencing.

I also believe in the need to act urgently, without delay. The opponents' arguments are based on false assumptions and misleading conjectures designed to raise fear among single family homeowners. They only represent a minority of Arlington residents, despite the image they are trying to create by loud and aggressive tactics, and the number of signs they are displaying (illegally) on our streets.

The MMH proposal fits perfectly in Arlington's long-term master plans and respects and protects the basic principles of relative density, stormwater and tree canopy.

Public Comment #86

- I urge you to DEFER consideration of so-called "Missing Middle" housing until addition information can be obtained, shared with Arlington residents, analyzed, and discussed during public meetings.

As described by CPHD Staff, so-called "Missing Middle" housing is another component of New Urbanism, commonly referred to as "Smart Growth."

Although New Urbanism has been the County's sole planning paradigm for more than 30 years, the various components of New Urbanism the County Board approved over the past three decades are designed to promote and expand infill gentrification growth-for-the-sake of growth.

The "car-free diet" is a more vehicles, more vehicle trips, diet. Subsidized "Affordable Housing" is not affordable to the workforce and low wage middle class. The "Urban Village" is urbanization of low and medium density residential neighborhoods (e.g., Shirlington Village).

Similarly "Missing Middle" is the historic urbanization along arterials and Metrorail corridors taken to every residential neighborhood in the County.

In fact, there is an adequate supply of actually affordable single family homes and larger condominiums in Arlington and in nearby Virginia jurisdictions, per real estate agents and listing services. The price of non-rental housing is current falling. Moreover, Metrorail and Express Lanes had been expanded so more residents of actually affordable homes can commute to Arlington.

What is "Missing Middle" but another component of Smart Growth that all will be required to conform to without adequate analysis of costs and consequences"

Public Comment #87

- With tonight's election showing 70 percent of Arlington voters supporting pro-MM county board candidates, and your meetings coming soon, I wanted to take this opportunity to express my support for missing middle. It has the support of a majority of Arlington voters. A vocal minority should not be allowed to dilute or delay its adoption into the zoning code, especially given that we are in the midst of a housing crisis.

Public Comment #88

- I live in Arlington Ridge and I'm writing to you to urge you to support the current Missing Middle Housing proposal, without dilution or delay.

I live in a duplex here and I feel very lucky to have found my house. Thanks to the ban on Missing Middle Housing, houses like mine are rare in my neighborhood. We need to end this ban and start the process of rebuilding the Missing Middle in Arlington

Now that the county has voted over 70% in favor of the pro-Missing Middle candidates for County Board and with the on-going housing crisis, we cannot delay this rebuilding any longer.

Public Comment #89

- The staff presentation at the October 17 LRPC and the Commission's discussion was valuable, thank you. I support:
 - Lot-size tiers for 5-8 units
 - No parking requirement in transit proximity zones
 - Form book, possibly form base code for 5-8 units [tradeoffs here]
 - Tree requirement of one per unit
 - BZA review for non-conforming lots
 - Focus and resources devoted to tracking
 - GLUP narratives to support housing goals, amendments to support these
 - Parity with single-family infill

- Existing SF owners invariably oppose ongoing SF infill; allowing public involvement could (unfortunately) be a barrier adding to costs. Compare [subsidized] SF residents' concerns re: disruption to that of high-rise neighbors of high-density infill!
I support inclusion, communities WILL adapt/change over time.

Public Comment #90

- This pernicious, divisive proposal is one of the worst proposals I have ever seen from the Board. It can only be supported by developers and people who want to cash out and move from Arlington. As for current residents, who could possibly want an 8-plex looming over their house? This proposal will not result in more affordable housing and rentals, only displacement of existing residents, and probably lower income residents. Therefore, it is likely to disproportionately displace Hispanics and persons of color, and it could even be found unconstitutional for that reason.

It will result in increased over-crowding in the County, resulting in the need to raise taxes for more schools and other infrastructure. I plead with the Board to drop this proposal.

As a compromise, on larger lots 4-plexes might be allowed, and duplexes could be allowed on 60 foot wide lots or larger.

Public Comment #91

- In June, the Forestry and Natural Resources Commission (FNRC) [raised](#) strong concerns in an advisory letter to the County Board that recommendations from the Missing Middle Housing Study (MMHS) would have a detrimental impact on Arlington's tree canopy. For tree canopy, Ladd's Oct 31 memo admits the "expanded housing option development" due to increased housing density would decrease the tree canopy coverage requirement to 10% or 15% under the Chesapeake Bay Preservation Ordinance (CBPO). Ladd's memo proposes an Option 6A that would require at least one shade tree per dwelling unit. Ladd's memo claims this would "generally result in tree canopy coverage that is closer to parity with the CBPO requirement for single-family development," i.e., 20 percent.

County Staff's MMHS [presentation](#) to the FNRC on May 26, 2022, noted under the CBPO tree canopy coverage requirements for lots could be reduced from the current 20% to 10% to 15% due to changes that eliminated single-family home zoning, increasing the density of units per acre. In that same presentation, County staff sought to reassure the FNRC that, "[tree canopy of 20% to 50% is achievable](#)," (p. 23) on MMH lots. County staff did not provide any explanation of how this could be achieved. However, a subsequent FOIA request to the County yielded a spreadsheet of calculations that were behind the claims that up to 50% tree canopy coverage is achievable.

In the County's spreadsheet depending on the size of the dwelling between 3-14 large and small trees would be required to achieve canopy lot coverages of 24%-63% (see table below). **Per the information released under the FOIA, the current Option 6A would seem to be an inadequate requirement for a tree canopy goal.**

If in fact this zoning arrangement is legal – one standard for single-family homes and another for multifamily homes even though the zoning requirement permits a density that would lower the CBPO requirement likely to 10% for all rezoned single family home areas – **the LRPC and ZOCO should recommend the County landscaping requirement in Option 6A be what was behind the assurances provided to the FNRC in the spring. Though most are inadequate for achieving the goal of 40% tree canopy coverage for Arlington, all are substantial improvements over a 10% or even 20% coverage standard.**

Overall, I look forward to your close scrutiny of the latest MMHS proposal. As you can probably appreciate after the many months of discussion about the MMHS, it is not going to achieve its rhetorical goals of providing more affordable housing, righting past wrongs, or more diversity in ownership of housing. In fact, is likely to produce more expensive housing and displace owners out of what is the existing less expensive housing in Arlington. And some of the MMH types would be redundant to apartment/condo style housing of the type that already exists in Arlington. Moreover, the MMHS has apparently deliberately neglected looking at alternatives that already exist under Arlington's zoning code. At our FNRC meeting we were told existing zoning code would allow re-development of commercial properties along transit coordinators into joint-use MMH types, but the MMHS had not studied that possibility even though it sought only some 20 lots a year for redevelopment, i.e., to house an additional 150 people a year.

The LRPC and ZOCO are well positioned to understand the MMHS shortcomings and voice their concerns and objections. But in so far as the MMH proceeds despite not solving the problems it identifies and in fact worsening them, the least we can do is ensure MMH type housing lots maximize their potential for tree canopy coverage and do less damage to Arlington's tree canopy. A further consideration should be a recommendation to increase setbacks to limit the potential footprint size for development. This would increase greenspace, increase planting room for trees and vegetation and further help reduce stormwater runoff. Limiting structure size through setback increases would also have the beneficial effect of keeping new or redeveloped housing stock less expensive.

Thank you for your attention.

Arlington County Planning Commission
Zoning Committee
Public Comments Received Prior to 12:00pm, 11.09.2022

County staff calculations on potential tree canopy coverage of MMH lots released under the FOIA

Type	Square Ft	Large trees	Small trees	Canopy potential	Canopy Perc	Meets minimum 20%	Meets County target 40%?	Conservation opportunity
Duplex 1	5000	7	3	3168.75	63	Yes	Yes	
Duplex 2	6000	6	1	2500	42	Yes	Yes	
Duplex 3	6000	6	4	2912.5	49	Yes	Yes	
Duplex stacked 1	5000	4	3	1987.5	40	Yes	No	
Duplex stacked 2	5000	4	10	2950	59	Yes	Yes	Maybe
Duplex stacked 3	6000	5	1	2106.25	35	Yes	No	Maybe
Fourplex 1	10000	7	4	3306.25	33	Yes	No	Maybe
Fourplex 2	10000	9	0	3543.75	35	Yes	No	Maybe
Fourplex 3	8125	7	0	2756.25	34	Yes	No	
Townhome 1	6000	5	2	2243.75	37	Yes	No	
Townhome 2	10000	7	3	3168.75	32	Yes	No	
Townhome 3	10000	5	8	3068.75	31	Yes	No	Maybe
Triplex 1	6000	5	3	2381.25	40	Yes	Yes	Maybe
Triplex 2	10000	5	3	2381.25	24	Yes	No	Maybe
Triplex 3	6000	4	5	2262.5	38	Yes	No	
Multiplex 1	10000	7	2	3031.25	30	Yes	No	Maybe
Multiplex 2	10000	8	1	3287.5	33	Yes	No	
Multiplex 3	6000	3	2	1456.25	24	Yes	No	Maybe
SFD 1	3500	2	2	1062.5	30	Yes	No	
SFD 2	3500	3	2	1456.25	42	Yes	Yes	
SFD 3	3500	2	1	925	26	Yes	No	
Townhome Stacked 1	10000	7	3	3168.75	32	Yes	No	Maybe
Townhome Stacked 2	12000	8	7	4112.5	34	Yes	No	
Townhome Stacked 3	15000	12	0	4725	32	Yes	No	

Public Comment #92

- Do not pass MMH