

January 13, 2022

Dear Madam Chair and Members of the County Board,

Re: Review of ASF Inputs and Reiterating Requests on Missing Middle Up-zoning

Executive Summary. Arlingtonians for Our Sustainable Future (ASF) welcomes the new County Board; we take this opportunity to review our engagements to date with county officials on the Missing Middle Housing Study (MMHS). We repeat our longstanding request for detailed impact studies prior to any further work on the study, or at least a concurrent process that can accompany Phase II.

Recap of ASF Engagement: ASF has closely tracked the MMHS since it was announced in December 2019, through the November 2021 [MMHS Phase I report](#) "Expanding Housing Choice." We have shared our concerns with staff, commissions, the Board, and our own supporters. To recap:

1. [ASF communicated policy concerns -- most notably during public comment at the September 12, 2020 Board Meeting -- about Missing Middle \(MM\)](#). (See also [video of comment and Board replies](#).) We followed up with numerous presentations, letters, and emails to County staff and commissions. These efforts have noted the potential for MM up-zoning to raise taxes for all residents, to accelerate gentrification, to eradicate large swaths of green space and tree canopy, and to leave key infrastructure as an afterthought (explaining those tax increases noted above) As one example of our engagements with county commissions upon the release of the Phase I report, see [our November 1, 2021 letter to the Planning Commission](#).
2. We asked [how the County Manager could use a "generational transformation" to suspend infrastructure planning \(and the work of the Joint Facilities Advisory Commission\)](#) while moving forward to reverse longstanding land use policy, i.e. the 40-year compact with residents to concentrate density in Metro corridors but not beyond. The [County's Research Bulletin #3 of MMHS](#) acknowledged this promise of "preservation of lower-density areas" outside Metro corridors but none of the current MM research gives compelling reasons for unwinding it. Our concerns over this disconnect of priorities were also the subject of our [July 28, 2020 requests we made for the County to modify its public engagement on MM](#).
3. ASF has shown that the county has not made probative the link between its goal of equity and potential up-zoning. Core MMHS documents, including the [scoping](#) and [study framework](#), relied on affordability and equity as motivations for up-zoning. The county notes on its MMHS

webpage that "people of color have been disproportionately burdened and impacted ..., most notably in COVID-19 cases and deaths, but also in loss of jobs and income, and in food and housing insecurity. Arlington's commitment to addressing these issues, including housing affordability, remains steadfast." And while the [Phase I report](#) now admits that affordability will not be achieved, it holds fast to the related diversity/equity goals, observing on page 13 that "the existing land use regulations. . . do not provide enough housing options to support the full range diversity of households needed for *a diverse, inclusive, and economically sustainable community.*" (Italics ASF's.) We provided the county [a study by local firm Arlington Analytics \(AA\) that more MM units were unlikely to be affordable except in very few areas](#). *We note now that those projections by AA showed affordability likely limited to areas where MM was already allowed by right, which would make up-zoning for affordability in other areas moot.* We added context to the AA report with analysis that [new townhomes in Green Valley](#) were on the market for prices that made them affordable only to average White and Asian households, based on Area Median Incomes (AMI). These analyses -- which the county has so far ignored -- negate the rationale that up-zoning will unravel past racial injustices such as redlining. To the contrary, new MM units are being built and coming on line for over \$900,000, even higher than the levels projected by Arlington Analytics.

4. [We petitioned the Board and the Acting County Attorney, with presentations, letters, and meetings, to adopt fiscal planning tools](#) that would enable the county to quantify and plan properly for the infrastructure and service costs associated with denser zoning, so far to no avail. See a related [study by Arlington Analytics on cost recovery for Merion Pike West](#) development. MM up-zoning likewise will impose substantial costs that the county has not reflected in the plans it has prepared to date.

5. ASF participated in surveys and [expressed concerns about objectivity of those surveys and the process](#) the county used to engage the public on MM. We objected when other groups — lobbying on behalf of new zoning — were presented as partners, even sponsoring one public forum as cohosts with county staff. ASF signed up to be an "MM partner; yet partnership proved difficult if one posed tough questions. More troubling are efforts we have not yet brought to the Board's attention, including attempts to silence us by a member of the Planning Commission, accusations of lying (refuted by staff) by a member of the Housing Commission, and scolding by staff and removal of our content from chatrooms. We sat dumbfounded -- and thank staff for pushing back -- when one Planning Commissioner suggested staff dilute MM feedback received from single-family homeowners as "they do not represent the majority of residents." Shall we ask that the views of cyclists, residents of affordable housing, and schoolchildren be likewise discounted when policies affecting them are considered? We were met with sighs of exasperation by County Board members who insisted that MM is "only a study" even while stating elsewhere their preference for up-zoning.

ASF Requests.

1. We understand that staff in its Phase 1 report has "ruled out" only two types of MM housing from its next phase of "study, i.e.; " accessory dwelling units or ADU's, because these are

already allowed, and cluster zoning due to the difficulty of consolidating properties. Essentially then, staff has decided that every other type of Missing Middle is eligible for possible inclusion for by-right zoning in possibly all residential areas. Until the County can address our concerns with adding significant new density with townhomes, duplexes, and multi-plexes, we suggest staff study the following IN LIEU OF MM types it is exploring in Phase 2. **We ask that you work to preserve the MM housing and moderately priced single-family housing that EXIST NOW (let's call it "Existing Homes" or EH.) EH is relatively modest; preserves affordability and green space/mature trees; poses minimal budget strain, given existing infrastructure; and trims the sails of gentrification.** ASF includes in this definition those MM units mentioned in the County's [MMHS Research Bulletin #3](#) (townhomes, duplexes, small multifamily units) but also the modest, older, single-family housing all over the county. These Existing Homes are priced BELOW new MM units and should be preserved as entry-level housing. Up-zoning will add fuel to the development frenzy that is razing existing market-rate affordable housing of all types. The full irony of proposed MM zoning then is that it removes a key barrier for builders to raze the older Existing Homes the county says are a large component of our "single-family" neighborhoods already! (In Research Bulletin 3, the county notes that Missing Middle units account for 50% of housing types in single-family areas outside of the R-B corridor.) ASF believes that preserving these older homes and encouraging remodeling vs. teardowns will do more to preserve true affordability than denser zoning in these areas, as [we also noted in our November 2021 letter to the Housing Commission](#).

2. We reiterate our longstanding requests for key actions, to be conducted as part of Phase 2 or prior:

- Perform site-specific fiscal impact analyses for new, multi-unit residential projects;
- Release all existing long-term operating budget forecasts;
- Prepare three county forecasts comparing current zoning with up-zoning:
 - Long-term operating budget;
 - Long-term environmental impact;
 - Long-term household income by quintiles showing projected disparities among different household groups compared to national average

We thank you for your consideration of ASF's concerns and look forward to working with the Board, staff, and commissions in the New Year to move toward a responsible and balanced approach to Missing Middle housing that fully accounts for diverse perspectives, including ASF's. Please contact me if you have any further questions.

Sincerely,

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