



Alliance for Regional Cooperation

"Keeping it Regional"

Written testimony to the Arlington County Board regarding 10/17/20 board meeting agenda item #47: *N-FBC-11 Amendment to the Arlington County Zoning Ordinance Article 11.2 Section 902 CPN-FBC Columbia Pike Neighborhoods Form Based Code Districts (Appendix B of the Zoning Ordinance) to adjust the Area Median Income (AMI) limit for affordable homeownership units*

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Honorable Chairperson Garvey & County Board Members,

My name is Jim Schulman. I am the Executive Director of the Alliance for Regional Cooperation, or ARC, a non-profit organization dedicated to regional economic development in the Washington, DC Metro Area. Our mission statement reads: "ARC works with local businesses, consumers, and social enterprises, to foster explicitly regional economic activity in the interests of economic justice, sustainability, and cultural vitality." I am also a practicing Architect and am active with the DC Grassroots Planning Coalition. ARC recognizes, as does Arlington County, that the provision of affordable housing is very much a metropolitan-wide economic and humanitarian concern.

The issue before you is tricky because the Form-Based Code is complex and this AMI change proposal potentially impacts both affordable rentals AND condos. This is due to the fact, as several individuals have observed in testifying on this issue before various Arlington Commissions, that "this policy places the County's thumb on the scale" in favor of converting affordable rental units for folks at 60% AMI into affordable condo units for folks at 80-100% AMI (when current leases expire). This means that if this proposed policy change is implemented, it is almost a certainty that in the future, lower-income earning households currently residing along the Pike will be displaced, likely to locations completely outside of Arlington.

The proposed policy also appears to contribute to backdoor efforts at achieving radically greater densities than currently exist, especially at the eastern end of Columbia Pike. As I understand the Neighborhood Form-Based Code, since the bonus density requirements for

subsidized housing are allocated on a purely percentage-of-units basis, developers can theoretically get bonus density of up to 6 additional stories for providing only one affordable condo unit in their development! ARC is in favor of retaining the existing policy which grants bonus density for development of Condos at 60% AMI, because the need to build the household wealth of struggling families is so great. Although the current policy has admittedly not proved hugely effective at stimulating the construction of affordable units for ownership, it will nevertheless **do less harm** than encouraging developers on the Pike to switch their focus from building apartments to providing subsidized condos for households that make over \$100K. I am old enough to remember the Condo conversion gold rush in New York City in the 1980's and all the pain and displacement that entailed. Far better than raising the AMI would be for the County to provide incentives (not all of which would have to be monetary) for the development of more **shared-equity housing coops** and **community land trusts**. Housing co-ops and housing land trusts are proven mechanisms, in place all over the nation, including in Virginia, that would create islands of affordability in a sea of real estate speculation that the County government appears eager to ignore, if not inflame.

ARC believes that Arlington County should **protect** existing affordable housing - even if some worry that along the Pike it might be too concentrated - until new committed affordable units that folks **at those income levels** can afford are made available as part of the County's efforts to achieve greater equity in the provision of housing. This is about continuing to allow folks with limited incomes to be able to live in Arlington County at all, not an effort to deprive others, with higher incomes, the opportunity to build household wealth. This is especially the case given the rumored high number of luxury housing units that have been sitting empty throughout the County during the pandemic that would better serve the county were they to be occupied.

Though I support the use of a form-based code, as a designer I also believe that the highest density of housing should be within the immediate vicinity of the commercial intersections along Columbia Pike. This would be in keeping with good planning practice as is articulated by the renowned planner, Kevin Lynch, in his book **Good City Form**. Lynch explains that high density areas should be like pearls on a necklace, focused on points where streets with high traffic intersect. Creating high density all the way along a corridor preserves its automobile-serving character, and fails to protect and preserve nearby lower-density residential districts.

ARC urges the Arlington County government to fully analyze the impacts of development on a project-by-project basis. The impacts assessed should include fiscal impacts, equity of housing access, school populations, presence of mature trees, emergency services, traffic, storm water and utility infrastructure, to mention just a few. ARC is in alignment with the NAACP,

Arlingtonians for Our Sustainable Future, and the various civic associations in opposition to the proposed amendment. ARC sees the need for more careful analysis as I've just described and greater consultation with current residents regarding development proposals.

Arlington's housing policies should not necessarily mirror neighboring jurisdictions. Planning Commissioner Stephen Hughes, who has been very much involved in the Form Based Code implementation process, testified on 10/5 before the Planning Commission that the whole point of setting the AMI at 60% in the first place was that it matched existing market rents along the Columbia Pike corridor. This seems more relevant to the policy being considered than whatever level of AMI Fairfax or Loudoun Counties may be assisting.

I'd like to finish by raising an environmental matter. County Planning staffer Matt Mattauszek made a comment at the Planning Committee session on 10/5. He attempted to reassure Planning Commissioners by stating (something to the effect) that in order for concerns about losing relatively affordable market-rate rental units (MARKs) to be realized, market rents along the Pike would need to be significantly higher than they are now, so as to allow developers to be able to "move up into concrete construction." Regardless of whether that is the case, Carl Elefante, the 2018 President of the American Institute of Architects, regularly explains that, if concrete, as a building material, were a nation, its greenhouse gas emissions would be third highest in the world, following #1 United States and #2 China. To prevent further climate catastrophe, humanity must stop our addiction to building with concrete, whether that be buildings, bridges, or roadways. Alternatives to concrete for constructing mid- and hi-rise buildings, such as cross-laminated timber construction, and recycled steel, are becoming more prevalent. ***We must stop, absolutely stop, building concrete-frame buildings.*** Arlington County should be a leader in this movement. As my friend Phil Bogdonoff reminds people regularly, "there are no jobs on a dead planet."

Thank you for allowing the Alliance for Regional Cooperation to present its views.

A handwritten signature in black ink, appearing to read "Jim Schulman". The signature is fluid and cursive, with a large loop at the beginning.

Alliance for Regional Cooperation, Executive Director