



The Falls Church Village Preservation and Improvement Society

November 27, 2022

Chairman Krasner and Members of the Planning Commission
City of Falls Church
300 Park Avenue
Falls Church, VA 22046

Subject: VPIS Opposition to Proposed Amendments to Transitional Zones

Dear Chairman Krasner and Members of the Planning Commission:

The Board of the Village Preservation and Improvement Society (VPIS) has expressed opposition to amendments to Transition Zones in several recent letters to City Council (i.e., [May 5, 2022](#) and [September 16, 2022](#)). As the Planning Commission prepares to consider amending Transition Zones at meetings in December, **VPIS strongly urges you to reject proposed amendments** for the reasons provided below.

1. The City has not established that the need for this change outweighs the problems it causes.

The City has stated that the reason for the proposed revisions to T-Zones is that the change would provide Falls Church with additional housing, including for middle income people (i.e., the “missing middle”). To our knowledge, however, the City has not provided evidence that residential housing will be built or that residential units will be affordable for middle income people. Despite the accommodations offered to developers by the proposed zoning change, most new residential units may be unaffordable for most people.

At the same time, the proposed zoning changes would cause direct, demonstrable harm to many residents of existing condo buildings and would eliminate transitions for neighboring residential districts. On balance, we can't find a positive benefit. Before making a zoning change this drastic, it is the City's responsibility to provide clear evidence of benefits.

2. Citizens rely on existing zoning regulations when they purchase property.

Citizens of Falls Church have relied on the existing T-zone regulations—establishing a space of “transition” from higher to lower density--to protect them and their property from unwanted encroachment. This ordinance effectively eliminates that protection. Eighty-percent lot coverage, ten-foot setbacks, and fifty-foot height limits cannot be said to provide any reasonable definition of “transition.”

3. This change in zoning may have negative environmental effects.

The narrowing of space between high and low-density construction would significantly reduce the City’s ability to plant and grow trees--an established City goal reflected by the City’s seeking and receiving recognition as a “Tree City, USA.”

4. A City government should very seriously consider the views of its citizens on controversial matters.

On November 2, 2022, in City Council chambers, the Falls Church Planning Commission held a “listening session” on the proposed T-Zone changes. Attendance overflowed into the Council antechamber. The vast majority of speakers spoke in opposition to the change with only a few, some of whom owned property that would benefit from the change, speaking in favor.

5. Development in these sensitive areas should not be “by-right.”

By making any development that meets the new regulatory requirements “by-right” development, this ordinance cedes City authority to control development in T-Zones to developers. We contend that to ensure that City goals are achieved in all proposed projects, the City must retain the existing project review authority.

Finally, when a proposed ordinance meets substantial and legitimate opposition, an effort may be made to “keep the process moving” by simply adjusting the existing language. In our view, the current proposal has too many flaws to justify mere tweaking. Rather, the City should drop the proposed T-zone changes and, instead, fully review the housing benefits it wants and develop programs and policies that clearly achieve these goals.

Sincerely,



Jeff Peterson
VPIS President
on behalf of the Board of Directors

cc: Mayor Tarter and Members of the City Council