# Arlington County Civic Federation

November 23, 2026

Arlington County Board
2100 Clarendon Boulevard
Arlington, VA 22201

**RE: Comments on the October 2026 Revised Draft Multimodal Transportation Plan and Map Series**

Dear Chair de Ferranti and Members of the County Board:

The Arlington County Civic Federation (CivFed) appreciates the opportunity to provide additional comments on the October 2026 Revised Draft Multimodal Transportation Plan (MTP) and accompanying Map Series. The MTP is an important document that will shape the County for years into the future and we appreciate how much staff and volunteer time has gone into is preparation.

On April 14, 2026, CivFed adopted its resolution, *A Safe, Equitable, and Accountable Transportation Plan in Arlington County*. Subsequently, on April 24, CivFed transmitted transportation infrastructure and implementation recommendations for consideration in the Capital Improvement Plan (CIP). On August 23, CivFed submitted detailed comments on the earlier draft MTP.

This letter supplements and builds upon our August 23 comments, addressing provisions of the October 2026 Revised Draft MTP and accompanying Map Series, as well as concerns that remain unresolved. We request that the County consider both submissions together.

Our recommendations are also supported by previously adopted CivFed resolutions addressing land-use planning, housing, zoning, public engagement, infrastructure capacity, and accountability. Particularly relevant are CivFed's March 2023 *Resolution to Restore the Public's Confidence in Arlington County Governance*, December 2024 *Residential Housing Tracker* resolution, and June 10, 2025 *Resolution to Improve Planning and Zoning Policy and Processes*. CivFed's June 2, 2015 *Affordable Housing Master Plan* further supports consideration of housing needs and impacts on neighborhood schools and County services, while the June 9, 2026 Resolution: Study of Lot Coverage / Height / Setback Provisions of Zoning Ordinance addresses the impacts of redevelopment on impervious surfaces, tree canopy, and surrounding neighborhoods.

Of particular relevance to the proposed MTP Street Typology is CivFed's November 13, 2007 Resolution Regarding the Master Transportation Plan Map, which specifically addressed potential inconsistencies between street classifications and GLUP designations and requested that arterial street categories avoid terminology implying particular land uses or development intensity.

Those recommendations reflect a consistent principle: **Arlington's transportation policies must be supported by realistic planning assumptions, credible implementation schedules, operationally feasible development requirements, effective enforcement, and measurable accountability.**

We appreciate the County's recognition of many of these objectives in the revised draft, including improved integration of transportation and land-use planning, the importance of multimodal accessibility, curbside management, and transportation performance monitoring. Nevertheless, we remain concerned that significant portions of the plan establish desirable goals without adequately addressing how those goals will be achieved, how conflicting priorities will be resolved, or what corrective actions will be available when implementation does not produce the intended results.

Of particular concern is how the proposed MTP policies, street classifications, and network maps will influence subsequent Countywide land-use planning, redevelopment decisions, and infrastructure requirements. These recommendations may establish expectations and shape future decisions well before their practical consequences are fully evaluated or communicated to affected communities. The County should identify and disclose reasonably foreseeable impacts during the MTP adoption process rather than defer those questions entirely to subsequent area studies or development reviews.

Because the MTP will guide Arlington's transportation investments, development approvals, and use of the public right-of-way for years to come, these questions should be resolved before adoption or addressed through explicit, time-bound implementation commitments.

The attached comments are organized to facilitate both policy review and implementation. The Executive Summary highlights CivFed's principal concerns and recommendations, while the sections that follow provide supporting analysis, references to previously adopted CivFed positions, recommendations for consideration and incorporation into the final MTP and its implementation framework, as well as specific requests for County Board action.

We respectfully request that these recommendations be addressed before adoption of the final Multimodal Transportation Plan and that the County provide a written response identifying how CivFed's concerns have been incorporated or otherwise resolved.

Thank you for your consideration.

Sincerely,

*NJ Giacobbe, Jr.*

Nicholas J. Giacobbe, Jr.
President, Arlington County Civic Federation

cc: Arlington County Manager
Arlington County Division of Transportation
Arlington County Planning Commission
Arlington County Transportation Commission
Civic Federation Transportation Committee

# Arlington County Civic Federation Comments
# On October 2026 Revised Draft
# Multimodal Transportation Plan and Map Series

## Executive Summary: Principal Concerns and Recommendations

The Arlington County Civic Federation supports the goals of the revised Multimodal Transportation Plan (MTP), including safety, accessibility, reliability, sustainability, and accountability. However, the final plan must provide more than a long-term vision. It must establish realistic implementation requirements, measurable outcomes, enforceable commitments, and processes for addressing transportation problems before they adversely affect residents and surrounding neighborhoods.

Building on CivFed's April 14, 2026 adopted transportation resolution and subsequent letters, we recommend that the County strengthen the final MTP in the following areas:

**1. Implementation, Funding, and Accountability.** Establish a two-year rolling implementation plan linked to the Capital Improvement Plan (CIP), identifying responsible agencies, funding sources, project milestones, and performance measures. Provide annual progress reporting and procedures for addressing delayed or ineffective improvements.

**2. Land Development and Transportation Planning.** Require development approvals to address actual transportation and operational needs, including parking, pick up/drop off (PUDO), deliveries, loading, emergency access, and neighborhood impacts. Incorporate enforceable requirements into the Arlington County Zoning Ordinance (ACZO), site plan conditions, and development-review procedures. Coordinate essential transportation improvements with development schedules.

**3. Parking Requirements and Neighborhood Protection.** Base parking ratios on observed vehicle ownership and parking demand, transit availability, demonstrated transportation demand management (TDM) effectiveness, and surrounding neighborhood conditions. Avoid eliminating minimum parking requirements without adequately evaluating foreseeable demand, spillover impacts, and available corrective measures. Parking deficiencies should not become permanent neighborhood problems after construction.

**4. TDM Compliance and Enforcement.** Require transportation demand management commitments to be implemented and verified before occupancy, independently monitored where appropriate, and subject to public reporting and timely corrective action. Compliance must be demonstrated through actual performance, not merely administrative reporting.

**5. PUDO, Loading, and Curb Management.** Require new developments to accommodate predictable passenger pickup/drop-off, delivery, service, moving, sanitation, and accessible loading needs on site to the greatest extent feasible. Public curb space should supplement, not substitute for, adequate development design.

**6. VDOT Coordination, Transit, and Safety.** Establish formal coordination and implementation procedures with the Virginia Department of Transportation (VDOT) for state-maintained corridors. Provide measurable schedules for transit improvements, particularly Columbia Pike and ART services. Strengthen accessibility, pedestrian safety, construction management, and emergency access requirements.

**7. Countywide Planning, Street Classifications, and Land-Use Impacts.** Evaluate and disclose how proposed MTP street classifications and network maps may influence future land-use designations, zoning, redevelopment intensity, right-of-way requirements, and infrastructure investments. Clarify whether the proposed Medium-Density and High-Density Arterial classifications are intended to support more intensive development outside established Metro-oriented planning areas, what geographic areas could be affected, and what additional housing development capacity or potential buildout could result. Consistent with CivFed's adopted housing and planning resolutions, evaluate the implications for transportation, neighborhood conditions, schools, and other County services. The ongoing Ballston Park/Buckingham planning study and the proposed reclassification of a portion of Wilson Boulevard in Bluemont illustrate why these questions should be addressed before the MTP is adopted. A comprehensive Countywide comparison of existing and proposed street classifications should be made publicly available before adoption.

**8. Transparency and Community Participation.** Establish clear processes for public review, civic association involvement, monitoring, and corrective action. Explain how community recommendations have been addressed and distinguish between funded, achievable transportation improvements and longer-term aspirations dependent on future approvals or uncertain funding.

**Our central recommendation is that the County adopt an MTP that connects transportation policy to demonstrated needs, realistic infrastructure capacity, enforceable implementation, and meaningful accountability.** Planning assumptions should be evaluated before decisions are made, required transportation improvements should have credible implementation pathways, and foreseeable impacts should not be shifted to surrounding neighborhoods or left for residents and the County to resolve after development occurs.

The following sections provide detailed recommendations, distinguishing positions previously adopted or formally submitted by CivFed from additional issues identified during review of the revised MTP.

## I. Recommendations Previously Adopted or Formally Submitted by CivFed

### 1. Make Implementation, Capital Planning, and Accountability Central to the MTP

*Relevant draft provisions: Policies O, P, and V; Chapter 6, Transportation Guidance for Land Development (pp. 91–96); Chapter 7, Realizing the Plan (pp. 97–102).*

The revised draft identifies several short-term actions, links transportation improvements to the CIP, and establishes five-year performance reporting. These are useful steps, but they do not fully address CivFed's previously submitted recommendations.

The April resolution and August letter called for a two-year rolling implementation plan translating the adopted transportation maps, modal priority networks, and corridor recommendations into projects with identifiable responsibilities, estimated costs, funding pathways, and anticipated completion schedules.

CivFed reiterates its request that the final MTP establish a publicly accessible implementation program that:

- Identifies near-, medium-, and long-term projects, including those dependent on redevelopment or outside agency approvals.
- Assigns responsible County divisions and participating state or regional agencies.
- Provides estimated costs, funding pathways, milestones, and measurable performance outcomes.
- Connects transportation commitments in adopted plans to the CIP and development-related infrastructure requirements.
- Provides annual progress reporting and explains significant delays, funding gaps, and changes in implementation priorities.
- Establishes procedures for evaluating projects that fail to achieve their intended outcomes, perform below expectations, or produce unintended adverse impacts, and for implementing corrective actions.

The five-year performance review proposed in the MTP should supplement, not replace, ongoing monitoring of project implementation and operational performance.

The final MTP should also establish meaningful opportunities for civic associations to request transportation improvements that fall between routine service requests and full Neighborhood Complete Streets projects. Written responses should explain decisions, applicable criteria, and available alternatives.

**2. Integrate Land Development Decisions with Transportation Infrastructure and Operations**

*Relevant draft provisions: Policy D (p. 36); Policy O (p. 47); Chapter 6, Transportation Guidance for Land Development (pp. 91–96).*

Land use and transportation decisions cannot be separated. Development approvals establish transportation operating conditions that can be extremely difficult, expensive, or impossible to correct after construction and occupancy.

The adopted CivFed resolution specifically called for Area Transportation Plans as part of Multimodal Transportation Assessments (MMTAs), including transportation counts, multimodal access, neighborhood street and parking impacts, and mitigation sequencing.

CivFed's June 10, 2025 Planning and Zoning resolution provides additional support for these recommendations. It called for maintaining adopted Comprehensive Plan and GLUP policies until changed through meaningful public engagement, including policies supporting preservation of low-density neighborhoods and concentration of greater development intensity near Metro corridors. It also called for adequate public transportation service and infrastructure when considering increased density outside transit corridors, supported by transportation studies and demonstrated infrastructure capacity.

CivFed's 2015 Affordable Housing Master Plan resolution also called for assessing the effects of affordable housing development on neighborhood schools and other County services, while the December 2024 Residential Housing Tracker resolution called for identifying housing production potential under existing zoning and land use. Together, these adopted positions reinforce the need to evaluate future development capacity and infrastructure requirements before changes in land-use expectations are established.

We recommend strengthening Chapter 6 to require development applicants to demonstrate how the full range of anticipated transportation activity will operate in practice, including parking, PUDO, deliveries, commercial loading, service vehicles, moving, sanitation, emergency access, and internal circulation.

Development assessments should also consider cumulative impacts from other approved or anticipated projects and the surrounding transportation network.

Where essential public transportation improvements are necessary to support a development, the County should identify how those improvements will be funded, approved, and delivered, and how their schedules will be coordinated with construction and occupancy.

The MTP should direct corresponding amendments to the Arlington County Zoning Ordinance (ACZO), standard site plan conditions, MMTA guidance, and Site Plan Review Committee (SPRC) procedures, where appropriate, so that these requirements become binding rather than advisory.

**3. Base Parking Requirements on Actual Demand and Avoid Shifting Costs to Neighborhoods**

*Relevant draft provisions: Policy D, Strategy 7 (p. 36); OPL-3 through OPL-5 (p. 95); Curb Lane Use Framework (pp. 77–84).*

CivFed has consistently recommended that parking ratios be calibrated to observed vehicle ownership and parking utilization, taking into account transit access, TDM performance, affordability, surrounding curb demand, and anticipated development characteristics.

We are therefore concerned that Policy D, Strategy 7 proposes studying the elimination of parking minimums, while OPL-5 calls for minimizing the parking provided in new developments without expressly requiring adequate analysis of existing and reasonably anticipated demand.

The MTP should distinguish between reducing unnecessary vehicle trips and eliminating the need for vehicles. Residents may use transit, walking, or bicycling for many trips while continuing to need a vehicle for employment, caregiving, medical appointments, or other activities.

This concern is particularly important for affordable housing. As noted in CivFed's August letter, the Metropolitan Washington Council of Governments' *State of the Commute* findings indicate that lower-income workers may rely more heavily on vehicles for employment than higher-income workers. Affordability should not be treated as evidence that residents have no need for parking.

The consequences of an inadequate parking ratio extend beyond the individual development. Once a building is occupied, adding substantial parking capacity may be prohibitively expensive or physically infeasible. The resulting demand can be displaced to surrounding public streets, potentially affecting nearby residents, businesses, deliveries, accessible parking, and emergency access.

CivFed recommends that the final MTP:

- Require parking analyses based on observed conditions at comparable occupied developments and reasonably anticipated demand.
- Evaluate neighborhood spillover and cumulative parking impacts before approving substantially reduced ratios.
- Require proposed TDM measures and alternative transportation services to be operational and demonstrably effective rather than relying solely on projected future availability.
- Establish enforceable monitoring and corrective-action requirements when actual conditions differ materially from the assumptions used in development approval.
- Maintain a reasonable and timely Residential Permit Parking (RPP) review process without treating RPP as a substitute for adequate development planning.
- Direct amendments to ACZO parking standards to incorporate observed-demand analysis and appropriate neighborhood protections.

Before endorsing any further elimination or reduction of parking requirements, the County should explain how the proposed policy will protect existing neighborhoods from displacement of parking demand and identify what remedies will be available when approved assumptions prove inaccurate.

**4. Make TDM Commitments Verifiable, Enforceable, and Operational Before Occupancy**

*Relevant draft provisions: Policy I (p. 41); TDM-1 and TDM-2 (p. 96).*

The draft's TDM-2 guidance calls for regular surveys, performance measures, follow-up actions, and biennial evaluations of TDM effectiveness and private compliance. CivFed supports these concepts but believes stronger requirements are necessary.

The April resolution called for standardized, enforceable TDM commitments; independent compliance audits; publicly reported compliance status and parking studies; and verification that required measures are implemented and operational before occupancy.

CivFed's June 2025 Planning and Zoning resolution also called for a system to track implementation of approved site plans, compliance with site plan conditions, and subsequent amendments or administrative changes. The MTP should incorporate these existing CivFed recommendations into its transportation compliance framework, including tracking changes to approved TDM and other transportation-related obligations.

The MTP should therefore identify:

- Minimum requirements for TDM implementation and pre-occupancy verification.
- Responsible parties for monitoring and enforcement.
- Fixed compliance review schedules and independent verification where appropriate.
- Public disclosure of survey results, compliance reports, and significant deficiencies.
- Defined thresholds and deadlines for corrective action when measures are missing, ineffective, or not being implemented.

Compliance should not be measured solely by whether reports have been submitted or obligations have been administratively acknowledged. The County must also determine whether required transportation measures are functioning and whether the assumptions supporting approval remain valid.

The County should establish a reliable process to ensure that required reviews occur when scheduled, findings are acted upon, and unresolved compliance matters are escalated rather than indefinitely deferred.

**5. Strengthen PUDO, Loading, Delivery, and Building Operations Requirements**

*Relevant draft provisions: Policy T (p. 53); Policy U (p. 54); CM-2 and OPL-1 (p. 95).*

CivFed supports the draft's attention to curb management and its requirement for adequate off-street loading facilities in commercial, mixed-use, and high-density residential development.

However, CM-2 places substantial emphasis on providing on-street PUDO space near building entrances. This should be clarified to avoid creating an expectation that public curb space will accommodate predictable private development demands.

The adopted resolution and August letter recommended that new residential and mixed-use developments accommodate foreseeable passenger PUDO, rideshare, delivery, loading, moving, sanitation, service, and accessible passenger-loading activity on site to the greatest extent feasible.

The final MTP should require realistic operational assessments, including anticipated vehicle sizes, turning movements, peak activity, pedestrian conflicts, garage access, and emergency vehicle requirements.

Public curb space should supplement, rather than substitute for, adequate site design.

The County should also require operating plans and appropriate signage, markings, and management arrangements before occupancy. Where operational conditions create persistent obstruction of travel lanes, bicycle facilities (including bike lanes, protected bike lanes, and shared-use paths), sidewalks, or emergency access, the County should have defined enforcement and corrective-action procedures.

**6. Establish a Formal VDOT Coordination and Corridor Implementation Framework**

*Relevant draft provisions: Policy Q (p. 49); Priority Corridors (p. 97); Map Series.*

CivFed's adopted resolution and subsequent letters requested a formal Arlington-VDOT coordination framework addressing transportation planning, safety, accessibility, maintenance, design standards, and implementation responsibilities on state-maintained roadways.

The draft identifies important corridors and recognizes the need for cooperation with regional and state partners. However, a policy of coordination alone is insufficient when County transportation improvements depend on another agency's approval, funding, or operational decisions.

We reiterate our request for:

- A formal MOU or equivalent coordination framework.
- Early VDOT involvement in area planning and site plan reviews affecting state-maintained roads.
- A designated County point of contact for VDOT matters.
- Publicly available study milestones, alternatives, County comments, and implementation status.
- Written identification of unresolved jurisdictional disagreements and a process for elevating significant issues.
- A feasibility assessment of County ownership or maintenance of appropriate non-interstate state routes.

Glebe Road deserves particular attention as a major north-south corridor serving both residential and commercial areas. The County should articulate a corridor-wide transportation vision that differentiates local conditions and establishes practical pathways for implementation with VDOT.

The MTP should also connect transportation improvements recommended in adopted area plans, including Langston Boulevard, to credible funding and implementation strategies rather than relying on future planning or redevelopment to resolve significant infrastructure needs.

**7. Provide Measurable Transit Improvements and Reliable Alternatives**

*Relevant draft provisions: Policies B, G, I, and Q; Transit Priority Network (pp. 62–65).*

CivFed's adopted resolution specifically called for Columbia Pike transit improvements, including real-time arrival information, transit signal priority, off-vehicle fare payment, improvements to passenger boarding and unloading, adequate vehicle capacity, lighting, and published implementation milestones.

The resolution also requested ART improvements, expanded peak service where appropriate, improved shelters, and annual fleet capacity and reliability reporting by corridor.

The final MTP should retain these specific commitments and connect them to measurable performance targets, funding, and implementation schedules.

Particular attention should be given to north-south and cross-County travel, where transit connections may not provide practical alternatives to driving for many trips.

The MTP should not assume that future transportation alternatives will adequately accommodate anticipated development unless their capacity, service quality, implementation schedules, and accessibility can be reasonably demonstrated.

**8. Make Safety, Accessibility, and Emergency Readiness Operational Requirements**

*Relevant draft provisions: Policies A, C, E, J, K, and L; Chapter 6 streetscape guidance.*

CivFed supports the MTP's emphasis on safety and accessibility, including its alignment with Vision Zero.

The adopted resolution requested improved near-miss and hazard reporting, transparent procedures for crosswalk and pedestrian beacon requests, quick-build safety treatments, speed management, and prioritization of crossings near parks and along major arterials.

It also called for a five-year ADA-first sidewalk remediation program, emphasizing utility-pole obstructions and annual progress reporting.

These recommendations should be incorporated into measurable implementation programs rather than remaining general policy statements.

**E-Bike, Scooter, and Micromobility Safety and Enforcement.** CivFed's April 14, 2026 transportation resolution specifically called for balancing safety among pedestrians, bicyclists, motorists, transit users, and users of e-bikes and other last-mile devices. It also recommended expanded micromobility parking corrals, geofenced parking and slow zones in dense areas, continued permit-based operator accountability, safety education, and a plan to reduce obstructions caused by these devices.

The revised MTP's Policy E, Strategy 7 emphasizes education, outreach, and improved riding conditions for bicycles and scooters. While education is important, it should be accompanied by effective enforcement of applicable operating and parking requirements, measurable safety

outcomes, and corrective action when unsafe behavior persists. The MTP should establish a coordinated approach to addressing unsafe or reckless operation of e-bikes and scooters, particularly where conflicts occur with pedestrians and other vulnerable road users.

The County should also strengthen requirements to prevent improperly parked or abandoned dockless e-bikes and scooters from obstructing sidewalks, accessible pedestrian routes, curb ramps, bicycle facilities, and other public rights-of-way. This should include clearly designated parking areas, enforceable operator responsibilities, accessible reporting procedures, timely removal of improperly parked devices, and monitoring of recurring problem locations. These measures should protect pedestrian accessibility, particularly for people with disabilities, while preserving safe micromobility options.

The MTP should also address the operational reliability of streets during construction, major events, weather emergencies, and other disruptions.

**Regional Emergency Evacuation Routes.** Arlington's transportation network also serves an important regional emergency management function. Designated emergency evacuation routes originating in Washington, DC, and elsewhere in Northern Virginia pass through Arlington, creating transportation requirements that extend beyond the County's normal travel patterns and local street operations.

The MTP should explicitly recognize these regional responsibilities and require coordination with the District of Columbia, VDOT, the Virginia Department of Emergency Management, and other appropriate regional and federal partners. Proposed street redesigns, lane reallocations, intersection modifications, curbside restrictions, and other transportation changes affecting designated evacuation corridors should be evaluated for their effects on emergency evacuation capacity, traffic management, emergency vehicle access, and the movement of large volumes of traffic under extraordinary conditions.

The County should identify applicable regional evacuation corridors, explain how emergency operations requirements are incorporated into street-design and modal-priority decisions, and establish procedures for reviewing proposed changes with responsible emergency management and transportation agencies before implementation.

Maintenance of Traffic (MOT) plans should preserve accessible pedestrian routes, appropriate bicycle and micromobility detours, transit access, school safety, and emergency vehicle access. Where approved plans are not followed, residents and civic associations should have a clear process to request corrective action.

Transportation facilities should not open for public use without required signs, markings, curb controls, accessible features, fire-lane identification, and other safety and operational elements in place.

### 9. Provide Transparency, Community Participation, and Meaningful Corrective Action

*Relevant draft provisions: Policies H, O, P, and V; Chapter 7.*

The April resolution called for area- and corridor-focused transportation roundtables, a publicly accessible transportation information hub, and greater transparency concerning transportation studies, compliance, and implementation.

These recommendations are reinforced by CivFed's March 2023 governance resolution and June 2025 Planning and Zoning resolution, which called for meaningful two-way public engagement, early disclosure of planning proposals, access to supporting information, and substantive responses to community concerns. The June 2025 resolution further requested that civic association submissions be included in the formal site plan record and addressed by County staff.

CivFed's 2015 Affordable Housing Master Plan resolution similarly called for additional community dialogue concerning housing policy and its implementation. These principles should also govern how MTP recommendations are applied through subsequent area studies, GLUP reviews, zoning changes, and development approvals.

The final MTP should establish processes for ongoing community involvement rather than limiting participation to initial project planning and periodic engagement exercises.

These processes should include clear staff contacts, written responses to substantial requests, published implementation and compliance information, and opportunities to review proposed corrective actions.

CivFed also requests that the County provide a public response explaining how substantive recommendations submitted during MTP engagement, including those in CivFed's August 23 letter, were considered and addressed.

## II. Additional Concerns Identified Through Review of the October Draft and Its Application to Countywide Planning

The following concerns emerged from CivFed's review of the October 2026 revised draft MTP and its potential implications for Countywide planning. They build upon principles established in previously adopted CivFed resolutions and formally submitted comments, including consistency with adopted land-use policies, transparency, meaningful public engagement, adequate transportation infrastructure, and accountability for implementation. These concerns identify additional issues requiring clarification, evaluation, or action before adoption of the revised MTP.

### 1. Street Typology, Future Development, and Countywide Planning Accountability

*Relevant draft provisions: Street Typology (pp. 69–76); Chapter 6; Map Series, Map F.*

The proposed Street Typology should not be viewed simply as a technical update to street classifications. These designations will influence future area planning, redevelopment proposals, transportation infrastructure requirements, and the allocation of public and private right-of-way.

The MTP states that recommended street conditions may be achieved through County projects, redevelopment, easements, and additional right-of-way. Consequently, proposed classifications may have significant implications for existing properties, surrounding neighborhoods, public infrastructure investments, and future development expectations.

The Ballston Park and Buckingham Commercial Area Planning Study provides a useful illustration of how these issues are already emerging through an active County planning process.

Although the study was initiated primarily in response to expiring affordable housing commitments at Ballston Park Apartments, the County Board's May 19, 2026 charge encompasses both residential and commercial properties and provides for consideration of alternative land uses, development densities, building heights, historic district boundaries, and transportation infrastructure requirements.

The County should explain the planning, policy, and procedural considerations that led to the inclusion of the Buckingham Commercial Area in a study initiated primarily to address affordable housing preservation. Of particular relevance to the MTP is whether the inclusion of the commercial area influences the land-use assumptions, development-density expectations, street typologies, transportation design standards, or redevelopment options being considered for adjoining residential properties. The County should also clarify whether the broader study scope has influenced the proposed MTP street classifications before any corresponding changes to the GLUP have been separately considered and adopted.

County planning materials identify North Glebe Road in the study area under the existing Commercial Center Arterial classification, the draft Medium-Density Arterial classification, and a potential High-Density Arterial designation if greater development density is recommended through the study.

The associated minimum sidewalk, planting, and building-side buffer guidance could increase the combined streetscape width on each side of the roadway from approximately 12–14 feet under the existing guidance to 15 feet under the draft Medium-Density Arterial designation, or 18 feet under a potential High-Density Arterial designation.

Although the proposed MTP street classifications and related recommendations in the Ballston Park/Buckingham study remain under consideration, they are already influencing the County's planning process and may establish expectations for future land-use, zoning, redevelopment, and transportation decisions. Their reasonably foreseeable consequences should therefore be evaluated and disclosed before the policies are adopted, rather than deferred to later planning or development reviews.

A particularly important question is whether the proposed Medium-Density and High-Density Arterial classifications are intended to influence future land-use and zoning decisions along designated corridors. Although a change in street classification does not itself amend the GLUP or Zoning Ordinance, the County should clarify whether these classifications will be used to support subsequent recommendations for increased development density.

CivFed's June 2025 Planning and Zoning resolution reaffirmed the importance of maintaining adopted Comprehensive Plan and GLUP policies, including preserving low-density neighborhoods and concentrating greater development intensity near Metro corridors. The MTP should explain how the proposed arterial classifications relate to these adopted policies.

Specifically, the County should clarify whether potential increases in development intensity would remain concentrated within established Metro-oriented planning areas or could extend along arterial corridors based on the availability of bus service. The County should explain whether the geographic principles traditionally associated with Metro-oriented development, including the approximately quarter-mile station-area concept, could be expanded or applied differently to corridors served by WMATA Metrobus or ART routes. Would proximity to an individual bus stop be considered sufficient to support increased development density, or would the County require demonstrated transit frequency, capacity, reliability, and accessibility? The County should identify which corridors and surrounding properties could be affected, including whether proposed classifications could influence future land-use decisions along portions of North Glebe Road beyond the Ballston Park/Buckingham study area.

The County should also identify the reasonably anticipated additional development capacity and potential buildout associated with any proposed changes in land-use expectations along affected arterial corridors. This analysis should distinguish development permitted under existing GLUP designations and zoning from development that could become possible under reasonably foreseeable changes in land-use policy or zoning. Where sufficient information is available, the County should provide comparative estimates of additional residential units, commercial development, and associated infrastructure requirements, both within identified planning study areas and across other potentially affected corridors.

This request is consistent with CivFed's December 2024 Residential Housing Tracker resolution, which called for identifying housing production potential under existing zoning and land-use policies and establishing measurable housing production and preservation goals. Where new transportation classifications may influence subsequent land-use or zoning changes, the County should disclose the potential additional residential capacity and estimated buildout under reasonable development scenarios. This would allow the public to understand how proposed planning changes relate to existing housing capacity and established housing needs.

CivFed's 2015 Affordable Housing Master Plan resolution also supports evaluating the geographic distribution of affordable housing and assessing impacts on neighborhood schools and other County services. Accordingly, projected development scenarios should identify the cumulative implications for transportation infrastructure, parking, transit capacity, public facilities, environmental resources, and surrounding neighborhoods.

Wilson Boulevard in Bluemont provides another example. Concerns submitted to the County Board regarding the October 2026 draft MTP identify a segment of Wilson Boulevard between approximately North Greenbrier Street and North Woodrow/Abingdon Street that is proposed for classification as a Medium-Density Arterial, despite predominantly low-residential GLUP designations along portions of the corridor. These concerns also identify longstanding

deficiencies in pedestrian infrastructure, including narrow sidewalks, utility obstructions, limited right-of-way, and unresolved transportation safety and operational issues.

This example reinforces CivFed's November 13, 2007 Resolution Regarding the Master Transportation Plan Map, which raised concerns about arterial street classifications that might imply greater development intensity than permitted under adopted GLUP designations. That resolution requested removal of land-use terminology from arterial street classifications and greater flexibility to accommodate safety and other corridor-specific conditions.

This concern is particularly relevant because the revised MTP identifies, among its short-term actions (p. 98), a review of the Arlington County Zoning Ordinance to align references to the 2007 MTP and transportation network with the new plan's terminology, including its street classifications. The County should clarify the intended scope and potential consequences of these amendments, distinguish administrative terminology updates from substantive changes affecting land-use or development requirements, and ensure that any proposed changes are separately disclosed, evaluated, and subjected to the applicable public review and approval processes. Adoption of the MTP should not be interpreted as advance approval of subsequent GLUP or zoning changes.

The proposed 2026 MTP should therefore explain how its new street typologies were assigned, whether they reflect existing adopted land-use designations or anticipated future development, and how inconsistencies with the GLUP will be identified and resolved. The County should also distinguish transportation improvements necessary to address existing pedestrian safety and accessibility deficiencies from improvements that would be required to support future increases in development intensity. Essential safety improvements should not depend solely on future redevelopment.

The examples of North Glebe Road and Wilson Boulevard raise concerns that similar changes may be occurring elsewhere in Arlington, including along corridors predominantly serving existing low-density residential neighborhoods. Before adoption of the MTP, the County should publish a comprehensive, street-by-street comparison of existing and proposed street typologies, identifying the affected street segments, their geographic limits, existing and proposed classifications, associated mileage, and the rationale for each substantive change. This analysis should identify whether proposed classifications are consistent with currently adopted GLUP designations or are based on assumptions concerning future land-use changes that have not yet been separately studied, reviewed by the public, or approved by the County Board.

The revised MTP also identifies 11 Priority Corridors for Further Study (p. 97): Arlington Boulevard, Carlin Springs Road, Fairfax Drive and 10th Street North, Glebe Road, Langston Boulevard, North George Mason Drive, Shirlington Road, South Hayes Street, Walter Reed Drive, Washington Boulevard, and Wilson Boulevard. Although described as corridors for future transportation studies and improvements, their designation raises broader questions about how these studies may influence future land-use planning, redevelopment expectations, and development intensity. The County's Plan Langston Boulevard process, which involved years of planning, analysis, and public engagement before adoption in 2023, illustrates the importance of a comprehensive and transparent approach when corridor planning has potential land-use

consequences. The County should clarify whether designation of these eleven corridors is intended to establish priorities or expedite subsequent planning and development decisions, and whether future studies may serve as a basis for increased development density or changes to the GLUP or zoning. Any such changes should be supported by appropriate analysis, meaningful community engagement, and separate public review and approval, rather than being treated as authorized through adoption of the MTP.

These examples raise broader Countywide questions that should be addressed before the MTP is adopted:

- How will new street classifications be applied to existing developed properties and future redevelopment proposals?
- Where will additional right-of-way be obtained, and what will be the potential impacts on private property, existing roadway operations, and surrounding neighborhoods?
- How will proposed street-design classifications interact with existing zoning, the General Land Use Plan (GLUP), adopted area plans, and future land-use studies?
- How will the County evaluate transportation capacity and neighborhood impacts when planning studies contemplate increased development density?
- What changes to travel lanes, intersections, curb parking, transit, loading, and neighborhood circulation may be necessary?
- Which improvements can be implemented under existing conditions, which depend on redevelopment, and how will they be funded and scheduled?

Of particular concern is the potential for transportation classifications and anticipated development intensity to become mutually reinforcing assumptions. Higher development density may be used to justify a different street classification, while the resulting classification may subsequently help establish expectations for more intensive redevelopment.

The County should explain how it will ensure that these assumptions do not substitute for independent analysis of transportation demand, infrastructure capacity, neighborhood impacts, funding feasibility, and appropriate land-use decisions.

Street classifications do not independently authorize increased zoning density. Nevertheless, because the MTP will become an element of Arlington's Comprehensive Plan, its recommendations may carry substantial weight in later planning decisions.

CivFed believes that reasonably foreseeable implications should be disclosed and evaluated during the MTP adoption process rather than deferred entirely until individual area studies or development applications are considered.

This is a Countywide planning and accountability concern. The Ballston Park/Buckingham study and the proposed street classification changes along Wilson Boulevard in Bluemont illustrate how the proposed framework may influence future planning and development decisions. The same questions should be examined wherever future planning or redevelopment relies on the new MTP classifications.

**2. Require Transparency Regarding How MTP Maps Will Guide Area Studies and Development Approvals**

*Relevant draft provisions: Network Guidance (pp. 56–90); Chapter 6; Chapter 7.*

The draft Map Series states that the maps are intended to guide future project planning, prioritization, and development rather than identify specific projects or treatments.

Although this distinction is important, these maps will likely influence subsequent County planning recommendations, development expectations, and infrastructure investments.

The County should therefore do more than describe the maps as general guidance. It should identify and explain their reasonably foreseeable consequences before adoption, particularly where proposed designations differ materially from existing adopted transportation guidance.

For example, when a new street classification anticipates wider sidewalks, expanded planting areas, additional right-of-way, or different modal priorities, the County should explain how these recommendations may affect existing transportation operations, public investment needs, private property, and future redevelopment.

Where an area study proposes changes to the transportation network based on anticipated development, the County should distinguish among:

- Transportation improvements needed to address existing deficiencies.
- Improvements required to support already approved development.
- Improvements that would become necessary if additional development intensity is authorized.
- Long-term aspirations that do not yet have identified funding, agency approvals, or implementation schedules.

This distinction is particularly important when a proposed land-use change depends on transportation improvements that may not be funded or implemented for many years.

The MTP should also establish a clear process for reconciling proposed map changes with existing adopted plans, identifying when recommendations require additional analysis or County Board approval, and communicating the anticipated consequences to affected communities.

The County should not defer disclosure of reasonably foreseeable transportation and neighborhood impacts simply because detailed engineering, zoning changes, or individual development proposals will occur later.

**3. Evaluate the Full Operational Consequences of Roadway and Modal Priority Changes**

*Relevant draft provisions: Policy B; Modal Priority Networks; Curb Lane Use Framework.*

The modal priority framework establishes how the County proposes to prioritize uses of constrained rights-of-way.

While prioritization can improve safety and mobility, significant reallocation of roadway or curb space should be supported by a documented analysis of its effects on other modes, adjacent neighborhoods, deliveries, transit, emergency response, and intersection operations.

In particular, the County should identify what information will be required before changes are approved, how affected communities will be engaged, and which performance measures will be used after implementation.

If significant adverse effects occur, the County should have an established process for reviewing and modifying the treatment.

**4. Link Street Classification and Development Intensity to Demonstrated Transportation Capacity**

*Relevant draft provisions: Policy D; Street Typology; Transportation Guidance for Land Development.*

The Ballston Park/Buckingham and Wilson Boulevard examples also raise a broader question: how will the County ensure that transportation infrastructure, transit capacity, parking, loading, and neighborhood circulation can accommodate the development intensity contemplated by future area studies and potential land-use changes?

Future land-use assumptions should be supported by realistic assessments of transportation demand and the infrastructure needed to accommodate it.

These assessments should consider existing transportation deficiencies, cumulative impacts from other planned developments, actual parking and vehicle ownership patterns, transit service, and capacity, PUDO and loading requirements, pedestrian accessibility, and emergency vehicle access.

Where proposed development depends on improvements to state-maintained corridors, the County should obtain meaningful VDOT participation and identify feasible implementation pathways before relying on those improvements as supporting assumptions.

The County should also explain how transportation improvements necessary to support proposed development will be funded and coordinated with development schedules.

An adopted plan should not establish expectations for substantially increased development intensity without a credible understanding of the transportation infrastructure needed to support that development.

The County should avoid situations in which increased development is approved while transportation improvements essential to its successful operation remain unfunded or indefinitely deferred.

**5. Strengthen Utility Coordination and Removal of Obsolete Infrastructure**

*Relevant draft provisions: Policy J; SS-8 and SS-9.*

The MTP addresses undergrounding and placement of utilities during development, but existing obstructions also require systematic attention.

The County should consider a coordinated program to inventory abandoned, duplicative, or inactive utility poles and related facilities, establish responsibility for removal or relocation, and pursue necessary state authority to address unresolved obstructions.

This issue is closely related to CivFed's adopted ADA-first sidewalk remediation recommendations.

**6. Identify Enforcement Capacity and Privacy Protections Before Expanding Automated Systems**

*Relevant draft provisions: Policies E, S, and T.*

The draft discusses automated curb enforcement and emerging transportation technologies.

Any implementation of these technologies should be accompanied by a clear explanation of legal authority, purpose, operating costs, accuracy, oversight, data retention, access controls, and privacy protections.

Technology should not be assumed to solve a problem that is fundamentally caused by inadequate site design, insufficient operational capacity, unclear rules, or the lack of effective enforcement.

## III. Requested County Board Action

CivFed respectfully requests that the County Board direct staff to:

1. **Incorporate previously adopted and formally submitted CivFed transportation recommendations** into the final MTP or identify the specific implementation measures through which they will be addressed.
2. **Strengthen Chapter 6 and associated development-review requirements** so that transportation and land-development decisions are operationally realistic, evidence-based, and enforceable, with appropriate implementing changes to the ACZO and development-review procedures.
3. **Establish a two-year rolling implementation plan and annual reporting process** linked to the CIP, with clear responsibilities, milestones, funding assumptions, and corrective-action mechanisms.
4. **Evaluate and disclose the reasonably foreseeable Countywide consequences of the proposed Street Typology and network maps before adoption**, including how these classifications may influence future area planning, redevelopment expectations, right-of-way requirements, transportation operations, and infrastructure investments.

5. **Clarify the potential land-use, zoning, and housing-capacity implications of the proposed Medium-Density and High-Density Arterial classifications**, including whether these designations may influence future GLUP amendments, rezoning, or increased development density along arterial corridors; how the County will apply existing Metro-oriented development principles; what geographic areas may be affected; and what additional residential development capacity and potential buildout could result. Consistent with CivFed's adopted housing and planning resolutions, provide an assessment of the cumulative transportation, infrastructure, school, public-service, and neighborhood impacts associated with reasonably anticipated development scenarios. Consistent with CivFed's November 2007 MTP Map resolution, identify and explain any inconsistencies between proposed street typologies and existing GLUP designations, including along North Glebe Road and Wilson Boulevard, and consider whether classification terminology should be revised to avoid implying land-use changes that have not been separately reviewed and approved. Provide a publicly accessible, Countywide comparison of existing and proposed street typologies, including affected street segments, their geographic limits, mileage, the rationale for substantive changes, and consistency with currently adopted GLUP designations.
6. **Require coordinated transportation and land-use analysis when future planning studies contemplate changes in development intensity**, including assessment of existing conditions, cumulative impacts, parking and loading demand, neighborhood effects, transit capacity, VDOT coordination, infrastructure costs, and implementation feasibility.
7. **Incorporate regional emergency evacuation requirements into transportation planning and street design**, including identification of designated evacuation corridors, coordination with appropriate regional emergency management and transportation agencies, and evaluation of proposed roadway and intersection changes for their effects on emergency traffic operations and evacuation capacity.
8. **Strengthen micromobility safety, parking compliance, and enforcement**, consistent with CivFed's April 14, 2026 transportation resolution, including measures to address unsafe e-bike and scooter operation, expand designated parking areas and appropriate geofencing, ensure timely removal of devices obstructing sidewalks and bicycle facilities, strengthen shared-device operator accountability, and publicly report safety and compliance outcomes.
9. **Clearly distinguish funded and achievable transportation improvements from those dependent on redevelopment, outside agency approvals, or uncertain future funding**, and explain how development decisions will account for those dependencies.
10. **Publish a substantive response to significant community comments**, including those previously submitted by CivFed, and identify any issues requiring additional study, policy development, or County Board consideration.

## Conclusion

CivFed supports Arlington's commitment to a transportation network that is safe, equitable, accessible, reliable, sustainable, and accountable.

However, the success of the MTP cannot be measured solely by the adoption of policies, the expansion of multimodal networks, or progress toward future travel goals. It must also be measured by the County's ability to implement promised improvements, accommodate actual transportation needs, prevent foreseeable adverse impacts, enforce development commitments, and correct problems when they arise.

The County should also recognize that the MTP will establish a framework for decisions extending well beyond transportation infrastructure alone. Its street classifications, network maps, and development guidance will influence subsequent land-use planning, redevelopment proposals, and neighborhood conditions throughout Arlington. Those consequences should be understood and communicated before policies are adopted, rather than addressed only after planning assumptions have become established expectations.

Arlington should not adopt development or transportation policies that depend on assumptions about future behavior, infrastructure, or service availability without reasonable evidence that those assumptions can be achieved and sustained.