

August 9, 2023

SENT VIA EMAIL

Mark Schwartz  
County Manager  
County Manager's Office  
2100 Clarendon Blvd., Suite 318  
Arlington, VA 22201

Subject line: Illegal lot line adjustments/"split-lot subdivision," Expanded Housing Option (EHO) permits, and any building permits for 4015 & 4019 7<sup>th</sup> St S (Real Property Codes 23019030 and 23019029, respectively)

Dear County Manager Schwartz:

We, concerned neighbors on 7<sup>th</sup> and 8<sup>th</sup> St S surrounding the subject properties, are writing regarding two abutting lots located at 4015 and 4019 7<sup>th</sup> St S that were both acquired in late 2022 by a Classic Cottages-related LLC (and immediately transferred to 4015 7<sup>th</sup> St S LLC, another related business) and are proposed for development. We respectfully request that you and your staff **reject** the following:

- An illegal "split-lot subdivision" of two existing lots into two new lots with significantly reconfigured lot lines proposed by 4015 7<sup>th</sup> St S LLC (hereinafter "developer"), owner of the two abutting lots.
- An ineligible EHO permit submitted for 4015 7<sup>th</sup> St S/Lot 12B by the developer that does not comply with the minimum lot width, seeks an EHO permit based on a non-existent, unrecorded plat and not based on current lot lines and measurements, among other concerns.
- An ineligible EHO permit submitted for 4019 7<sup>th</sup> St S/Lot 12A by the developer that does not comply with the minimum lot width, seeks an EHO permit based on a non-existent, unrecorded plat and not based on current lot lines and measurements, among other concerns.

**Having obtained the various application materials through a FOIA request, we are deeply troubled that 4015 7<sup>th</sup> St S LLC would knowingly apply for two abutting EHO permits and a lot line adjustment to reconfigure the two properties that do not comply with the minimum requirements of an EHO development and the Arlington County Zoning Ordinance.** Also demonstrating an apparent intent to deceive, the 4015 7<sup>th</sup> St S LLC's planning manager verbally informed several neighbors just prior to its July 12 EHO application that it was only building one house on each lot, and in a June 12 letter notifying some neighbors of a proposed "subdivision" to a split-lot configuration—which we hereby dispute—wrote that one house will be demolished and "two new homes will be built in its place;" see below and enclosed. **The County should reject these applications on the two abutting lots.**

**In support of our requests to reject the EHO applications and the proposed lot line reconfigurations, we offer the following comments.**

**1. Illegal Split-lot Subdivision.** Regarding the proposed split-lot “subdivision” or lot line reconfiguration, the developer does not have a “by right” ability to reconfigure the two existing lots into a new configuration as a subdivision is not occurring despite what is being claimed. As a result, the developer’s current “subdivision” request may not be approved administratively by the zoning administrator. The Arlington County Zoning Ordinance is clear that split lots can be created from one previous lot, pursuant to §3.2.4.C.1.b. Hence, a split-lot subdivision occurs when two lots are created from one lot, which is consistent with the dictionary definition of dividing into smaller parts. In the case of 4015 and 4019 7<sup>th</sup> St S, there are already two existing lots, not one. The owner of two abutting lots is attempting to significantly alter the lot lines between each, under the guise of a split-lot subdivision. Thus, there is no legal subdivision being proposed, the developer has no “by right” authority to do this, and the zoning administrator may not approve this request under §3.2.4.C. We respectfully request information on any other existing zoning ordinance or real estate process for altering lot lines between two properties, including public engagement opportunities, county decision-makers, and county staff contact information.

**2. Incorrect Plats and Lot Measurements Used for Two EHO Applications.** Regarding the eligibility and legality of each EHO permit, an application based on an illegal subdivision should also render any EHO permit relying on these non-existent lot configurations and measurements moot and illegal. Enclosed are the current plats of the two properties, as provided by 4015 7<sup>th</sup> St S LLC for its demolition permit. The county should reject the two applications and invite the developer to apply for permits using the correct recorded plats, if desired.

**3. Failure to Meet EHO Requirements.** The permits—based on the questionably reconfigured lots—do not qualify for a multiplex since neither of the two EHO permits comply with the EHO’s minimum lot width. For a R-6 EHO development, the minimum lot width must be 60 feet for a multiplex, pursuant to §10.4.4 and as defined at §3.1.8. In the developer’s proposed split-lot/lot line reconfiguration, the width of the front lot line is only 50.35 feet and the middle point—based on the developer’s drawings, which we have not yet independently verified for accuracy—is only 57.67 feet. This is less than 60 feet. The Arlington County Zoning Ordinance is clear that the Board of Zoning Appeals does not have the authority to grant a use/variance permit for EHO developments. §15.6.6 states, *“The Board of Zoning Appeals shall not grant use permits to modify requirements for expanded housing option development as set forth in §10.4.”*

**4. Need for Independent Verification of Developer’s Calculations and Information.** If the developer tries to correct its applications and utilize the process in §3.1.8.B.2, we request that the County independently verify the measurements and the developer’s proposals for building within the new reduced lot areas, including additional setbacks and structure locations necessary to be in compliance with this method of altering the minimum lot width. We also respectfully request any written comments and emails between the County and the developer regarding the two EHO permits’ use of §3.1.8.B.2.

**5. Require New Permits, Not Review Cycles if Substantial Changes.** We request that if the developer significantly alters its permits, that it is required to submit new applications. While we agree that it is reasonable to provide revisions and a few review cycles for permit applications, new permit applications are necessary if an application significantly changes. For example, for the two EHO permit applications at

4015 & 4019 7<sup>th</sup> St S, we trust that the County will require new permits should (A) the developer elect to apply for EHO permits on the existing, legally recorded lot configurations (rather than the split-lot/lot line reconfiguration, as it is currently using in its applications); or (B) the developer elect to seek permission for EHO uses other than a 6-plex (such as a 4-5 multiplex, semidetached, duplex or townhomes). Your attention to this request for a process clarification is necessary to ensure transparency and public awareness of the EHO permit and use being sought by the developer for each lot. Otherwise, without new permits and, subsequently, updates to the County's online EHO permit tracker, it imposes significant hardship on nearby neighbors to ascertain what is being proposed and evaluated by the county. The FOIA process is not an appropriate solution, as it can take up to 12 business days for a response, and the onus is on the public to request the right information at the right time rather than on the County to notify the public.

**6. Social and Environmental Impacts.** In addition to the aforementioned process and eligibility concerns, there are also significant and numerous concerns regarding the impacts of each individual permit application and collectively including:

- Disproportionate concentration of two EHO permits on abutting lots in South Arlington in Alcova Heights on 7<sup>th</sup> St S;
- Cumulative adverse impacts of two abutting EHO developments;
- Size of the two structures' footprints;
- Placement of the two structures;
- Incompatibility and dissimilarity to the structures on properties surrounding the lots in question;
- Unstudied detrimental injury to property and improvements—such as homes' foundations—on similar nearby sloped lots;
- Lots' unique shapes that are narrower in the front and deep;
- Proximity within 100 feet to Doctor's Run within the Chesapeake Bay watershed;
- Inclusion in a Resource Protection Area of a portion of one existing lot;
- Importance as part of a unique forested corridor and mature tree canopy
- Environmental impacts (e.g., habitat loss; destruction of trees, with nine large trees already removed as part of developer's house demolition permit); and
- Adverse effect on the safety of our neighborhood particularly given the narrow street—without complete sidewalks—that serves as a county emergency vehicle route and as a walking and bike route to both Alcova Heights Park and our neighborhood elementary school.

We urge the County to reject these applications. The County's consideration of any lot realignment and permit applications must carefully consider the separate and cumulative impacts of what is proposed on these abutting lots. We respectfully request that you give full consideration of elements common to county decision-making including public welfare, the health and safety of persons residing in the neighborhood, injury to property and improvements in the neighborhood, the compatibility of the proposed development with the surrounding neighborhood, and preservation of natural landform and significant trees and foliage. You may contact us using the contact information in the electronic communication transmitting this letter. Thank you for your attention to this matter.

Sincerely,

Michael Arnold and Sam Chavis  
4039 8<sup>th</sup> St S

Mikael Manoukian and Emily Crews  
4037 8<sup>th</sup> St S

Chrissy & Manny Bonilla  
4026 7<sup>th</sup> St S

Chuck Pill and Carol Alvarez  
4016 7<sup>TH</sup> St S/706 Quincy St S

Jan Canterbury  
4011 7<sup>th</sup> St S

Kelly & Anthony Reed  
4000 7<sup>th</sup> St S

Marty & Suzanne Gold  
4029 7<sup>th</sup> St S

Jeff Russell and Maureen McGee  
4033 7<sup>th</sup> St S

Jamshid & Bobbye Kooros  
4037 7<sup>th</sup> St S

Daryn Yoder and Samantha Carl-Yoder  
4005 7<sup>th</sup> St S

Kelly Mahaffey and Drew Borovics  
4034 7<sup>th</sup> St S

Enclosures: June 12 "Preliminary Subdivision Plat for 4015 & 4019 7<sup>th</sup> St S" letter from 4015 7<sup>th</sup> St LLC  
Correct Plats for 4015 and 4019 7<sup>th</sup> St S  
§10.4, "Expanded Housing Option Development," from the Arlington County Zoning Ordinance

CC: Christian Dorsey, Chair, Arlington County Board  
Libby Garvey, Vice-Chair, Arlington County Board  
Takis P. Karantonis, Member, Arlington County Board  
Matt de Ferranti, Member, Arlington County Board  
Tannia Talento, Member, Arlington County Board

4015 7<sup>th</sup> St S LLC  
433 E Monroe Ave  
Alexandria, VA 22301

June 12, 2023

[REDACTED]  
[REDACTED]  
[REDACTED]TH STREET S  
ARLINGTON VA 22204

Re: Preliminary Subdivision Plat for 4015 & 4019 7<sup>th</sup> St S

This is to notify you that a preliminary subdivision plat for 4015 & 4019 7<sup>th</sup> St S, with RPC # 23019030 & 23019029 respectively, has been submitted to the Arlington County Department of Environmental Services, Subdivision and Bonds Administration.

This plat, as described below, may be reviewed at: 4015 7<sup>th</sup> St S LLC, 433 E Monroe Ave, Alexandria, VA 22301, 571-366-3301, [rafael@ccottages.com](mailto:rafael@ccottages.com), or by contacting Arlington County Department of Environmental Services at [703-228-3629](tel:703-228-3629).

LOCATION: 4015 7<sup>th</sup> St S, Arlington, VA 22204

DATE SUBMITTED: February 28, 2023.

AREA OF SUBDIVISION: 24,815 sq. ft.

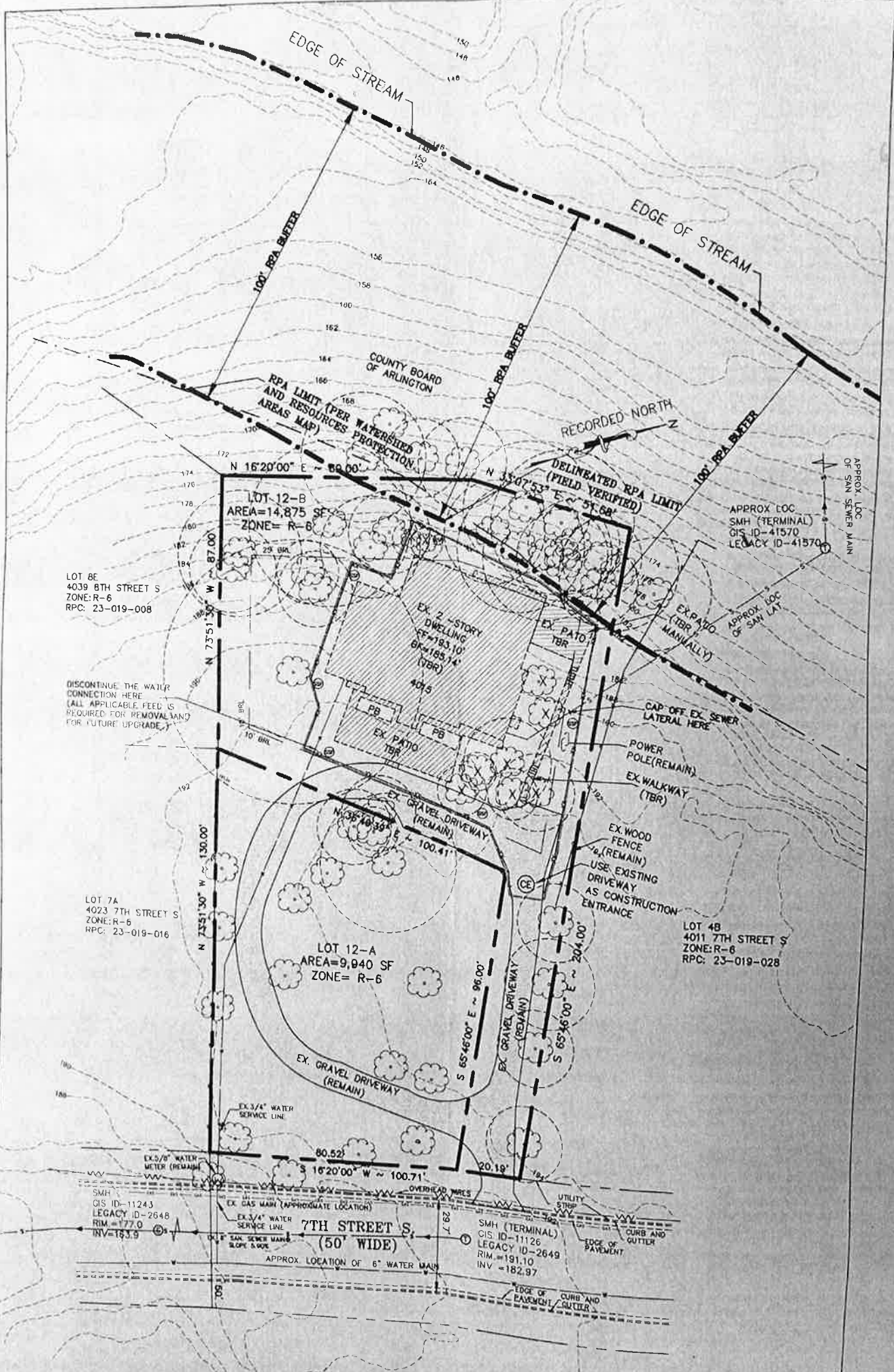
DESCRIPTION: The purpose of this subdivision is to consolidate the existing lots and create a split-lot subdivision with 50-foot wide frontages each. The existing home shall be demolished, and two new homes will be built in its place.

Sincerely,



Rafael Arcinue  
Planning Manager  
4015 7<sup>th</sup> St S LLC

Cc: Arlington County Department of Environmental Services  
2100 Clarendon Boulevard, Suite 800  
Arlington, VA 22201-5447



EDGE OF STREAM

EDGE OF STREAM

100' RPA BUFFER

100' RPA BUFFER

100' RPA BUFFER

RPA LIMIT (PER WATERSHED AND RESOURCES PROTECTION AREAS MAP)

RECORDED NORTH

DELINEATED RPA LIMIT (FIELD VERIFIED)

APPROX LOC SMH (TERMINAL) GIS ID-41570 LEGACY ID-41570

APPROX LOC OF SAN SEWER MAIN

N 16°20'00" E ~ 60.00'

N 35°07'53" E ~ 51.68'

LOT 12-B AREA=14,875 SF ZONE=R-6

LOT 6E 4039 8TH STREET S ZONE:R-6 RPC: 23-019-008

DISCONTINUE THE WATER CONNECTION HERE (ALL APPLICABLE FEED IS REQUIRED FOR REMOVAL AND FOR FUTURE UPGRADE.)

N 73°51'30" W ~ 87.00'

N 73°51'30" W ~ 87.00'

N 73°51'30" W ~ 130.00'

LOT 7A 4023 7TH STREET S ZONE:R-6 RPC: 23-019-016

EX. 2-STORY DWELLING EF=193.10' 66'x165.74' (TBR)

EX. PATIO (TBR)

EX. PATIO (TBR) MANUALLY

CAP OFF EX. SEWER LATERAL HERE

POWER POLE (REMAIN)

EX. WALKWAY (TBR)

EX. WOOD FENCE (REMAIN)

USE EXISTING DRIVEWAY AS CONSTRUCTION ENTRANCE

LOT 4B 4011 7TH STREET S ZONE:R-6 RPC: 23-019-028

EX. GRAVEL DRIVEWAY (REMAIN)

N 35°10'30" E ~ 100.41'

LOT 12-A AREA=9,040 SF ZONE=R-6

S 65°46'00" E ~ 96.00'

EX. GRAVEL DRIVEWAY (REMAIN)

EX. GRAVEL DRIVEWAY (REMAIN)

S 65°46'00" E ~ 204.00'

EX. 3/4" WATER SERVICE LINE

EX. 3/4" WATER METER (REMAIN)

EX. 3/4" WATER SERVICE LINE

EX. 1" SAN SEWER MAIN (SLOPE 3.00%)

7TH STREET S (50' WIDE)

OVERHEAD WIRES

UTILITY STRIP

EDGE OF CURB AND GUTTER

EDGE OF CURB AND PAVEMENT/GUTTER

SMH GIS ID-11243 LEGACY ID-2648 RIM=777.0 INV=183.9

SMH (TERMINAL) GIS ID-11126 LEGACY ID-2649 RIM=191.10 INV=182.97

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*This excerpt from the Arlington County Zoning Ordinance (ACZO) contains the development standards for Expanded Housing Option (EHO) projects, as of July 1, 2023. It is provided for convenience as opposed to replacing or superseding the provisions in the currently effective [Zoning Ordinance](#).*

Additional development standards for EHO projects not found in this excerpt include:

- ACZO §3.2.6 *Placement*
- ACZO §12.9.2 *Accessory Dwellings*
- ACZO §14.3.3 *[Parking] General Requirements*
- ACZO §16.2 *Nonconforming Buildings and Structures*

## **§10.4 EXPANDED HOUSING OPTION DEVELOPMENT**

### **§10.4.1.Purpose**

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The purposes of this §10.4 are to:

- A. Promote the creation of housing options suitable for meeting the current and future needs of Arlington;
- B. Provide opportunities to increase housing supply and the range of housing options, at a variety of price levels and sizes, available throughout Arlington;
- C. Support environmental goals by encouraging more compact housing options, tree conservation and planting, options for reduced on-site parking requirements, and housing that can make use of existing infrastructure; and
- D. Preserve and enhance valued neighborhood features, including walkability, opportunities for connections to nature, and low-rise pattern development.

### **§10.4.2.Applicability**

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Expanded housing option development is allowed within the R-20, R-10, R-8, R-6, and R-5 districts, subject to the issuance of a permit by the Zoning Administrator, and subject to the provisions of this subsection.

#### **A. Exception**

Properties located entirely or partially within a planning district as identified on the General Land Use Plan Map are not eligible for expanded housing option development.

### **§10.4.3.Uses**

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Expanded housing option development shall include the following uses:

- A. Duplexes
- B. Semidetached
- C. Townhouses (maximum of 3 units)
- D. Multiple-family (maximum of 6 units)

### **§10.4.4.Density and dimensional standards**

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#### **A. By-right**

By-right development in accordance with §10.4 shall comply with the following standards, except as otherwise expressly allowed or stated in this ordinance.

Type of Standard	R-20	R-10	R-8	R-6	R-5
<b>Site area, minimum (sq. ft.)</b>					
2 - 4 dwellings	20,000	10,000	8,000	6,000	5,000
5 - 6 dwellings	20,000	10,000	8,000	6,000	6,000
<b>Site area, maximum (sq. ft.)</b>	43,560				
<b>Lot width, minimum (feet)</b>					
Duplexes or multiple-family	100	80	70	60	50
Semidetached	24	24	24	24	24
Townhouses	16	16	16	16	16
<b>Height, maximum (feet)</b>	35				
<b>Main building gross floor area, maximum (sq. ft.)</b>					
Duplexes			4,800		
Semidetached			5,000		
Townhouses			7,500		
Multiple-Family:					
3 units			6,000		
4 units			7,200		
5-6 units			8,000		

1. Semidetached dwelling and townhouse lots may be subdivided into individual dwelling lots of no less than 1,300 square feet each, provided that the deed of dedication shall commit sufficient common land to satisfy the total site area requirements, per §10.4.4.A. The deed of dedication shall provide each lot the right to use the common land for:

- (a) Parking, when not located on individual dwelling lots;
- (b) The right to use land dedicated to other common uses; and
- (c) For easements for access to public streets and other common area.

**2. Nonconforming Lots**

- (a) Nonconforming lots that were recorded under one ownership at the time of the adoption of this ordinance, as set forth in §16.1.1, may be occupied by expanded housing option uses with up to 4 dwelling units.
- (b) Nonconforming lots that were recorded under one ownership at the time of the adoption of this ordinance, as set forth in §16.1.1, may be occupied by expanded housing option uses with 5 to 6 dwelling units, subject to the following minimum site area requirements: 7,000 square feet for 5 or 6 units.

**B. Special Exception**

1. The purpose and intent of special exception approvals of expanded housing option development on larger sites is to:

- (a) Promote flexibility, sustainable design that is in harmony with surrounding neighborhoods by coordinating building forms, the bulk, scale and placement of new buildings, and the relationship between buildings and structures within the development and surrounding properties;
- (b) Support the goals of the Master Transportation Plan, Community Energy Plan, Stormwater Master Plan, and/or the Affordable Housing Master Plan; and
- (c) Preserve natural land forms and significant trees and foliage.



2. Development with more than one main building including expanded housing option uses on any lot with an area of one acre or greater on July 1, 2023, require use permit approval as provided in §15.4. All expanded housing option development allowed by use permit shall comply with the following standards and all other by-right standards of §10.4, except as otherwise approved by the County Board.

Type of Standard	R-20	R-10	R-8	R-6	R-5
Site area, maximum (sq. ft.)	43,560				
Lot area, minimum (sq. ft.)					
Duplexes or multiple-family	20,000	10,000	8,000	6,000	5,000
Semidetached or townhouses	1,300	1,300	1,300	1,300	1,300
Lot width, minimum (feet)					
Duplexes or multiple-family	100	80	70	60	50
Semidetached	24	24	24	24	24
Townhouses	16	16	16	16	16
Height, maximum (feet)	35				

### C. Bulk, coverage, and placement

1. Maximum lot coverage shall be as follows:

MAXIMUM LOT COVERAGE					
Categories	R-5	R-6	R-8	R-10	R-20
Maximum lot coverage (%)	50	45	40	37	30
Maximum lot coverage with one or more porches of at least 60 square feet (exclusive of any wrap-around or side portion) facing a street (%)	53	48	43	40	33

2. Maximum main building footprint shall be as follows:

MAXIMUM MAIN BUILDING FOOTPRINT COVERAGE AND CAP					
Categories	R-5	R-6	R-8	R-10	R-20
Maximum main building footprint coverage (%)	34	30	25	25	16
Maximum main building footprint coverage with one or more porches of at least 60 square feet (exclusive of any wrap-around or side portion) facing a street (%)	37	33	28	28	19
Maximum main building footprint (sq. ft.)	2,380	2,520	2,800	3,500	4,480
Maximum main building footprint coverage with one or more porches of at least 60 square feet (exclusive of any wrap-around or side portion) facing a street (sq. ft.)	2,590	2,772	3,136	3,920	5,320

- (a) Maximum main building footprint coverage on undersized lots in a zoning district shall be the same square footage as permitted on a standard sized lot (e.g., 6,000 square feet in R-6) in the zoning district, subject to all applicable setback requirements.
- (b) There shall be no more than one main building within a development's site area.
  - (1) §10.4.C.1.b shall not apply to expanded housing option development approved by special exception as set forth in §10.4.B.
- (c) For the purpose of coverage regulations, a group of semidetached or townhouse dwellings shall be considered a single main building and maximum

coverage requirements shall be calculated using the entire site area, rather than individual lots within a subdivision.

3. For bulk, coverage and placement requirements not listed in this section, see §3.2.

**§10.4.5. Use standards**

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**A. Accessory Uses**

For sites which have established expanded housing option development in accordance with §10.4, accessory uses shall be permitted as specified in §5.1.4.

**B. Accessory dwellings**

1. Accessory dwellings, subject to the provisions of §12.9.2, shall be permitted within or attached to semidetached or townhouse dwellings permitted under §10.4.
2. Notwithstanding the provisions of §10.4.5.A, accessory dwellings shall not be permitted on lots containing duplex or multi-family dwellings which are subject to the provisions of §10.4.
  - (a) Properties with a permitted detached accessory dwelling as of on July 1, 2023, shall be permitted to establish a duplex within the main building, subject to the provisions of §10.4 and the provisions of §12.9.2.

**§10.4.6. Site development standards**

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The site development standards of Article 13 and Article 14 apply to all development, except as otherwise specified below.

**A. Parking**

1. Parking for expanded housing option development subject to the provisions of §10.4 shall be provided in accordance with the following standards:

Site Location	Minimum Parking Requirement (spaces)	Additional Requirements
Sites located entirely within a ¼ mile radius of a Metrorail station entrance	0.5 per dwelling unit	Sites fronting on a cul-de-sac shall provide a minimum of 1 space per dwelling unit
Sites located entirely within a ½ mile radius of a transit stop along the Premium Transit Network, as indicated on the Master Transportation Plan		
All other sites	1 space per dwelling unit	

2. The Zoning Administrator shall approve a reduction in the required number of parking spaces to no fewer than 0.5 spaces per dwelling unit, subject to the following:
  - (a) A parking survey determines that the occupancy of on-street parking spaces on the block on which the site area is located is less than 65%;
  - (b) The number of reduced spaces, if added to the on-street parking spaces occupied in the parking survey, shall not result in parking occupancy that exceeds 85%; and
  - (c) **Exception:** Sites fronting on a cul-de-sac are not eligible for a parking reduction under the provisions of §10.4.6.A.2.

3. **Exception:** If an expanded housing option development would result in a loss of on-street parking spaces equal to or greater than the number of required off-street parking spaces, due to the creation of a curb cut, no off-street parking spaces shall be required.
4. Additional parking standards and exceptions for expanded housing option development are set forth in §14.3.3.

## **B. Location of parking spaces**

### **1. Sites zoned R-5, R-6 or R-8**

Up to two surface parking spaces shall be allowed between a building's street-facing façade and the street. For corner lots, up to four surface parking spaces shall be allowed between a building's street-facing façade and the streets on which the site has frontage, with no more than two spaces on a single street frontage.

### **2. Sites zoned R-10 or R-20**

Up to three surface parking spaces shall be allowed between a building's street-facing façade and the street. For corner lots, up to four surface parking spaces shall be allowed between a building's street-facing façade and the street on which the site has frontage, with no more than three spaces on a single street frontage.

### **3. Alley access**

If a lot abuts an alley improved to county standards, vehicle access to parking spaces shall be provided from the alley, and parking spaces shall not be allowed between a building's street-facing façade and the street.

### **4. Enclosure**

Any parking spaces that are located within the main building footprint and face a street or side yard shall be enclosed within a garage.

### **5. Curb cuts**

Curb cuts shall not exceed 17 feet in width measured at the edge of the street easement or right-of-way.

## **C. Garage wall width**

1. If an attached garage entrance faces a street, the width of the garage wall facing the street, measured as the horizontal distance between the interior side walls of the garage, shall be no more than 50% of the building façade along that street. If there are multiple attached garages within a building, this standard shall apply to the sum of all garage walls with entrances facing a street. For the purposes of this calculation, a group of semidetached or townhouse dwellings shall be considered a single building.

## **D. Building entrances and orientation**

### **1. Duplex and multiple-family dwellings**

- (a) At least one exterior entrance shall face a street or open onto a front porch that faces a street.
- (b) On interior lots, there shall be no more than one exterior entrance facing each side yard.

(c) On corner lots, there shall be no more than one exterior entrance facing each adjacent property line.

(d) No more than one exterior entrance to a building lobby or common area shall face a street.

**2. Semidetached and townhouse dwellings**

Each unit shall have an exterior entrance facing a street or that opens onto a front porch that faces a street.

**E. Upper story stairs**

1. All stairs used to access dwellings located entirely above the ground story shall be enclosed within the building.

2. **Exception:** The provisions of §10.4.6.E.1 shall not apply to stairs facing a rear yard.

**F. Landscaping**

1. There shall be a minimum of four shade trees for sites with 2-4 dwelling units, and a minimum of eight shade trees for sites 5-6 dwelling units prior to issuance of a certificate of occupancy. This requirement may be satisfied with existing trees and/or by planting trees on-site.

(a) Trees planted to satisfy the requirements of §10.4.6.E.1 shall be species listed in the Arlington County Recommended Shade Tree List.

(b) Trees planted to satisfy the requirements of §10.4.6.E.1 shall conform to the standards set forth in §14.2.2.D.

**G. Screening**

1. Heating, air conditioning units and other similar equipment shall be screened from view of street rights-of-way by fences, walls, or landscaping. Equipment mounted on a roof shall be sited in a location that is not visible from street rights-of-way. This provision shall not apply to equipment related to the generation of solar energy.

2. Exterior trash collection and storage areas shall be screened from view of street rights-of-way and adjacent properties by fences, walls, landscaping, or other structures.

**§10.4.7. Annual Limit on Permits**

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**A. Sites zoned R-5**

No more than 7 expanded housing option developments shall be permitted in any one calendar year for sites zoned R-5.

**B. Sites zoned R-6**

No more than 30 expanded housing option developments shall be permitted in any one calendar year for sites zoned R-6

**C. Sites zoned R-8, R-10, or R-20**

No more than 21 expanded housing option developments shall be permitted in any one calendar year for sites zoned R-8, R-10, or R-20, combined.

**D. Expiration**

The provisions of §10.4.7 that set forth annual limits on permits shall expire on June 30, 2028.