

**CLIMATE CHANGE, ENERGY AND ENVIRONMENT COMMISSION**

**c/o Department of Environmental Services  
2100 Clarendon Blvd., Suite 705  
Arlington, VA 22201**

February 27, 2023

Honorable Christian Dorsey, Chair  
Arlington County Board  
2100 Clarendon Blvd., Suite 300  
Arlington, VA 22201

Dear Chair Dorsey,

The Climate Change, Energy and Environment Commission endorses the County's proposal to create a stormwater utility as it shifts the burden of maintaining and improving the stormwater system to property owners based on the amount of impervious surface area, more directly connecting payments to the degree of contribution to stormwater runoff. The Commission appreciates all of the effort and resources that went into making sure that there were ample opportunities to comment and learn about the main aspects of the new utility. Adoption of a stormwater utility will align Arlington with similar best practices in Alexandria, Falls Church, and other local jurisdictions in Virginia.

While a stormwater utility is seen primarily as a mechanism to finance its stormwater infrastructure, C2E2 believes that the proposal misses several opportunities to incorporate incentives to limit impervious surface and protect tree canopy coverage.

- The fee assessment structure could be further delineated from three to five tiers or more to discourage property owners from expanding impervious surfaces on their property.
- A credit directly related to existing tree canopy coverage, prorated for the amount of canopy coverage above 20 percent (or other amount) would capture the value trees provide for stormwater retention and encourage property owners to protect and preserve their trees. The credit could be automatically granted by leveraging available imagery and methodologies for tree canopy coverage, which the County will be using to monitor the tree canopy.
- Programs similar to the discontinued StormwaterWise program prioritizing lower-income residents, affordable housing complexes, and nonprofits to reduce impervious surfaces and install stormwater management measures would help ratepayers to reduce their payments while building more resiliency into the stormwater infrastructure.

With such improvements a stormwater utility program would ensure funding for maintaining and improving its stormwater infrastructure while encouraging property owners to take measures that capture more stormwater on their property, reducing pressure on the infrastructure. With Northern Virginia set to suffer from more intense rainstorms due to climate change, having the best stormwater utility program possible is extremely important for our community's welfare.

Sincerely,

A handwritten signature in black ink that reads "Joan F. McIntyre". The signature is written in a cursive style with a large, stylized initial "J".

Joan McIntyre

Chair, Climate Change, Energy and Environment Commission