



November 22, 2021

Honorable Matt de Ferranti, Chair
Arlington County Board
Ellen M. Bozman Government Center
2100 Clarendon Blvd, Suite 300
Arlington, VA 22201

Re: Missing Middle Housing Survey Phase 2 – Concerns about Adequacy of Addressing Tree Canopy Conservation

Dear Chair de Ferranti:

At its regular meeting on October 28, 2021, the Forestry and Natural Resources Commission (FRNC) received a presentation on the Missing Middle Housing Study (MMHS) Phase 1 report from County Staff as the MMHS moves on to its Phase 2 study. This was an update to the MMHS presentation to the Urban Forestry Commission (UFC) at its meeting on February 27, 2020.

Overview:

FRNC commissioners appreciate the fact that the Phase 1 report highlighted the desire of Arlingtonians to conserve Arlington's tree canopy and other biophilic and sustainability features. These interests were strongly expressed in community feedback during the Phase 1 outreach. We share the community's interest in having a better housing supply in Arlington. However, as outlined below, we are concerned the Phase 2 study seemingly will not incorporate conservation of Arlington's tree canopy as a fundamental county priority in its scope of analysis. A healthy tree canopy is important to the health and well-being of Arlingtonians, regardless of housing type, and conservation is arguably of more concern as density increases. We recommend the Phase 2 study included tree canopy and biophilic priorities as key elements, and consider all avenues for balanced solutions, such as potential zoning ordinance changes that could promote the goals of both conserving tree canopy and providing missing middle housing types.

After the 2020 MMHS presentation, the UFC wrote an advisory letter to the County Board with recommendations about the process being utilized by the MMHS to ensure it accounted for County tree canopy conservation concerns and biophilic aspirations. In particular, the UFC recommended that the relevant impact analysis should be included in each study phase, noting: The Phase 1 report findings will define and limit the scope of impact assessments of subsequent policy options. The UFC is concerned that all natural resource,

urban forestry, environmental protection and biophilic priorities (among others) have representation in the study reports in this phase. We are concerned that because the Phase 2 focus is on specific housing types for recommendation, working documents for that phase will default to practical consideration of other factors and impacts as obstacles rather than acknowledging their legitimacy as county priorities. If this is the analytic posture on non-housing variables, it is more likely to elicit no further study interest rather than be seen as reasons that some proposals in some situational contexts just are not acceptable.

The UFC recommended for the MMHS process that:

We believe that advisory bodies and the public would more fully understand the ultimate decisions on this critical issue if they first have the opportunity to digest the documents that begin and end each phase. So, we support a nominal “stopping point” that distinguishes between the “what do we now know” findings from each phase and the “what should we do about it” beginning of the subsequent phase.

The FRNC underscores that the MMHS Phase 1 study recorded the UFC’s and many citizens feedback about conserving Arlington’s tree canopy. It notes:

In Arlington County, tree canopy has shown a downward trend from 43% in 2008 to 41% in 2016. During this same time period, the five one-family dwelling Residential (R) zoning districts experienced a significant loss of tree canopy, and all four Multiple-family (RA) zoning districts experienced a loss of tree canopy. The County has sought to mitigate tree loss in residential land with tree planting and conservation. However, the loss on residential land is a critical concern as well as its associated loss of the ecosystem benefits of trees in these zoning districts and loss of pervious surface, which reduce the opportunity to regain these benefits and degrade our natural environment. Large-scale loss of tree canopy can also exacerbate stormwater impacts at both the lot—and system—scales. (p. 14)

The Phase 1 report says, “In Phase 2, the study will consider how to proactively address neighborhood change that is already occurring, including loss of trees, other natural resources, green open space, and pervious surfaces.” (p. 14)

Despite these words about prioritizing tree canopy conservation, the FRNC is concerned about the direction of the Phase 2 study. The recommendations for the Phase 2 scope of analysis under the section “Housing Type Design Analysis and Recommendations,” include “tree conservation” and “biophilia” as criteria but in the context of analyzing previously selected housing types. (p. 27) Environment and sustainability, including “tree canopy conservation” and “biophilia” are—confusingly—later described as outside the scope of the Phase 2 study, but something the County “may need to explore to support preservation/production of Missing Middle housing types.” (p. 31)

Thus, we fear what the UFC cautioned against in 2020 is materializing. The Phase 2 study will focus on specific housing types while other county priorities such as tree canopy conservation are going to be acknowledged by the Phase 2 study but left outside its scope despite the large impact on tree canopy that

could result from the MMHS recommendations. Moreover, no stopping point after the Phase 1 study is being considered so its results can be adequately digested by Arlingtonians. A key question is what is the additional or maximum infill capacity that exists in the designated Metro corridors that may be used to alleviate any supposed shortfall in housing types as Arlingtonians for a Sustainable Future (ASF) raised in their October 28, 2021 letter to the FRNC on the MMHS study.

The Forestry and Natural Resources Commission understands the challenges our community confronts in supplying current and future residents with a better housing supply. We share the concern identified in the Phase 1 study that:

Arlington's housing stock is aging, and there is strong regional housing demand and limitations in Arlington's Zoning Ordinance on what can be built. As a result, small single-family homes are being torn down and replaced by much larger single-family homes at the rate of 125 homes a year. If the County does nothing to allow other housing types, Arlington will continue to experience impacts on school enrollment, more households with more vehicles, loss of trees and other natural resources, and loss of pervious surfaces. (p. 19)

The Phase 1 study report also noted, "New housing types could also reduce housing costs by encouraging more compact living options, compared to the average size of 4,750 square feet for a new single-family detached house in Arlington." (p. 14), adding:

"In looking at Missing Middle housing types, the study will consider scenarios for varying building footprints and lot coverage requirements. It is possible that some Missing Middle housing types could be built within the same footprint currently permitted for single-family detached houses with existing permitted or slightly taller building heights. Under such a scenario, new housing types may help realize an increase in housing supply to help support the County's housing needs without leading to more impervious surfaces or tree loss than currently experienced through the teardown and rebuild phenomenon. Other housing types that require larger footprints will be evaluated for opportunities to achieve tree canopy conservation, as well as consideration of stormwater impacts. Phase 2 will also consider how and whether new or revised policies and regulations could result in outcomes that achieve both study goals for Missing Middle housing and other County goals for tree canopy." (p. 15)

The Urban Forestry Commission's September 1, 2020, letter to the County Board raised the issue of zoning ordinances having an impact on conserving the tree canopy and the importance of the MMHS incorporating data regarding tree canopy conservation into its study.

The FRNC therefore recommends the Phase 2 study should explicitly examine if a nexus between tree canopy conservation and providing missing middle housing types through zoning ordinance changes exists. If so, such zoning changes could potentially reduce the new construction footprint in lots, which could both conserve existing tree canopy and constrain the market price for a new housing unit. (However, such prices may remain relatively expensive

raising questions about their affordability to current residents or Arlington as documented in AFS's letter to the FRNC.)

We thank you for this opportunity to share our views, and we look forward to engagement on this important issue as it evolves.

Sincerely,



Phil Klingelhofer, Chair

Forestry and Natural Resources Commission

Cc: Members, Arlington County Board
Mark Schwartz, Arlington County Manager
Claude Williamson, Director, Department of Community Planning,
Housing and Development