



February 23, 2023

Honorable Christian Dorsey, Chair
Arlington County Board
Ellen M. Bozman Government Center
2100 Clarendon Blvd, Suite 300
Arlington, VA 22201

Re: RTA on Missing Middle Housing Study and Draft General Land Use Plan
and Zoning Ordinance Amendments

Dear Chair Dorsey:

The Forestry and Natural Resources Commission (FNRC) wishes to provide additional views on the Request to Advertise the Missing Middle Housing (MMH) Study Draft General Land Use Plan and Zoning Ordinance Amendments. As we noted previously, the FNRC rejects the notion that Arlington must choose between expanded housing options and retaining and expanding our tree canopy. The FNRC believes it is possible to do both if we make the correct policy decisions to ensure adequate spaces are available for trees.

Allowable Lot Coverage and Making Room for Trees

Tear downs reducing our tree canopy are an urgent problem impacting storm water run-off, carbon storage, heat island effect, air and water quality and should be treated as such. Lot coverage has been discussed repeatedly throughout consideration of MMH. The current development practice scrapes sites clear of structures, mature trees and other vegetation, and builds out to the maximum lot coverage allowable, leaving little or no space left for canopy trees. Making room for trees is an issue for both single family homes and any potential changes related to MMH.

The FNRC strongly recommends the upcoming CPHD workplan include a study on reducing allowable lot coverage to provide room for planting canopy trees. This is consistent with the recommendation in the recently updated Chesapeake Bay Ordinance, as well as the draft Forestry and Natural Resources Plan. Lot coverage was last addressed in 2005 and focused primarily on very large homes being built that were out of character of the surrounding neighborhoods. There was essentially no consideration during the 2005 review of impacts on tree canopy or storm water run-off.

The lot coverage study should also include all of the impervious surfaces that are not currently counted in this calculation. The impact of additional impervious surfaces such as expansive walkways and patios precludes having space for trees and other conservation landscaping. They should be captured if we are to manage the cascading negative impacts resulting from excessive impervious surfaces. This is consistent with

the proposed changes under the Storm Water Utility Fee. The FNRC urges better coordination of these inter-related issues across County departments and objectives.

MMH Tree Planting Recommendations

The FNRC appreciates efforts to address the loss of tree canopy, and how that might be exacerbated under the proposed MMH zoning changes. The County Board approved at its January 25, 2023 meeting to include an option of up to eight shade trees.

Section 6A (F)1 of the RTA as published, states:

There shall be a minimum of up to four shade trees for sites with 2-4 dwelling units, and a minimum of up to 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.

As noted previously, option 6 (A) of the one tree per dwelling unit included in the October 31, 2022 staff draft (and subsequent later drafts) would do very little to exceed the baseline tree canopy requirements of 10% under the Chesapeake Bay Ordinance that would result from the proposed MMH changes in zoning. The language in the adopted RTA creates some uncertainty about what exactly will be required per dwelling unit and may result in lower tree requirements than suggested in the staff draft. The FNRC recommends that the words “up to” be stricken from this section. The resulting policy would be a minimum of four shade trees for sites with 2-4 dwelling units, and a minimum of eight shade trees for sites with 5-6 dwelling units.

Overall, however, this change would not in practice create a much stronger tree planting requirement than the original staff draft. Though a small improvement for two, three, five and six units, it would be no different for the four units. Staff’s updated January 21, 2023 presentation (pg. 40) to the board published online after the January 21 meeting shows a way forward. **The FNRC supports scaling tree planting numbers to the size of the lot.** And, the table below can be used as the requirement for tree plantings per lot size. As noted above, the Board voted on up to eight trees at the meeting and the FNRC would view using this table as a guideline as permissible.

Chesapeake Bay Preservation Ordinance 20% Tree Canopy Requirement for Single-Detached		
Lot Size	Minimum Trees Required to for CBPO 20% Tree Canopy	<ul style="list-style-type: none"> ▪ CBPO canopy is measured at 20-years maturity ▪ Tables assumes native, large canopy trees <ul style="list-style-type: none"> • More trees required to meet 20% if smaller species chosen
5,000 sq ft	3	
6,000 sq ft	3	
7,000 sq ft	4	
8,000 sq ft	4	
9,000 sq ft	5	
10,000 sq ft	5	
12,000 sq ft	6	
15,000 sq ft	8	

The FNRC has advocated for much higher tree planting requirements than what is currently proposed in the adopted RTA. The commission notes that unless and until the County makes a firm commitment to make room for and preserve and plant more trees, we will continue to experience “death by a thousand cuts”, both figuratively and literally, resulting in the continued decline in tree canopy.

Thank you for this opportunity to share our views.

Sincerely,



Phil Klingelhofer, Chair
Forestry and Natural Resources Commission

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