



June 23, 2022

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

Re: The Forestry and Natural Resources Commission does not support the Missing Middle Housing Plan because it threatens Arlington's tree canopy

Dear Chair Cristol:

The Forestry and Natural Resources Commission (FNRC) has serious concerns about the proposed Missing Middle Housing Study (MMHS) [Phase 2 Analysis and Draft Framework](#), which was presented to the FNRC at our May 2022 meeting.

Our gravest concern is the serious negative impact that the construction of multi-unit dwellings would have on the County's already declining tree canopy. We note that both the Phase 1 and Phase 2 proposals do acknowledge the need to "conserve tree canopy and create and maintain connections to nature." But as the presentation also shows, the Missing Middle Housing plan would reduce tree canopy lot coverage to only 10% to 15% in 20 years on MMHS redevelopment lots, much less than the already inadequate 20% coverage in 20 years for new single-family homes.

That's a prescription for accelerating the current alarming loss of trees on private property in the County, which is reducing quality of life and increasing urban heat island effects, energy bills, stormwater flooding, and geographical and social inequities.

The Commission also worries that developers and home buyers will ask for exceptions to the proposed rule allowing only one-half car per unit, given the desirability of off-street parking, making it even harder to achieve even a low level of tree canopy coverage on lots with multi-unit dwellings.

During their presentation to the FNRC, County staff claimed that tree canopy coverages of 20% to 50% could be achieved on multi-unit Missing Middle properties, especially if setback requirements were altered to move buildings closer to the street or to reduce the overall size of the building envelope. However, the FNRC found these claims to be both inflated and disingenuous, since such setback changes, or other policies and incentives that might help achieve those goals, are not included in the plan.

Given the FNRC's crucial role in protecting and supporting the County's invaluable trees and other natural assets, the Commission cannot support the Missing Middle Housing Plan unless it also includes concrete and believable policies for achieving higher tree canopy coverage on redeveloped properties.

FNRC Commissioners also have concerns that go beyond our forestry and natural resources focus. We worry that staff did not examine opportunities to concentrate Missing Middle Housing redevelopment along transit corridors, which would reduce potential traffic and parking issues, or to redevelop older single-story commercial property on transit routes. Smaller, more affordable units in these corridors would offer a win-win: providing housing solutions while limiting the damage to the tree canopy and the natural environment.

The FNRC fully understands the desire for more housing choices and understands staff put considerable effort into the MMHS. But the Commission doesn't support the rush to change zoning rules County-wide in ways that can't be easily undone when all alternatives have not yet apparently been considered, and when concrete policies to protect our vital natural environment and urban forest have not yet been developed.

We therefore join many other groups and County residents (for example, 70% of respondents in a recent ARLnow [poll](#)) in asking that the comment deadline for the MMHS should be extended. We also ask the County Board to direct staff to develop specific policy proposals for achieving the higher tree canopy coverage percentages that staff suggests may be possible.

Finally, we do agree with a fundamental assumption embedded in the study. People who wish to buy new homes in Arlington should have choices other than the huge and expensive houses that now make up the bulk of new single-family development. That's why the FNRC strongly supports zoning changes to reduce building footprints for new construction (whether multi-unit or single-family) in residential areas, an issue the FNRC raised more than two years ago in a March 9, 2020, advisory letter. As the FNRC wrote later in a November 22, 2021, advisory letter, such zoning changes "could both conserve existing tree canopy and constrain the market price for a new housing unit."

Thank you for the opportunity to share our views.

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