



September 21, 2022

The Honorable Katie Cristol, Chair  
Arlington County Board  
2100 Clarendon Blvd.  
Arlington, VA 22201

RE: Missing Middle Housing Proposal (slightly corrected version of 9/21/22 original)

EcoAction Arlington commends the County for undertaking a long-needed reexamination of residential zoning in Arlington and proposing changes that would reverse decades of discriminatory housing policies in our community. Our hope for changes to zoning and the General Land Use Plan resulting from this process, as we assume is also the County's, is that once finalized and adopted they will render Arlington a more environmentally sustainable and socially just community. We therefore offer our views on what makes for such a community, how we see the current draft of this policy furthering this vision, and ways in which we think it could be improved to more fully achieve this goal.

**An Environmentally Sustainable Community:**

An environmentally sustainable community, in EcoAction Arlington's view, is one that takes all possible measures to address and adapt to the worsening climate crisis and to safeguard and grow its natural resources both for the well-being of its residents and for environmental protection purposes. In a largely urban / suburban environment like Arlington's that is facing population pressures, becoming and remaining a sustainable community requires designing for higher density growth to increase energy efficiency and walkability, reduce the need for long commutes in fossil fuel-powered vehicles, and prevent sprawl. An environmentally sustainable community also preserves and enhances its tree canopy and green spaces, and employs natural infrastructure solutions to: absorb stormwater run-off, serve as a carbon 'sink,' minimize heat island effects, and confer the full range of biophilic benefits to its residents.

How do we see the draft MMH policy advancing this aspect of the vision? We see this policy as making important strides toward creating a more environmentally sustainable community but lacking needed clarification on exactly how key elements of the policy will be implemented to achieve the stated results.

*Addressing and adapting to the worsening climate crisis:*

The draft MMH policy is presented in the context of the County having already adopted a goal of becoming a carbon neutral community by 2050. The draft policy calls for greater housing density as the population grows and this is an important step toward creating a more carbon neutral community, at least on a per capita basis, given that smaller and more tightly clustered dwellings are more energy efficient and can increase walkability if located near stores, jobs, schools and parks. Units that offer increased walkability and pedestrian access to transportation corridors can reduce the number of rides by residents in gas-powered vehicles.

The draft MMH policy would be made stronger in terms of climate mitigation, however, if it were to give the County tools to incentivize or require ambitious carbon emissions reductions in new MMH. Specifically, in addition to any incentives it can offer toward these ends, the County should explore how it can strengthen or amend the Zoning Ordinance or General Land Use Plan to require new MMHs to be:

- significantly more energy efficient
- fueled by renewable energy sources
- electric-ready if not offering fully-electric systems at construction
- equipped with EV-charging or at least EV-ready (conduits and wiring are laid), and
- built close to the Smart Growth corridor, in a first phase of the roll-out, to enhance walkability and use of public transportation in substitution for individual cars

*Safeguarding and growing our natural resources:*

The draft MMH policy is not clear about the impacts it will have on the County's tree canopy and green spaces. It states that the new multi-family **during the development stage**, per code of Virginia, **are held** to a substantially lower tree canopy requirement – 10% or 15% compared to 20% minimum for single-family homes (p.23), **and this tree coverage is unlikely to change much over time**. But at the same time it asserts that “Tree canopy of 20% to 50% is achievable” without offering any explanation of how this conclusion was reached. The draft Forestry and Natural Resources Plan says (p. 27) this could happen “through conservation of existing trees and planting beyond the regulatory requirements,” but neither the FNRP nor the MMH study offers an explanation of how this would be accomplished. The County needs to describe the measures by which it will incentivize or require a higher tree canopy on these lots than is minimally required by the State – otherwise, it seems highly unlikely to happen.

It is important to emphasize that the MMH policy is being considered at a time when residential development is already occurring in Arlington at an accelerated pace and within a regulatory environment, it can be argued, in which allowable building footprint sizes are too large (think 'McMansions') to prevent negative impacts on the tree canopy and root systems and in terms of stormwater run-off. Therefore, not only is it worrisome that the tree canopy coverage required for new MMHs would be lower than for single-family homes, but that they would be built on the same footprint as, and be even more likely than single-family homes to max-out the allowable footprint which is already proving damaging to Arlington's environment.

An additional lack of clarity is whether the final MMH policy will permit reduced on-site parking requirements to support transportation, stormwater, tree canopy, and other environmental goals as is suggested on p. 12 of the draft MMH study. Larger multi-family homes (6- and 8-plexes) are likely to be located on large lots further from public transportation, thus also likely requiring cars. What is absent and unclear from the MMH study is how the additional cars and parking spaces almost certainly needed for residents of these larger MMH buildings will be accommodated on the same footprint as for a single-family home.

In summary, the MMH policy could be strengthened with regard to natural resource preservation if it gives the County the ability to incentivize or require preservation of the tree canopy and clearly lays out how these policy measures will work. Specifically, the County should explore how it can strengthen or amend the Zoning Ordinance or General Land Use Plan to require that new MMHs:

- enhance tree protection
- increase planting areas and parkland acquisition

- reduce impervious areas (e.g., have reduced or no minimum parking requirements), and
- improve replanting practices

## **An Environmentally and Socially Just Community**

A more environmentally just community, in Eco-Action Arlington's view, is one that offers all residents, regardless of race or income level, equitable tree canopy coverage in their neighborhoods and thus freedom from the heat island effect, equitable access to parks and other green spaces, and equal enjoyment of clean air and surrounding environments. A more socially just community, among other things, is one that offers current and prospective residents – particularly our teachers, firefighters and other critical front line workers as well as members of traditionally marginalized groups – access to reasonably-priced, if not exactly “affordable,” housing.

How do we see the MMH policy advancing this aspect of the vision? We applaud the County for proposing to eliminate single-family-only designation in all Arlington residential areas by means of this policy. This aligns well with EcoAction Arlington's own recently-enhanced commitment to Diversity, Equity and Inclusion (DEI), which was driven by our acknowledgement that Black, Indigenous and Persons of Color are far more likely to be victims of environmental degradation than others in our community. As noted above, however, it is not clear from the current draft that the MMH policy will advance environmental justice in the form of preserving tree canopy on, or access to green spaces for, new MMH construction in any location, including in lower-income, traditionally African American neighborhoods of Arlington. It is also not clear what it could mean in terms of displacement of residents of single-family homes in those neighborhoods who may get priced out of their long-time communities. We will address these issues one at a time:

### *Preserving tree canopy and access to green spaces for residents of new MMH*

To ensure that tree canopy is protected for residents of new MMH, particularly ones built in areas traditionally most impacted by environmental degradation, the policy should be accompanied at the time of entry into effect by amendments to ordinances and plans or programs that will help to preserve tree canopy for this type of new construction. We provide suggestions above on amending the current zoning and land use policies, and EcoAction Arlington is pleased to acknowledge that we are discussing with the County possible support for our recently launched [Tree Canopy Equity Program](#). Additional policies and programs should be considered, including planning for new parks and green spaces to accompany any new MMH buildings for communal access and enjoyment.

### *Unintended impacts of development and reducing the risk of resident displacement*

While potentially going beyond the purview of an environmental organization like EcoAction Arlington – even one with a DEI lens – we are concerned that an unintended consequence of the MMH policy could be that it will put price pressure on long-time residents of older single-family homes in traditionally African American neighborhoods and force their relocation outside their communities. The draft MMH policy states (p. 21) that “Neighborhoods that are predominantly duplexes and townhouses today (e.g., Arlington Mill, Green Valley, Penrose) and other mixed-use areas would not be impacted.” But this seems not to be true in the case of single-family homes in three similar neighborhoods with a mixture of single- and multi-family homes, but lower than the average 40 percent tree canopy coverage [hereafter “tcc”], as of 2016: John M. Langston Civic Association/Halls Hill High View Park (20% tcc), Arlington View (21% tcc) and Aurora Highlands (30% tcc). Single-family homes in these neighborhoods could

be the first lots targeted for new MMH construction, putting pressure on long-time homeowners and on the already-below-average tree canopy coverage in those areas.

It is also worth noting the correlation between significant multi-family zoned housing and lower-than-average tree canopy coverage in the following civic associations: Radnor/Ft. Meyer (17% tcc), Long Branch Creek (26% tcc), Green Valley (27% tcc), Buckingham (27% tcc), Penrose (29% tcc), Columbia Heights (34% tcc), and GlebeWood (36% tcc). The draft policy also notes that renters, who comprise the bulk of Arlington's residents, are most at risk of displacement from redevelopment unless renting on large properties zoned for lot sizes between 5,000 and 20,000 square feet, which does not represent the majority of renters.

A final equity concern is that the MMH policy does not appear uniformly to be offering a path to home ownership for middle income Arlingtonians; rather it seems that the larger 6- and 8-plex units are anticipated to be investor-owned rental properties that provide more of an economic leg-up to the investors than to their tenants. So, it seems there are several equity-related questions yet to be resolved with regard to this policy.

Again, EcoAction Arlington commends the County for undertaking a long-needed reexamination of residential zoning in Arlington and proposing changes that would reverse decades of discriminatory housing policies in our community. EcoAction Arlington asks that the County Board Members continue to take a hard look at how the MMH policy might be amended to promote environmentally sustainable and socially just development, as well as to counteract any potential negative impacts, and provide clear explanations for how the policy will be implemented.

As a final note, we would like to express our appreciation for the County's collaboration with the Arlington Chapter of the National Association for the Advancement of Colored People (NAACP), as well as ourselves, on the challenging issues of environmental and social justice. The NAACP is a close collaborator of EcoAction Arlington's on these critical topics.

Please let us know if you would like to discuss the particulars of any of our above recommendations.

Sincerely,

/s/

Elenor Hodges, Executive Director  
Jenn Yates, Chair of the Board of Directors

cc: Arlington County Board Members