



Honorable Libby Garvey, Chair
Arlington County Board
2100 Clarendon Blvd, Suite 300
Arlington, VA 22201

March 9, 2020

RE: Missing Middle Housing Study

Dear Chair Garvey:

At its regular meeting on February 27, 2020, the Urban Forestry Commission received a presentation on the county's Missing Middle Housing Study. We thank staff for this overview of the study purpose and design. We are writing an advisory letter at this time specifically as part of the engagement on the draft study scope and process. We will appreciate future briefings on the study as it progresses, findings when they are available, and policy proposals as they are developed.

The Urban Forestry Commission understands that Arlington's future housing policies should be guided by many interrelated interests—most included as goals in comprehensive plan elements and resolutions already adopted—ranging from a diversity of housing, energy efficiency and transportation access to daily biophilic experience and sustainable infrastructure and development. UFC supports the stated examination and evaluation of all types of data that are relevant to this complex issue, as outlined in the draft study scope and timeline. The following recommendations pertain to a few key concerns about data scope and data use throughout the course of this study.

- 1) Role and Characterization of Data Types. The draft scope mentions some key impact considerations such as tree canopy, energy, parking, transit access and schools. In our view, however, the manner in which these are incorporated diminishes their relevance, perhaps enabling a stovepipe approach to this important policy challenge. We suggest that the value of these considerations be recognized by modifying the final scope document to acknowledge their important place in existing plans.
- 2) Integrate Data about Other Comprehensive Plan Elements. To achieve a broad and balanced information base, UFC recommends that data categories in the draft scope document be supplemented with those already defined and included in other comprehensive plan elements, as well as in the resolutions and supporting information on equity and biophilic planning. The draft scope document does speak to some of these topics, but does not address what data

may be employed and when in the study that would happen. We believe that empirical data collected in association with master, management and implementation plans need to be a part of the study database to produce strategically valid findings.

- 3) Assessing Impact. Residential areas are our largest land use type, in terms of acreage, and our greatest opportunity to create alternative housing types for future need. They are also the greatest opportunity to alter current patterns of energy efficiency, environmental impact (to include, among other related topics, storm water management and tree canopy), parking and transportation access, and other public facility and infrastructure features. Those effects may enhance alignment with other county goals, or may be counter to those goals. And, those impacts—both positive and negative and of varied degrees of intensity—may be highly situational. The analysis of data and the interpretation of those findings is a complex matrix of context-sensitive combinations of characteristics such as lot size, location, proximity to critical services and infrastructure, topography, neighborhood character, natural resource value and built structure size and type. Urban Forestry Commissioners recommend that to successfully identify policy modifications that do no harm and support and increase desired housing stock, all of these factors need to be included and addressed in the analysis.
- 4) Potential for Nuanced and Effective Policy Choices. It is unlikely that there will be a single, one-size-fits-all solution that is a viable and supportable policy. Any research findings should support a nuanced assessment of options, based on the unique assortment of characteristics of existing R-zoned areas. This is critical to the development of housing options that are sensitive to context and compatible with other county plans and goals.
- 5) Potential Added Value to Zoning Policy. With a broad-spectrum data collection effort, the Missing Middle Housing Study also has the potential to provide information about current housing development impacts. The UFC has grave concerns about tear-down development in single-family residential zones because of the severe impact on tree canopy in many neighborhoods, storm water management, heat island effects, among others. Ultimately, these concerns are not primarily about the fact of redevelopment, but the manner of redevelopment with regard the interplay of lot size, lot permeability, existing tree and ecological conditions, building footprint and location, and construction damage. It may be possible that the study findings pertaining to impacts on lot, neighborhood and county-wide concerns have sufficiently broad applicability that they can also support parallel zoning modifications for new single-family construction.
- 6) Inclusion of Relevant Impact Analysis in Each Study Phase. All of this underpins an important concern regarding the study definition and process. At this point it is unclear to UFC what the exact products are after Phase 1 data collection is completed, and in particular, what empirical data, in addition to engagement results, are conveyed to Phase 2. The Phase 1 report findings will define and limit the scope of impact assessments of subsequent policy options.

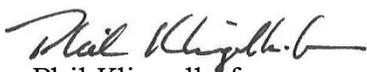
The UFC is concerned that all natural resource, urban forestry, environmental protection and biophilic priorities (among others) have representation in the study reports in this phase. We are concerned that because the Phase 2 focus is on specific housing types for recommendation, working documents for 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. This is especially the case with regard the report that conveys to Phase 3, which involves the actual formulation of specific policy proposals.

- 7) Process Steps and Phase Products. 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. UFC also encourages well-publicized availability of the body of knowledge accumulated through each phase. This will promote process transparency, content integrity, and public acceptance. All parties will be more likely understand proposed policy options, to engage more effectively in discussion about those options, and to accept the basis of any decisions that are adopted by the Board to address our housing imbalance with these intermittent and separate steps.

The Urban Forestry Commission appreciates the challenges faced by the county with regard to an equitable housing supply, and acknowledges the efforts of county staff in the preparation of the study materials. We are supportive of this exploratory initiative to find solutions, and envision that the study process be a series of precision evaluations and conclusions, and carefully derived policy options.

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, Urban Forestry Commission

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