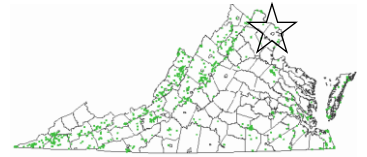




POTOMAC RIVER GROUP VIRGINIA CHAPTER

THE CITIES OF ALEXANDRIA & FALLS CHURCH, AND ARLINGTON COUNTY



June 8, 2022

Honorable Katie Cristol, Chair
Arlington County Board
2100 Clarendon Boulevard
Arlington, VA 22201

Dear Chair Cristol:

The Sierra Club supports the Missing Middle Housing Study Phase 2 Draft Framework and urges its adoption by the County Board. This letter outlines the rationale for our support.

Adding missing middle housing to existing low-density development is an antidote to suburban sprawl. It results in far more compact and energy efficient housing located closer to jobs, transit, goods and services. It results in sharply reduced greenhouse gas emissions from both buildings and transportation when compared to housing developed in the outer suburbs, or to the enormous single-family homes typically erected in place of smaller homes in Arlington.

The environmental destruction caused by suburban sprawl also is well-documented. Entire ecosystems are bulldozed to create homes far from jobs. The environmental destruction caused by adding missing middle housing, in contrast, is minimal, as each multi-unit building will be no larger than the size already allowed for a single-family home.

There are important equity and justice issues involved in this policy decision. There is a long history in Arlington of excluding those who cannot afford the cost of a single-family home from living within about 70 percent of the County's land area, including many of the most scenic and desirable areas close to parks, transportation, top-ranked schools and other amenities. This exclusion is accomplished by the County's single-family-only zoning law. While this currently operates as a form of economic exclusion, in the not-too-distant past explicit race-based provisions were included in many neighborhoods. While many contend that the currently practiced economic exclusion is benign, we believe the evidence strongly supports our view that it is a factor in the ongoing disparities that exist in our community. As land prices in Arlington climb ever higher, the unfairness of exclusive zoning laws only grows.

Some have used environmental arguments in opposition to multi-unit housing. One concern often raised is that multi-unit housing will result in added stormwater runoff. The County's stormwater challenges are very real and are worsened by climate change. However, the Missing Middle Framework is clear that any new buildings will be limited to the size already allowed, making the proposal essentially neutral in terms of impact on stormwater. It is up to the County, with community support, to ensure that new construction of all kinds does not contribute in any way to Arlington's stormwater problems, which are caused primarily by poor practices of the past.

Some people say that existing single-family-only zoning laws are good for the environment because they effectively direct population growth away from Arlington. The Sierra Club disagrees. The Club judges

that the best way to minimize negative environmental effects from the projected increase of 75 million in the U.S. population by 2060 is to build more densely in already developed areas, rather than encourage sprawling, low-density development on undeveloped land. Planning for this inevitable growth in population, as Arlington is doing, is the best and most responsible way to protect the climate and promote environmental sustainability.¹

Another common concern is that multi-unit housing will harm Arlington's tree canopy. In fact, some have made unsubstantiated claims that the Framework will result in the "potential devastation" of Arlington's tree canopy. The basis for this devastation, they say, is that state law allows developers of multi-unit housing to meet a lower standard of 15 percent tree canopy coverage on their lots rather than the single-family-housing standard of 20 percent. On closer inspection, however, these numbers bear little relationship to reality. The 15 and 20 percent numbers represent the expected growth of canopy twenty years into the future, based on trees on the lot at the time of initial occupancy, including saplings planted by the developer. As soon as an occupancy permit is issued, all trees on a property may be removed or neglected; there is no requirement for any owner to meet the canopy coverage ratios. Our understanding is that there can be no such requirement under Virginia state law.

The Sierra Club believes the best way to increase tree canopy in Arlington is to promote stronger state and local policies that will create effective incentives for all property owners, including multi-unit owners, to plant and maintain more trees. The Club also supports EcoAction Arlington's Tree Canopy Equity Program, which targets tree planting in areas where trees are most needed, and the Civic Federation's initiative to preserve Arlington's tree canopy.

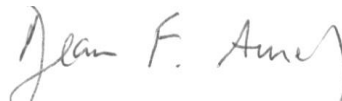
Another topic addressed by the Framework is parking requirements. In most parts of Arlington covered by single-family zoning, street parking is readily available. We urge the County to rely, to the maximum extent possible, on street parking rather than requiring on-site parking spaces that increase impervious surface area.

The Framework will not, by itself, resolve the affordable housing crisis in Arlington that requires so many local workers to commute from elsewhere. However, any multi-unit housing provided under the Framework will almost certainly be less expensive than the very large single-family houses that will be built under current zoning. Adoption of the Framework would make Arlington a national leader on housing policy and a more sustainable community for decades to come.

Sincerely,



John Bloom, Chair
Sierra Club – Potomac River Group



Dean Amel, Land Use Issues Chair
Sierra Club – Potomac River Group

¹ The Sierra Club's urban infill policy can be found at:
https://www.sierraclub.org/sites/www.sierraclub.org/files/Infill%20Policy_5.18.2019.pdf.