



April 8, 2019

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

Re: Accessory Dwelling Regulations

Dear Chair Dorsey:

The Urban Forestry Commission (UFC) has been following the discussion about the recommended changes to the Accessory Dwelling regulations. We heard a presentation at the UFC's September 28, 2017, meeting and again at the March 28, 2019, meeting. While we support the concept of increasing affordable housing through the creation of accessory dwellings within existing homes, we continue to have serious concerns about the impact that new construction of detached accessory dwellings will have on trees. We believe that the recommended changes as currently envisioned conflict with the county's goal to maintain its current tree canopy coverage.

We recognize that the county currently allows for the installation of detached sheds on residential property, which appears to have minimal impact on the tree canopy; however, unlike a shed, an accessory dwelling, even one that is the smallest permissible size proposed (560 square feet), will require, for example, the digging of footings for stability and installation of a sewer line. This heavy construction, even with a small footprint, would impact tree roots and health, lead to the death of trees, and reduce tree canopy coverage. Furthermore, this environmental disturbance will not require adherence to the Chesapeake Bay Regulations as those Regulations are only triggered by a disturbance of 2,500 square feet--which most detached accessory dwellings will not meet. This means no arborist overview for tree protection will be required during construction of detached accessory dwelling as proposed, and therefore, no tree canopy replacements will be mandated. Hence, we believe that the impact on tree coverage and environmental outcomes overall will be negatively impacted by allowing for the construction of detached accessory dwellings.

The Urban Forestry Commission continues to strongly object to the recommendations that would allow new detached accessory dwelling construction, due to the potential impact on existing trees and tree canopy, which are already severely impacted by knock down and infill development.

Should detached accessory dwellings be approved, we recommend that the following steps be included in the resulting review and approval process:

- 1) Require a survey of the lot to identify any existing trees over 12" DBH (Diameter at Breast Height);
- 2) If any 12" DBH or larger trees are identified, recommend a survey by a certified arborist to determine the impact on those trees and what preventive action can be taken to retain those trees, given the proposed construction;
- 3) Provide notice to adjacent neighbors if a 12" DBH or larger tree on the neighbor's property (and where such tree(s) are within ten feet of the property line will be impacted by the construction) and require the homeowner who is constructing the detached accessory dwelling work with a certified arborist, using best practices, to protect the neighbor's tree from harm resulting from construction of the accessory dwelling;
- 4) Collect data on the number of trees identified as 12"DBH or greater that are damaged or removed as a result of construction so that the long-term impact of the detached accessory dwelling policy may be reviewed and revised, if necessary.

Thank you for the opportunity to share our views on these potential changes.

Sincerely,


Phil Klingelhofer, Chair
Urban Forestry Commission

cc: Members, Arlington County Board
Members, Planning Commission
Mark Schwartz, Arlington County Manager
Claude Williamson, Director, Department of Community Planning, Housing and Development
Jane Rudolph, Director, Department of Parks and Recreation