



The Falls Church Village Preservation and Improvement Society

September 14, 2021

Mayor Tarter and City Council Members
City of Falls Church
300 Park Avenue
Falls Church, Va., 22046

SUBJECT: Strengthening Stormwater Management in Falls Church

The Board of the Village Preservation and Improvement Society (VPIS) urges you to strengthen the City's efforts to manage stormwater. VPIS has long supported programs and policies to protect the environment (see: <https://www.vpis.org/environment/>), including programs to manage stormwater, and currently operates the RainSmart Program in cooperation with the City.

Proposed Actions

In order for the City to meet the challenges of more extensive rainfall and rapid population growth, the Council needs to define long term goals for managing stormwater under these difficult conditions. Specifically, the Council needs to set goals for minimizing property damage from flooding and protecting and restoring local streams. Simply up-sizing the City storm sewers over many years will reduce localized property damage but is not likely to meet environmental goals. **To meet both goals, the Council should call for the Citywide application of green infrastructure measures on public and private property and institute a process to make that happen.**

City Stormwater Commission: A critical step in this process is to create a City commission to oversee all stormwater related issues. The new commission should be charged with framing short and long-term goals for managing stormwater flooding and reducing environmental impacts and developing the programs and funding plans needed to meet the goals. The commission should include Council members along with at least five citizens from different areas of the City with experience in stormwater issues. The new commission should have a clear role in the City Capital Improvements Program and in decisions concerning impervious surface fee rates and spending.

Impervious Surface Fee Rates: Although the Council is considering recommendations for an increase in the impervious surface fee rate, VPIS recommends that no increase to the rate be adopted until the new commission can consider the amount and timing of any rate increase and make a recommendation to the Council. Although the current Stormwater Task Force has recommended a rate increase, VPIS believes that a rate increase is not an imminent need and can be delayed to allow time for the new commission, which would have a more comprehensive charter than the current Task Force, is able to make a recommendation.

Background

In the coming decades, a changing climate is expected to result in more rainfall and more extreme, high rainfall events. Stormwater poses several risks to the community. Storms can cause flooding that damages property and causes significant inconvenience and stress for homeowners. The infrastructure that carries stormwater away from homes (i.e., streets and storm sewers) discharge water to local streams, adding pollutants and generating high velocity flows that rip sediment from streambanks and degrade stream ecology. Local streams are damaged, but the harm extends to communities downstream from Falls Church, all the way to Chesapeake Bay. The City has an obligation to both minimize flooding and property damages and maintain a healthy environment within its jurisdiction while not burden neighboring communities with our pollution.

At the same time, the City population is increasing and roads, rooftops, and other impervious surfaces that come with that population growth increase the need to manage stormwater to avoid damage to property and the environment. Some of this population growth is consistent with the growth of the larger region but some is the result of policies adopted by the Council to promote growth or the lack of policies to require new development to minimize harmful impacts (i.e., allowing high density development and clearing of lots of mature trees).

The combination of a more damaging rainfall and rapid urbanization pose a serious threat of both more extensive flood damages to homes and more widespread degradation of both local streams and downstream water bodies. Unfortunately, the City is unprepared to meet this challenge.

- The City is spending millions of dollars on a few storm sewer projects to remedy very localized flooding but has not invested in the Citywide application of green infrastructure (i.e., measures to manage stormwater where it falls and help it soak into the ground rather than runoff to streets and storm sewers) to any comparable extent.
- The City created an impervious surface fee to help finance stormwater measures but is using a significant part of the fee income to pay the costs of administering the fee and has not adopted a long-term plan for needed stormwater investments or determined how fees and other revenues will fund such a plan.

- The City created a credit program to encourage property owners to adopt measures to manage stormwater in exchange for reduced impervious surface fees but has made the credits difficult to attain and has set credit value so low that few people see it as an incentive to implement the listed measures. The credit program is capped at \$70,000 but presently total credits are worth only about \$19,000, split between commercial and residential property owners.
- The City has signed a Memorandum of Understanding with VPIS to operate a RainSmart program to provide small grants to City residents who purchase a rain barrel or install “green infrastructure” measures such as rain gardens or conservation landscapes but has cut funding for the program this year from \$10,000 to \$5,000.
- The City established a Stormwater Task Force in 2019 but gave it only a very narrow charter of simply ranking a fixed number of storm sewer remediation projects. It later expanded the charter to include recommendations on changes to the impervious surface fee and possible creation of a permanent oversight body.
- The City adopted useful provisions related to stormwater in code (e.g., limit on percent of lot coverage and tree preservation) but has encountered controversy and difficulty in consistent implementation of these requirements.

The gradual application of small-scale green infrastructure measures across the entire City will require a sustained, long-term commitment to plan and the funding to implement it. Some of the green infrastructure measures that might be included in such a stormwater plan include:

- gradual removal of concrete curbs and gutters along key street segments and replacement with “soft” drainage such as swales and bioretention features;
- investment in stormwater management on site at public and private parking lots including retention structures, rain gardens, swales, and increased tree density;
- increased density of on-site stormwater management on private property including installation of residential rain gardens and conservation landscapes, rain barrels and cisterns, and retention of mature trees;
- City investment in new parks and green space, including potential projects to purchase and remove structures at locations where stormwater retention is optimal;
- restoration of City streams to remove deeply incised streambanks and create streams and wetlands that slow the velocity of the flow and allow stormwater to soak into the ground;
- expanded use of green roofs on large commercial buildings and related structures (e.g., parking structures);
- expanded requirements to manage stormwater at new construction and to protect existing stormwater management assets on a construction site (e.g., mature trees); and
- strengthened enforcement of existing requirements for lot size, lot coverage and setbacks, tree protection, and construction site runoff control.

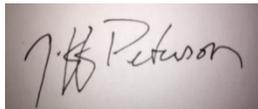
In addition to flood reduction and stream protection benefits, the wide application of small green infrastructure measures offers benefits including more native plants and mature trees, reduced urban heat island effect expected to increase as the climate warms, more efficient building heating and cooling, improved small animal and insect habitat, and improved pollination.

Conclusion

Climate change and a growing population mean that stormwater management will be a critical challenge for the City in the decades ahead. The City should commit to managing both the flood damage and the environmental harms associated with stormwater and should appoint a new City stormwater commission to lead the way in this vital effort.

We would like to support this effort in any way we can and look forward to working with you.

Sincerely,

A rectangular box containing a handwritten signature in black ink. The signature appears to read "Jeff Peterson" in a cursive style.

Jeff Peterson
On behalf of the Board
Village Preservation and Improvement Society

cc: City Manager
Environmental Sustainability Council
Urban Forestry Commission
Planning Commission