

**CLIMATE CHANGE, ENERGY AND ENVIRONMENT COMMISSION**  
**C/o Department of Environmental Services**  
**2100 Clarendon Blvd., Suite 705**  
**Arlington, VA 22201**

July 27, 2023

Ryan Delaney, Principal Planner  
Department of Parks and Recreation  
Arlington County  
2100 Clarendon Blvd.  
Arlington, VA 22201

Dear Mr. Delaney:

C2E2 commends County staff and supporting contractors for a comprehensive revision of the Forestry and Natural Resources Plan (FNRP) that offers a clear vision with strategic directions and actions. The draft plan recognizes the importance of our tree canopy and natural resources as natural capital that requires dedicated investment to provide a host of environmental, health, and economic benefits.

While a number of improvements have been made, we feel the following areas could use greater emphasis:

While proposed actions are listed, the plan lacks sufficient metrics associated with the key strategic directions and the implementation plan does not provide a sufficient framework for tracking progress. The FNRP should include a schedule to report on progress made on the action items and proposed next steps for accomplishing the tasks set out in the plan and track progress on key indicators related to tree canopy coverage and health of our natural environment. Such indicators should include tree canopy coverage by neighborhoods, progress in reducing invasive plants, improvements to water quality, and diversity of flora and fauna. Progress reports should go beyond the status report of 'not started,' 'ongoing,' or 'completed' to provide a description of what has been accomplished to date and what is planned for the next reporting period.

The role of volunteers should be highlighted. Arlington has many active volunteer groups that are doing work to improve natural resources of the County, from the Tree Stewards to Master Naturalists, and Stream Water Monitors. And, EcoAction Arlington is actively working to plant trees. Such an inclusion would paint a more complete picture of the situation and provide credit to all of these volunteers and volunteer leaders.

The Plan should address the tree canopy issue with a more granular strategy for optimizing canopy. Different types of land, types of ownership, and neighborhoods call for different strategic approaches to increasing and maintaining tree canopy and natural areas. Equity of tree canopy could be incorporated into this more granular approach.

The role of private property in tree canopy loss is critical, given that 70% of land in Arlington is privately owned. We support prioritizing incentives and zoning changes to reduce lot coverage and increase the preservation and planting of canopy trees. In addition, the County should offer technical assistance and incentive programs for installation of conservation landscaping, tree care, and removal of invasives on their property.

The role of high white-tailed deer numbers and invasive plants should be more clearly articulated in the environmental degradation of Arlington's forested areas and included in the plan's priorities. Reducing deer numbers and treating invasive plants are both critical to restoration of our natural areas.

We would like to see the plan address the importance of pollinators and insect decline and suggest adding incentives and educational outreach to citizens on the importance of maintaining native pollinator plants for wildlife. The Xerces Society has a program called Bee City USA, <https://xerces.org/publications/brochures/bee-city-usa>, that brings communities together to protect pollinators by increasing the abundance of native plants, providing nest sites, and reducing the use of pesticides. Arlington is already a Tree City USA and is a member of the Biophilic Cities Network. Working towards pollinator conservation should be an important part of our Forestry and Natural Resources Plan.

Finally, the FNRP should address light pollution and its impacts on the wellbeing of citizens and wildlife as well as energy conservation more directly rather than a mention under action item 4.6.2. In 2016, the C2E2 produced a white paper on light pollution that is still relevant and helpful. It is attached for reference. Likewise, most of the other actions subsumed under 4.6.2 are important enough to be included as separate action items to facilitate tracking implementation.

We again commend the Department of Parks and Recreations for a well-developed second draft and look forward to seeing commission recommendations incorporated into the final version.

Sincerely,



Joan F. McIntyre

Chair, Climate Change, Energy and Environment Commission

cc: Arlington County Board

Jane Rudolph, Director of Parks and Recreation