



September 30, 2022

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

Re: Comments on the draft Forestry and Natural Resources Plan

Dear Chair Cristol:

The Forestry and Natural Resources Commission (FNRC) believes that the draft Forestry and Natural Resources Plan (FNRP) is an important step forward in the never-ending struggle to preserve and enhance the County's invaluable tree canopy and natural spaces, which are crucial for the future health, well-being, and quality of life of our citizens.

The Commission is pleased with the Plan's comprehensiveness and the new attention it brings to such pressing issues as inequity, given the dearth of trees and other natural resources in historically disadvantaged areas of the County, and climate change, which is increasing the severity of stormwater flooding, urban heat, and other major threats. The FNRC also thanks the Plan's team for describing the enormous and myriad benefits of trees and natural landscapes, for thinking creatively about ideas for wildlife and natural resource corridors, and for learning from pioneering efforts in other cities, such as Savannah, Georgia's system for rigorously measuring the value of its tree and landscape resources.

That said, the Commission also believes that the Plan falls short of its potential to put Arlington on a greener, healthier, more sustainable path. We see at least four opportunities to make the Plan stronger and more useful. We respectfully ask for:

1) A greater sense of urgency

As the population of Arlington grows and development continues, our urban forests and other natural areas are coming under immense and growing pressure. Stroll through just about any neighborhood and the sounds of chainsaws, concrete mixers, or other construction activities can drown out the birdsongs and chattering squirrels as forested lots are clearcut and filled nearly property line to property line with massive new houses or other developments.

The threat to our precious natural environment is greater than ever, and business-as-usual is a recipe for irreplaceable loss. As County Urban Forest Manager Vincent Verweij succinctly explains: “The central problem is that we are running out of space.”

The Commission fears that the draft Plan fails to convey the severity of the threat—and the need for urgent action. In particular, we believe that it is both incorrect and a strategic mistake to say that “*Arlington’s overall tree canopy has remained stable.*” In the FNRC’s consultations with tree canopy measurement experts, we learned that the 2016 survey was conducted with a different, less accurate methodology than the 2011 survey (which showed 40% tree canopy coverage). It is thus not scientifically defensible to conclude that the tree canopy has *not* declined substantially since 2011.

Moreover, the experts tell us that the 2016 survey *can* be used to assess trends in individual neighborhoods—as long as the changes are large enough to be statistically significant. And there, the trends are alarming. Twenty-four of the 30 civic association areas across the County show measurable declines between 2008 and 2016, with drops of as much as 20% in some neighborhoods.

The FNRC is gratified that the Plan does emphasize the need for (and that the County has already budgeted for) a new tree canopy survey that will more accurately assess current tree canopy coverage and the magnitude of the task that lies ahead. We hope that will be done as quickly as possible, even if we fear that the results will be disturbing.

The Commission is also pleased that County staff understand that a crucial purpose of the draft Plan is to educate, inspire, and encourage action by County leaders and ordinary citizens. We worry, however, that this purpose is undermined if the severity of the threat is not fully acknowledged and articulated.

Nor does it help to include the dubious and disingenuous claim in **Section 1.2.3.1** that “*missing middle housing designs have the capacity to provide a potential tree canopy for each site/property (up to 50%),*” given that the strictest legal requirement will be as little as 10% coverage in 20 years.

2) A shift in tone and emphasis in the recommendations from vague and aspirational to direct, specific, and actionable

The Plan identifies and discusses many possible actions that, if undertaken, will bring substantial progress in preserving the County’s natural resources.

But the Commission worries that in case after case, recommendations are couched using equivocal and conditional terms, such as “could consider” or “should explore,” rather than in prescriptive and actionable language. We count more than 50 uses of the word “consider.” The bullet point construction in **Section 2.2.1** even has the grammatical consequence of repeating the word. (The draft says “...*the county should consider whether to:* • *Consider revising the ACZO [zoning ordinance].*”)

The Commission understands that the Plan is still a “preliminary” draft, and that County staff will create specific goals and targets as they respond to community inputs and move towards implementation. We do urge, though, that staff revisit the actual language and make adjustments to use words that are less vague and aspirational, and more specific and actionable. To give just a few suggestions:

- Where the draft says: “*Seek legislative changes at the state level that provide Arlington County with a broader set of policy tools*” (1.2.1), why not name the actual key changes? i.e., “Work to amend state law to give local jurisdictions the authority to impose stricter tree canopy requirements than the maximum of 20% coverage in 20 years currently allowed under the Chesapeake Bay Preservation Ordinance.”
- Or instead of: “*Arlington should explore revising site plan and Landscape Standards to foster the preservation of trees and landscape features with significant ecosystem value*” (1.3.2), why not simply say: “Arlington should revise site plan and Landscape Standards....”
- Instead of: “*Consider establishing caps on impervious surfaces*” (1.2.3.1), why not just say: “Establish caps on impervious surfaces.”
- Instead of: “*Consider changes to the Zoning Ordinance that better align it with the County’s goals for forests and natural resources management...*” (1.2.3.1), why not say: “Change the Zoning Ordinance to better align it....”

The Commission strongly believes the draft needs less vagueness and deference, and more boldness and specificity. Language changes could be made throughout the draft to strengthen the Plan, without preempting or usurping the future implementation process. At the end of the process, the FNRC believes, we all want the same thing: ambitious hard goals and targets against which future trends can be measured. The Plan could be clearer, for example, that a 40% tree canopy coverage goal should be considered to be the bare minimum—and strenuous efforts should be made to exceed that basic goal.

3) Deeper, creative thinking about land uses, possible incentives, and educational efforts

The draft Plan does an excellent job in identifying opportunities to enhance the County’s natural environment, such as better use of school properties, rights-of-way, and conservation easements. It also offers innovative incentives like “*bonding and escrow requirements [to] assure landscape retention and maintenance*” (1.3.3) after trees are planted.

The Commission thinks, however, that the Plan could go further. We recommend that the Plan include such additional specific strategies as:

- Create a joint urban forestry/Arlington Public Schools task force (with an actual budget) to systematically assess APS properties and then develop and implement plans to maximize the potential for trees and other valuable natural landscapes.

- Develop and implement a plan to make creative uses of rights-of-ways, with ideas like mini-forests, “vertical” forests, pollinator corridors, or diverse plantings of native shrubs or meadows.
- Given the importance of financial incentives in influencing behavior, create new incentives for tree and natural landscape planting and preservation. Ideas include (but are not limited to):
 - Recommending that Arlington County join most other local jurisdictions in providing tax credits for conservation easements.
 - Implementing a mechanism to reduce utility bills or property taxes for homeowners or landlords who can document tree plantings or other measures to increase tree canopy coverage, or who maintain tree cover above specified high thresholds. The County could also study whether such incentives might be more cost-effective than building bioswales or other stormwater reduction infrastructure.
 - Giving developers more incentives for tree preservation and planting, such as faster permitting or allowing them to build higher in exchange for reducing building footprints (and/or impervious surface areas) and using the extra lot space for additional tree and shrub planting above the 20% coverage in 20-year requirement.
 - Requiring bonds to be posted to get occupancy permits in new development, with money to be periodically refunded to homeowners if their properties stay on track to meet the 20-year tree canopy coverage requirement (now 20%, but hopefully strengthened in the future).
 - Creating a system of bonuses for staff to reward increases in County-wide tree canopy coverage above the 40% target, when documented in regular tree canopy surveys.
- Create and implement new, more specific ideas “*to enhance education and outreach initiatives*” (2.3.2). These could include information about the energy-saving, pollution-reducing, economy-enhancing, or stormwater-controlling benefits of trees included in County utility or tax bills (and it would help, of course, if the County also implemented financial incentives for tree preservation and planting that could be promoted in such outreach). Educating Arlington residents about the many financial and health benefits people receive from nature brings these issues home in a very personal and specific way. The County could even use roving educators (staff or volunteers) who would talk with people about these benefits where they live, shop, or go to school.
- Better educate County citizens about the serious damage caused by “*intense foraging pressure from deer*” (SD 3: Biodiversity) and create a detailed plan for appropriately controlling the deer population.

4) More explicit and deeper connections with other County plans

As the draft Plan describes in detail, urban trees and natural landscapes offer immense benefits in intercepting and storing rainfall, slowing stormwater runoff, reducing urban heat and energy bills, cleaning the air, and capturing and storing carbon.

We suggest that the Plan take an additional step further, recommending that the Forestry and Natural Resources Plan include explicit and formal connections to other key county plans, such as the stormwater, energy, and public spaces plans.

For example, the FNRP should ensure that urban forests and other natural landscapes are evaluated and measured for their stormwater retention capabilities, allowing those natural

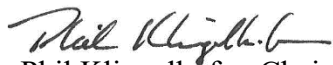
features to be formally counted in meeting the goals in the stormwater plan, while the stormwater plan should include incentives for preserving and/or planting new trees and natural landscapes.

Similarly, the FNRP should recommend accurate and periodic assessments of net carbon storage in trees and other vegetation, with those numbers being included in the Energy Plan's formal calculations of Arlington's net greenhouse gas emissions. The FNRP also could more strongly call for achieving the Public Spaces Master Plan's (PSMP) #1 Action Goal—and the resulting benefits for tree canopy and natural landscapes—of acquiring 30 acres of new public space. And the plan could call for the development of biophilic design guidelines, with examples of green infrastructure, that could then be used to meet the policy objectives in the PSMP, the Energy Plan, and the Chesapeake Bay Preservation Plan.

The Forestry and Natural Resources Plan is crucial for preserving and enhancing the natural environment that makes Arlington County a desirable place to live. This draft plan is a worthy effort, but we must take advantage of every opportunity to make it even stronger and more valuable. The Forestry and Natural Resources Commission expects to continue to provide oversight and advice as the plan moves forward to finalization and implementation.

Thank you for the opportunity to share our views.

Sincerely,



Phil Klingelhofer, Chair
Forestry and Natural Resources Commission

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



Park and Recreation Commission
2100 Clarendon Boulevard, Suite 414
Arlington, Virginia 22201



September 28, 2022

Honorable Katie Cristol
Chair, Arlington County Board
2100 Clarendon Blvd., Suite 300
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Ryan Delaney, Principal Planner
Department of Parks and Recreation
2100 Clarendon Blvd.
Arlington, VA 22201

RE: Parks and Recreation Commission - Forestry and Natural Resources Plan

Dear Chair Cristol and Mr. Delaney:

We thank the Department of Parks and Recreation and all the stakeholders that provided input into the Draft Forestry and Natural Resources Plan (FNRP) released on August 1, 2022. It is a major undertaking. Combining the previous Urban Forest Master Plan and the Natural Resources Management Plan into a single plan and creating a new element of the Comprehensive Plan provides the County and residents with new vision and tools to support our parks, trees and urban ecology.

While the importance of the Plan is obvious, the ultimate Action Steps recommended in the plan do not do justice to the importance of the County's natural resources. For example, the intersections between the topics of forestry and natural resources to other topics such as zoning and siting are critical. The Action Steps are too mild for a plan that is for the first time elevated to the County Comprehensive Plan. More fulsome goals should be directed toward interactions with other master plans to create a robust and sound framework for protecting and enhancing Arlington's green infrastructure.

Secondly, the appendices do not sufficiently document the wealth of information forming the basis for the FNRP. For example, the 2017 *Urban Tree Canopy Assessment* and the 2011 *Wildlife of Arlington: A Natural Heritage Resource Inventory Technical Report* are not attached, but they should be as these are the most recent iterations of these studies.

In contrast, we are very pleased that equity in public spaces and the concept of natural capital are highlighted with emphasis in the FNRP. These are important innovations that should direct and form the basis of future forestry and natural resource decisions in the County.

We are disappointed that mention of the importance of deer management is excluded and that the proposed changes to the Standard Site Plan Condition relating to a) increased developer contributions to the Tree Canopy Fund, and b) detailed biophilic principles are not discussed. These Standard Site Plan conditions changes, as well as other changes that relate to zoning, ordinances, and legislation changes, should be mentioned in the FNRP to help guide other areas of Arlington County toward a more robust development of green infrastructure to combat climate change and improve life for all citizens.

More Robust and Clearly Stated Goals

The FNRP would be greatly improved with clearly stated and measurable goals in each area of action. As it is now written, the County commitments are unclear. Phrasing should include “The County will . . . “ or at least “The County will endeavor to . . .” rather than using weak or noncommittal verbs. The final Plan will have minimal impact without defined action steps that are understandable and measurable. There is too much reliance on the verbs “consider” and “explore” which are not actionable and do not serve the interests of the forests and natural resources as well as more directive language would.

Appendices and Links to Other Plans Need Strengthening

As this is the first time that the FNRP is elevated to the status of the County’s Comprehensive Plan, the document misses an important opportunity to educate about the history of Arlington’s forests and natural resources as well as their relationship to the other elements of the Comprehensive Plan. At a minimum, citations to the other Plans mentioned in the FNRP should be included in the main body of the document. The Appendix 3 is only a brief summary of the other plans and a sentence or two about how the FNRP supports each of the other plans. Considering the integration of forestry and natural resources with all the other plans, these links should be clearly called out with references. For example, the nine areas listed on page 28, in Section 1.2 under “Expand Spaces for Trees and Natural Areas” should be linked in the document for both clarity and educational value. It is important to document the extensive legal framework for forestry and natural resources protection that already exists in the many plans, laws and initiatives effective in Arlington County.

Natural Capital

The importance of “natural capital” as a governing principle throughout the FNRP is a very welcome change from prior versions.¹ In concert with the Natural Resiliency provision in the Capital Improvement Plan (CIP) budget the County moves ever closer toward the capacity to

¹ “[Natural] resources constitute our stock of natural capital. . . .” FNRP Draft at page 2.

invest in nature, (rather than simply managing it from one year to the next) for the significant benefits of heat island reduction, health improvements, habitat restoration and carbon emissions reduction, among others. We support the concept in Strategic Direction 4.5.1 to source funding for forestry and natural resources from the CIP.

The County Board and staff face myriad decisions every year that require mediation between conflicting County priorities such as providing adequate transportation, housing, and stormwater services on one hand, with preserving the forest and natural resources on the other hand. The FNRP highlights many of the health and environmental benefits of trees and access to nature but lacks a framework and associated metrics for assessing the benefits of our natural resources when its preservation conflicts with other County goals. A transparent analysis including the robust valuation of natural resources should be performed to make a defensible determination when such conflicts arise. Both the tree canopy data and natural resources inventory are outdated and FNRP should prioritize updating this information to provide a more accurate baseline. Strategic Direction 1.3.1 mentions that Arlington County should incorporate the value of trees and natural areas in County planning decisions as performance measures for investment in urban forestry, but this should be extended to situations where the opposite of investment is at stake. Strategic Direction 4.5.3 would be a positive measure in providing tools to calculate the value of various green assets. In other words, where natural areas are being sacrificed for a conflicting goal, these metrics should be brought to bear on the decision to ensure the cost is worth the benefit. The County's invasive plant removal efforts should be expanded and the funding should come at least in part from the CIP as an investment in Arlington's green infrastructure. The Commission therefore supports Strategic Directions 3.2.(1-4) that call for coordinated approaches for protection of natural capital through invasive species removal and control. We further support the funding of these efforts as proposed in SD 4.5.1,2,&4.

Equity in Tree Canopy Cover

The draft succeeds at articulating the relationship between historically racist zoning laws and the lack of tree canopy cover in neighborhoods with higher-than-average BIPOC (black, indigenous and people of color) populations and higher than average poverty. *See* FNRP draft at pages 13 and 15 (“[T]he most diverse, racially mixed areas of the County have lower tree canopy than the less diverse ones.”). *See also* Paragraph 2.1. More robust targets for correction should be incorporated into the action provisions.

Strategic Direction 1.1.1. recommends neighborhood planning goals or benchmarks to maintain a forty percent tree canopy cover across the County and Strategic Direction 2.1.1 provides for the development of benchmarks to direct resources to underserved areas. As mentioned, however, the baseline data should be updated to measure progress. Further, the tree canopy cover of 40% for the entire County is a *minimum* and should be expanded to the extent that tree canopy cover increases in areas with below average coverage. Moreover, a long-term twenty-year horizon should be adopted for aspirational tree canopy targets as well as the health of all green infrastructure including that related to storm water and biophilia.

We were disappointed that the FNRP repeated, without evidence, the assertion that potential development allowed by the Missing Middle Housing Study Phase 2 Draft Framework could achieve up to 50% tree canopy on a lot (SD 1.2.3). The FNRP says this could happen “through conservation of existing trees and planting beyond the regulatory requirements,” but does not offer an actionable strategy for accomplishing this goal. Without a clear action plan, including incentives or requirements, the FNRP offers no reason to believe that anything more than the State minimum 10-15% tree canopy coverage will be achieved for such properties, resulting in an overall erosion of tree canopy coverage.

Directing resources toward increasing tree canopy cover in underserved areas is a high priority for the PRC, because, as the FNRP maintains at footnote 51, much more hard work and commitment is needed to recruit property owners in underserved neighborhoods to plant trees on their property than in higher income areas. We feel very strongly that the County should devote the resources required to assess low-tree canopy areas, set targets for improving them, and follow through with action plans with measurable results.

Strategic Direction 2.1.1 explains that 20,000 trees will need to be planted to achieve targets set by the Tree Equity Score, but the FNRP completely understates the need for County support to achieve such targets by stating, “owners in underserved neighborhoods may need public support for planting and long-term care.” The County should support such planting and maintenance programs and do so robustly. The FNRP should clarify this important need and prioritize it. Each Civic Association or planning region with below average tree canopy cover should have a charted path for achieving increased tree canopy during the next ten years.

In Strategic Direction 1.1.3 the FNRP generally mentions increased acquisition of public space, but such acquisition should be targeted predominantly at neighborhoods with already low tree canopy to appease heat island effects, health effects and many other environmental degradations that go along with lower-than-average tree canopy coverage. This is especially true as the County considers the impacts of increased development and the attendant need for tree canopy cover in areas with greater density.

Managing Trees and Native Plants for Climate Change

Expansion and improvement of our natural green infrastructure is an important complement to the essential need to reduce Greenhouse Gas (GHG) emissions caused by combustion of fossil fuels - a goal embodied in the County’s Community Energy Plan, and this should be more clearly delineated in the FNRP. Green infrastructure can mitigate heat islands, reduce ambient temperatures when placed strategically, and can reduce energy costs. Trees and native plantings slow and filter stormwater runoff, an especially important attribute as more and more intense storms become the norm. On the margins, trees, plants along with healthy soil sequester carbon.

The draft FNRP misses an opportunity to highlight the importance of natural solutions in addressing flooding and stormwater runoff under Strategic Direction 2: Climate Mitigation,

Adaptation, and Resilience. Inclusion of some key actions to use conservation landscaping, tree preservation and trees, and replacement of lawn and impervious surfaces would reinforce ongoing County efforts to address stormwater and flooding under its Flood Resilient Arlington program. The County could work with neighborhoods to establish watershed regions where neighbors collectively get a discount (similar to a solar cooperative) on the cost of contractors and materials to reduce impervious surfaces, install rain gardens and reduce lawn space in conjunction with County work on the roads and public areas to enhance and facilitate these neighborhood projects.

Public Participation in Managing Green Spaces for Climate Change

We are encouraged that public participation and educated volunteers are part of the FNRP strongly endorsed. We are very pleased with all of Paragraph 2.3. We encourage the County to do all it can to educate and incentivize residential and commercial property owners to plant native trees and shrubs and reduce the sizes of their lawns. Individuals should be educated about the benefits of creating wildlife corridors and reducing the insect apocalypse through such plantings.

Tenants, as well as homeowners, should be encouraged to plant trees and remove invasive species in the places where they live. We encourage the development of regulations and incentives to encourage commercial and faith-based properties to improve natural resources on their properties. Moreover, the County should encourage private property owners to participate in the Northern Virginia Conservation Trust by providing tax incentives for providing green benefits to our citizens.

We encourage reviving the Stormwater Wise program and expanding the tree canopy program and other such programs through greater funding and increased scope across all County populations.

NOVA Parks

We are pleased that the FNRP specifically calls out the other parkland owning entities, NOVA Parks and the National Park Service in the description of Arlington's lands. (*See* pages 11 and 16.) We are also pleased that plans are suggested to work with existing partners, and we hope this includes NOVA Parks and the NPS. *See* Strategic Directions 4.2.1 through 4.2.3. Arlington County is a part owner of NOVA Parks and provides tax revenue to this entity each year. It is within the purview and responsibility of DPR to monitor and engage with NOVA Parks to ensure consistency of goals regarding invasive plant removal, stormwater retention policies, preservation of tree canopy and other important considerations, and this duty should be more clearly stated in the FNRP. Committing such environmental principles to an MOU format would be a great step toward providing clarity and support to NOVA Parks direction to ensure such is consistent with Arlington County's desires. Perhaps an environmental management audit of NOVA Parks could be useful to learn the cost of managing the NOVA Parks in Arlington in accord with the priorities in the FNRP.

Legislative, Zoning, Ordinance and Site Plan Changes to Address Climate Change

The FNRP should discuss the need for legislative changes to make it easier for the County to acquire parkland. One useful tool would be a County right of first refusal to acquire land for park purposes.

The FNRP could discuss potential opportunities to use rezoning, form-based codes, and sector plans in neighborhoods expecting denser development to standardize setbacks for building to allow more space for street trees, native plantings and to insert requirements for green spaces. This is especially important when more vertical density is being planned such as along Langston Boulevard where one- and two- story buildings and large surface parking lots are likely to be replaced with multistory buildings. There may be opportunities to reduce street widths or eliminate street parking to build in more spaces for trees, as well as improving bike and pedestrian infrastructure. Integration of forestry and natural resources planning with other broader planning processes is critical to ensuring the County is taking every step possible to address local impacts of climate change

We note that the Standard Site Plan Conditions have not increased the developer contribution to the Tree Canopy Fund per tree since 2007. We encourage the FNRP to state that developer contributions per tree should be increased to more reasonably reflect the value of the trees cut down. This request was specifically included in a request to the County made by the Park and Recreation Commission, the E2C2 and the Forestry and Natural Resources Commission within the last twelve months.

The FNRP should include as an action step to develop detailed guidelines for Biophilic design, especially in more densely developed neighborhoods as part of the Site Plan Review process. This too was requested by all three commissions listed in the above paragraph.

The County's weed ordinance should be reviewed and adjusted if necessary to prevent homeowners with conservation and native landscapes from being penalized.

Setbacks for residential properties new development should allow for flexibility to preserve trees and to locate trees and other green infrastructure where they will have the greatest environmental benefit, such as shading homes to reduce energy costs, or landscaping to address stormwater that considers the natural slope of the property.

We are pleased that steps are already underway to develop an ordinance prohibiting the planting of bamboo. The FNRP should endorse this effort and make a point of taking other steps to pass laws prohibiting the sale and planting of invasive plants, as permitted by state law.

Arlington Public Schools

We are pleased that the FNRP draft includes a commitment to work with APS to manage its lands to preserve and enhance natural areas. Strategic Direction 1.1.5 is a necessary and positive step towards working with APS to identify and make available new tree canopy and

natural spaces. It would be helpful if more succinct goals could be included and a commitment from APS to collaborate should be among the goals. Strategic Direction 2.3.4 comes close to achieving this objective but should be more insistent on working toward a commitment from APS to support the recommendations in the plan.

Biodiversity

Biodiversity is a vital component of our approach to natural resource management. Strategic Direction 3 is a welcomed addition to support a health ecology. The Commission continues to support natural land acquisition (SD 3.1.1) and more frequent natural resource inventories (SD 3.1.2) and assessments (SD 4.1 - 8). Threat Management approaches in SD 3.2 should incorporate deer management as part of our effort to protect and improve biodiversity. Too many deer are threatening our biodiversity, eating native plants in parks and neighborhoods. Most surrounding jurisdictions control deer populations. We are strongly in favor of it too. Deer management should be specifically discussed as an important element and tool of the FNRP. SD 3.5 can reduce threats to our resident and migrating bird populations through reduced light pollution (Dark Skies) (SD 3.5.1) and use of high-quality bird friendly glass (SD 3.5.2). We appreciate the plan elements in SD 3.3 to create more natural infrastructure and conservation connectivity. The notion of connective corridors for plants and wildlife using incentives for private land and for public land where feasible is a welcomed addition to the plan. Thank you for this opportunity to provide comments. Please contact me with any questions or concerns.

Sincerely,



Shruti Kупpa
Chair – Park and Recreation Commission

cc: Members, Arlington County Board
Mark Schwartz, Arlington County Manager
Jane Rudolph, Director, Department of Parks and Recreation

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

September 28, 2022

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 developing a comprehensive draft Forestry and Natural Resources Plan (FNRP) that offers a clear vision and strong principles. 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. The plan acknowledges the importance of engaging private property owners to achieve its goals and gives a prominent role to building partnerships within the County government and with institutions, organizations, and volunteers. Finally, we strongly support the action steps presented under Action 4.5 that aim to secure sufficient and sustained funding to implement the plan's goals.

C2E2 offers the following recommendations to further strengthen and improve the draft FNRP to ensure that it can serve as a strong and comprehensive roadmap for implementation and achieve its overarching vision. In addition, Commissioners Mikaila Milton and Joan McIntyre have provided specific in-line comments through the online platform. Our key recommendations are:

- FNRP should provide greater clarification and emphasis on baseline conditions, noting current problems and threats to our tree canopy and natural resources and implications for climate change mitigation and stormwater management.
- The goals should be more ambitious, disaggregate, and measurable, including neighborhood-based targets for tree canopy coverage.
- The concept of stewardship, reflected in Action 2.3 and other actions throughout the Plan, should be elevated to a strategic direction to highlight the importance of engaging the whole Community in meeting the goals of the plan.
- Priority should be given to zoning and other land use planning mechanisms to protect and expand our urban forests and other natural resources, programs to address equity access to tree canopy and natural areas, management of invasive species, including deer, developing guidelines for biophilic design, and securing necessary funding to implement the plan.

Provide greater clarification and emphasis on current baseline conditions.

- A more detailed and nuanced description of the role the County's tree canopy and natural resources can play in mitigating climate change, making clear that protecting and improving these natural assets is complementary to the critical importance of eliminating the use of fossil fuels for energy consumption. Improving our natural resource assets can help to reduce urban heat island effects, save energy, mitigate increases in stormwater from increasingly intense storms, and absorb some CO₂ and other pollutants.
- Assessment of the current baseline should more clearly reflect the extensive degradation to the County's natural resources and threats to the tree canopy and acknowledge that available data used for the plan are dated.
- The role of natural solutions in addressing stormwater runoff in the face of more intense storms should be specifically included as at least one action item under Strategic Direction 2, Climate Mitigation, Adaptation, and Resilience, to reinforce initiatives under Flood Resilient Arlington and the Stormwater Management Plan.
- More detailed descriptions of impacts, challenges, and actions related to current and historic inequities in access to Arlington's natural resources is needed to align with the stated principle that the benefits of Arlington's natural assets should be shared fairly across neighborhoods.

Establish more ambitious, disaggregated, and measurable targets for the FNRP and ensure a clear separation from the action items identified to achieve them (targets are currently presented as action items). At a minimum the FNRP should identify high level, ambitious goals and provide action items to develop more disaggregated objectives based on updated inventories and neighborhood-based assessments. The County should consider adopting the Nature Based Solutions Institute's 3-30-300 rule – i.e., everyone should be able to see three trees from their home, live in a neighborhood with at least 30 percent tree (or vegetation) coverage, and be no more than 300 meters (less than a quarter mile) from green space for multiple recreational usage. At a minimum:

- Tree canopy coverage targets should go beyond preventing further loss to expanding the tree canopy coverage to at least 45 percent along with a minimum coverage in all neighborhoods in Arlington of 30 percent. A priority action item should be to conduct a neighborhood-by-neighborhood assessment to identify opportunities and set targets for an expanded tree canopy coverage and other native plantings. Special attention should be given to addressing inequitable coverage in neighborhoods that have a higher proportion of lower income and racial/ethnic minority households.
- The FNRP should set explicit targets for expanding natural areas by identifying potential options to create wildlife corridors on both public and private lands and for improving the overall health of the County's natural resources through reduction of invasive species (including deer), improved water quality, and greater diversity of flora and fauna in the County.

Promoting Stewardship – While this is an underlying theme throughout, the plan would be stronger by making action item 2.3 *Deepen Arlingtonians’ commitment to the conservation of trees and natural resources* as a separate strategic direction focused on fostering stewardship throughout the Arlington Community.

- A new strategic direction that consolidates action items peppered throughout the plan would highlight the important role that partnerships with schools, institutions, and the public will play in achieving the key goals of the FNRP. As noted, Arlington has a strong community of organizations and volunteers already active and eager to promote the changes needed through action, education, and outreach, especially when supported by County programs and incentives to advance these goals.
- Expanding tree canopy and native plantings and supporting outdoor classrooms on school property and incorporating citizen science tools such as iTree Eco, Nature’s Notebook, and iNaturalist into lesson plans should be emphasized as key ways to imbue an ethos of stewardship in the upcoming generation. Creation of Career Center programs for natural resource management and arborist training would further advance this goal.
- Adding an outdoor classroom coordinator would help facilitate the stated goal of creating outdoor classrooms at every school and involving children in natural resources stewardship and education while adding to student wellbeing.

Priority Actions – While the draft FNRP contains a comprehensive list of actions items that reflects the multifaceted approach needed to achieve its goals. C2E2 has identified a number of key actions that it believes should be prioritized.

- Revision of zoning ordinances related to lot coverage, setbacks, and other requirements that will better protect existing trees and natural resources and support their greater inclusion into our built environment. Planning principles that align with goals for preserving and expanding the tree canopy and overall natural resource assets should be incorporated into sector and other planning documents for sectors anticipating major redevelopment such as along Langston Boulevard and in National Landing, identifying opportunities to increase publicly accessible green spaces in exchange for greater height density.
- Adoption of a land use ordinance that would provide tax benefits and other incentives to property owners who agree to conservation easements to protect natural (and historic) resources by restricting future development on the property.
- Programs to specifically address lack of tree canopy and access to natural resources in neighborhoods with a higher proportion of low income and minority populations.
- Expansion of county invasive species control programs, including adoption of a deer management strategy and a bamboo ordinance as well as a revision of the County’s weed ordinance to protect maintained native plant gardens.
- Development of detailed guidelines for achieving the Counties Biophilic City goal, with specific emphasis on identifying ways to incorporate nature in densely developed neighborhoods and establishing guidelines/ordinances that comply with International Dark Sky and bird-friendly building design.

- New or expanded incentive programs such as the Tree Canopy Fund and the former StormwaterWise program to support protection and expansion of the tree canopy and conservation landscaping on private properties. Sliding scale grants based on income as well as targeted programs could be used to ensure that necessary funding is directed toward lower income and minority communities that have lower tree canopy coverage.
- Dedicated funding to ensure successful implementation of the FNRP.

We again commend the Department of Parks and Receptions for a laudable first draft and look forward to further discussing the revisions of the FNRP as it moves to its final version.

Sincerely,



Joan F. McIntyre

Chair, Climate Change, Energy and Environment Commission

cc: Arlington County Board

Arlington Forestry and Natural Resources Draft Plan

NVCT Comments 10.3.22

Prepared by Matt Gerhart, Conservation Director

Overview:

This a thorough, well-structured and helpful planning framework! Many thanks for the clearly structured Strategic Directions under which the key action areas fall.

The vision (pg 14) is thorough and touches on all the elements of the plan, but could be seen as a bit wordy and potentially hard to digest for the public. Additionally it is a bit hard to see the role of private citizen stewardship in it, except as part of ‘other green spaces.’ Think about incorporating residential pride in stewarding the environment “at home” as well as in public spaces in these types of statements.

We agree clear metrics for progress need to be established to show progress – but simple and transparent to the public is best. Consider measures that private landowners can contribute to in addition to governmental lands/initiatives.

We do see a lot of community concern about tree loss come in the context of not really understanding the details and limitations of the development process – it is often too late to intervene or adjust plans at the point people engage. So a focus of the plan in a number of places should be developing specific engagement pathways targeted toward helping citizens understand how to make (and inform) smart development decisions, and ways to engage beyond the ‘normal’ public process – including engagement with other community partners or incentive programs. Better knowledge of the process would result in earlier and more effective engagement by citizens.

The discussions on equity and justice in environmental outcomes are very well structured and a helpful guide to developing tangible new directions.

Please reach out with any questions.

Particular comments:

Strategic Direction 1

We recommend including in Section 1.1 development of non-traditional conservation mechanisms (beyond fee purchase or easement donation) as options for Arlington residents who wish to steward their resources, particularly where multiple landowners own/steward important forest patches.

-
- 1.1.1 We agree with some of the other comments received that to keep a goal of 40 percent canopy will not “increase and protect tree canopy” when it represents a planned (though small) decrease. Even holding to current levels or a small increase would be a good framing for the county’s primary natural resource plan.
 - 1.1.2 No net loss of county natural lands is critical, especially where non-designated with a conservation status. We appreciate the county’s adherence to this excellent standard.
 - 1.1.3 Include reference to private conservation mechanisms for conservation such as conservation easements via county partners like NVCT.
 - 1.1.6/7 We support these recommendations and are willing to help facilitate/ participate.
 - 1.2.3.1A - Pg 31. We are working throughout our region to help promote policy changes for VA that would allow opt-in higher thresholds for tree canopy preservation/ tree save; penalties for improper cutting of trees likely need to be increased too.
 - 1.2.3.1D We are also happy to help develop incentives that could work for incentivizing planting of natives or other enhancements to water quality on private lands.
 - 1.2.3.2C Consider funding of off-site land acquisition to enhance resources available to purchase or conserve important sites.
 - 1.2.10 Also support the promotion of such systems such as LEED-ND.

Strategic Direction 2

- 2.1.2 Strongly support pursuit of this initiative and would be interested in participating.
- 2.2.1 Consider utility/energy sector partnerships that can incentivize plantings that reduce heating and electricity demand.
- 2.3.3 Strongly support this recommendation and would be interested in participating and providing technical assistance.

Strategic Direction 3

- 3.1.1/2 Strongly support the recommendation and the inventory and science work needed to justify it, particularly regarding specialized wildlife resources.

- 3.3. NVCT, possibly most strongly of all, supports the recommendations of section 3.3 and is interested in sharing and building upon our own planning work in this regard, particularly regarding possible enhanced incentives, including financial incentives, on private lands (3.3.2).

Strategic Direction 4

- 4.2. We consider ourselves to be part of this goal and actively support such enhancement of existing relationships and pollination among county-supported and related partner efforts. We are able to help provide cross-county connections and support better regional coordination across the DC Metro area, including with Maryland and D.C.



September 27, 2022

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

RE: Forestry and Natural Resources Master Plan

Dear Mr. Delaney:

EcoAction Arlington thanks the Department of Parks and Recreation and all the stakeholders who provided input into the draft Forestry and Natural Resources Plan (FNRP) released on August 1, 2022. It is a major undertaking. The dedication, seriousness, and integrity of the project shines throughout. We are very pleased that EcoAction Arlington-suggested elements and themes were largely included in the draft plan, including the importance of equity in public spaces, public participation in preserving green spaces for climate change reasons, involving Arlington Public Schools, valuing natural capital and inclusion of NOVA Parks in the Plan. We are disappointed that the importance of deer management is not mentioned and that the Tree Canopy Fund is not affirmed as a powerful public engagement tool to restore tree canopy in Arlington. We think the introduction could be improved with publication of an indigenous peoples' Land Acknowledgement in place of the language referencing native peoples on page one.

Natural Capital

The importance of “natural capital” as a governing principle throughout the FNRP is a very welcome change from prior versions.¹ In concert with the Natural Resiliency provision in the Capital Improvement Plan (CIP) budget the County moves ever closer toward the capacity to *invest* in nature, rather than simply managing it from one year to the next, for the significant benefits of heat island reduction, health improvements, habitat restoration and carbon emissions reduction, to name a few. We support the concept in Action Step 4.5.1 to source funding for forestry and natural resources from the CIP as well as other action steps to secure robust funding to implement the plan.

¹ “[Natural] resources constitute our stock of natural capital. FNRP Draft on page 2.

The County Board and staff face myriad decisions every year that require mediation between various County priorities that can conflict with protecting and expanding our tree canopy and other natural resources such as providing adequate transportation, housing, and stormwater services or negotiating community benefits with private developers. The FNRP should go beyond Action Step 1.3.1 to incorporate the value of trees and natural areas in County planning decisions as performance measures for investment in urban forestry to assess decisions when natural resources are being sacrificed for a conflicting goal to ensure full awareness of costs and benefits.

Equity in Tree Canopy Cover

The draft acknowledges the relationship between historically racist zoning laws and the lack of tree canopy cover in neighborhoods with higher-than-average BIPOC (black, indigenous and people of color) populations and higher than average poverty. For example, on pages 13-15 the FNRP states that, “the most diverse, racially mixed areas of the County have lower tree canopy than the less diverse ones,” and paragraph 2.1 has similar affirming language. Lacking, however, are robust targets for correction of historical wrongs. The overarching but unambitious goal of maintaining the tree canopy coverage at 40 percent should not only be revised upward but be backed up with feasible, if challenging, neighborhood-by-neighborhood targets, with particular attention to these underserved neighborhoods.

Directing resources toward increasing tree canopy cover in underserved areas is a high priority for EcoAction Arlington because, as we discovered in our pilot Tree Canopy Equity Program, <https://www.ecoactionarlington.org/community-programs/trees/tree-canopy-equity-program/>, many more resources are required to deliver these services to low- and moderate-income BIPOC communities than other places in Arlington. *See also*, the article cited at the FNRP at footnote 51 regarding the hard work and commitment that is needed to recruit property owners in underserved neighborhoods to plant trees on their property. We feel strongly that the County should devote the resources required to take assessments of low-tree canopy areas, set targets for improving them, and follow through with action plans measuring results.

Action Step 2.1.1 explains that 20,000 trees will need to be planted to achieve targets set by the Tree Equity Score, but the FNRP completely understates the need for County support to achieve such targets by stating “owners in underserved neighborhoods may need public support for planting and long-term care.” The County should support such planting and maintenance programs, and do so robustly. The FNRP should clarify this important need and prioritize it. Each Civic Association or planning region with below average tree canopy cover should have a charted path for achieving increased tree canopy during the next 10 years.

In Action Step 1.1.3 the FNRP generally mentions increased acquisition of public space, but such acquisition should be targeted predominantly at neighborhoods with already low tree

canopy to lessen heat island effects, negative health effects and many other environmental degradations that go accompany lower-than-average tree canopy coverage. This is especially true as the County considers the Missing Middle Housing policy and the attendant need for tree canopy cover in areas with greater density.

Managing Trees and Native Plants for Climate Change

Expansion and improvement of our natural green infrastructure is an important complement to the essential need to reduce Greenhouse Gas (GHG) emissions caused by combustion of fossil fuels -- a goal embodied in the County's Community Energy Plan, and this should be more clearly delineated in the FNRP. Green infrastructure can mitigate heat islands, reduce ambient temperatures when placed strategically, and can reduce energy costs. Trees and native plantings slow and filter stormwater runoff, an especially important attribute as more and more intense storms become the norm. On the margins, trees, plants, and healthy soil serve to sequester carbon.

The draft FNRP, under Strategic Direction 2: Climate Mitigation, Adaptation, and Resilience, misses an opportunity to highlight the importance of natural solutions in addressing flooding and stormwater runoff. Inclusion of some key actions to use conservation landscaping, tree preservation and trees, and replacement of lawn and impervious surfaces would reinforce ongoing County efforts to address stormwater and flooding under its Flood Resilient Arlington program. The County could work with neighborhoods to establish watershed regions where neighbors collectively get a discount (similar to a solar cooperative) on the cost of contractors and materials to reduce impervious surfaces, install rain gardens and reduce lawn space in conjunction with County work on the roads and public areas to enhance and facilitate these neighborhood projects.

Public Stewardship of Natural Resources

We are encouraged that the FNRP embraces the principle of Communitywide engagement in achieving its goals, encompassing people, organizations, institutions, and businesses. We are pleased with all of Action 2.3, Deepen Arlington's commitment to the conservation of trees and natural resources, and believe the plan would be stronger by elevating this concept to a strategic direction focused on fostering stewardship throughout the Arlington Community. We encourage the County to prioritize efforts to build stronger partnerships with the already strong volunteer and organizational networks committed to the County's vision (EcoAction Arlington, Master Naturalists, Tree Stewards, Master Gardeners, and others) to educate residential and commercial property owners to plant native trees and shrubs, remove invasives, and reduce the sizes of their lawns to provide wildlife habitat and create wildlife corridors. EcoAction Arlington's active network of interested, concerned citizens has demonstrated repeatedly the value of this type of education and volunteerism.

Such engagement should be reinforced with incentives and programs that facilitate efforts by property owners to transform their properties into healthier ecosystems that add to the overall natural assets of the County.

- The FNRP should reaffirm the value of the Tree Canopy Fund in offsetting loss of tree canopy through development and consider options to secure more funding to build on the program's success to meet more ambitious goals for expanding the tree canopy, especially in neighborhoods with low tree canopy and higher rates of poverty and inequitable access to green space. As the Standard Site Plan Conditions have not increased the developer contribution to the TCF per tree since 2007, we encourage the FNRP to recommend increasing developer contributions per tree to more reasonably reflect the value of the trees.
- We encourage the development of regulations and incentives to encourage homeowners and commercial and faith-based properties to improve natural resources on their properties. Moreover, the County should encourage private property owners interested in protecting valuable natural resources on their land for future generations to consider establishing conservation easements through the Northern Virginia Conservation Trust by providing tax incentives.
- We encourage reviving the StormwaterWise program and introducing similar programs through greater funding and increased scope across all County populations to provide both financial and technical assistance for conservation landscaping. Means testing and outreach efforts can be used to ensure that proportionally more funds are going to lower income households

NOVA Parks

We are pleased that the FNRP specifically calls out the other parkland owning entities, NOVA Parks and the National Park Service in the description of Arlington's lands. (See pages 11 and 16.) We are also pleased that plans are suggested to work with existing partners, and we hope this includes NOVA Parks and the NPS. (See Action Steps 4.2.1 through 4.2.3.) Arlington County is a part owner of NOVA Parks and provides tax revenue to this entity each year. It is within the purview and responsibility of DPR to monitor and engage with NOVA Parks to ensure consistency of goals regarding invasive plant removal, stormwater retention policies, preservation of tree canopy and other important considerations, and this DPR role should be more clearly stated in the FNRP. Committing such environmental coordination and quality control to an MOU format would be a great step toward providing clarity and support to NOVA Parks direction to ensure such is consistent with Arlington County's desires. EcoAction Arlington would support an environmental management audit of NOVA Parks to analyze how much funding would be required to manage the parks in a manner that would increase the environmental attributes that are touted in the FNRP.

Legislative, Zoning, Ordinance and Site Plan Changes to Meet FNRP Goals

We recommend that the FNRP prioritize actions to set standards through rezoning, form-based codes, and sector plans for development/redevelopment that balance increased density with opportunities to allow more space for street trees, native plantings and to insert requirements for green spaces. This is especially important when more vertical density is being planned such as along Langston Blvd where one and two story buildings and large surface parking lots are likely to be replaced with multistory buildings. There may be opportunities to reduce street widths or eliminate street parking to build in more spaces for trees, as well as improving bike and pedestrian infrastructure. Development of detailed guidelines for biophilia, especially in more densely developed neighborhoods, as part of the Site Plan Review process would provide further guidance to embedding natural elements into our built environment.

The FNRP should similarly prioritize a review and revision of zoning for single family and missing middle housing to meet its goals. Overall lot coverage allowance should be reconsidered and be better aligned with providing adequate space for healthy tree canopies and native plantings and reducing potential future impact on the stormwater system as a result of continued redevelopment. Setbacks for residential property redevelopment should allow for flexibility to preserve trees and to locate trees and other green infrastructure where they will have the greatest environmental benefit, such as shading homes to reduce energy costs, or landscaping to address stormwater that considers the natural slope of the property.

The County's weed ordinance should be reviewed and adjusted if necessary to prevent homeowners with conservation and native landscapes from being penalized and the County should continue to move forward with steps that are already underway to develop an ordinance prohibiting the planting of bamboo. The FNRP should endorse this effort and make a point of taking other steps to pass ordinances prohibiting the sale and planting of invasive plants, as permitted by state law. The County should continue to pursue legislative changes to restrict the sale of invasive plants and fund invasive removal efforts.

Arlington Public Schools

We are pleased that the FNRP draft includes a commitment to work with APS to manage its lands to preserve and enhance natural areas, but more succinct goals should be included along with a commitment from APS to collaborate. In particular, EcoAction Arlington encourages the FNRP to include an Action Step to help APS implement the objectives of the Living Schoolyard Initiative. (For more information, see the Arlington Living Schoolyard Initiative white paper at this link:

docs.google.com/document/d/1iymo0hccQCo0KtiwirBZD_xOPTvmQxzcbzy2QAvl50s/edit)

Action Step 2.3.4 comes close to achieving this objective but should be more insistent on working toward a commitment from APS to abide by DPR recommendations in this regard.

Indigenous Peoples' Land Acknowledgement

We encourage the DPR Staff to publish an indigenous peoples' Land Acknowledgement at the beginning of this Forestry and Natural Resources plan in place of the mention of indigenous peoples in the introduction on page one. EcoAction Arlington developed an indigenous peoples' land acknowledgement at the direction of its newly formed Diversity, Equity and Inclusion ("DEI") Committee. www.ecoactionarlington.org/wp-content/uploads/2022/03/EcoAction-Arlingtons-Justice-and-Inclusion-Policy.docx.pdf It reminds our leaders of the importance of incorporating all voices including those of future generations in discussions of policy and actions. Here is a website with resources for drafting a respectful and meaningful land acknowledgement. <https://americanindian.si.edu/nk360/informational/land-acknowledgmentegard>.

Deer Management

Deer are ruining the forests, backyards, school yards, parks and other public places in Arlington. They eat the saplings of diverse species and/or damage saplings with antler rub, leaving only a few species to mature. The forests are becoming monocultures denuded of native trees that are critical as habitat or forage for local fauna. Most surrounding jurisdictions control deer populations, and we are strongly in favor of doing so too. Deer management should be specifically discussed as an important element and tool of the FNRP.

Thank you for this opportunity to provide comments. Please contact either of us with any questions or concerns.

Sincerely,

/s/

Jill Barker, Board Member

Elenor Hodges, Executive Director

cc: Ms. Katie Cristol, Chair, Arlington County Board
Arlington County Board Members



11100 Wildlife Center Drive, Suite 100
Reston, VA 20190
(703) 438-6008 • info@audubonva.org
audubonva.org

September 30, 2022

Via email: rdelaney@arlingtonva.us

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

RE: Draft Forestry and Natural Resources Plan

Dear Mr. Delaney:

Audubon Society of Northern Virginia (ASNV) appreciates the hard work by Parks and Recreation as well as the Natural Resources Joint Advisory Group in developing the draft Forestry and Natural Resources Plan (FNRP). We are very encouraged that the FNRP calls for conservation of natural resources (including wildlife), restoration of degraded areas on County lands, valuing natural resources in all County planning processes, continuing and increasing invasive species management programs, establishing a connectivity network, conducting periodic assessments of resources, and providing sustainable funding to support land acquisition as well as other management goals. We also are encouraged by the FNRP's call for establishing partnerships with both public and private entities to push the features of natural resource areas in the County parks out into private lands, to the extent possible. Such efforts can help establish wildlife corridors, which are essential to protection of local wildlife in urbanized Arlington, with its fragmented natural resource areas.

We are surprised that the FNRP does not yet specify the need for aggressive management of the deer population in Arlington County. At a minimum, we support identifying deer management as a Priority Action in the final FNRP. Deer in Arlington County are systematically eliminating understory and preventing the growth of native trees in Arlington's forested areas and along its natural corridors. As you know, healthy understory in forested areas is essential habitat for many native bird species such as the Wood Thrush, which produces one of the loveliest songs of Northern Virginia passerines.

Beyond those general observations, we attach an outline of some specific recommendations on the draft FNRP, particularly on Strategic Direction 1 (Conservation) and Strategic Direction 3 (Biodiversity).

Respectfully submitted,

Tom Blackburn
Advocacy Chair
Audubon Society of Northern Virginia

Attachment 1

September 30, 2022 Letter of Audubon Society of Northern Virginia Draft Forestry and Natural Resources Plan

Strategic Direction 1

Conservation: Increase and protect tree canopy, natural areas and biophilic features throughout the County

1.1.2 Ensure no loss of County-owned natural lands

Preventing loss of natural lands must include **restoration of currently degraded natural lands**. For example, the 2010 Natural Resources Management Plan identified the area adjacent to the Glencarlyn dog park as a Natural Resource Conservation Area (NCRA); however, it has not been protected and is significantly degraded by the dog park and ad hoc trail users (both pedestrians and mountain bikers). See also the comments on section 1.2.9 regarding encroachments. Although it may no longer appear to be one of the County's "highest-quality natural areas," its location at the intersection of Long Branch and Four Mile Run qualifies it as deserving protection/restoration. See also the FNRP's recommendations in section 3.1.3 for maintaining the NCRAs. ASNV recommends that restoration of degraded Natural Resource Conservation Areas be a Priority Action in the final FNRP.

In addition to restoration, preventing loss of County-owned natural lands requires analysis of all proposed park projects to ensure that natural lands are taken into account. The analysis should include NOVA Parks projects within Arlington County, such as the possible expansion of the W&OD trail in Barcroft and Glencarlyn Parks, which could result in loss of forest and meadow habitat in an important natural corridor. It is too easy for decision-makers for individual projects to allow the loss of a small area of green space here and tree or two there, without taking into account the cumulative effect of all those losses—death by a thousand cuts. ASNV encourages Parks and Recreation to approach all proposals with the urgency of resource protection in mind.

1.1.3 Advance urban forestry and natural resource goals through County public space acquisition

The criteria for acquisition of natural resource lands from the 2019 Public Spaces Master Plan (PSMP) are valid and useful. It would be helpful if the final FNRP indicated (a) whether the County has taken steps to acquire any of the lands identified in the PSMP as Natural Resource Acquisition Areas, (b) whether any of those indicated tracts may no longer be acquisition targets, and (c) whether there are additional lands that could qualify as Natural Resource Acquisition Areas. Consider also whether the FNRP should recommend accelerating acquisitions and/or increasing the amount of acreage targeted to meet natural resource needs given the pressures of climate change and storm water challenges from increasing development.

1.2.9 Conduct a systematic inventory of land encroachments that threaten to degrade public lands

Encroachments that degrade public lands and harm natural resources are not limited to dumping (although that is a serious problem), appropriation, or noxious usage of adjacent lands. We recommend considering the following as encroachments, because they are actions by park users and from nearby properties that endanger local wildlife: lack of leash law enforcement, which results in free-ranging dogs that stress wildlife; free ranging cats (both pet cats and feral cats) that kill wildlife; release of balloons (which may be inadvertent) and scattering of small waste materials (glitter, candy wrappers) in picnic areas in or adjacent to the natural areas; and discarding large bags of waste materials from picnics or parties, which bags are subsequently opened and trash scattered by scavenging crows, raccoons, and

squirrels. All of those listed “encroachments” could be at least partially mitigated through public education or modification of some park use rules. But they will not be changed unless they are identified as harmful. Education could be useful here: when park users are aware of the benefits of natural resources and the potential harm from their activities, they are more likely to change behavior. Signage about yard waste dumping also could be helpful.

Strategic Direction 3

Biodiversity: Sustain vibrant landscapes for people, plants and wildlife

3.1.5 Develop a Meadow Management Plan

ASNV supports the County’s developing a Meadow Management Plan. Creation and management of meadow habitat is important and should not be limited to meadows that would be large enough (20 acres) to support grassland birds such as the Grasshopper Sparrow or American Kestrel. The small areas available for meadows within Arlington’s parks and in connective corridors can still provide habitat for important insect species and other birds that do not require large meadows to thrive. Areas that can be managed as meadow habitat include borders of the W&OD trail, so involvement of NOVA Parks in a Meadow Management Plan is essential. As noted above (comments on section 1.1.2), the contemplated expansion of the W&OD trail in Barcroft and Glencarlyn Parks is a threat to some existing and potential meadow habitat.

3.5.1 Reduce light pollution

The principles outlined for reducing light pollution in County facilities, parks and trails in Section 3.5.1.1 are excellent; however, ASNV recommends that the potential adverse effects of lighting on natural resources may be weighed more heavily in future environmental reviews and individual park plans if the FNRP includes some references documenting the harm to wildlife and other natural resources from the loss of dark skies. Some articles we have found persuasive are listed on Attachment 2 and may be important to development of a future parks lighting plan. ASNV understands that the FNRP is a high-level plan, but we would prefer that it be more prescriptive with respect to possible lighting in existing no- or low-light areas, including along mixed use paved trails in natural areas of the parks. Such connective corridors along remaining stream valleys are important to wildlife: ideally, such areas should have no lights or, if lighted, be equipped with light that is warm-colored, shaded to prevent spill and up-lighting, and triggered only by motion sensors.

3.5.2 Support and further develop and strengthen the guidance of the bird-friendly material outlined in the Green Building Incentive Policy

ASNV supports improvements to the Green Building Incentive Policy (for example, regarding applicability to ground floor windows, height to which standards apply, etc.), but it also recommends that the County take more aggressive action to prevent loss of birds through building collisions. The requirements of the Policy apply only to development seeking to qualify for bonus density. The FNRP should include recommendations that the County ensure that any new County facilities are constructed to prevent bird loss through collisions and investigate retrofit technology for County facilities that currently present collision hazards. In addition, ASNV recommends that the County include in its legislative priorities for 2023 State legislation allowing local jurisdictions to adopt green building requirements.

Attachment 2

September 30, 2022 Letter of Audubon Society of Northern Virginia
Draft Forestry and Natural Resources Plan

Suggested references for Section 3.5.1 on reducing light pollution

Florida Atlantic University, Department of Physics, "Light Pollution Harms the Environment," available at <http://cescos.fau.edu/observatory/lightpol-environ.html>.

International Dark Sky Association, "Light Pollution Effects on Wildlife and Ecosystems," available at <https://www.darksky.org/light-pollution/wildlife/>.

International Dark Sky Association, brochure, "Light Pollution Can Harm Wildlife," available at https://darksky.org/wp-content/uploads/bsk-pdf-manager/Wildlife-Brochure-FINAL2_32.pdf.

"Light pollution is bad for humans but may be even worse for animals," *The Conversation*, Sept. 9, 2014, available at <https://theconversation.com/light-pollution-is-bad-for-humans-but-may-be-even-worse-for-animals-31144>.

National Park Service, "Animals Need the Dark," available at https://www.nps.gov/articles/nocturnal_earthnight.htm.

Gareth Willmer, "Light Pollution Is Altering Plant and Animal Behaviour," *Horizon Magazine*, March 28, 2018, available at <https://phys.org/news/2018-03-pollution-animal-behaviour.html>.



October 1, 2022

Via Email

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

Re: Forestry and Natural Resources Plan

Dear Chair Cristol:

The Arlington Tree Action Group has reviewed the draft of the Forestry and Natural Resources Plan that was released on August 1, 2022.

While there are many excellent recommendations in the plan to conserve or improve tree canopy in Arlington, the next draft should express a much stronger sense of urgency throughout the document about the importance of our natural resources and their potential to address climate change. We are living in the midst of a climate crisis that is severely exacerbated for Arlington residents with the rapid loss of trees and natural resources being replaced by impermeable surfaces. County leaders must act now to avert further deterioration of our natural resources and the functions they provide.

Below are several other recommendations that we hope will inform the next draft of the plan.

Measurable Goals, Metrics, and Timeframes

Each of the strategic recommendations in Strategic Directions 1 – 4 should list after the description:

- A measurable goal or metric that determines when this action has been achieved
- A timeframe in which to achieve the action
- A person or department responsible for seeing the action to completion

Without these specific parameters, this document more closely resembles a list of aspirations rather than the actionable plan we need now.

Stronger Language

Many of the actions listed in the plan use vague language rather than clear declarative statements. For instance, section 1.1.4 states: “Reflect FNRP-adopted policies in future Comprehensive Plan elements, sector and area plans.” This statement should read “FNRP-adopted policies **must** be reflected in future Comprehensive Plan elements, sector and area plans.”

In addition, often the only actions are for the county to “consider” or “explore.” These are not the sort of actions that this plan needs. For example:

“1.2.3.1.B **Consider** establishing caps on impervious surfaces that are not already counted as lot coverage under the Zoning Ordinance.”

“1.2.3.1.D **Consider** changes to the Zoning Ordinance that better align it with the County’s goals for forests and natural resources management while fostering diverse housing choices.”

“1.2.5 **Consider** revisions to Landscape Standards for new subdivisions, multifamily, institutional and commercial projects.”

These should be stated as actions, since they are within the County’s power to act upon:

- “**Establish** caps on impervious surfaces...”,
- “**Change** the Zoning Ordinance...”,
- “**Revise** the Landscape Standards...”

40% Tree Canopy

Section 1.1.1 talks about maintaining a 40% tree canopy county-wide. However, it does not list any specific recommendations as to how this can be achieved given all by-right new residential construction in Arlington only requires a 20% tree canopy – and that number will soon be slashed to 10% if Missing Middle passes. The plan needs to show the specifics and the math behind how we get to 40% from 10% if that becomes the new standard in our residential areas, which is where 70% of our canopy resides.

By-Right Development

ATAG strongly recommends changes to zoning (particularly, reducing allowable lot coverage or increasing setbacks of re-developed or new houses) that will encourage both tree preservation and tree planting.

ATAG would also like to see bonding and escrow requirements for newly planted trees (mentioned in section 1.3.3) be enacted for by-right developments, similar to the one the City of Falls Church has.

Inaccuracies in the Missing Middle Housing Insert

On page 30 of Section 1.2.3.1 there is an insert about the MMH Study. There are several statements in this section that are misleading or questionable and should be removed. For instance, the quote that says “potential tree canopy up to 50%” is misleading in that this is based solely on what a particular homeowner chooses to do at their own expense and on their own time. The county has no way of enforcing this percentage. ATAG also notes that the ability to reach 50% as shown on the consultant report for the study is not possible.

Also, the statement that “retention or replacement” of trees would “remain the same as the status quo” under MM is **completely** inaccurate since we know the required replacement percentage is about to be cut in half. Both statements should be removed.

Legislative Action

The plan mentions seeking legislative changes at the state level in several places (1.2.1, 1.2.3.1-A). The plan would be much more effective if the ordinances, bills, or laws (VA Code: 15.2-961, for instance) were listed and with the exact changes that Arlington is seeking. This would help both the county and the various groups in Arlington that support trees target their lobbying efforts.

In addition, the plan should state that legislation affecting tree canopy or natural resources in Arlington should be one of the highest priorities on the annual list of Legislative Agenda items for the House of Delegates session in January. Typically, trees are mentioned as one of the last priorities on that list and consequently there are no initiatives arising out of that effort.

Establish a “Trees and Green Space First” Policy for Site Plans and Use Permits

Given their importance in reducing heat, intercepting storm water, and reducing pollution, trees need to be driving the planning of projects - not an afterthought.

In section 1.2.3.2, the FNRP discusses site plan and use permit projects. On these types of projects, we hope that the revised plan will insist that well-positioned trees, plantings that support native wildlife, and permeable surfaces be considered among the highest priorities in approving these projects.

Improving How Trees are Valued

Section 1.3 of the plan talks about ways to value a tree differently than the Council of Tree and Landscape Appraisers (CTLA) calculations. ATAG applauds the action of using i-Tree and other tools to quantify the environmental and community value of trees. Before trees are removed, the environmental and community losses should be made transparent to all who will be affected.

Partnership Between DPR and APS

ATAG supports the recommendation in section 1.1.5 to formalize the relationship between APS and DPR. We recommend this take effect **immediately**. Each school should develop a specific landscape plan that shows how to maximize tree cover on its property. The FNRP should also stress tree **preservation** on APS property, in addition to planting/growing new trees.

Monitoring the tree canopy

Section 4.1.1 recommends the county conduct a tree canopy study every 3 to 5 years. ATAG recommends changing this recommendation to be every 1 to 3 years. Since the cost for these studies continues to go down, and the technology continues to improve, we think an annual study should be the ultimate goal, given the rapid pace of development. This is the only tool we have to measure how the county is doing on its stated goal of a 40% overall tree canopy.

Transparency with Maintenance Schedules

ATAG supports establishing a regular maintenance schedule for trees (section 4.4) and recommends moving to “pro-active” tree maintenance. We also concur with publishing these maintenance schedules on the county website (as is suggested in the plan) so they are available to residents.

Funding for Green Infrastructure

Given the size and scope of the recommendations in this plan, the County needs to expand funding for natural resources, trees, and the Urban Forestry staff. ATAG fully supports the recommendation in section 4.5 that the county fund our “green infrastructure” the same way it funds its gray infrastructure – using the Capital Improvement Plan (CIP) process.

Note that the FY 2022 Arlington budget reduced Urban Forestry funding by 4% at a time when the number of development projects continues to increase, and the staff to review development plans is spread thin. A steady source of funding via CIP would be beneficial outside of the unpredictable nature of year-to-year budgeting.

We appreciate the county’s work and investment in this updated Forestry and Natural Resources Plan and look forward to reviewing the next draft.

Sincerely,

Arlington Tree Action Group (ATAG)

Cc: Mark Schwartz
Ryan Delaney
Adam Segel-Moss

Donaldson Run Civic Association

September 29, 2022

Katie Cristol, Chair
Arlington County Board
2100 Clarendon Boulevard
Arlington, VV 22201

Re: Forestry and Natural Resources Plan

Dear Chair Cristol:

On behalf of Donaldson Run Civic Association (DRCA), we file these comments on the staff's draft Forestry and Natural Resources Plan, released August 1, 2022.

Our comments reflect DRCA's experience with the expanding and irreparable loss of mature trees resulting from development in our neighborhood. They also highlight certain draft recommendations resulting from the efforts over the past year of an informal working group, convened under the auspices of the Civic Federation. While these draft recommendations have not yet been considered by the Civic Federation, they seek to identify specific reforms to County ordinances and practices designed to stem the accelerating tree loss in the County.

We applaud County staff for identifying the challenges Arlington faces with increased development and the importance of maintaining a commitment to ensuring the many well recognized benefits of increased tree canopy. We share the belief in the biophilic principle of making nature a priority in urban planning (p. 2). We also agree that these benefits should extend throughout all areas of the County regardless of their different demographic characteristics.

Nevertheless, we believe the draft plan fails to communicate the sense of urgency required in light of the rapid loss of trees and green space in the County. It also fails to identify specific steps the County can take to achieve the laudable goals advanced in the plan. Zeroing in on *how* we can achieve these goals is essential in light of where we now find ourselves. We don't have time not to make that effort.

While we address additional steps below, we have the following seven high-level recommendations for your consideration in finalizing the plan:

- The draft plan seeks to ensure "zero loss" of our existing tree canopy (p. 25), while expanding that canopy "where possible" (p. 49). Arlington can and should do better, by walking the walk as well as talking the talk about trees. Our specific recommendations are designed to stem the "significant [tree] losses on private property" (p. 15) documented by the draft (p.24), as well as adding to parklands to honor the commitment made by our predecessors in the 1940s (p. 1). It is distressing to see that the County is now requesting bond authority in the amount of \$22.46

million for local parks and recreation for the next year, *none* of which will be devoted to “Parks and Land Acquisition and Open Space.”

- In connection with the “missing middle” proposal referred to in the draft (p. 30), the June 23 letter to the County Board from the Forestry and Natural Resources Commission (FNRC) expressed serious concerns about that proposal in light of the “already declining tree canopy.” The Commission does not support missing middle changes “when concrete policies to protect our vital natural environment and urban forest have not yet been developed.” These include “zoning changes to reduce building footprints for new construction (whether multi-unit or single-family) in residential areas, an issue the FNRC raised more than two years ago.”
 - Consistent with consensus views expressed in last year’s Online Engagement Summary (see p. 18), the August 1 draft plan does tee up such zoning changes for consideration (p. 31), and we include some additional ones below. However, like the FNRC, **we cannot support any missing middle changes to the Zoning Ordinance that are not preceded by reforms to the 2005 lot coverage provisions of the ordinance.** The need for such reforms long predated any missing middle proposal. Indeed, staff recognized that need at least as far back as the 2014 Stormwater Management Plan. Accordingly, the plan should be revised to recommend reprioritization of these reforms so as to precede, not follow, any “missing middle” changes to the Zoning Ordinance.
 - Apart from the loss of existing mature trees from oversized home footprints (single-family or multi-family), we also note the reduced 20-year future tree canopy protections (p. 30) that would result from adopting the missing middle proposal. **There is no support provided for the wishful thinking that developers will not take advantage of these reduced protections, and will instead “plan[t] beyond the regulatory requirements” to ensure “up to 50%” tree canopy.** Any such assumption runs flatly contrary to DRCA’s repeated experiences.
 - The plan’s analysis of these reduced tree canopy protections also seriously understates the potential scope of these reductions, because **the reductions will also apply to any single-family developments in the new multifamily zoning districts.** As the County has recognized, the state law 10% cap on local tree canopy requirements (Va. Code § 15.2-961) applies to *any* “site zoned 20 or more units per acre.” Under the missing middle proposal, we believe developers of single-family homes would assert that the 20% limit now applicable to them would be reduced to 10% in such zones.
- **Review of site plans for use permits and special exceptions should receive notice and opportunity for input from neighbors and affected civic associations, before staff recommendations on such plans.** The County should implement a public outreach program to alert civic associations and others about the opportunity to participate in such discussions, which could address steps to avoid loss of mature trees.
- **The County should revise its tree preservation ordinance to ensure maximum use of the authority granted under state law.** Va. Code § 10.1-1127.1.
 - When Arlington implemented this authority in 2002, the County Board amended the proposal to give owners of single-family homes – and no other property owners – a veto right (not required by state law) over designation of trees for special protection. While

all property owners have a right to be heard, state law ultimately provides the County Board with authority to override their views.

- The County Board should charge the FNRC with making annual proposals for such tree designations, for consideration by the County's urban forester, who should provide a written explanation to the Board and the public on action to accept or reject such proposals.

■ **The County should strengthen its Chesapeake Bay Preservation Ordinance as follows, to comply with state law requirements:**

- Clarify that *any* exception to the prohibition against land development within an RPA to must be considered not by staff, but by the Chesapeake Bay Ordinance Review Committee.
- Prohibit the installation, within an RPA, of any facilities designed to collect and treat runoff from an individual lot or some portion of the lot. This would deter use of such mitigation to facilitate removal of trees.
- Update and expand the County's RPA designations, with full use of the "other lands" provision as permitted under state law and the County's ordinance (61.5(B)(1)(e)).
- Accelerate the September 2024 deadline required by state law (HB 504, sponsored by Delegate Hope, and implementing regulations VAC 25-830-130, 25-830-155) to increase protections designed for "preservation of mature trees" and "climate change" imperatives.

■ We agree that **Arlington's General Assembly delegation should introduce legislation to amend the tree canopy provisions of Va. Code § 15.2.961 to grant Arlington County unrestricted authority to impose tree canopy coverage requirements in reviewing development plans.**

Whatever the situation may be in other areas of Virginia, in this high density and accelerating redevelopment area we need stronger tools to address the accelerating stormwater management and other impacts of tree loss.

- Governments speak to their real priorities through their budget and capital investment choices and commitments. As noted above, the County's bond issue for parks and recreation should reflect the need to acquire and preserve more of our dwindling green space. Too often, the County opts out of opportunities to do so the way our predecessors did (p. 1). The destruction of trees to make way for intensive development of the Febrey-Lothrop site in Dominion Hills is a tragic example of this lost opportunity. Nor should we rely on incentivizing private developers to undertake the creation of such public goods, with often unacceptable tradeoffs.

In addition, we have the following recommendations on the draft plan:

- As the draft notes (p. 15), 84% of the trees in Arlington are on private rather than public land. Accordingly, the priorities in the final plan should focus more on protecting mature trees and future tree canopy on private land.
- The lot coverage reform proposals (p. 31), which will apply to both existing single-family and any future multi-family developments, should also include reducing overall lot coverage percentages in each R district, revisiting the detached rear garage and front porch exceptions, and accounting for oversized lots in smaller (e.g., R-5 and R-6) districts to avoid dwarfing adjacent homes.

- Under no circumstances should reduced lot coverage footprints be traded off for *increasing* the 35-foot height limit for residential structures. This would defeat a critical purpose of zoning – to prevent “interfering by . . . height and bulk with the free circulation of air and monopolizing the rays of the sun which otherwise would fall upon the smaller homes.” *Village of Euclid v. Ambler Realty Co.*, 272 U.S. 365, 394 (1926), cited, e.g., in *Cedar Point Nursery v. Hassid*, 141 S. Ct. 2071-72 (2021). Indeed, there is widespread recognition that the current height limit is far too generous, because among other things it fails to account for the steep slopes in the county (by using calculations based on the average height of four corners of the structure), and counts only half the height of gabled homes.
- Landscape standards (1.2.6) should also incorporate the most recent ISA standards for tree preservation during development. While it may have been updated, see N. Matheny and J. Clark, *Trees and Development: A Technical Guide to Preservation of Trees During Land Development* (1998).
- Based on what we see from development in our neighborhoods, county enforcement of tree preservation requirements during this period of accelerated residential teardown and redevelopment is inadequate. While this problem may be exacerbated by lack of resources, and by inadequate communication between developers and their crews, our experience has been that lax enforcement sends the wrong message to them and they lack any real incentive to comply with best practices. See, e.g., Letter from DRCA to County Manager re 4009 N. 25th Street, July 28, 2020. The County should also seek General Assembly action to increase the relatively modest penalties now imposed for construction-related violations, including loss of required licenses.
- Such enforcement can be enhanced by requiring (as with subdivision plans) that tree preservation plans filed with the County be provided to neighbors and the relevant civic association. The County Attorney has now reversed prior rulings by staff that such plans are exempt from FOIA requests, but proactive efforts to make these plans available in advance of County action on them would be more effective, by getting this information in the hands of those most affected by it.
- We agree that tree canopy requirements under existing law need strengthening (1.2.6) by preventing subsequent owners from removing trees planted to comply with such requirements. This requirement should be coupled with post hoc reviews of these plans to determine whether they have achieved their tree canopy targets after the specified 20-year period.
- On public lands, we agree that the County needs to increase its attention to (and thus funding of) maintenance of trees after they are planted (pp. 60, 69). Proactive maintenance programs should include regular solicitation of input by the relevant civic association(s).

Thank you for your consideration of these comments.

Sincerely yours,

Bill Richardson
President
Donaldson Run Civic Association

cc: Forestry and Natural Resources Commission

From: [david.howell](#)
To: [Ryan Delaney](#)
Subject: Comments Part 2--Appendices
Date: Tuesday, September 13, 2022 2:27:53 PM

EXTERNAL EMAIL

Hi Ryan,

This message includes my comments and suggestions about the FNRP Appendices. I understand fully that with the timetable and content challenges to complete the first draft of the plan for an August 1 release, some parts didn't get as much attention up to now as the main body of the document. That's not a problem, and I know that will change as work progresses. But I do see this as an opportunity to comment on the Appendices as an important part of the plan, and to make suggestions prospectively about what to consider in next steps.

The appendices are vitally important as reference, education and validation tools, and as a way to provide context and credibility to the underlying precepts on which most the plan is built. As discussed, I prefer a much more robust set of appendices, and as noted, the Appendices portion of the PSMP is equivalent in length to the plan itself. So I am providing below some ideas for additional appendices and/or specific documents that I think could/should be included as a resource for readers. In some cases these also connect to comments about how the opening section of the plan (pages 1-22) need to be more robust and explanatory, and the inclusion of these appendices will help prompt content ideas for expanding and enhancing that portion of the plan.

A variety of appendix styles and content will be very beneficial to those who read for reference as well as those who read for plan recommendation background. Much of the content may exist in some form—perhaps not the most useful form for user-friendly purposes in all cases—but is readily available to repackage and create an appropriate format. Other content will need to be sourced (among county sources that already exist) and created as new documents for this purpose. These are not difficult tasks. They will be made easiest if the format and approach to each is already decided and is part of the guidance to those who are assembling and organizing the material. In other words, the instruction is “here's how it should look and should work for readers, and use these materials to create it”. Seems simple, but an abundance of clarity will help.

Happy to discuss,

David

SUGGESTIONS FOR APPENDICES

1. Tree species inventory (perhaps with a few basic specs/characteristics).
2. Tree Canopy Survey with maps
3. Champion and Specimen tree inventories and maps
4. General flora inventory—species list by categories (taxonomic or ecological conditions)
5. Wildlife inventory—the intro and species lists excerpted from the 2011 report
6. Topographical/ecological type map of Arlington, without development, showing

- vegetation cover, water drainage and other natural conditions.
7. Map of Arlington with parks, trails, all roads and development.
 8. Map of Arlington with developed areas and non-developed areas and heat-island differentials.
 9. Natural conservation areas—one-page profiles with photo and location map of each designated area
 10. RPA description and map
 11. Constructed/restored natural areas profiles, such as Ballston, Sparrow, Bluemont, lower 4MR.
 12. Water quality background and testing overview. Aquatic wildlife sampling info.
 13. Inventory of data collection and analysis functions on all natural resource monitoring and oversight. Brief description of each function and frequency.
 14. Profiles of stewardship/volunteer organizations and activities
 15. Profiles of programs for private property stewardship and naturalizing: Audubon at Home, Native Plant sales and support, etc
 16. Biophilic Cities Network application and Biophilic Cities CB resolution
 17. Expanded table of Comp Plan interconnections with more detail. Edit overly deferential title/descriptor of this table.
 18. Map/inventory of school properties and dedicated natural areas in school grounds. Some schools are now getting some rain gardens (and vaults) and more natural, unprogrammed space.

SUGGESTIONS FOR ADDITIONAL RESOURCES

This list includes sources that I recommend be included as content in the body of the plan introductory section, or in appendices, or both. They are materials that provide supportive context, connections, and references appropriate to both parts of the plan.

1. The World Bank Urban Nature report, November 2021. This should be drawn from in the body of the plan and perhaps excerpted in a “further resources” appendix.
2. The Virginia Wildlife Viewing Plan. This should be referenced and drawn from in the body of the plan and the executive summary should be in a “further resources” appendix.
3. Excerpts from the Pentagon City Sector Plan, the Clarendon Sector Plan, and some illustrations/examples from private development projects and public facility projects. Could include several schools, the Lubber Run Community Center, the Long Bridge Aquatic Center, PenPlace, Artis Senior Living, and a few others. The Appendix would be about how we do/can build with nature and create biophilic spaces.
4. There certainly are more possibilities, but these are “core” perspectives on why the plan is important and how it matters.

From: [david.howell](#)
To: [Jennifer Fioretti](#); [Ryan Delaney](#)
Subject: Additional point to comments 1 and 2
Date: Wednesday, September 14, 2022 11:04:44 AM

EXTERNAL EMAIL

Jennifer and Ryan,

In my previous messages I focused on what I think are shortcomings in perspective, approach and content to the initial section of the draft, as well as the Appendices. What I neglected to include are largely positive reactions and comments on elements that are plan strengths in important areas. So, here are a few additions that I think are especially important:

- The vision statement is quite good. It is well written and holistic in perspective. I only have one suggestion at this point, which I put in the survey tool. Just after the initial word "Arlington...", add "...values nature..." and then continue with "...and manages its natural and built environments..." This embeds nature as a cultural and official asset, and provides an anchor for the first three principles.
- The principles are also well done and represent an important range of attributes. My main suggestion here is that the order should be reversed for the first two principles, so that the recognition of intrinsic value of nature is first. This supports the (current) first principle (move to second in the sequence) and is justification for all of the others.
- The portion on relationship to other plans, and on biophilia includes good points in what is there, but it is too thin, and I think would benefit from the change in order.
- Throughout the initial section there are pieces here and there that are also ok for what they are, but as noted in the original comments, just insufficient to depth and continuity with the overall purpose/themes of the opening section. So a revision/expansion of many subparts might be done to include that content, or even built upon it, to enhance their effectiveness in supporting the vision and principles and creating an explanatory foundation for recommendations.
- The definitions appendix is solid and while it might benefit from a few additions, it a good first draft.
- The table that crosswalks this plan with other comp plans needs some attention to the descriptions and topics. The title is an example of the meek posture found in several parts of the draft. We should not define this as how the FNRP "supports" other comp elements, but the areas of recommendations and purpose where the FNRP and other plans have common cause. This should support what we are already seeing in some areas, and what we want and need, that the comp elements should be mutually supportive, cutting across department program and funding lines to create holistic goals and benefits as described in the single vision and 6 principles. This title conveys a subservient perspective.
- The housing/race history is an important component. Perhaps it should just be in the history portion of the intro, or in the equity discussion. It isn't long enough to be an appendix. Aside from development, the three most important impacts on distribution of natural resources in Arlington's history are the Civil War and associated deforestation, the redline policies noted in this appendix, and the reservation/acquisition/designation as not buildable space in the middle of the 20th century that preserved many of the parks we now have. (Well, we should also acknowledge that the federal protection of the Potomac shoreline north of the airport and south of Alexandria has kept the river from

being developed like many other cities.

I apologize for not including these points before, particularly those on the vision and principles. They are the most fundamental to the plan, and they are quite good as a draft. I suppose part of my concern about some of the other portions is that they do not stand up to this standard and support—conceptually and substantively—those plan anchors.

David

To: Ryan Delaney, Principal Planner, Arlington County, Department of Parks and Recreation, Park Development Division

From: Stephanie Martin (352 N. Edison St., Arlington, stephmartin60@aol.com)

Thank you for the opportunity to comment on the draft Forestry and Natural Resources Plan. As a volunteer and Master Naturalist member since 2008, I share your strong commitment to natural resource conservation. Overall, I believe this plan sets the right direction for protecting our diminishing natural resources. I encourage the County to develop the policies, standards, and rules necessary to the successful implementation of the plan. Below are more detailed comments:

- In discussing how the FNRP relates to other County plans and commitments, it is important to acknowledge possible changes that could come out of the “missing middle” study (see 1.2.3). Many existing houses do not use the entire footprint that would be allowed under existing zoning rules. When developers are left free to build to the limits, it is likely that many mature trees will come down. In designing the rules to implement “missing middle” policies, the need to preserve the County tree canopy should be taken into consideration. Retaining only 10-15% canopy on a property while removing healthy mature trees should not be good enough to get a higher density zoning permit. If the County cannot do this type of conditional zoning, we should hold off on missing middle changes until we can get the state to allow Arlington more freedom in protecting its natural resources.
- I strongly support maintaining the existing 40% tree canopy (see 1.1.1), but as this is an aspirational document, why not aim higher? 50 or 60%? This will require the cooperation of private landowners, but the County could get more creative with rules, education, and incentives to make that happen. This aligns with section 2.3.
- Not all trees are equal. For instance, replacing a mature white oak with a Callery pear is not providing much of a benefit to the native wildlife. I encourage County regulations to incorporate rules or incentives for planting native trees with long-term benefits to the natural environment. (See, e.g., 1.2).
- I support the idea of quantifying, to the extent possible, the benefits of trees and natural areas. Section 1.3 lists environmental-related factors in the quantification. Have there been any studies about the economic value that is added to property by the presence of trees or natural landscaping? Some folks may respond to a pocketbook-related benefit.
- I encourage the County to provide resources and co-sponsorships to educational efforts in cooperation with volunteer groups such as Master Naturalists and Tree Stewards. The County’s volunteers have a wealth of knowledge and enthusiasm to draw from. County involvement would be especially welcome in programming for climate-vulnerable areas, where the County’s relationship with local “nature ambassadors” (see 2.3.3) would be helpful in kick-starting educational programs. Perhaps the County could also partner with native plant nurseries as well, such as Earth Sangha.
- I strongly agree with the notions in sections 3 and 4 that the County look at the natural habitat on a holistic basis and develop tools to track the health of our natural resources over time. With respect to the invasive species actions in section 3.2, the County should work with landscaping companies and building managers to encourage, through whatever methods are available, use

of native plant alternatives. Recently I noticed that at the “Madison at Ballston” apartment building, the landscapers had actually *planted* English ivy.

- I encourage the use of citizen volunteers where useful. Perhaps Arlington could sponsor its own version of the City Nature Challenge just for the county and do it more often, such as quarterly, in order to get a seasonal view of Arlington’s flora and fauna (see 4.1.7).
- With respect to volunteers, it is important to keep red tape to a minimum, as a plethora of forms is usually a turn-off to citizen volunteers (see 4.3.2). I suggest that where volunteers are part of an organization that separately tracks and records locations, activities, and hours worked that the County work with those organizations to minimize reporting duplications for volunteers.

Comments on Draft Forestry & Natural Resources Plan

To: County Board, County Manager, members of County Staff and Advisory Commissions

From: Natasha Atkins

Date: October 3, 2022

Thank you for the opportunity to comment on the Forestry and Natural Resources Plan. I commend the staff for the enormous effort they have made in producing this document. I have made specific comments on the online version, but I wanted to highlight the most important points here.

1. Plan Lacks Real Actions

- The plan is not really a plan but rather a descriptive aspirational document. It lacks urgency and specificity; most “actions” are timid recommendations that allow the County to avoid implementation of meaningful measures. plan *The FNRP recommends the development of tools to guide implementation* is a typical “action” in this document. A real action would be, “The FNRP recommends the following tools to ensure that Arlington meets....” Without specific actions it is too easy to say, “We have checked this off. We have considered X.” The plan must include actions that are accountable and progress that is measurable.
- The plan lacks actions to address the priorities that emerged from surveys and stakeholder groups. For example, Priority Action 1 was Improve Planting Practices. The FMRP lacks specific actions to address this. It should include the many ways to achieve better survival of developer-planted and TCF-planted trees on private property, and County-planted trees in parks, on school grounds, and along streets (suggestions made in online document).

2. The plan has almost completely omitted aquatic habitats.

Why haven’t water quality and aquatic life been more thoroughly examined? The FNRP’s only action is “The County should develop a strategy to manage and protect” aquatic habitats—a dozen years after the Natural Resources Management Plan made an identical recommendation. Apparently, little has been accomplished in this time, even as stormwater runoff, air quality, invasive species, water temperature, and eutrophication pose greater problems for aquatic habitats and wildlife.

3. The plan makes minimal reference to the importance of *creating* habitat on, for example, sites that were once residential.

Creating mini-parks is one way to more evenly distribute areas where people can have access to nature and tree canopy can be increased. These projects can also be a great way to involve the community.

4. Goals Should be Finer-Scale

Aiming for county-wide tree coverage of x percent is not particularly useful. Distribution of tree canopy is important. e.g., What is the desired canopy coverage of each neighborhood, given that conditions are variable? If heat is a problem and tree

planting is constrained (e.g., in parts of Metro corridor), how else can heat index be lowered? What requirements in site plans, incentives, etc. will you need?

5. Data Must Drive the Actions *and* Assessments of Impact

In addition to measuring neighborhood-scale tree canopy, heat index, stormwater runoff, the plan needs analysis of cause. What is driving the low canopy or loss of canopy? Stormwater runoff? Heat index? No trees? Little greenspace? Tall buildings that reflect exacerbate heat gain or reduce airflow? Amount of impervious surface? Type of building materials? What strategies are available? Placement or numbers of trees planted? Are there architectural solutions such as roof material, building heights or sculpting? What action is needed, who should drive it, and what are the goals? What are your metrics for measuring success?

6. Data in plan should be presented in graphical form (e.g., canopy coverage by neighborhood, number of trees planted/removed on streets, parks, schools, private property) in last x (3-5?) years

7. Plan Needs More Specific Recommendations for Community Involvement

Citizen volunteers and middle-school through college students can provide people-power for everything from tree planting to measuring heat indices, from monitoring water quality to creating a comprehensive and updatable tree inventory of all publicly planted trees. Use students and interns, engage the Career Center, partner with Virginia Tech and other STEM programs to encourage greater appreciation of the natural world, provide science training, and create, conserve, restore, and maintain habitat.

8. Unclear Integration with Other County Plans

The FNRP The plan refers to various other plans that have informed this one. The FNRP should summarize which recommendations and actions have yet to be implemented, why they have not, and how yet another plan will ensure action. It is disappointing to see that some of the actions are verbatim action items from the 12-year-old Natural Resources Management Plan. How will this plan ensure that actions are implemented and monitored?

9. The Plan Needs Significant and Careful Editing

The length can be cut in half by tightening up the writing and eliminating unnecessary descriptive and background information. The writing sounds bureaucratic and contains errors of content (e.g., the definition of biodiversity), usage, and grammar. The organization is confusing in parts, such as why certain information is contained in Climate Mitigation and not Conservation.

Sincerely,
Natasha Atkins
natashaatkins1@gmail.com

Mary Wolter Glass
4427 25th St. N, Arlington, VA 2207
Mglassmail1@gmail.com - 703-786-3308

October 3, 2022

Via Email

Katie Cristol, Chair
Arlington County Board

Dear Arlington County Board,

At a time when we need aggressive programs to preserve Arlington's tree canopy and fight climate change, the County must provide clear, decisive leadership. The County's draft Forestry and Natural Resources Plan (Plan), released to the public on August 1 fails to do this. Unfortunately, after so much money and time has already been invested, a serious reframing is still essential to provide a more vigorous plan. I call for an immediate pause in the preparation of the document until the document can be better organized around issue areas, pertinent data, effective strategies, and feasible actions that meet the needs that have been articulated as priorities by Arlington's citizens.

The Plan must serve equally as a guide for the present as well as the future. Staff has already indicated that some of the actions in the draft could be initiated even before the full plan is approved. If so, they should be started. With more community dialogue, the redrafted Plan can better reflect and mitigate the potential real-world consequences Arlington's citizens are already experiencing as natural resources are lost through inadequate management and rapid development.

We need our government's leadership, feasible programs, and adequate funding to implement achievable solutions for public and private lands and reap the many benefits available from our green infrastructure assets. I urge you to fundamentally rework this pivotal policy document to make it beneficial for Arlington citizens now and in the future. In my attached annotated response to the Plan, I have included specific information, comments, and recommendations toward this end.

Sincerely,

Mary Wolter Glass

Cc: Brian Delaney
Adam Segel-Moss
Forestry and Natural Resources Commission
Climate Change, Energy and Environment Commission
Parks and Recreation Commission

Attachments: Overview Comments on the Plan
Detailed comments on Plan text.

Overview comments on the 8/1/22 draft Forestry and Natural Resources Plan:

1. **The Plan provides too little data and description of all our natural resources focusing extensively on trees and biophilia.** The Plan should begin with a good description of the resources and actions should be associated with each resource category. There is not appropriate information on our waterways, aquatic life, soils, etc. that heavily influence what is happening now and is likely to occur in the future.
2. **The Strategies in the plan should be statements of objectives not vague titles.** A “strategy” is defined as an action plan that leaders use to achieve a desired state in the future. The Plan’s strategies do not do this. The strategies chosen attempt to organize the Actions by general topics, but that leads to confusion and duplication because similar actions are found in more than one section. There are many good Action Steps, but they are poorly grouped. Natural resource goals are mixed in with zoning, outreach, administration, etc. The USFS sets out the following steps to achieve an effective plan.

1	PROJECT PLANNING Set clear goals and strategies for the UTC project.
2	ASSESSMENT Complete data collection and classification to obtain current UTC data.
3	ANALYSIS Integrate UTC data with stakeholder input and other datasets to answer questions about where to protect, plant, and manage trees for social, environmental, and economic benefits.
4	IMPLEMENTATION Develop a suite of products to share UTC information and help inform policies and planning.
5	MONITORING AND EVALUATION Implement short- and long-term monitoring to assess tree canopy change and progress in reaching goals.

https://www.fs.usda.gov/treesearch/pubs/59006_p3

Also, this document provides examples of clear, succinct project goals which allow better grouping of specific actions, better organization of the document as a whole. The following graphic is a good example (from p.4 of the same report).

BOX 1. Examples of Urban Tree Canopy Project Goals

Establish a baseline measure to monitor urban forest canopy cover and change:

- ▶ To set policy and goals (e.g., minimum canopy).
- ▶ To inform land use and comprehensive planning.
- ▶ To develop ordinances.
- ▶ To evaluate programs.

Prioritize tree planting efforts in support of:

- ▶ Environmental justice.
- ▶ Urban heat island mitigation and energy conservation.
- ▶ U.S. Environmental Protection Agency voluntary air quality plans (State Implementation Plan).
- ▶ Stormwater management.
- ▶ Lower crime.

- ▶ Economic considerations (e.g., real estate values, retail sales, tourism, commercial districts).
- ▶ Community walkability.
- ▶ Physical and psychological health.

Develop disaster preparedness, response, and mitigation plans that may include:

- ▶ Floodplain conservation to address catastrophic and recurring flooding.
- ▶ Debris planning and management.
- ▶ Forest recovery and restoration.
- ▶ Community resilience.

Support watershed planning with local partners to:

- ▶ Enhance forested riparian zones.
- ▶ Improve stormwater management (flooding, infiltration).
- ▶ Implement forest-to-faucet concepts (connecting water users to the headwaters).
- ▶ Enhance regional greenspace and recreation.

Support an Urban Forest Sustainability and Management Audit that:

- ▶ Includes a robust inventory and monitoring component.
- ▶ Supports Tree City USA and Tree Campus USA designations and program growth awards.

Adapted from: Kimball, L.L.; Wiseman, P.E.; Day, S.D.; Munsell, J.F. 2014. Use of urban tree canopy assessments by localities in the Chesapeake Bay watershed. *Cities and the Environment*. 7(2): article 9.

- This report should be reorganized around the Natural Resource categories first (e.g. forests, wildlife, vegetation, etc.)** including better data on each and description of their condition. Then, actions for each resource can be presented around actions such as climate change options, outreach options, zoning/permitting options, funding options, management options, legislative options, etc.
 - Good example of a strategy from the USFS report **“Climate adaptation actions for urban forests and human health.”** Their Strategy 1 is “Activate social systems for equitable climate adaptation, urban forest, and human health outcomes”, a clear statement of an action.
 - The Plan’s “Conservation” strategy is a good example of the problems. It does not identify the current resources that are to be conserved and, therefore, what the priorities are. The Subtitle, “Increase and protect tree canopy, natural areas and biophilic features” is equally confusing because biophilic features are not and should not be mentioned under Conservation they are man-made features.
 - The Conservation Actions and Action steps should be reorganized. In Section 1.1 for example, goals like the 40% tree canopy or no decrease in natural lands are mixed in with administrative items like coordination with Comprehensive Plan elements, public space acquisition criteria, and relationships with groups like the APS. Finally, it also includes discussion of methods to get private partners to fund the goals which is an outreach activity not a method to conserve resources. In the natural resource fields, there are many techniques for successful conservation which are not identified as potential options in the Plan.

4. **The Plan does not identify what needs to be done to preserve our natural resources and address citizens' priority concerns.** There is no direct link between, or relative sense of priority for, the "Actions" or Action Steps in the Plan in relation to the "Action Areas" identified by citizens at the community engagement (p.18). The aspirational tone of the document ignoring immediate needs is worryingly reminiscent of "climate change deniers". It should prioritize resources (money, priority statements from County leaders, etc.) as desperately needed for any action e.g., inventorying resources, planting trees, etc. Similarly, the claim that the Plan's approach is "holistic" further lead to unclear distinctions for vastly different needs across the different resources.
5. **The "Strategies" and "Actions" selected for the Plan's focus were not based on adequate local data to identify key priorities for future action.** Statements of relative local importance or scientific facts supporting an Action are not provided. The draft is not based on any current measures of the extent and condition of our tree canopy and natural resources. That is the reasonable starting point for environmental resource planning, but the Arlington data is five to eleven years old with significant gaps. For instance, available data on annual tree removals and plantings on public and private property exists on the Open Data website. This data should be shown, explained, and analyzed to identify and provide important information on most effective Actions. Similarly, data on the actual tree plantings through the Tree Canopy Fund from its inception should be made known relative to removals. This will show their impact to date and the potential for future impact from this program. Again the USFS report above describes in detail the importance of and value that can be derived from effective analysis of the data.
6. **Climate change should be the essential frame of reference for this Plan.** We are in a climate crisis today that is being severely exacerbated for Arlington residents with the rapid loss of trees and natural resources being replaced by impermeable surfaces. With rampant private development accelerating and anticipated to continue, the County leaders must take action now before the functioning resource base reaches the tipping point and largely disappears.
The Plan gives lip-service to the importance of trees and climate change but presents no concrete goals for reducing carbon emissions and other pollutants. Full climate change and other benefits from standing trees should be calculated (for example, using i-Tree) and become a mandatory part of public and private projects and reported in the County open data system. Examples of cities that are already implementing green infrastructure and calculating the financial benefits to the jurisdiction should be called out (e.g., Snoqualmie, WA
https://static1.squarespace.com/static/58a9a82db3db2bfa5def5c9c/t/5f7c92f7d9b3f94e53e0c7ce/1601999637479/Snoqualmie_Final_FullSpread_092520_ReducedSize.pdf).
7. **Throughout the Plan, the County significantly understates its existing authority to regulate to preserve our natural resources.**

- a. The County has considerable discretion to change its Zoning Ordinance in ways that will preserve mature trees and other valuable natural resources. Even considering “by right” development, work conducted by the Civic Federation provided a large array of well-considered options including: reduced allowed lot coverage; adjusted setbacks; permits to remove Heritage, Specimen, and Memorial trees; upgrading the Stormwater Management Ordinance; amending procedures for changing General Land Use Plans and Zoning Categories; and amending the use of Residential Use Permits and Special Exemptions.
<https://www.civfed.org/newContent/2021-03/2021-03%20EnvAff%20Resolution%20Collaboratives%20Preserving%20Tree%20Canopy%20REPORT.pdf> , <https://www.civfed.org/newContent/2022-08/2022-08%20ACCF%20EnvAff%20TreeCanopy%20Phase%203%20Priorities.pdf> , and <https://www.civfed.org/newContent/2021-03/2021-03%20EnvAff%20Resolution%20Collaboratives%20Preserving%20Tree%20Canopy%20APPROVED.pdf>.
- b. **The County does not use its full power to monitor and enforce existing building codes and resource guidelines.** The Chesapeake Bay ordinance, the Trees and Shrubs Ordinances, and the Land Disturbing Activity/Stormwater Permit are some of the tools that can be expanded and aggressively enforced with sufficient funding and qualified staffing. Options for bonding trees on private lands have been adopted by other jurisdictions and mandatory two-year maintenance for tree and vegetation planted could be added to public and private projects.
- c. **The County can work more effectively across all departments, and in coordination with the Arlington Public Schools,** to make preservation of natural resources a key component for project planning and operations.

8. The Plan does not reflect the budgetary and investment requirements to achieve even a small portion of the “Actions” recommended.

- a. **The County needs to commit to expanded annual funding for natural resources and trees.** The FY 2022 budget reduced Forestry funding by at a time when the complexity and time required for reviewing development plans exploded. This means that staff time in support of other forestry and natural resource activities get less attention, e.g. the reduction in staffing at the Nature Centers. The plan calls for many actions, including additional tree maintenance, without any indication of how County resources will be made available. Instead, many references are made throughout the Plan to funding alternatives including private businesses, private property owners, advocacy groups, volunteers, and others. County budgets for invasive species removal have not increased since it started in 2011. The text repeatedly cites the importance of public education but points to existing programs rather than enhanced County responses to accomplish the goals.

- b. The County has resolutely resisted calls for needed Natural Resources and Tree inventories and surveys.** The Plan calls for tree canopy assessments every three to five years, but the County has not provided funds that can be used for such a survey until the Plan is completed hopefully sometime in 2023 with the survey available in 2024. The surveys for natural resources date back to 2011 and no funding has been scheduled for updating. As the USFS and many other urban tree and natural resource planning guides say is an essential first step.
 - c. The County has failed to implement recommendations in the 2004 Forestry plan for acquisition of more land with natural resources.** The Open Space Plan also calls for additional park lands that could include natural areas but commitments for near-term acquisitions have not been included in the CIP.
- 9. This Plan has no priorities, timelines or designated responsible parties, and is redundant, and patronizing in tone.** This Plan repeats many of the same goals stated in the 2004 Forestry Plan without concrete steps to achieve them. The appendix with a report on implementation of the 2004 Plan text misleads the reader or is vague about what was really accomplished. This should be eliminated, or hard data provided.
- 10. This plan conflates biophilia, biodiversity, and natural ecosystems. This distracts from the fundamental issues that need to be addressed and is scientifically wrong.** If kept, Strategy 3 should be “Natural Resources and Ecosystems” and focus on what resources exist, their current status, and the Actions needed to preserve and enhance them. “Biophilia” is now a buzzword used by many to falsely equate man-made development with improving nature. The “biophilic elements” included in the plan such as green roofs and planters for significant trees is severely lacking in comparison with Arlington’s remaining natural resources. Biophilia get too much discussion in the text and data on activities (other than discussions and publicity) conducted to date is not provided. The Plan fails to adequately address the Natural Resources components throughout.

We are in a climate crisis today that is being severely exacerbated for Arlington residents with the rapid loss of trees and natural resources being replaced by impermeable surfaces. With rampant private development accelerating and anticipated to continue, the County leaders must take action now before the functioning resource base reaches the tipping point and largely disappears. We urge you to fundamentally rework this pivotal policy document to make it beneficial for Arlington citizens now and in the future.

From: [frazmo](#)
To: [Ryan Delaney](#)
Subject: One last FNRP comment: using tech and leveraging social media
Date: Sunday, October 2, 2022 7:50:51 PM

EXTERNAL EMAIL

Hi Ryan, nice to see you a few days ago. I want to make one more comment on the draft FNRP.

I would like to see some discussion and language about exploiting information technology and leveraging social media to enhance people's appreciation of our trees and natural resources and to broaden the audience we reach.

Just keeping it short:

using more signs with QR codes to lead people to additional information about things of interest in the parks -- just as an example

Making some use of emerging augmented reality/virtual reality/metaverses to provide more immersive experiences, both in the physical places and in virtual spaces. For example, imagine a VR exploration of a large tree, being able to "climb" up into the canopy and examine the other living things that use the tree, etc.

Use social media to reach out to broader audiences and get new people interested in the resources. DPR has made some good initial moves in this direction, but so much more can be done. The plan should address all this at least at the high, aspirational level.

Thanks, best, and cheers, Steve

From: [Jason Papacosma](#)
To: [Ryan Delaney](#); [Adam Segel Moss](#)
Subject: RE: Forest and natura resources open house
Date: Monday, October 3, 2022 3:28:52 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Hey Ryan, Adam – Just a quick question. Did you also get this email from Karen Olson Weaver?

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[Only Rain Down the Drain!](#)

Please note that any email sent to/from Arlington County email addresses may be subject to disclosure under the Freedom of Information Act (FOIA).



From: Karen Olson Weaver <karen@olsonweaver.com>
Sent: Friday, September 30, 2022 10:25 AM
To: Jason Papacosma <Jpapacosma@arlingtonva.us>
Subject: Forest and natura resources open house

EXTERNAL EMAIL

Glad I got to tune in last night and thanks for the last minute reminder! I am just catching up on the overall plan, but would welcome the opportunity to discuss with you how community associations could play a part, possibly as a 'fourth stakeholder' group as they are quasi commercial/homeowners.

-Associations organize a large number of homeowners into a small group of decision makers, so that approaching CA's magnifies the impact of county actions to educate, incentivize etc, and gives individual homeowners more opportunity to make an impact, if they have the support of the

boards. (You might check with Plant Nova Natives, where you will see that they have been taking this CA approach for some.

time, and could use some help from the county. They have a large network.

<https://www.plantnovanatives.org/>)

As I said, I am a newly elected board member of the Fairlington Villages CA, which has 1700 units, 300 buildings on a 90 acre campus. (This does not include the 1/2 dozen associations in South Fairlington.) I am also the owner of a landscape lighting company, and have been very active with landscape professionals in the WDC region for 15 years.

It did just occurred to me at the end of our meeting last night that incentivising associations to

- purchase electric over gas maintenance vehicles, and

- using electric rather than gas lawn mowing/blowing/edging would be both educational as well as a financial motivation.

- use county compost instead of chemical fertilizers to build up turf soil quality. Right now, individual unit owners have access to free compost, but the association does not.

- Mulch- CA's also need a place to compost our leaves/tree prunings etc, because we are paying for that to be hauled away, then paying again to purchase mulch.

- water bills. I realize our community gets a special rate for water, but our individual units are not monitored, so we all pay the same rate, and there is no way to measure consumption as an incentive to reduce. I have been looking at 'in line' meters that could be attached to unit water lines, but the cost (wholesale appr \$500 each) plus labor to install extends the ROI quite far out. Maybe an incentive, or an opportunity to purchase meters from the county would get the price down.

There are many ways the county could help- too many to list right now as I am just getting my day started. Let me know if you'd like to schedule a longer discussion.

Thanks so much for the opportunity to reach out!

Karen

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