

June 30, 2023

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

Re: Forestry and Natural Resources Plan draft

Dear Chair Dorsey:

At its June meeting the Forestry and Natural Resources Commission (FNRC) received a staff presentation on the recent draft Forestry and Natural Resources Plan, released for public engagement on June 1 of this year.

In an advisory letter dated September 30, 2022, the FNRC commented on the initial public draft of the Forestry and Natural Resources Plan. The commission is very pleased to see this latest version, which does contain many of our previous recommendations. Overall, every aspect of this draft represents a significant improvement, and it reflects the time, energy and talent applied to this Plan in the interim. Nevertheless, our briefing, discussion, and individual review have highlighted some additional opportunities to sharpen the focus of the plan and enhance its impact as an element in the Comprehensive Plan assembly.

General Themes and Approach

Arlington values its parks, trees, and neighborhoods. All of those are under threat from climate change and development. The challenges are real, and immediate, and existential in that what is not sufficiently protected, conserved, and restored will undoubtedly be lost. This applies to all of our county land, both public and private. FNRP goals are critical to reducing the vulnerability of our spaces and preserving the many benefits of living here.

The commission cannot emphasize enough the urgency of moving forward on the recommendations in this plan. Acknowledging the fundamental value of natural capital and the necessary stewardship, both public and private, to preserve, protect and expand our natural assets is critical. The commission strongly supports the implementation of this plan through a holistic and integrated approach, acknowledging the interrelationships of this plan along with other elements of the Comprehensive Plan, such as the Stormwater Master Plan (SMP), the Community Energy Plan (CEP) and the Chesapeake Bay Preservation Plan (CBPP) among others. Our county's spaces—public and privately held, are interdependent with respect to achieving meaningful results. Our spaces are physically contiguous and operate as an urban ecological system. Our plans must work together in an ongoing, integrated, and singular effort to enable us to achieve viable natural solutions for the county. Natural features (vegetation and pervious surfaces) are a common theme to mitigate air pollution, heat island effect, storm run-off, and ecological imbalance.

Commission Members

Phil Klingelhofer, Chair
John Carey
Caroline Haynes
Nat Ames
David Howell
Kate Donohue
Melody Mobley
Stephen Sockwell
Michael Beckmann
Josh Handler
Mikaila Milton
Noreen Hannigan
Bill Browning
Colt Gregory

Content Enhancements and Additions

The following specific comments were discussed in the FNRP meeting. Commissioners noted that some apply to multiple recommendations.

- In addition to enhanced information and education, the Plan should address more strongly the incentives—personal and altruistic-based—for individual property owners to steward their land in ways that further the Vision of the Plan.
- The Plan should emphasize measurable results and activity targets as a way of being clear how actions relate to goals, and how to compare expectations with outcomes. It is recognized that in some cases these would be developed as part of an implementation plan, not defined in the recommendation. But creating them should be part of the recommendation language.
- Throughout the Public Spaces Master Plan and this Plan, the fundamental issue for our residents involves quality of space, availability of space, population distribution and the availability of nature and natural spaces in an equitable manner. Arlington envisions equitable access to nature's amenities. From land acquisition to the naturalizing of infrastructure to the enhancement of public and private property with respect to biophilic experience and sustainable contributions to our climate challenges, our fundamental strategy involves the location and proximity to quality spaces for all residents. The equitable availability theme should be a recurring one throughout the Plan.
- The Plan should address the tree canopy issue with a more granular description of a strategy for optimizing canopy. Different types of land, types of ownership, types of land uses, and locations will likely call for different strategic approaches to encouraging, supporting, actively implementing tree conservation and tree planting initiatives. In addition, there are for some areas more effective ways to support broad county environmental and ecological goals than a trees-only approach. Location-based data on the natural state as well as the natural potential of various neighborhoods and specific land areas will help optimize the result of all goals. Strategic Direction 1—Conservation is the primary section for discussing this, but the point is germane in other SDs as well.
- The Plan is oddly silent on the existing robust volunteer activity and the organizations that already exist and foster those activities in Arlington. Organizations such as the Master Naturalists, Master Gardeners, Tree Stewards, Stream Water Monitors, Eco-Action Arlington, and others greatly enhance county staff resources in the areas of natural land stewardship, environmental education, and citizen science. Likewise, there is no mention of the Tree Canopy Fund and the ability of the county, with volunteers, to expand tree planting on private property. The failure to recognize the contributions of these important programs is a serious omission in the current draft.
- The Plan should speak more directly to the policy collaboration potential in the Equitable Housing Ordinance with respect to tree planting minimums and their application more broadly. This tool would seem to enhance the opportunity to address goals in this plan and the SMP, CEP and CBPP.

- FNRC sent an advisory letter on February 25, 2022 regarding needs for and opportunities to improve our Standard Site Plan Conditions. Commissioners believe that the FNRP should include specific recommendation language along the lines of that letter, to provide a more clear and effective means of promoting the goals in the Plan, as well as providing further support for the SMP, CEP and CBPP.
- The plan addresses invasive “native species” (SD 3.2.6) but we are concerned that deer over-browse was not specifically mentioned as an important target for this action. Independent scientific research has “noted that tree regeneration failure is widespread and that “without active deer management, ecological health of Arlington County’s natural areas will likely continue to degrade.”
- FNRC sent an advisory letter on February 23, 2023 regarding zoning ordinance provisions for setbacks and lot size, and consideration of tree preservation and planting scaled to size. Those provisions should be noted in the FNRP. In the past year or two concerns have focused on provisions within the Missing Middle/Expanded Housing Options proposals, and the multiple residence lot. But in fact, the concern also pertains to all residence types and lot sizes. We recognize that overbuilt lots with a single residence can be and is often as harmful to tree canopy, heat island and stormwater concerns, and that while there are some mechanisms in place to mitigate those (eg, LDA 2.0) the problem is better avoided, particularly when the development begins with the cutting of a half-century natural investment in the form of a single oak tree. Our zoning and site policies need to be harmonized with other goals for the quality of our space.

Commissioners are enthusiastic in support of this Plan and the milestone it represents with respect to our holistic recognition of the value of our space, our nature, and our future sustainability. Equitable biophilic space and a healthy ecosystem for all residents to live, work, grow up and grow old—are an attainable goal with the integration of the Forestry and Natural Resources Plan as the 12th Comprehensive Plan element. Our comments are intended to promote effectiveness, to enhance Comp Plan goal achievement in a holistic way, and to encourage and enable the broad public awareness and understanding of the Plan’s purpose and necessity as well as their role as participant and beneficiary of its implementation.

The commission appreciates the opportunity to provide comments on this draft of the Forestry and Natural Resources Plan.

Sincerely,



Phil Klingelhofer, Chair
Forestry and Natural Resources Commission

Cc: Members, Arlington County Board
Jane Rudolph, Director, Department of Parks and Recreation
Ryan Delaney, Principal Planner, Department of Parks and Recreation

June 29, 2023

Honorable Christian Dorsey
Chair, Arlington County Board

Ryan Delaney, Principal Planner
Department of Parks and Recreation

2100 Clarendon Blvd., Suite 300
Arlington, VA 22201

RE: Parks and Recreation Commission Comments on the Draft Forestry and Natural Resources Plan

Dear Chair Dorsey and Mr. Delaney,

We thank the Department of Parks and Recreation and all the stakeholders that provided input into the Forestry and Natural Resources Plan (FNRP) version released at the beginning of June 2023. 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. With the enactment of the final plan, County decisions must, for the first time, consider the importance of our urban forests and natural resources as among the twelve most important components of the County's Comprehensive Plan. We are pleased that the Vision Statement was amended to acknowledge the importance of creating resilience in the face of climate change, a concept that should feature prominently in all County decisions.

We are also pleased that working with landowning jurisdictions within Arlington, such as NOVA Parks and the National Park Service are elevated in Principle #6 so that Arlington financial resources have a magnified impact, but we believe the nature of these collaborations should be more formalized and directive. We are pleased that space was allowed to address invasive "native species" but are disturbed that deer management was not specifically mentioned as an important target for this action.

The PRC concurs with the ten Priority Actions listed on page 39, especially the long-held goal of increasing County public space acquisitions, but notes that a critical step in achieving this goal will require the County to set aside considerable funding for land acquisition. Further, acquisition should be targeted in equity areas with below average tree canopy cover. The legislative changes mentioned as a priority action are important but should be better explained and delineated in the plan. The goal of enhancing development standards is laudable, and we remind you of the March 2022 letter sent by PRC, NRJAG and FNRC setting forth specific changes desired in the development standards to enhance and protect tree canopy and biophilia. A copy of this letter is attached. The plan to recruit and train more local volunteer leaders is good, but the draft fails to acknowledge or plan to build upon the incredible scope and breadth of volunteer work performed already by Arlington volunteer organizations such as Tree Stewards, Master Naturalists, Master Gardeners and EcoAction Arlington, to name a few. We are pleased that addressing tree canopy equity in underserved areas is a prominent goal but would prefer to see a greater focus on resources and a plan for planting the thousands of trees needed in these known areas to close the equity gap. We are also pleased with the movement from reactive to proactive maintenance of natural assets, as we infer these will be treated as natural capital and funds from the Capital Improvement Plan (CIP) shall be allocated for their maintenance just as would occur for a constructed asset.

Natural Capital

Commission Members

Shruti Kuppa
Jill Barker
Sarah Baryluk
Nelson Dimpter
Sergio Enriquez
Dean Foster
Colt Gregory
Gretchen Hickey
Neal Hunter
Mark Lincoln
Adam Rasmussen
Melissa Riggio
Alex Sanders

The importance of “natural capital” as a governing principle throughout the FNRP is a very welcome change in the County’s perspective. In concert with the Natural Resiliency provision in the most recent CIP budget the County moves ever closer toward investing in nature 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’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 Direction 3.2 (and subparts) 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 Strategic Direction 4.5 (and subparts).

The FRNP should commit the County staff to perform a transparent analysis including the robust valuation of natural resources to make a defensible determination when conflicts arise in County priorities that threaten the County’s natural capital. Strategic Direction 4.5.3 provides examples of tools to calculate the value of various green assets, and this is helpful but does not go far enough. Before natural areas are sacrificed for a conflicting goal, these tools and measures should be used to convey to County decision-makers whether the cost is worth the benefit. The County Board and staff face myriad decisions every year that require mediation between conflicting County priorities such as providing adequate transportation, housing, stormwater services and development. The FNRP (Strategic Direction 4.5.3) should be strengthened so that the County performs an analysis for assessing the benefits of our natural resources when their health is at stake. We therefore support, Strategic Direction 3.1, Assess and account for all the benefits of trees and natural areas. The formal assessment of the ecological services and the community value of trees/natural areas provided is a crucial element to retaining them. The benefits of improved stormwater management, reduced heat island effects, and positive health benefits of even small green spaces require more formal consideration in decision-making.

Equity in Tree Canopy Cover

The FNRP succeeds at articulating and identifying 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, (FNRP at pp 23-24 and 77-78) and we are pleased that correcting this injustice is a high priority, but the FNRP does not provide any specifics for funding to plant the estimated 20,000 trees in the equity areas necessary to close the gap. Moreover, the FNRP header refers to the “identification” of areas that need greater tree equity, yet lists several tools that already identify these areas. No time should be wasted “identifying” the areas of need, and the full force of the County’s resources should be applied to vigorously address the inequitable tree canopy as soon as possible. The “exploration” of funds for this purpose mentioned in Section 4.5.4 should be supplemented with a robust analysis of the costs necessary to plant enough trees to reverse the inequality along with a recommended plan for acquiring the funds.

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.

NOVA Parks, NPS and APS

We are pleased that the FNRP specifically calls out the other parkland owning entities, NOVA Parks and the National Park Service (NPS) as well as focuses on Arlington Public School (APS) property in the description of Arlington’s lands. 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. We support SD 1.1.7 to expand and formalize the relationship between APS and DPR to ensure that school sites meet community objectives for tree canopy and natural spaces. Further, we recommend committing the FNRP’s environmental principles to an MOU format with NOVA Parks, as mentioned in SD 1.1.8 and 4.2.3, to build support and provide clarity to help ensure public lands in Arlington are managed according to its

citizens' desires. We recommend articulating a clear intention to collaborate with NPS, including with an MOU if possible, as suggested in SD 4.2.3, so that care and management of this land is optimized by applying the principles in this FRNP to the extent that NPS concurs.

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

We are pleased that the FNRP identifies seeking state-level legislative changes as a priority action. Providing Arlington County with more policy tools to guide planning and development is a key step in attaining a biophilic vision for all of Arlington. We encourage the County to continue to prioritize this effort so that Arlington has more tools at its disposal to balance the need for natural resources with the need for development in neighborhoods expecting denser development. However, this priority action has incomplete information in the Implementation Framework presented in the current draft of the plan. We recommend that the implementation information for this action be identified.

We are pleased that the FNRP identifies several opportunities to by-right and special exception development standards to improve the conservation and management of natural resources. We strongly support the changes recommended in the FNRP and urge the County to pursue the identified changes. These changes will be critical in areas development is planned to allow more space for street trees, native plantings and to insert requirements for green spaces. 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 especially support SD 1.3.2 which would result in a better valuation of trees' contributions to our health, ecosystem, and neighborhoods for developer contributions to the Tree Canopy Fund.

Biodiversity

The proposed FNRP actions to support existing and create more space for ecological communities is critical for biodiversity in Arlington. Taken collectively, the actions in this area can result in a web of approaches, tools, and actions used to create and sustain more biodiversity in Arlington. The Commission supports the development of more specific plans and actions to accomplish this goal.

3.1.6 Adopt a Native Plant Requirement for Public and Private Sites to Expand Use and Retention of Local and Regionally Native Plants

Adoption of a stronger native plant requirement for public and private sites is a welcomed addition to the Priority Actions list in the FNRP. The language of "move towards" a native plant policy, however, dilutes the potential effectiveness of the action. We appreciate incorporating the draft policy into Arlington's Landscape Standards and look forward to better understanding barriers to policy implementation and taking positive steps to create a native planting requirement.

3.2.1 Update Arlington's Invasive Species Management Strategy

Updating the Invasive Plant Management Strategy (3.2.1.), participating in EDDR identification and response, working with regional partnerships (PRISM) (3.2.2), restricting the sale of invasive plants (3.2.5) are positive inclusions to the FNRP. Dedicated funding for Invasive species management (3.2.3) and Expanding Invasive Plant Detection and Removal programs (3.2.4) are supported by the Commission. The Commission would like to see a strengthening of the partnership between county volunteer organizations (e.g., Tree Stewards, Master Gardeners, Master Naturalists, Park Stewards). County volunteers working in our parks are often the first to identify high impact invasives but need support beyond hand-pulling to remove them. Including volunteer organizations in invasive identification and timely removal efforts would benefit our parks and natural areas.

3.2.6 The overabundance of deer in Arlington demonstrably hinders the ability to create healthy diverse native ecosystems in Arlington

Both the White-Tailed Deer Herbivory Impact Assessments (2023) and the Deer Density Final Report (2021) have identified the need to control the deer population. Deer controls will help bring back more balanced and resilient local ecosystems. The current rate of deer over-browsing for both our woody and herbaceous

native plants is reaching a critical point – the point at which natural regeneration is no longer possible. The development and implementation of a strong, effective deer management program should be explicitly incorporated into the Forestry and Natural Resources Management Plan.

3.3. Establish a County-wide Natural Infrastructure and Conservation Connectivity Network

The actions outlined in this section are strongly supported. In an all-volunteer effort, Powhatan Springs Park has just established a working relationship with Dominion Hills Area Recreation Assn (DHARA) through Audubon's Stretch the Parks initiative (3.3.1-2). It helps create a partial corridor between Upton Hill Regional Park, Powhatan Springs and DHARA. Linking together these areas with both public and private lands may eventually result in a natural corridor reaching Ashlawn Elementary school. The FNRP implementation can help the County identify and act on similar opportunities while incorporating volunteer support (4.2.1).

3.3.3. Underutilized/unplanned Areas Regardless of Ownership

It is difficult to obtain new green space in Arlington. Using the “nooks and crannies” approach for underutilized areas can help us identify small opportunities that can add up to larger space for native plantings. For example, some homeowners are already working in areas across from their homes and next to the walls along I-66 corridor. Identifying, encouraging and supporting such efforts can add habitat-friendly green spaces to our neighborhoods.

3.5 Foster Biodiversity in the Built Environment

The Commission appreciates the inclusion of actions to reduce light pollution and strengthen use of bird-friendly materials. Birds are attracted to light particularly during nights of spring and fall migration. More responsible lighting designs and the application of Dark Skies principles can reduce bird kills during this vulnerable period. Increasing the height requirements for use of bird-friendly glass from 0 – 100 feet will reduce window strikes in our area where tall new construction using reflective glass increases bird strikes.

Sincerely,

Shruti Kuppa



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

July 27, 2023

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

Dear Mr. Delaney:

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

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

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

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

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

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

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

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

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

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

Sincerely,



Joan F. McIntyre

Chair, Climate Change, Energy and Environment Commission

cc: Arlington County Board

Jane Rudolph, Director of Parks and Recreation

June 30, 2023
Caroline Haynes
Comments on FNRP

1). p. 9 Rewrite second paragraph to reflect greater urgency:

There is a strong sense of urgency in the need to preserve and protect this ecological web from the intersecting pressures of climate change, increasing urbanization and invasive species. Arlington is at an inflection point: as we continue to grow, it is essential that we intensify efforts to protect, enhance and manage our natural resources for both current and future generations.

2). p. 9 A Natural History of Arlington

Add *and the Potomac River* to end of second sentence:

...low impact farming, hunting and fishing from nearby streams and the Potomac River.

3).p. 15 Suggested language change:

6. The County should invest wisely to achieve maximum returns.

The County is the steward of both its natural capital and financial resources. Both must be managed prudently and in tandem to maximize the impact of investments.

4). Somewhere within Existing Conditions (maybe at the end, p. 31??) include a summary of volunteer organizations. **Proposed summary of volunteer organizations attached.** *This could be inserted here or possibly on p. 70 in place of the Bellevue reference. Should have something in both locations.*

5). p. 42 Strike second paragraph (duplicated from above paragraph.)

6). Side bar on p. 42 still does not make sense to me. If we say that the county has the equivalent of 4.5 football fields of trees (which I still think is a horrible analogy, since the mental image of trees on a football field is so wrong), and the rate of decline is 4 football fields, then we end up with a half of a football field left of trees? The whole analogy is a distraction and doesn't make sense (at least to me). Can't we say more clearly that we are losing trees at a rapid rate on private property and need to take urgent action to arrest this loss?

7). p.43. Rewrite third sentence of caption under Natural Lands map to include “*volunteer organizations*”. Volunteer organizations have robust education and outreach programs on conservation landscaping.

Through education and outreach programs, the County and volunteer organizations encourage private owners to “naturalize” their property and improve their habitat.

8). We need a full discussion of the Tree Canopy Fund somewhere, including how it is funded and administered. Maybe replace the sidebar on p. 54 or one of the other sidebars with a description of the Tree Canopy Fund??? Or possibly somewhere near 1.2.10, or 1.4.3??

9). Biophilic Design sections need source references and footnotes.

10). Rewrite 1.4.3 to better acknowledge existing volunteer organizations. Suggested language:

Build on existing partner groups to recruit and train community, cultural and faith-community leaders to serve as nature ambassadors and proponents of grassroots conservation.

11). Caption lacking on full page photo:

Master Naturalist volunteer at work removing invasive vines.

12). I suggest we strike the language under 4.3.1 completely and replace with something like the paragraph below (*in italics*). (We may also want to consider striking the Seattle Program accomplishments and replace with some of our local stats which are also pretty impressive. I’m happy to help with collecting those stats.)

4.3.1

Strengthen coordination with organizations that volunteer in the county to share information, plan jointly and maximize the impact of volunteer efforts for natural resources.

Arlington has a robust network of volunteer organizations, such as the Master Naturalists, Tree Stewards and Master Gardeners, where volunteers are trained in best practices and provide critical organizational support. The organizations themselves provide the training and coordination, thereby reducing the burden on County staff and resources to provide that structure. The impact of these volunteers is magnified when closely coordinated with County objectives. The structure of the Park Stewards program provides a model for facilitating close coordination with staff, streamlining communications and providing on-going coordination and support of volunteer leaders.

13). On the sidebar on page 116, I recommend striking the section of the sidebar with the Virginia Working Landscapes. As far as I know, VA Working landscapes is not working within

Arlington, and we have other citizen science or survey projects that could be included instead. Replace with local stats, such as the county-wide tree survey completed by Tree Stewards on trees planted with the Tree Canopy Fund, or pull stats on one of the ARMN citizen science projects like the NASA Ozone project. (Happy to help with follow up on the data if you are amendable.)

Comments on the Forestry and Natural Resources Plan (6/27/23)

Bob Benson (rsbenson79@gmail.com, 703-635-0689)

To Arlington County Staff:

I am providing the following comments on the draft Arlington County Forestry and Natural Resources Plan. I have been a resident of Arlington since 1979. My family and I have benefitted greatly from living in a county with a broad tree canopy and amazing parks and other green spaces. My comments are informed by a 41-year career in environmental protection and past civic work in Arlington on urban forestry and environmental issues. I currently serve as a volunteer for the Chesapeake Bay Foundation.

The draft plan is comprehensive and well written. It contains a wealth of ideas and proposed actions. The current plan certainly reflects the hard work and dedication of county staff members and the heartfelt input of many citizens who care about these issues. The overall thrust of the plan is positive, with a focus of doing many things to maintain the status quo in terms of the current state of Arlington's natural resources. The overall message seems to be that, while the county faces challenges in sustaining its green spaces, the actions in the plan will hold the line against those threats.

In a county with unlimited resources and a healthy natural environment, such a plan would be sufficient. However, that is not what currently exists in Arlington. In fact, Arlington's natural resources are in a state of crisis, with many indicators supporting that position, among them:

- a decline in tree canopy from 40% to 31-34% in just a few years, accordingly to non-county data from two reputable sources;
- an ever-increasing onslaught of invasive plants that threaten the viability of our parks and remaining forest lands;
- impacts from climate change that are severely stressing current tree stock and increasing heat island effects from paved surfaces across the county;
- continued inadequate tree coverage and green space in the more economically disadvantaged neighborhoods of Arlington;
- the continuing loss of notable trees to development, often regardless of citizen objections;
- the continued underutilization of school properties for trees and other natural green spaces;
- a hugely disproportionate preference for gray infrastructure instead of green infrastructure methods to control storm water runoff and limit downstream impacts on Chesapeake Bay;
- a perpetual scenario where developers have relatively free reign to develop parcels after cutting down all trees, with little post-construction accountability to maintain the trees that are planted;
- a major lack of public understanding about the major economic value of trees on their property and in public spaces, and the proper ways to maintain the health and safety of their trees.

These factors and others do not reflect a county whose environmental resources are healthy and simply need maintaining. They instead show a county whose once enviable natural resource base, which made Arlington a great place to live and contributed to both the environmental and economic health of its citizens, is now in a state of crisis. The current status quo shows a clear and alarming downward trend of our tree cover and natural habitat. This trend disproportionately impacts our poorest citizens. The many indicators listed above send a clear signal that the health of our natural ecosystem, which provides such great value to our long-term prosperity, does not appear to be sustainable.

Yet the current draft plan does not convey any sense of urgency – quite to the contrary, it gives a clear message of stable sustainability which is not the approach that is required at this time. It spreads limited county resources over 86 actions, far too many to proactively solve the top problems that we face today. While it has a great many good ideas – nothing in the implementation plan is overtly objectionable – it will dilute its message and effectiveness by not acknowledging the urgency of our current situation and the need to present a clear vision and focused path forward to address the major challenges head on, with sufficient resources focused on a targeted set of actions that will achieve the biggest bang-for-the-buck results.

I therefore recommend that the Executive Summary and introductory sections of the plan be reworked to clearly convey the sense of urgency that current conditions call for. Start by clearly articulating the environmental, economic, social, and equitability benefits of our trees and other natural resources. Right now, this foundational information is buried in Appendix A. The plan should describe these primary benefits up front to justify why a bold plan is necessary at this time. The plan also should add data on the calculated economic benefits of natural resources in Arlington, in terms of increased property value, enhanced county reputation (as a draw for investment), and overall health and well-being. This is vital information, even if merely estimated, in order to justify increased county investment in its natural resources.

Then the Executive Summary/Introduction should clearly list the factors that are putting Arlington's invaluable natural resource base at risk in 2023 (see list above). The long-term vision for the plan should address those factors directly and go beyond the general aspirational statements of the current vision and principles. The plan should state a tangible goal to stabilize and restore the county's tree canopy and green spaces to levels that the county had when the first plan was issued in 2004. The plan should state up front that this goal is essential and a bare minimum to sustain our natural ecosystem for generations to come. The plan should also spell out the many benefits of doing so, echoing the overall theme that this plan is not just a set of maintenance proposals, but a long-term strategy to restore and enhance the incredibly valuable green resources that make Arlington uniquely special as a suburb to a major city.

The actions in the draft plan should be re-structured to focus on priorities that directly address the most critical problems identified at the beginning of the report. These priorities should be articulated at the beginning of the document. The priorities listed on page 39 are an excellent starting point, though I recommend some changes to them, below. The plan should use the priorities as a framing device for

grouping the *most essential* actions from the implementation plan around each priority. These mini-groupings of essential actions should show the financial and staff resources thought necessary to achieve success and the timeline and anticipated outcomes of such actions. The tone here should be one of highly prioritized problem-solving to achieve imperative results, not an inventory of everything that could possibly be done. Certainly, actions would be drawn from the catalog of 86 items listed in the implementation plan, which I suggest be converted into an appendix for overall reference purposes.

While I appreciate the ten listed priorities in the current draft plan, I do recommend that certain of these actions be reworked as follows to more explicitly address the county's greatest needs:

- (1) **Explicitly identify Arlington's tree canopy, parks, and other natural resources as a top tier county priority, equivalent to other county priorities like transportation, housing, schools, and infrastructure.** (This represents a shift in tone and mindset for the county but it also conveys an essential message about why the Forest and Natural Resource Plan is so important today.)
- (2) **Initiate a fast-track study to calculate quantitatively the ecosystem valuation services and related benefits of all Arlington natural resource assets.** (This ties in with Items 1.3.1, 1.3.2, and 2.1.2, though I suggest that this is a much higher priority because it is foundational data to support increased attention and investment across-the-board.)
- (3) **Restore Arlington's tree canopy to at least 40% coverage and restore other green spaces to 2004 levels.** (This is consistent with Item 1.1.1, but shifts focus away from simply maintaining the status quo. The F&NR Plan should require (if not express itself) an articulation of the steps necessary to achieve this restoration goal and a timeline for doing so.)
- (4) **Ensure 70% of Arlington's trees are regionally native by 2035.** (This is a good 'stretch' goal. I recommend that you incorporate Item 3.1.6 and any other native tree actions into a single item to emphasize the priority nature of this objective.)
- (5) **Expand and fund county programs to purchase, establish, and preserve trees and green space in neighborhoods throughout Arlington, particularly in disadvantaged areas of the county.** (This ties in with the excellent acquisition Item 1.1.5 and the tree equity area ideas in Items 2.1.1 and 2.1.2 but goes much further and raises this from an exploratory topic to a county-wide financial priority. It also would support an expanded green infrastructure priority, listed below.)
- (6) **Launch a major new collaborative program to plant and maintain trees and natural habitat on APS properties county-wide, starting with schools in disadvantaged neighborhoods.** (While this is similar to the preceding item, I think it should be a stand-alone priority because of the sizable land area involved and the longstanding disconnect between tree strategies for schools and other county lands. Item 1.1.7 addresses this point, but in an indirect way that will continue the status quo and not take full advantage of the opportunities that school lands provide.)
- (7) **Greatly expand funding for county tree and natural resource maintenance (including watering and invasives programs).** (This action ties in with Item 4.1.1, but it gives a much more explicit message about what really is necessary to shift to a more proactive approach.)

- (8) **Launch a county-wide homeowner education program about the proper value and maintenance of trees via all civic associations, the faith-based community, schools, and other venues that will reach all citizens.** (This ties in with Item 1.4.3 and other items in the plan, but again I see an expanded all-hands-on-deck approach that would pull in schools, business leaders, and others besides the important groups identified in 1.4.3. The action items also should involve a rethinking of how the county communicates its message (both delivery strategies and content).)
- (9) **Lead a northern Virginia regional legislative effort to identify and advocate for changes in current law to enable the county to impose and enforce more stringent requirements for tree protection, maintenance, and replacement in development site plans.** (Clearly this relates to Item 1.2.1, but I suggest a broader collaborative effort to work with the entire northern Virginia delegation and other entities like the Chesapeake Bay Foundation to increase the chances of successful legislative reform.)
- (10) **Adopt a county requirement that all commercial development and county transportation and infrastructure projects must include green infrastructure (i.e., natural) design elements to address at least XX% of storm water runoff.** (This related to Items 1.2.2 and 1.2.12, but as with my other recommendations, I think there should be a top priority effort to establish more explicit and stringent green infrastructure requirements, especially for county-run public works projects. A more proactive approach here would lay the groundwork for establishment of a county-wide natural infrastructure and connectivity network as called for in Item 3.3)
- (11) **Proactively seek outside funding for investment in tree and natural resource programs in Arlington.** (While the current draft plan has many items that address collaboration with non-business groups, I recommend that the county make a concerted effort to actively seek grant money for its natural resource programs from all available funding sources and that it work with entities like the Chamber of Commerce and other prominent businesses in Arlington to develop partnerships to support 'green' initiatives. The return on this investment could be great.)
- (12) **Provide the Forestry and Natural Resource Commission with concurrence authority to review all actions involving existing and prospective notable trees.** (This relates to several items in the draft plan, but is intended to give the appointed forestry advisors for the county a greater say in how notable trees are dealt with).

By restructuring the plan in this way, which would not be too difficult given the good content that already is in the draft, the county will convey its message and vision much more effectively to the public. That message will be, in part, that Arlington is committed to solve the very greatest problems that are affecting our natural resources, for the equitable benefit of all Arlingtonians. The rationale for making these targeted investments of staff time and tax dollars will be clearer. This approach and message will be more likely to inspire and motivate citizens to support the county's actions and to take action on their own.

Thank you for your consideration of my perspectives and recommendations. I would be happy to discuss them further with members of the county staff.

Sincerely,
Robert S. Benson

2616 North Potomac Street
Arlington VA 22207
rsbenson79@gmail.com
703-635-0689

From: [Bill Browning](#)
To: [Ryan Delaney](#); [Jennifer Fioretti](#)
Subject: Comments on the latest draft FNRP
Date: Monday, June 26, 2023 8:40:21 AM

You don't often get email from browningwh@gmail.com. [Learn why this is important](#)

EXTERNAL EMAIL

Ryan/Jennifer,

Thanks for the opportunity to provide comments on the FNRP at this stage of the process. I'm only offering two suggestions in this email as I want to see how you handle the placeholder for deer management. There are many more suggestions that I could offer, if I feel that insertion is not complete enough.

For example,

In section 1.1

- the plan states "[a]ction to achieve that goal is complicated by current patterns of land use in the County."
- This section could be rewritten to say "[a]ction to achieve that goal is complicated by current patterns of land use and the imbalance of deer in our forests in the County."

On page 84, Strategic Direction 3

- the plan writes..."Biodiversity — the richness of species in an ecosystem — looks beyond the benefits provided by singular trees, such as shade or aesthetic enhancement, and to the foundational systems of the natural world. It is maintained by the interactions among plants and animals such as seed dispersal, population control or the far reaching effects of keystone species that shape their community."
- "Biodiversity — the richness of species in an ecosystem — looks beyond the benefits provided by singular trees, such as shade or aesthetic enhancement, and to the foundational systems of the natural world. It is maintained by the interactions among plants and animals such as seed dispersal, population control or the far reaching effects of keystone species that shape their community. With Arlington lacking apex predators like wolves or mountain lions, deer have become ecological bullies ruining the habitat for a variety of songbirds and amphibians. As a consequence of this imbalance, our depaupered forests are unable to support the biodiversity we desire.

Thanks. I look forward to the next draft,

Bill

From: [brooke alexander](#)
To: [Ryan Delaney](#); [fnrp](#); [Adam Segel Moss](#); [brooke alexander](#)
Subject: brooke alexander comments on FNRC
Date: Saturday, July 1, 2023 12:12:21 AM

Some people who received this message don't often get email from brooke.alexander52@gmail.com. [Learn why this is important](#)

EXTERNAL EMAIL

Hi Ryan

 [draft-forestry-and-natural-resources-plan_-june...](#)

I have written my comments below. **Note in the attachment above, I have highlighted in yellow the words to which the comments were directed as indicated on the following pages. Hopefully you can follow this.**

Brooke Alexander
Ashton Heights Civic Association Tree Canopy and Native Plant Coordinator
UVA Master of Land Use and Environmental Planning 1980

p 39 Most Important

Conservation and tree planting programs are not going to keep 40% tree canopy countywide, if we keep reducing the amount of land available for trees. We need to reduce the allowable lot coverage county wide. During our Missing Middle discussions, the County Board deferred to the ongoing FNRP to speak to this question. It is essential that the FNRP do this. This document should be yelling 'FIRE!'

Short of that, minimally the FNRP should have these Action Items:(1)measure our county tree canopy coverage (within a year) and (2) within 2 years assess how our tree canopy loss will progress for the next 20 years under the current lot coverage allowances. We must do this in order to have the opportunity to change the trajectory.

So, first we need to look at the reality of the tree canopy, present and future, under current lot coverage allowances (which have increased with MM). Then we need to plot a course correction before we lose the opportunity.

p 7 I don't see this in this document. I see a lot of hedging.

p 7 I don't see 'Glossary' in the table to contents. to what does this refer?

p17 A comprehensive plan IS policy--why not say 'these planning documents reflect Arlington policy on...'

p17 :EXPLORED"!! This is very weak. When adopted, this will be county policy. "Explored" should be replaced by 'set forth' or 'defined in'.

p 20 I think you mean 'additionally', not 'however'.

p21 ADD "and tree canopy" (conservation or provision of public open space AND tree canopy)

p21 and 22. The (1) site plan process and (2) use permit, and (3) form based codes do not

mention the items listed under 'by-right' development. As written, this implies that tree canopy and other vegetation requirements, as well as Erosion and Sediment Control, Chesapeake Bay Preservation, Stormwater Management and Floodplain Management, and lot coverage, street trees, screening, landscaping and setbacks have no part in these decisions. Please add the appropriate language to these sections.

p23. We need to incorporate support for nature in our built up area. This paragraph seems to indicate an either/or situation. Doug Tallamy proposes adding native trees and plants to private property, which altogether across the nation could become our largest National Park. This might be the place to introduce Tallamy's concept of the Homegrown National Park (which is pictured on p 96 without accompanying explanation).

p25 and 26. why are these hedges here? Remove all 3 hedges! It is clear that we have a decline in tree coverage. Plantings on public land helped to balance tree loss on private lands. It's clear from the 2016 data. But even more clear when looking at the LIDAR report done with 2021 data. The LIDAR report was not done by the county, but that's no excuse to leave out the information, even if you just include the summary info.. Afterall, you used the 2021 Marymount Heat Index information (p79)

p27 put this information with the sentence above (p260 where it claims that planting on public lands has offset losses on private lands. To do otherwise implies that public lands can continue to offset future losses in residential areas. It also implies that losses in private property (like those suffered in Ashton Heights) are unimportant.

p27 what is the source of 13%. These numbers are incongruent with info above which indicates 15.9% (120,000 of 755,000 trees) are controlled by the county. Perhaps these are from 2 different points in time. In any case, this should be clarified.

p28 Insert here a statement of invasive non-native plant's deleterious impact upon our native plants and animals. then make the statement about some natives are capable of exceeding ecological carrying capacity.

p35 what is climate protection capacity? Do you mean to say "maximize trees and green space to protect against the effects of global warming"??

p39 what is natural vegetation? do you mean **native** vegetation?

p39 Adopt a native plant requirement for public and private sites. This requirement should state a clear preference for the pure species of native plants, NOT cultivars. Cultivars are developed for the benefit of people; cultivars often sacrifice those attributes that benefit our native fauna and flora.

p42 remove this hedge. 'tree canopy has declined '

p42 ADD what happens here is central to our future canopy, as 87% of our county trees are owned by private or institutional land owners.

p42. redundant paragraph

p42 replace last paragraph with "With our tree canopy, we are dealing with a living resource.

Dead, dying and trees at high risk of failure are removed. When this happens, newly planted trees.....led to novel syndromes like Oak Decline, which threaten some of our oldest, highest value tree species. Detrimental effects on our tree canopy may result as the effects of climate change continue to mount."

p 43. Move this paragraph to the front of this section.

p45 no link here

p 45 re: these tools, what tools?

p46. how does 20% coverage on future schools get us to 40% tree coverage?

p54 ADD: reduce allowed lot coverage. Evaluate whether full build outs in Arlington residential zones will leave space to support 40% average tree canopy. If not, reduce lot coverage

p55 stack utilities accessing residences so that there is space for trees on residential properties

p55 evaluate how utilities and stormwater facility can be placed to maximize tree canopy on residential properties

p78 remove hedges. weak statements

p91 reduce the discussion of native invasives in this intro, as it has its own discussion below. Keep just the area in yellow. And the major area/ number of species are non-natives.

p93. maintain/augment staff to oversee EDRR volunteer efforts

p96 shall be identified

p96. Explain Doug Tallamy's concept of a Homegrown National Park, and how Arlington could fit into that. Note Tallamy's assertion that we together can make a National Park to support our ecosystem

p100 Apparently an incentive of additional density is provided to private development projects with certain compliance with Dark Skies . In my opinion, this should be a requirement for a private development permit, not an incentive. I would recommend no additional density be given, but that as good citizens and neighbors these projects be required to comply.

p101 ditto comments for bird friendly buildings. No incentive. But requirement for permit.

From: [E J](#)
To: [fnrp](#)
Subject: Suggested edits to the FNRP
Date: Friday, June 30, 2023 4:17:17 PM

You don't often get email from emjmls@gmail.com. [Learn why this is important](#)

EXTERNAL EMAIL

Hi,

I submitted feedback through the website on content issues, but it was easier for me to do a list of typos and wordsmithing suggestions as an email. I hope that's OK.

This is a wonderful report, but the first two paragraphs are weakened by subjects that don't agree with verbs—or even if grammatically correct, they sound wrong. Subjects are separated from verbs with many prepositional phrases, so by the time I get to the verb, I don't know what is being referred to.

Page 9 Paragraph 1

Arlington's natural **resources are** an essential **element**. *Natural resources* is plural, so natural resources are essential **elements**.

Every component of these resources, from air, water and soil to plants, animals and fungi, **are** intertwined in a complex web

The subject and verb don't agree: either “**Every component...is** intertwined” or “**All components to these.....are**”

Page 9 Paragraph 2

As Arlington continues to grow, it is essential that we continue to protect, enhance and manage our natural resources to maintain it, and the benefits it provides, for future generations.

Too many “its.” ...our natural resources to maintain **it**: are we maintaining Arlington? If we are maintaining our natural resources, resources is plural, so ...enhance and manage our natural resources to maintain **them**..and the benefits **they** provide.

Page 21

We are expecting this plan to be valid for at least a decade, correct? Surely it would be safer to use the real URL <https://www.arlingtonva.us/Government/Programs/Building/Permits/Land-Disturbing-Activity-Stormwater>

instead of the shortcut [bit.ly/3FE3AKH](https://www.arlingtonva.us/Government/Programs/Building/Permits/Land-Disturbing-Activity-Stormwater)

Page 22

In 1900, Arlington County was still considered a rural community. That year's census counted only 6,430 residents, 379 small farms, several villages and few improved roads. But entering the 20th century, Arlington's mostly agrarian character began to reflect the impact of population growth driven by an expanding federal government. The federal workforce tripled during World War I, between 1916 and 1918, driving a 60 percent increase in the County population from 1910 to 1920. Between 1920 and 1930, the population grew another 40 percent, transforming a resource-rich rural community into a highly developed suburb.

I like the historical perspective but would prefer real numbers instead of or in addition to the percentages. I am mathematically challenged and cannot compute 60% of 6430 and add it, and then try to compute 40% of whatever the result was. Please add real population numbers.

Page 29

Typo in the word challenge:
represents not just a significant challenge

Change challenge to challenge

Page 31: The “Click to View” doesn't work.

I really like the sidebar contrasting stream restoration—which immediately makes me think about making it back the way it was— with stream resiliency. I think it is a good change.

However, the plan still uses “stream restoration” on page 137, 3.4.1, and 156 (item 15)

Page 39: 1.1.1

Maintain 40% tree canopy. We no longer have 40% tree canopy. Suggested change:

Establish 40% tree canopy County-wide...

Page 42:

Arlington’s overall tree canopy **appears to be declining**, even with tree planting and conservation on public land helping to partially offset losses on private lands.

This is too weak. Our canopy does not “appear” to be declining—it most decidedly is declining. Change to:
Arlington’s overall tree canopy is declining—from 41% in 2016 to 33% in 2022, even with tree planting and conservation on public land helping to partially offset losses on private lands.

Here’s the citation for the footnote:

<https://www.arlnow.com/2023/03/30/new-study-paid-for-by-local-naturalists-shows-declining-tree-canopy/>

Page 42: Identical paragraphs:

Parks and public spaces serve many different purposes — limiting the County’s ability to add more trees and conserve or create new natural areas. Given these constraints, the projected future development of privately and institutionally owned land poses complex challenges to tree and natural resource conservation.

But parks and public spaces serve many different purposes — constraining the County’s ability to add more trees and conserve or create natural areas. Given these constraints, the projected future development of privately and institutionally owned land poses complex challenges to tree and natural resource conservation.

Page 43:

In light of our equity issues—where many Arlingtonians do not enjoy the same life expectancy or quality of life—this sentence makes me uncomfortable:

assure the next generation of Arlingtonians enjoys the same quality of life we have today.

How about this instead:

...to assure an abundant tree canopy for future generations of Arlingtonians.

Page 44: 1.1 Sustain tree canopy

Change “sustain” to “improve”. The tree canopy is no longer at 40% and it will take lots of effort to build it back to that. This plan needs to be realistic about how far away we are from sustaining.

Page 50. 1.1.10:

Oversight, assistance and **permitting the removal** of these trees and changes to these landscapes could be enhanced through improved internal and external collaboration and regular education sessions.

This is confusing to me. “Permitting” removal seems contrary to the goal. If it means “providing a permit” where permit is a noun—a written authorization, surely that could be stated more clearly for people not used to the jargon of tree removal. I don’t know what to suggest, because I don’t understand the sentence.

Page 51:

1.1.2

– Expand protections within RPAs. (You did explain RPA on page 20, but surely this could spell out Resource Protection Areas, since it’s the first time it appears in 30 pages.)

Page 56:

1.2.5

Conduct an estimate of lawn area would highlight the opportunity for expanding trees and other natural resources.

Change to:

Conducting an estimate... OR Conduct an estimate of lawn area **to (instead of would)** highlight the opportunity..

Page 61:

The report uses well-being 12 times and wellbeing 3 times (excluding the footnotes.) Change all the instances of wellbeing in the report to well-being.

Page 85:

Lovely photos but the instructions say the identification is clockwise, when it is actually top left, top right, bottom left, bottom right. Actually, I am able to tell the difference between a turtle and the owlets, but if you leave clockwise in the instructions, the turtle and the owlets should be swapped.

Page 88:

The County could consider enhancing the climate lens of this inventory by collaborating with the USDA's Northern Institute for Applied Climate Science with developing a 50-year vulnerability analysis.

Suggest you change to:

Collaborating with USDA's....**to develop (instead of with developing)** a 50-year

Page 89

NRCA - (You explained NRCA on page 10 but it hasn't appeared since then. Surely now that it is actually going to be addressed it could be spelled out: Natural Resource Conservation Areas)

Page 126:

BMP - nowhere in the text is this defined as Best Management Practice. This is the first time it appears.

It's a really impressive report. Thanks to all who are working to hard on it.

Sincerely,

Eileen Janas

emjmls@gmail.com

703-521-9171

June 29, 2023

Comments to the Draft Forestry and Natural Resources Plan (2023). Submitted by Greg Zell. I have had an opportunity to review the draft plan and offer the following general and specific comments regarding the document.

Specific Comments:

[Section 3.4.1 PRIORITIZE STREAM PROJECT OPPORTUNITIES THAT ADDRESS MULTIPLE GOALS \(page 99\)](#)

My issue is with the language within the paragraph that discusses multiple goals. (1) I would hope that “meeting regulatory targets for sediment and nutrient reduction” would not be weighted as a higher priority than protection of a natural mature forest community within the group of NRCA’s, and (2) the final sentence affirms a need or desire to “restore and re-establish a hydrologic connection to floodplain wetlands”. My concern here is that many of the smaller piedmont streams within parkland in northern Arlington have not had a connection to any floodplain in modern geological times. These V-shaped valleys would not be considered to be “restored” if floodplains were engineered into a stabilization project. Prior to any “reconnection” efforts, I would suggest that a geological analysis be conducted to confirm the existence of an historical floodplain at the local site.

[APPENDIX D: ARLINGTON COUNTY DRAFT NATIVE PLANT AND MAINTENANCE STANDARD](#)

[DEFINITIONS – C \(pages 157-159\)](#)

This section defines a “local ecotype native” plant. I would not include the term “clonal reproduction” under this description unless you are specifically intending to include grasses, forbs, and other lesser forms of vegetation. Many/most woody shrubs and trees would be considered to be cultivars if produced in this way. The value in using seed produced plants lies in the greater genetic diversity. This comment would also relate to [PLANT REQUIREMENTS – C](#).

General Comments

1. The plan is well written and thoughtful. My biggest concern with the overall Plan is that it lacks a workable roadmap for the county to follow. It’s full of good ideas, (maybe too many) but without specific guidance to get there. I formerly worked for Arlington County and am well aware of the personnel and non-personnel resources available. I fear this this plan is overly optimistic and will doom those staff obligated to fulfil the plans promises. Without clear and near-term milestones for staff and others to judge success, it will be difficult to keep up staff morale and momentum after a year or two. Maybe set specific goals/objectives for certain tasks in a series of 2,3, 5 and 10 year goals. I also think current staffing levels will be unable to achieve the stated goals without additional assets and funding.

2. Another over-arching concern I have with this plan is similar to the concern I expressed with the former Urban Forestry Master Plan. While I understand the need to define the totality of the woody vegetation within the county as the “urban forest”, I have a concern that there is an insufficient delineation within the document between the general urban forest (including streetscapes, managed public recreational spaces, and private back/front yards and those identified/delineated natural forest communities found within the NRCA’s. Generally, these named/mapped communities require little to no “management” other than removal of identified hazardous trees. The primary objective within these communities should be “preservation” not active management. Any planting within these plant communities should be pre-approved, be objective based AND conform to the existing community type (example: Acidic Oak Hickory Forest, etc.).

Thank you for the opportunity to review and comment on the draft plan. Good luck with the plan, it’s acceptance and implementation. Regards,

Greg Zell

gregory.zell@verizon.net

Naples, Florida

From: [Alonso Abugattas Jr](#)
To: [jtoussaint](#)
Subject: RE: Forestry and Natural Resources Plan and Deer Assessment and Deer Management project
Date: Friday, June 16, 2023 1:40:38 AM

Thanks, and while the county has some information about including this into new buildings, education around this is always good. I'll see about passing these thoughts along to the engagement team. I am still working on the technical report and any numbers of dead animals would be good to include, especially unusual wildlife such as bats and such. I likely will not start again on that until the fall as the FNRP and deer engagement will pretty much fill most of my own time on this along with other items such as Park Corps camp, regular volunteer events, and the like.

Alonso

From: Jen Toussaint <jtoussaint@awla.org>
Sent: Friday, June 16, 2023 12:49 AM
To: Alonso Abugattas Jr <Aabugattas@arlingtonva.us>
Subject: Re: Forestry and Natural Resources Plan and Deer Assessment and Deer Management project

EXTERNAL EMAIL

Alonso,



Thanks so much for also sharing the FNRP (Forestry and Natural Resources Plan) update. I read through the draft and was wondering your thoughts on considerations around inclusion of an initiative around decreasing window-strikes for birds. We sadly get lots of victims of window strikes ranging from migratory songbirds to our larger raptors. As high-rises continue to go up so do our calls for this issue. Even if the added initiative was something along the lines of an education campaign? Ideally something around legislation requiring UV Reflective or Fritted glass on these larger structures would be very helpful but I am sure that is a much heavier lift! Would love your insights.

I have also been meaning to touch base with you around data. I prioritized redoing the past 10 years of deer data but now that that is finished are you still hoping to connect on data around the Wildlife of Arlington Technical Report? Perhaps we could sit together for an hour and try to find what information you might be looking for?

Many thanks,
Jenn

Jennifer Toussaint (she/her)
Chief of Animal Control
Animal Welfare League of Arlington



 jtoussaint@awla.org
 (703) 931-9241 ext. 210
 2650 S Arlington Mill Dr, Arlington VA 22206
 awla.org



On Tue, Jun 13, 2023 at 12:16 PM Alonso Abugattas Jr <Aabugattas@arlingtonva.us> wrote:

I know it's been a while since contacting you, but wanted to mention 2 projects that are starting. One is the engagement portion of the FNRP (Forestry and Natural Resources Plan) which has started and seeks input from the public as far shaping the integrated Forestry and Natural Resources management plans. Attached is some more information on this and an open house the County is launching. Please pass on to interested staff.

The County is also excited to let you know that the County's deer management project is set to kick off later this week (June15). This will include a website launch, the deer browse assessment report recently completed by our consultant, an informational video, project timeline, and our first community engagement opportunity. We will have an online questionnaire out for about a month and in mid-July, we plan on hosting an in-person community meeting. We know you've been interested in the topic and will be sure to keep you in the loop, but just wanted to use this as a heads up.

Alonso Abugattas
Natural Resources Manager
Arlington County Parks, VA
Phone: 703-228-7742
Cell: 571-235-2368

We are updating our Forestry and Natural Resources Plan! Provide your input here:

<https://projects.arlingtonva.us/fnrp/>

Any email sent to/from Arlington County email addresses may be subject to disclosure under Freedom of Information Act (FOIA) requests.

From: [Marion](#)
To: [Ryan Delaney](#); [Jennifer Fioretti](#); [fnrp](#)
Subject: RE: Comments on the latest draft Forestry and Natural Resources Plan
Date: Friday, June 30, 2023 4:09:58 PM

You don't often get email from mjordn@verizon.net. [Learn why this is important](#)

EXTERNAL EMAIL

Dear Ryan,

Thank you for the opportunity to submit comments on the Draft Forestry and Natural Resources Management Plan.

Our natural resources are under threat and need much support to protect and preserve what we have and to increase natural habitat where ever possible. The plan encompasses a wide range of goals and objectives that are vital for supporting local natural resources. These include recognition of role of private property owners, importance of regional partnerships such as PRISMs, protection of tree canopy and support of healthy ecological communities of native plants and wildlife, management of invasive species, importance of including Biophilic principles in design, encouraging natural landscapes, reducing light pollution, improvements in county maintenance practices, and need for additional funding sources.

I know that you have received many comments on all these topics, and I will focus on some that may not have received as much attention.

Arlington Public Schools lands. As a long-time volunteer at Barcroft Park and other county parks, I am very concerned that the adjacent APS properties which are not being managed for invasive removal are an ongoing threat to habitat restoration work in the parks. At Barcroft, the Claremont school property is located on a ridge above Barcroft and the many invasive plants there seed into the park and require ongoing work just to keep up. The plan mentions the option “to explore conveyance of existing contiguous forested areas on APS sites to DPR to encourage consistent management of Arlington’s public forests.” It is long past time to deal with invasives on school properties and this option would put habitat management under control of county employees with appropriate expertise. Of course, work on school lands will require additional resources as well.

Deer Management. I understand that the specific issue of deer management will be addressed in a separate county process. However, this document downplays the importance of this issue and does not accurately describe the situation or choices that we face. Ex., p 33 “While most Arlingtonians value the diversity of plants and wildlife in the County, many also noted the harmful impacts of expanding deer populations. General sentiment favors striking a balance between managing negative impacts of wildlife while also protecting habitats that benefit Arlington’s ecosystem”. This is very misleading. There is not a trade-off between diversity and deer management. If we want to protect natural habitats and their diversity, including a healthy deer population, we must address deer overpopulation.

Environmental Education. Section 1.4 briefly mentions environmental education. This is an important element to increase public understanding of the work that will be required to protect

natural areas. We know that residents value our natural areas, but they do not fully understand the choices that must be made to protect them. This includes both required county resources and personal activities such as keeping dogs on leash in the parks, and not damaging park lands.

Volunteer Management. The fact that the county devotes an entire section to describing plans for volunteer engagement without ever mentioning the contributions of volunteer organizations such as the Arlington Regional Master Naturalists and Tree Stewards is deeply concerning. The fact that examples of volunteer work in other cities such as Philadelphia are cited as examples of possible volunteer engagement and a detailed graph is shown of data from Seattle is deeply insulting to me and other long-time volunteers. To be effective, the planning process must start with a realistic understanding of the current state.

Detailed data on the work of ARMN Park Stewards and other ARMN volunteer work has been provided to county Parks and Rec staff for years and can be easily provided to the authors of this document. In 2022, ARMN volunteers provided over 2,300 hours of habitat restoration work in Arlington and recruited and supervised 1,100 members of the general public to help in this important work. The ARMN Park Stewards program, which is a joint program with Parks and Rec, provides dedicated, experienced ARMN members who have made long term commitments to work to improve habitat in over 20 priority county parks/natural areas. (ARMN also has Park Stewards working in five other neighboring jurisdictions.) Working closely with Parks and Rec staff the Park Stewards organize invasive removal events, monitor the parks for appearance of new invasives and success in regeneration of natives, and engage neighboring communities with educational and citizen science programs. The work of these volunteers enables county staff to greatly leverage their expertise and effectiveness. ARMN volunteers also support natural resources through programs such as Audubon at Home, and citizen science projects such as City Nature Challenge and Christmas Bird Count. The Tree Stewards are another example of trained volunteers who work closely with county staff to provide a variety of services to protect trees. There are several other organizations which provide support for nature education and habitat support and those should be included in future planning considerations as well.

The section on volunteers opens with a conclusion that what is needed to improve volunteer efforts is to “PROVIDE A SINGLE PLATFORM TO COORDINATE RECRUITMENT, TRAINING AND MOBILIZATION OF VOLUNTEERS.” I hope that going forward, ARMN and Tree Stewards and other volunteer organizations will be consulted in discussions about what could actually help support volunteer efforts. However, I made suggestions during the last draft review, along with other active volunteers, and they were all ignored.

I have significant concerns about the “single platform” as it is described here. The draft states “Dedicating efforts to volunteer management ensures it remains a priority; providing a centralized coordination platform, such as through a single point of contact at the County, helps minimize overlap and duplication of volunteer efforts. As part of this coordination, the County should assess the needs of existing volunteer organizations and individuals, and use that assessment to inform future initiatives.” The success of the work of ARMN and the Tree Stewards depends on close working relationships with county staff responsible for various aspects of natural resources management. Forcing such volunteers to go through a “single point of contact” will seriously undermine this work. My recollection of working with a previous county volunteer staff organization was not positive. That situation should be examined closely for lessons learned before assuming that a centralized something will provide value. The last sentence about assessing needs of existing

volunteer organizations is encouraging. This should start with conversations with leaders of the active volunteer organizations.

The proposal to “Formalize Volunteer Roles” again ignores fact that ARMN has documented the roles and responsibilities of Park Stewards with county staff. In addition, both ARMN and Tree Stewards provide training and organization to help members understand and connect with volunteer opportunities in Arlington.

At the discussion for the previous draft, county staff asked about recognition programs. All volunteers on that discussion call advised that the most important way to support and recognize volunteers is to provide adequate resources and priority to support the goals of habitat restoration that we are working so hard to achieve. The Bill Thomas award is recognized and valued as a high honor. However, if the county focuses on creating lots of awards instead of actually supporting volunteers, they will add to the demoralizing impact that this section has had volunteers as it is currently written.

To summarize, I support the broad scope of the plan. I urge consideration of my feedback on volunteer engagement so that we can all work together most effectively to implement actions to support our natural resources.

Marion Jordan
2448 S Walter Reed Dr., Unit F
Arlington VA

From: [Nicholas Giacobbe](#)
To: [fnrp](#)
Subject: Comments on Draft Forestry and Natural Resources Plan
Date: Thursday, June 29, 2023 9:05:22 AM

You don't often get email from ngiacobbe@gmail.com. [Learn why this is important](#)

EXTERNAL EMAIL

Good Morning,

Thanks for the opportunity to comment on the latest draft of the Arlington County Forestry and Natural Resources Plan. It is an ambitious project and I commend the work of the County's contractors in trying to lay out a strategy for the long term. Since this plan is likely to be in place for many years (the last update was well over a decade ago), it is critical that the underlying data be current. Throughout the report it refers to a 40% tree canopy. While an impressive number, more recent data sadly indicates that it is no longer the case. As a result, the urgency expressed in the report should be even greater. We simply do not have time to waste, we need to preserve the existing canopy and get new trees in the ground – stat!

One specific case where the data matters is the chart on page 28 of the Arlington County Canopy Change by Civic Association from 2011 to 2016. As a case in point I use my own civic association, Aurora Highlands, which indicates a 15% increase in tree canopy. Sounds good, doesn't it? The reality is that we are one of the areas in the County that is most threatened by speculative development and drastic canopy loss. In fact, the County has included our neighborhood as one of only ten areas for the new Tree Equity Fund because the reduction in the tree canopy is so dire. A reader of the report would not get that take-away as it's currently drafted.

The population projections are also troubling, it's going to take a lot of land (and potential tree planting area) to house an estimated population of 311,200 people and 283,700 jobs in 2050. Presumably some of these 70,000 new residents will also be school age children, so land will need to be found for schools to support this growing population (not to mention workplaces for the 60,000 new jobs). Given that reality, it's curious that the report's priority action 1.1.5 on page 39 is for the County to "Advance urban forestry and natural resource goals through County public space acquisitions." While in theory this is a laudable goal, we need to bring some fiscal reality into play. In spite of the County's budget trajectory in recent years, at some point the County Board will need to deal with the ever-increasing tax burden on County residents. We do not have an unlimited tax base and a lot of that future tax revenue stream is going to be needed for schools and other infrastructure to support the burgeoning population.

The other real challenge the County is facing is casually stated in a benign paragraph on page 42:

Newly planted trees — even if their number exceeds the number of trees removed — must grow for years before they can replace the ecosystem benefits provided by mature trees.

This is a serious problem! Far too many developments are removing mature trees and replacing them with saplings that will take decades to mature. In our neighborhood we have one development that will be removing 80+ mature canopy trees. While the developer intends to either replace the trees on site or give a small tribute to the tree canopy fund, the reality is that the important contributions of those 80+ mature canopy trees will cease for decades. That scenario is multiplied countless times in developments across the County. In the interim, who is doing the work of the tree canopy described so eloquently on page 68 of the draft text?

There also needs to be more work done to put in place some serious teeth on redevelopment projects that are approved by the County. As it currently stands in our neighborhood, the speculative developer buys a home, levels it, removes all organic material from the lot (especially mature trees), and then builds as many square feet as possible on the site. The County requires a minimal number of saplings to be put in place and when it's done a certificate of occupancy is issued. There's no requirement up front to maximize the preservation of existing trees, nor is there

a bonding requirement that the trees required by the site plan be maintained. So if the purchaser of the property doesn't like the trees, they are simply removed. Poof goes the tree canopy contribution, not to mention the destruction of what was there. If we need legislative authority to put additional measures in place, let's get started. What is more important?

In closing, I commend you for this initial draft and look forward to the next iteration which shows the real urgency and criticality of the situation we are facing with our tree canopy. Community engagement is critical, I note the multiple references to the Pentagon City Sector Plan of 2022, which was developed through a long conversation with the civic associations. We are fortunate to have many experts among Arlington residents who are willing to give freely of their perspectives and expertise. We all need to listen.

Regards,

Nick

Nicholas J. Giacobbe, Jr.

818 25th Street South, 22202

From: [frazmo](#)
To: [Ryan Delaney](#); [Jennifer Fioretti](#); [fnrp](#)
Subject: Comments on the latest draft Forestry and Natural Resources Plan
Date: Saturday, June 24, 2023 12:35:07 PM

EXTERNAL EMAIL

Dear Ryan, here are my comments on the latest draft. I'm also including Jennifer since we had a nice discussion at the open house.

Please forgive what may come across as the negative tone of the comments below. I tried to focus on constructively addressing what I considered problem areas. But overall I see a tremendous amount of good stuff that didn't need my commenting, and I compliment you and everyone else involved on all the good work. So please keep that in mind! Also I would be happy to discuss anything that would be helpful. Cheers, Steve

Steve Young
Frazmo@gmail.com
703.966.2966

5617 5th St S, Arlington, VA 22204

FNRP Comments 20230624

My comments are divided into two sections: first a few "macro" or overarching comments, and second a set of comments that are largely keyed to specific text with suggestions.

Macro Comments

Our natural resources, including trees, are not in a stable state. And the loss of tree canopy discussed in the draft is a symptom, not a cause, of massive threats that affect all of our natural resources. The Plan should have a stage-setting introduction that assesses the state of our natural resources and discusses key Threats and Opportunities at the most strategic level. Arguably the greatest Threat is climate disruption, although development pressures arguably are tied. I won't try to spell out all the climate threats, but an incomplete short list includes heat impacts, spread of invasive organisms and pathogens, flash droughts, more frequent and intense flooding events, and more severe storms in general causing tree blowdowns and other impacts. Exploding use and increasing inappropriate activities in our natural areas are the next major threat. As the Glencarlyn Park Steward, I see major issues, with the top one being off-leash dogs running throughout the park (much of which is NRCA). There is no sense of enforcement and thus no deterrence. The problem increased after Covid hit and appears to be virally increasing as more and more people see dogs running loose and assume that it's OK. The impacts on wildlife are significant, plus increased erosion causes multiple harms. And I see many more inappropriate activities that result in resource damage. In addition to inappropriate activities, simple increased use has led to damage – a good example is large-scale natural trail widening and proliferation of unplanned "social" or "goat" trails. Invasives

species are a major threat. Finally, although use of natural areas has exploded since early 2020, the County has not increased maintenance/stewardship resources commensurate with the need. Existing maintenance staff is woefully inadequate, and also from direct personal observation inadequately trained to protect natural resources. What I routinely witness is the opposite of a “first do no harm approach”. Unless the County invests more and better-trained resources to protect our natural areas from threats, we will lose more biodiversity and ecosystem services.

Similar to the recent assessment of deer impacts on natural areas, Arlington should conduct an assessment of its overall natural resources stewardship that identifies recommendations for enhancement.

I feel that I don’t need to catalog the effects of climate disruption and development pressures since they are so well known. I would be happy to meet to discuss the spectrum of inappropriate activities that I have witnessed. The key point is to set the context that our resources are in trouble.

On the complementary side, the kind of introductory stage-setting I am describing can also highlight Opportunities. Over the last ten years or so, significant progress has been made and this can and should be built upon. I would highlight the mobilization of volunteers that has taken place despite the lack of an adequate infrastructure to coordinate volunteer efforts. A particular bright spot has been progress in invasive plant management that demonstrates that “we can win this war” in our natural areas. Very significant progress in many parks can be attributed to coordinated efforts between County staff, dedicated volunteers, and greater use of professional invasives plant management contractors. Budgeting meaningful funding for the contractor invasives work was an important step. Funding should be expanded.

More Detailed Reactions

p.27, box: Typo, “Ray Fox” vice “Gray Fox”

p.30: Language that reads “... **less pollution-tolerant aquatic (or invertebrate) species...**” This seems not quite right, at least the parenthetical phrase. One option would be to just say “less pollution-tolerant species...”

p.33: There is this piece of language: **“While most Arlingtonians value the diversity of plants and wildlife in the County, many also noted the harmful impacts of expanding deer populations. General sentiment favors striking a balance between managing negative impacts of wildlife while also protecting habitats that benefit Arlington’s ecosystem”** This is very poorly framed in a manner that implies a trade-off between diversity and deer

management. Instead of setting up A vs B it should be A *and* B. I have a major problem with the second sentence in the excerpt. The “balance” it discusses is way out of whack; I don’t think the words on the page express the intended meaning. Just as a suggestion, here is a re-write that I think comes closer to the mark: **“Most Arlingtonians value the diversity of plants and wildlife in the County. Many did note the harmful impacts of expanding deer populations. General sentiment favors managing negative impacts of deer overpopulation and protecting habitats that benefit Arlington’s ecosystem.”**

Throughout: The draft seems to miss the importance of invasive plant management for protecting both existing trees and new plantings. Watering and pruning are mentioned but not invasives. I have personally witnessed many tree plantings that have failed because the small trees were engulfed by unmanaged invasive vines. Also the need for deer protection. And finally, poor training has caused multiple incidents of landscape crews mowing and bushhogging resulting in destruction of native plantings.

Throughout: The draft underplays the importance of volunteers on the ground. Master Naturalists are practically not mentioned. And Park Stewards are not mentioned at all.

p.41: The land area metrics in the box don’t make sense to me. I think perhaps something got scrambled (maybe my brain). Re-evaluate and rewrite.

p. 42: One paragraph is basically doubled. Understandable edit error as there are minor changes. Looks to me like inadvertently in editing the edited paragraph was pasted in overwriting another paragraph whose text is now absent. You can tell there is a jump that implies missing text that needs to be restored.

p. 46: This sentence: **“Virtually all of Arlington’s natural areas exist on County, regional or federal land”** I think this is an unfortunate statement, and I believe the aggregate area of privately owned natural areas is substantial. I think something like this would be closer to the mark: “Most of Arlington’s described and catalogued natural areas exist on County, regional, or federal land. However, the ecological significance of the natural areas on private property deserves recognition and stewardship should be encouraged.”

Area 4, Operations: The “do no harm” ethic needs to be stated and the need for more and better-trained maintenance resources should be captured. At present, there is essentially zero sense of deterrence for activities that violate park rules and cause damage to natural resources. There is virtually zero enforcement. My observation is that the problem exploded after Covid hit and continues to grow worse. The Plan needs to address this.

Mary Wolter Glass
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7030786-3308

June 30, 2023

Via Email

Ms. Jane Rudolf
Director, Department of Parks & Recreation
2100 Clarendon Blvd.
Arlington, VA 22201

Re: Suspend the Forestry and Natural Resources Plan – June 1, 2023 draft work

Dear Jane and the County Core Team for the FNRP:

I have spent a great deal of time reviewing this and the preceding drafts of the FNRP. There are many specific deficiencies that I and many other individuals and organizations have identified in all the drafts so far. These serious concerns have been inadequately resolved in the current draft. For this reason, I will not be providing my own detailed comments. Instead, I will point out **the issues that I believe constitute fatal flaws in the planning process and actions to meet the major challenges we face for our urban natural resources. This demands that the current work be paused while major corrections can be made.** The failings include:

1. Inadequate intake of public views and information
 - a. Limiting much of the input to online surveys that are biased and/or limited in scope.
 - b. Limited two-way conversations with stakeholders to hear their informed perspectives.
 - c. Failure to fully reflect and integrate the respondents' priorities in the Plan.
 - d. Inadequate time to review and respond to the most recent 170-page draft during the summer when residents are often unavailable.
 - e. Disregard for the importance of the above items as essential to any planning process.
2. Failure to access and use critical local data in the planning process.
 - a. Much of the material is generic not local and could be used in any planning.
 - b. Failure to recognize the new tree canopy data and instead continuing to misrepresent the tree canopy as being 40-41%, not the documented 33%, and pretending that it can be maintained at this level.
 - c. Failure to provide adequate inventories, or even good characterizations, of the existing environment and its many ecosystems, especially for our underrecognized natural resources other than trees.

3. Failure to recognize and provide specific guidance on the most critical issues facing Arlington locally.
 - a. The rapid pace at which Arlington's tree canopy is declining due to the aging of mature trees and development.
 - b. The need for aggressive tree planting programs (as in other local jurisdictions) using new technology and information available to improve rates of success.
 - c. The need for extensive education on many more issues facing natural resources that are targeted to the local environment including their value.
 - d. The need to retain mature trees wherever possible on public and private land with policies and evaluation methods that reflect the benefits lost and the inability of new tree plantings to recover these benefits.
4. The Need for Greater County leadership:
 - a. It can make better use of public lands to protect and enhance the tree canopy thereby providing a model for private sector actions.
 - i. Earlier review of projects and programs with trees given higher priority.
 - ii. Better education and coordination across County departments on the value and methods to protect the natural environments.
 - iii. Expand tree planting on public lands (40% of the plantable land identified) using innovative methods such as street tree pits for difficult urban locations.
 - b. Increase enforcement of all existing tree protection authorities for private lands along with required staff funding.
 - c. Immediately embark on a special task force to review County regulations, ordinances, zoning, etc. to find ways to protect trees during development and redevelopment to report back to the County Manger within 6-9 months.
 - d. Provide incentives for preserving trees in the new Utility Fee schedule.
 - e. Identify and pursue other incentives and funding opportunities at the local, state, and Federal levels to support tree programs for public and private initiatives.
 - f. Provide additional funding for tree maintenance - pruning, minimizing unnecessary tree loss, and removal of dead trees on public lands.
5. The substance and style of the document
 - a. The "Operations" Strategic Direction section is not a major goal, it should be a set of actions in the other Strategic Direction areas.
 - b. Poorly organized with related topics showing up in several different chapters.
 - c. Many actions are banal to the point of irrelevance, e.g. "3.4 Restore and manage water resources with a holistic, ecological approach."
 - d. The document is disjointed and uneven in the coverage of important issues. For example:
 - i. A section on biophilia is in the middle of "Conservation" and way too long. Why?
 - ii. Too many pretty pictures that explain nothing – they should be removed and replaced with more data.
 - iii. The 'Principles' hang out between the "Vision" and the "Planning Context". What is their role and ties to the major Strategic Directions?

- iv. Why the sidebar and pictures on page 18 with very little relevance for managing natural resources.
- v. Faulty data in graphic on page 24.
- vi. More tree canopy maps with important data are available and would inform a reader.
- vii. References to other states and any region-wide actions should be minimized in favor of more specific actions already occurring in the public and private sectors, e.g. natural landscaping

With so many fundamentals lacking in the substance and professionally recognized processes for both environmental work and urban planning ignored, the Plan must be considered unresponsive to the need for better management of our vanishing tree canopy and other natural resources. **Please halt the work on the Plan and refocus the efforts to meet the challenges I and others have articulated.**

Please include these remarks in the public record for comments on this draft.

Thank you,


Mary Glass

COMMENTS ON THE JUNE 2023 DRAFT FORESTRY AND NATURAL RESOURCES PLAN

David Howell

Overall Document and Organization

- These comments are an assortment of reactions to the June draft, listed by page to make reviewing them as easy as possible.
- Overall, every aspect of this draft is very encouraging and reflects the time, energy and talent of the team. This is new territory in some ways, and not only for Arlington, so we should be pleased with the general state of play.
- That said, many will still have concerns about some recommendations—particularly the detail, the ability to fix targets, and level of commitment. Some of that pertains to all Comp Plans, but some is justified, especially when it comes to committing to creating policies and tools for furthering work under the auspices of the plan. We should be able to say we will do something, even if we can't say exactly how much or even exactly what until the initial effort is begun.
- Organizationally, I still feel that there is ambiguity on why certain recommendations are where they are, or are/are not packaged with others better, or stated to be clearly not redundant from one SD to another. But here I only address a couple of instances where I thought text should be moved, and those are not recommendations.
- I include separate comments on appendices, as well as a comment on every photo included in the plan. That may seem presumptuous in some ways, but it's not intended that way. Many photos are very good. And some may be placeholders, just for layout purposes. But there are a lot of improvements to be made as the final final is prepared, and I hope that these comments help identify where and how those can be done to support the overall message of the plan.

Text Content

- page 22: Updates to the Stormwater Plan, Chesapeake Bay Protection Plan, Community Energy Plan, Public Spaces Master Plan, and this Forestry and Natural Resources Plan, along with the county Resolutions adopted in recent years call for an update or restructuring of the Form-based Code approach to development.
- page 26: Much of the data on tree canopy will be commented on as it is not consistent with recent analyses. These differences can be partly explained as due to methodological differences. Those should address both the calculated percentage differences (with margin of error) due to data collection differences. Importantly, this discussion should also address the implications for canopy percent trend rate in addition to static percent.
- page 27: unusual species/returning species side bar includes typo (gray fox instead of ray fox), omission of Eastern Bluebird. Check also Lepidoptera (Ocola Skipper) and Odonata (Blue-faced Meadowhawk) for taxonomic variety.
- page 41: Throughout SD 1 there is an overwhelming emphasis on trees, tree canopy, and land for trees. That is totally valid. But it isn't the only natural capital of interest under the heading that includes natural areas and biophilic features. This goal should also raise attention to other vegetation and soil life as part of the holistic foundation it is addressing. Shrubs, perennials, grasses should have a place here, as well as soil quality and ecological partners to all flora. Some of this will be discussed in SD 2 and especially 3, but from an ecological viewpoint, the Conservation goal should articulate a broader range beyond trees, and not leave it to an occasional collective term such as "natural area".
- page 50: and example of the previous point, this should be broader than just trees.
- page 57: 1.2.7 has no text. For ideas see many non-profit informational materials, and also my Stormwater/Rainwater Paper of March 2022.

- p 58: Re FBC as a precedent for how to guide landscaping is a reasonable idea, but the current FBC should itself be examined for updating to reflect several Comp Plan and Resolution policies that may not be adequately reflected in that guidance.
- page 62: The 5 principles included here have areas of poor articulation and muddy conceptualization. There is no cite for source, so I assume this prose originates with the draft plan. For example, the 2nd sentence in item 1 is questionable. Item 2 is an extreme point for an issue of availability and access. Basically, all of these seem to take angles or particular elements of principles and concoct rules from a negative avoidance perspective. Happy to discuss.
- page 70: Add bird-friendly window treatments to this education scope.
- page 73: In 1.4 generally, but in one of these the expansion of ecology, environment, landscape and stormwater mitigation should be added as a full program for the Career Center.
- page 32 and following: The order of community engagement, intro to strategic directions and priority actions should be changed. First, the intro to SDs should start on page 32. It is the plan structure, and has an opening explanation to that. Then the public engagement section, explaining that early engagement helped produce the SD themes, and in particular identified priorities that pertain to one or more SD in most cases. Third would be the crosswalk, with additional opening statement that says here are where the priorities are most clearly articulated in the SD structure. The current arrangement leaves the reader hanging twice with awkward transitions and little explanation of the continuity of thought.
- page 60: Good to have this page somewhere, but why here? Stands alone. Move to page 19.
- page 61-65: Move this to page 19 as well. This is informational background on biophilic planning and design. It informs some recommendation in all SDs. Better here than as an odd chunk where it is. Can finish the section with the PCSP page.
- page 15. Final item seems written as a nod to those who think that nature, biophilia, sustainability and ecological health are luxury spending items rather than the stewardship of our own county habitat. The content is about minimizing cost to the county. Efficient spending and cooperative efforts are fine, but this tone should be balanced with language about strategic investment in natural solutions, in natural capital quality, and in thoughtful and informed (by technology and education) stewardship. As is this is very one-sided.

Appendices

- page 161: “the Dillon Rule” definition should cite the actual provision reference in State law in the first sentence, and then say “commonly known as the “Dillon Rule””.
- page 162: Green Bank definition needs more. Is it self-sustaining? Is it in ecological balance? This just seems thin for anyone who might want to look at the glossary on this.
- page 162: Green Roof: The use of “layer” implies contiguous coverage, and the use of “system” implies a particular complex of features. Also, the term “often” is irrelevant to the definition. This definition should be based on the environmental, ecological and/or biophilic services created by roof vegetation (are they sufficient to functionally matter?).
- page 165: this Over-browsing definition misses the mark by being too general and avoiding the sensitive issue of deer until an oblique mention in the final word. What is said is not wrong but it’s not about over browsing, it is about edge ecology and invasive competition in disturbed or transition areas. Just hit the deer damage directly—that’s what it means.
- page 167-8: Alphabetize plan list and add Historical and Cultural Resources Plan, Public Art Master Plan, General Land Use Plan, Affordable Housing Master Plan. PAMP already refers to biophilia in last year’s update, and HCRP will this year. The others should.
- page 169: Alphabetize resolutions, or put in order of adoption, with the date included.

Graphics and Photos

- Overall—this being the first full layout and inclusion of elements other than text, the document is looking very good. The visual appearance is very important to most readers,

and especially to first time readers and those checking on content occasionally, both as visual organization tool and as illustration of our county space for the very reasons articulated in many sections of the plan. If the visual connection in the plan is not optimized, it will not perform as well in teaching the basic principles as if the illustrations are attractive in their own right.

- Some photos in the plan are ideal selections as a visual image of the text content they support. Also, some are excellent quality photos, although some excellent photos aren't the best for the particular use, and some suited well to the use are not the best image quality. Note that in a few cases the image quality is fine, but it needs cropping, or needs fitting to the space better. In a few cases they lack the interest or content gravitas to carry a visual message when used in the size and space allotted. Here's a list of some examples by page:
- page 8: headlining the document with a median strip is not the best choice, as compared to a neighborhood park. But if this is the choice, the overhead wires should be cropped out, as well as the stones and concrete retaining wall in the immediate foreground.
- By the way, if the section titles are standardized to be the same place on every page as it is in the page 8, it will have an impact on most of the full-page images used as title pages. This title is blocking the best part of the image.
- page 10: nice photo but way too much foreground.
- page 11: the idea is worthy, but the contrast is too extreme in too many places, and it is not a sharp image. Suspect it is a phone photo.
- page 12: similar issues to page 8. First, this isn't an ideal image for the beginning of the "vision" section. Composition—especially the top half of the image—is nearly irrelevant to vision, and the wires and nondescript building are distracting. As an image selection this is probably the most critical page to find an ideal choice. This is another documentation of DES stormwater/green streets projects. Those are wonderful but not for this.
- page 13: this is too similar to the image on page 10. Also, the foreground is out of focus, and the quasi-sunset is the only interest. This should be replaced. It can't be fixed and it does not fit the text of the same page, which is the opening paragraph on Vision. This page needs something else.
- page 14: the image (full-disclosure, I contributed this photo) is about autumn tranquility and the quietude of nature. It is ok here and not in opposition to Principles, but may be better used to support biophilic value, phenology, or parks. However, by its composition (as with all photos) the section label location matters and may be better in the upper quarter. If so, the salamander overlay could be repositioned to fit and balance.
- page 16: photo quality, composition and suitability to the text all are excellent.
- page 18: The first image could be cropped and lightened (btw, this would not meet the definition of green roof in the glossary. See comments in the Appendix section.) The second image has too much pavement and because of that most treed areas are too dark. The page 12 image, cropped to the bottom 2/3, could work here. The third image is an important one but the quality (exposure and angle) are not as good as desirable for the Ballston Wetland Park. The caption should also use that name. It is our premier constructed wetland and has already been designated a "park" with a CB adopted name.
- page 23: Aerial photo interesting but difficult to see. Can it be edited to lighten, add contrast and color intensity, and brighten?
- page 29: nice photo, but not quite sharp as depth of field softens head and leading wing edges. Also in this format the image sides have too much dead space. Could be cropped and slightly reduce in size.
- page 38: How does this represent priorities? Also, again, the label cuts the interest center and leaves a foreground of gravel with no photographic or substantive value at all.
- page 40: Nice photo and use of it. Could benefit from reducing contrast and lowering brightness, adding black and a bit of color intensity.
- page 52: OK phone photo, but are these plants all natives?
- page 57: Great photo of an important project site. Works well here.
- pages 64-65: All good examples and good photos.

- page 68: A good photo, and perhaps a good example of a LEED certified project, but there is little nature and little biophilic content. Suggest a better example from a partner city. The BC journal or partner city profiles might have something, or the many publications on the Terrapinbrightgreen website.
- page 75: Great photo and great use of it.
- page 83: Some action involved—better than all of those group poses—but a full page with so much dead space in the image is not the best presentation.
- page 85: Meadow photo is good and of an important feature. Needs some photo editing like exposure, contrast, black, sharpening. Other species portraits (full disclosure, these are mine) work well. Would like to switch the Eastern Amberwing to another that shows wing veins better and faces left, to match the other images, all facing out.
- page 90: Ok photos for the purpose. All could benefit from a bit of editing.
- page 94: Good photo and message. Maybe a bit of editing here to help.
- page 96: Fine.
- page 97: Great photo and use.
- page 98: Good message but could benefit from different angle vertically and horizontally.
- page 99: Great assortment.
- page 101: OK image of difficult bird to photograph (full disclosure, this is mine) but needs caption related to context (understory habitat and as a top-ten victim of glass collisions).
- page 103: Nice photo of another important eco niche. Could use a bit of editing.
- page 108: Very similar to the other aerial image. This one's better. Are they different in what they show?
- page 117: Not sure what to say. Where is the wildlife habitat, as opposed to the sign?
- page 118: Cute. Permission?
- page 127: Good subject. Could use a bit of editing.
- page 130: This is the Bon Air Rose Garden.
- page 141: Great close up and message.
- page 142: Glass buildings and grass lawn. Not really the best choice for this plan anywhere.
- page 144: Great choices that work.

Historic and Cultural Resources Plan

Comments from a Biophilic Cities Perspective

May 1, 2023

General Comments

- This draft plan is well written and organized. The shift from a “conservation” plan to the “historic and cultural resources” plan makes it a much more dynamic document about continuity and change, and offers many more opportunities for relevance of the past as well as for the future. It emphasizes the experiences and dynamics of life and place that adds meaning to the classical orientation of place.
- The context section is excellent. It is substantial and appropriate for a plan about historical value and recognition for the future.
- The comments here can be highlighted in numerous places in the Executive Summary.

Biophilia as Thematic Content

- The concept of biophilia has connections to the content of this draft plan throughout the document. One primary connection is with the character of place, and the experience with place both past and present.
- The Biophilic Cities Resolution, adopted in December 2019 with a unanimous County Board vote, is silently embedded in this plan as well. But unfortunately the term and concept are not explicitly discussed. The Resolution includes, in the Whereas statements, discussion of Arlington’s early recognition of the importance of natural spaces, its importance to health and well-being, its strong and integrating connections with sustainability, energy, ecology, environment, and many other key concerns represented in the Comprehensive Plan. The first indicator of performance under this resolution is to track “Expanded biophilic planning and design principles throughout existing policies and processes, such as comprehensive plan elements, sector plans, site plans, park master plans, and multimodal transportation plans and projects;...”
- The second indicator, also highly germane to the historical and cultural resource discussion, is: “Educational opportunities for the community, including residents and development stakeholders, about the benefits of biophilic principles to further the presence of nature in our buildings, facilities, homes and public spaces;...” Historically, residents had more access to natural surroundings because density and infrastructure in our space was much less than today. Now we are recognizing and committing to integrating nature into our built environment as well as caring for our parks and natural spaces. Those include historic sites and places that are to be appreciated by all.
- The 5th indicator is also highly relevant to this plan, given that the draft makeover was significantly about cultural history and equity. That indicator is: “Equitable access to green spaces, parks and other natural elements.” Whether an historic structure with specific role in history, or an area closely tied to the cultural experience of residents, the benefits of biophilic approaches to built spaces, landscaping and the broader site context (including natural corridors) enhances the appreciation of those historic features and the viewing and learning experience of those who visit them.
- The plan includes a background section on equity and the Equity Resolution, adopted 3 months before the Biophilic Cities Resolution. It is a very important anchor for so much of the plan, and is well presented. The plan would be much improved and more complete if a similar background description of Arlington’s urban nature and biophilia commitment were also highlighted in this way.

Assorted Observations and Comments

Throughout the plan there are many references to environment and energy and other “place-oriented” topics associated with Comp Plan elements. In many places these contexts could and should make reference to biophilic experience as a connecting, enhancing and integrating theme that bring people and place together in a positive way, both historically and for the future work under this plan.

- In Arlington historically, even into the war-driven mid-century growth, natural spaces were widely distributed and indoor/outdoor time and experience were distributed differently from later years in the 20th century. The 21st century paradigm is to respect, steward and benefit from nature. If retail outlets from the 30s, 50s or 70s are historically and culturally relevant, so are the open public spaces and outdoor private spaces of those times. Creating value for the past and for the future involve parallel awareness of the character and use of those spaces.
- Sustainability is typically applied as a concept for future policy and practice to minimize negative consequences of development and a range of policy choices. It is also applicable to historic recognition because we want the legacy of past experience to be conveyed with integrity of context as well as provide a positive presentation for the future. The site matters and the natural character is relevant as both message and medium.
- Relevant to page 18 discussion: Energy and environment are important. Most “historic” buildings and places existed before intensified development, massive infrastructure, high-volume transportation networks, pollution, tall buildings and extensive hardscape and the increasing use of glass as exterior building material. People walked, rode or took public modes through corridors that had shade, aromas and sounds of nature (biophilic sensory experience). As noted in the Resolution, we wisely began saving some of these corridors, especially rail, early on, and those are a large part of the 4% natural space today. Recognition of the historic experience with nature should be noted throughout, including in some equity discussion, where racial disparity has diminished access to nature and therefore quality of life for some portions of the population.
- Contemporary residents have awareness of climate change and related topics because it is in the news. The US joined 150 other nations in signing recent agreements on Climate Change and, separately, on Biodiversity. These are interdependent. But as a matter of daily experience, the contemporary population has very uneven, and often very diminished, experience with nature because for the past few generations nature has itself been pushed out, paved over, or chemically neutralized. Our county plans are an educational mechanism as well as a policy and prioritization guideline. So as part of the mission to retain and enhance recognition of historic places and cultural experiences, the role and presence of natural features is key to understanding daily life over time.
- Related to page 20: the discussion of the Public Spaces Master Plan is important. However, this should be extended to describe the purpose and content of the Forestry and Natural Resources Plan, which is on a parallel track for completion to the HCRP. The draft FNRP will include updated content from both of the sub plans noted for PSMP, plus much additional content, to provide an overarching policy guide for all physical space, urban ecology and biodiversity, including issues relating to development. This plan will become the 12th component in the county Comp Plan when it is approved in the fall.
- Relevant to page 22: Re “foundations” can connect this to the content of the FNRP.
- Relevant to page 38: Incentives could be integral to the stormwater utility fee structure, tree canopy programs and invasive plant removal programs.
- Relevant to page 39 and 55, as example of connections with biophilic goals, sustainability and other Comp Plan goals.
- Relevant to page 75: collaborative goal with FNRP.

The Plan and the HALRB

- Would like to discuss the mission of HALRB, its relationship to the plan and the program office, and the possibility of making plan themes more integral to the work of the board.

Historic and Cultural Resources Plan

Comments from a Biophilic Cities and Urban Nature Perspective

David Howell
June 20, 2023

This is an updated version of comments on May 1, after our virtual meeting. For convenience, most of the original comments remain. The Assorted Comment section builds on the original points and adds suggestions for editorial revision and additional content. That portion is by page number in the draft.

General Comments

- This draft plan is well written and organized. The shift from a “conservation” plan to the “historic and cultural resources” plan makes it a much more dynamic document about continuity and change, and offers many more opportunities for relevance of the past as well as for the future. It emphasizes the experiences and dynamics of life and place that adds meaning to the classical orientation of place.
- The context section is excellent. It is substantial and appropriate for a plan about historical value and recognition for the future.
- The main comments here should be highlighted as well in the Executive Summary.
- Include a recommendation (if needed, or consider, if not needed in the plan) to explore changing the name of the Historical Preservation Program to better fit the new scope of mission as expressed in the plan.
- Throughout, include photos of transportation facilities/corridors, parks, public spaces, schools and other places where the landscape or physical space context is depicted. Almost all photos are “portraits” of built structures, which may represent the supply of images but doesn’t represent the new plan title nor the full range of content that it is trying to incorporate in this new way of thinking about the relevance of history and culture.

Biophilia as Thematic Content

- The concept of biophilia has connections to the content of this draft plan throughout the document. One primary connection is with the character of place, and the experience with place both past and present.
- The Biophilic Cities Resolution, adopted in December 2019 by unanimous County Board vote, is silently embedded in this plan as well. But unfortunately the term and concept are not explicitly discussed. The Resolution includes, in the Whereas statements, discussion of Arlington’s early recognition of the importance of natural spaces, its importance to health and well-being, its strong and integrating connections with sustainability, energy, ecology, environment, and many other key concerns represented in the Comprehensive Plan.
- The first indicator of performance under this resolution is to track “Expanded biophilic planning and design principles throughout existing policies and processes, such as comprehensive plan elements, sector plans, site plans, park master plans, and multimodal transportation plans and projects;...” This of course calls for citing the resolution in the HCRP, and referring to it and Arlington’s natural character throughout history.
- The second indicator, also highly germane to the historical and cultural resource discussion, is: “Educational opportunities for the community, including residents and development stakeholders, about the benefits of biophilic principles to further the presence of nature in our buildings, facilities, homes and public spaces;...” Historically, residents had more access to natural surroundings because density and infrastructure in our space was much less than today. Now we are recognizing and committing to integrating nature into our built environment as well as caring for our parks and natural spaces. Those include historic sites and places that are to be appreciated by all.
- The 5th indicator is also highly relevant to this plan, given that the draft is significantly about cultural history and equity. That indicator is: “Equitable access to green spaces, parks and

other natural elements.” Whether an historic structure with specific role in history, or an area closely tied to the cultural experience of residents, the benefits of biophilic approaches to built spaces, landscaping and the broader site context (including natural corridors) enhances the appreciation of those historic features and the viewing and learning experience of those who visit them.

- The Forestry and Natural Resources Plan (FNRP) is already designated as the 12th element in the Comp Plan, and it is in the same stage of development as the HCRP. Its approach is in many ways analogous to this Plan’s history and cultural resources goals, in that it speaks to conservation of what should be valued, stewardship to continue the sustainability and future relevance in the life of the community, education to promote recognition and appreciation, and public engagement to promote involvement and connection to the plan’s mission. In addition, both are now in a development process as Comp Plan components for the subject matter they represent, expanding, redefining, and taking a holistic approach. Finally, they both call for expanded means incorporation into County decision-making, including modification of policies, plans and processes to appropriately value—as a county commitment—the resources they represent. Our history and culture are important to a full recognition of who we are as a community. Our quality of space and relationship to that space are important to our recognition of the value of nature for the community and the well-being of all individuals.
- The plan includes a background section on equity and inclusion. The Equity Resolution was adopted 3 months before the Biophilic Cities Resolution. It is a very important anchor for so much of the plan, and is well presented. The plan would be much improved and more complete if a similar background description of Arlington’s urban nature and biophilia commitment were also highlighted in this way. The PAMP, CEP, Green Building Incentive Policy, Pentagon City Sector Plan and the Clarendon Sector Plan all have various references to nature and biophilic planning and design.
- In Arlington historically, even into the war-driven mid-century growth, natural spaces were widely distributed and indoor/outdoor time and experience were distributed differently from later years in the 20th century. The 21st century paradigm is to respect, steward and benefit from nature. Housing, commercial buildings, and transportation modes from the 1890s, 1920s, 1940, or even 1960s are historically and culturally relevant. Each of those periods existed with a different range of features in unbuilt space, and the relationship between developed areas. Creating value for the past and for the future involve parallel awareness of the character and use of those spaces. This is particularly notable in the history of housing developments, including garden apartments. It is also notable in the history of transportation corridors.
- Sustainability is an important perspective for future policy and practice to minimize negative consequences of development and a range of policy choices. It is also applicable to historic recognition because we want the legacy of past experience to be conveyed with integrity of context as well as provide a positive presentation for the future. The site matters and the natural character is relevant as both message and medium.
- Contemporary residents have awareness of climate change and related topics because it is in the news. The US joined 150 other nations in signing recent agreements on Climate Change and, separately, on Biodiversity. These are interdependent. But as a matter of daily experience, the contemporary population has very uneven, and often very diminished, experience with nature because for the past few generations nature has itself been pushed out, paved over, or chemically neutralized. Our county plans are an educational mechanism as well as a policy and prioritization guideline. So as part of the mission to retain and enhance recognition of historic places and cultural experiences, the role and presence of natural features is key to understanding daily life over time.

Assorted Observations and Comments

- Throughout the plan there are many references to environment and energy and other “place-oriented” topics associated with Comp Plan elements. In many places these contexts could

and should make reference to biophilic experience as a connecting, enhancing and integrating theme that bring people and place together in a positive way, both as historical interpretation and for the future work under this plan. Likewise, natural spaces and features connect the earliest history to the future of the County, as we attempt to conserve what nature we have for our health and well-being.

- Page 5, middle column-remove “EI” from in front of Salvadorean.
- Page 6-The idea of removing “master” from the title is a good one in several ways, especially considering what the HCRP represents. But it is also a practical change that should become the precedent for all Comp Plan elements. I recommended it for the FNRP.
- Page 13-The chapter intro description below the title erroneously refers to the 2006 plan with the current plan title. The 2006 plan was the Historic Preservation Master Plan.
- Page 13-First column, line 5-Change “is” to “involves”.
- Page 13-First column-line 9, add “natural” before “landscapes” and add “sites and notable places”.
- Page 13-First column, line 10-change “adjust to the shifts required by” to “understand the nature of change from” ...trends in....
- Page 13-Middle column, as new 3rd bullet, add-The value of nature to our local predecessors and to contemporary residents, as reflected in the historically changing relationship residents have with natural spaces and features.
- Page 13-Column 3, final bullet-Change “impacts” to another word, perhaps “benefits”?
- Page 17, 3rd column, end of top paragraph-add “urban nature” before “sustainability”.
- Page 18, column 1, 1st sentence-add “spaces” before “places”.
- Page 18, column 2, 2nd paragraph: add reference to forestry and natural resource goals and biophilia (experience in nature) as areas for common interest and collaboration among partners in conserving places and spaces. See comments on page 1 and 2.
- Page 19, middle column, end of paragraph-update reference to PSMP. The Public Art Master Plan was approved last year as a free-standing plan. The Natural Resources and Urban Forest sub-plans are consolidated in the new FNRP, to be approved in late 2023.
- Page 20, column 2, last bullet-update the references to PSMP. This may need to be expanded with respect to forestry and natural resources.
- Page 20, column 2, last sentence: add “natural spaces” or “urban nature” or something that conveys the role of the physical environment in which everything else happens.
- Relevant to page 18 discussion: Energy and environment are important. Most “historic” buildings and places existed before intensified development, massive infrastructure, high-volume transportation networks, pollution, tall buildings and extensive hardscape and the increasing use of glass as exterior building material. People walked, rode or took public modes through corridors that had shade, aromas and sounds of nature (biophilic sensory experience). As noted in the Resolution, we wisely began saving some of these corridors, especially rail, early on, and those are a large part of the 4% natural space today. Recognition of the historic experience with nature should be noted throughout, including in some equity discussion, where racial disparity has diminished access to nature and therefore quality of life for some portions of the population.
- Related to page 20: the discussion of the Public Spaces Master Plan is important. However, this should be extended to describe the purpose and content of the Forestry and Natural Resources Plan. The draft FNRP will include updated content from both of the sub plans noted for PSMP, plus much additional content, to provide an overarching policy guide for all physical space, urban ecology and biodiversity, including issues relating to development. This plan will become the 12th component in the county Comp Plan when it is approved in the fall.
- Page 22, column 1-It could be noted here, or elsewhere should be noted, that the historical context being described is very much what the Chesapeake Bay Protection Plan and the Forestry and Natural Resources Plan are about. Conserving and restoring our natural resources, our biodiversity, and our experience in nature is an act of historic and cultural preservation because it is beneficial to contemporaries to have an awareness of the historical

character of Arlington, and some of the physical and cultural changes that residents experienced through history.

- Page 24, middle column, paragraph 2-it should be noted that the Civil War not only affected the agricultural economy; it radically changed the surface landscape, including our biodiversity and forest ecotype.
- Page 26, column 3, bottom paragraph-"healthy and bucolic" is precisely a biophilic assessment of Arlington at the time.
- Page 28, middle column, top-"garden city principles" are development concepts for providing nature in higher density projects. Again, this is the idea, if not the term, of desirable biophilic experience on an everyday basis.
- Page 29, middle column-The FNRP speaks to the results of these discriminatory practices. Arlington already has a Tree Equity Program, administered by EcoAction Arlington, and the new plan has more extensive attention to equity in access to nature for multiple reasons, including biophilic deprivation and vulnerability to climate change impacts.
- Page 34, column 3-add references and content example from the Pentagon City Sector Plan, which has extensive and forward-thinking views of the urban corridors in Arlington, including guiding principles of "places for people" and "places for nature" as well as a robust discussion of biophilic principles.
- Page 36, middle column, bottom paragraph-add "and natural" after "pressure on historical..."
- Relevant to page 38: Incentives could be integral to the newly adopted Stormwater Utility Fee structure, our Tree Canopy Programs, and invasive plant removal programs.
- Relevant to page 39 and 55, as example of connections with biophilic goals, sustainability and other Comp Plan goals.
- Page 44-this goal is important as a foundation for the remaining goals. If this isn't at the core, then the others have less significance or urgency. That said, I see two important and easy opportunities for additional content in the background here, and probably also in the section about Significance at the beginning of the plan.
- One opportunity is to enhance the references to native Americans. The acknowledgement is fine, but that is by necessity somewhat abstract and in the older parts of history. However, the old "Henry Clay" park is now Zitkala-Sa Park, honoring a Lakota Sioux woman who lived in Lyon Park, was a renaissance talent, and led the national campaign for rights for indigenous populations. So, point 1 is to make sure this goal about building understanding doesn't exclude particular populations because they are not overtly active in Arlington politics or engagement. There are many ethnicities represented among Arlingtonians. The page 5 call out of Vietnamese and Salvadoreans ignores several other cultural groups that have significant numbers. They don't need to be mentioned there, but to be "inclusive" there should be a broader discussion of our diversity than is currently in the plan. This is about people and their history. For example, the Ethiopian Community Center has been in operation for over 30 years.
- Related to this point, there are mentions of partnership with DPR on some sites. However, this undershoots our public recognition of the history of leaders. The plan should discuss, here or in other background, the fact that many of our parks and named buildings, facilities and streets provide this broad acknowledgement. There are extensive tables in the plan referring to buildings with various designations. But I could find no tables with lists of public parks named through a process that involved the Park and Recreation Commission, HALRB, and the Board. Serena Gray Park, Zitkala-Sa Park, Arlington Junction Park, Langston Blvd—these are examples of our historic/cultural awareness. A full inventory will help readers develop a sense that these acknowledgements are part of our recognition of the very things this plan values. It also supports goal 2 on engagement, in normalizing these actions as ongoing, legitimate, and part of what we value, and goal 4 on Partnerships.
- Goal on Partnerships-there are multiple opportunities to cite the common ground interests of conservation and stewardship of places and spaces. That includes built structures, hardscape, landscape, and overall site conditions. For integrity, historic sites should involve

not only structure replication/conservation, but also site replication/conservation. The same holds true for places where historic events have taken place.

- On the Regulations goal, my belief is that Arlington needs a process up updating all of its plans and land use documents, and that those need to align around a holistic perspective that acknowledges that natural landscapes, energy-efficient restoration and building, recognition of cultural diversity, and vision of a future state of affairs that is based on awareness that you can have change and continuity of values at the same time, and that is a valuable story in its own right.
- Please have staff crosswalk the partner and regulation goals with the content of the draft FNRP. There are many commonalities. This is worthy of a conversation between staff, for the potential benefit of both plans and the county.
- Re the Archaeology recommendation: Excellent. An inventory of what material culture is held, where, in DC, Arlington and Alexandria would help with a good baseline. Collaboration with DPR staff could be of value.