



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



September 28, 2022

Honorable Katie Cristol
Chair, Arlington County Board
2100 Clarendon Blvd., Suite 300
Arlington, VA 22201

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

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

Dear Chair Cristol and Mr. Delaney:

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

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

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

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

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

More Robust and Clearly Stated Goals

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

Appendices and Links to Other Plans Need Strengthening

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

Natural Capital

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

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

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

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

Equity in Tree Canopy Cover

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

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

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

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

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

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

Managing Trees and Native Plants for Climate Change

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

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

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

Public Participation in Managing Green Spaces for Climate Change

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

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

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

NOVA Parks

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

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

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

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

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

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

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

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

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

Arlington Public Schools

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

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

Biodiversity

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

Sincerely,



Shruti Kупpa
Chair – Park and Recreation Commission

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