

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

September 28, 2022

Ryan Delaney, Principal Planner
Department of Parks and Recreation
Arlington County
2100 Clarendon Blvd. Suite 414
Arlington, VA 22201

Dear Mr. Delaney

C2E2 commends County staff and supporting contractors for developing a comprehensive draft Forestry and Natural Resources Plan (FNRP) that offers a clear vision and strong principles. The draft plan recognizes the importance of our tree canopy and natural resources as natural capital that requires dedicated investment to provide a host of environmental, health, and economic benefits. The plan acknowledges the importance of engaging private property owners to achieve its goals and gives a prominent role to building partnerships within the County government and with institutions, organizations, and volunteers. Finally, we strongly support the action steps presented under Action 4.5 that aim to secure sufficient and sustained funding to implement the plan's goals.

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

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

Provide greater clarification and emphasis on current baseline conditions.

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

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

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

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

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

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

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

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

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

Sincerely,

A handwritten signature in black ink that reads "Joan F. McIntyre". The signature is written in a cursive, flowing style.

Joan F. McIntyre
Chair, Climate Change, Energy and Environment Commission

cc: Arlington County Board
Ryan Delaney