



September 30, 2022

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

Re: Comments on the draft Forestry and Natural Resources Plan

Dear Chair Cristol:

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

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

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

**1) A greater sense of urgency**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### 4) More explicit and deeper connections with other County plans

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

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

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

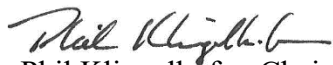
features to be formally counted in meeting the goals in the stormwater plan, while the stormwater plan should include incentives for preserving and/or planting new trees and natural landscapes.

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

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

Thank you for the opportunity to share our views.

Sincerely,



Phil Klingelhofer, Chair  
Forestry and Natural Resources Commission

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