

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

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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 FNRP 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 FRNP 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 FRNP 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 FRNP 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 FRNP 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 FRNP. 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 FRNP. 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