



February 8, 2021

Ms. Sarah L. Anderson
Senior Manager of Career Pathways
American Forests
sanderson@americanforests.org

RE: EcoAction Arlington Comments - Forestry and Natural Resources Master Plan

Dear Ms. Anderson

Thank you for the excellent public engagement process designed to invite public participation in the Forestry and Natural Resources Master Plan (hereafter “Plan”). EcoAction Arlington representatives Joan McIntyre, Carrie Thompson, Elenor Hodges and Jill Barker were interviewed collectively about the Plan on December 18, 2020 at 4:00 p.m. At that interview EcoAction Arlington was invited to provide further written comment on the Plan. This letter is in response. Thank you for the opportunity to collaborate. Please feel free to contact either Jill Barker or Elenor Hodges with any questions or concerns about these comments.

These comments address deer management, equity in public spaces, public participation in preserving green spaces for climate change reasons, Arlington Public Schools, valuing natural resources when tradeoffs arise in County decisions, and inclusion of NOVA Parks in the Plan. First, however, is a brief list of very specific items that the Plan should include.

Specific Plan Elements

In addition to the conceptual issues discussed below, EcoAction Arlington encourages you to incorporate the following specific elements into the Plan:

- Maximize tree canopy and native landscaping on County and APS properties -- limiting lawn to spaces dedicated for formal or informal sports and play areas.
- Review weed regulations to prevent such rules from discouraging (or removing) landscaping with native plants.
- Replace gas-powered lawn equipment, particularly leaf blowers, with electric-powered equivalents for services provided directly by the county or on county property.
- Seek state legislation to allow local jurisdictions to ban such equipment within the county to reduce associated noise and air pollution.

Deer Management

Deer are ruining the forest, backyards, school yards, parks and other public places. They eat all the saplings of diverse species, leaving only a few species to mature. The forests are becoming monocultures denuded of native plants that are critical as habitat or forage for local fauna. Most surrounding jurisdictions control for deer. EcoAction Arlington favors it too, if done humanely.

Equity in Public Spaces

BIPOC (black, indigenous and people of color) and Hispanic/Latinx persons should have equal access to the benefits of public places, as well as an equal opportunity to contribute to preserving them.

Policing in parks should not unduly discourage BIPOC and Hispanic/Latinx persons' enjoyment of natural spaces. Park Rangers and police should receive multi-cultural training so that they can become more adept at addressing conflicts among park users.

Further the County should create nature programming specifically oriented to and for Hispanic/Latinx and BIPOC communities, ideally featuring leaders of these communities as experts and role models for children. Bird and nature walks focused specifically on BIPOC and Hispanic/Latinx people with BIPOC and Latinx leaders should be encouraged.

Efforts should be made to correct documented inequities in access to open public spaces. In 2020 the Parks and Recreation Committee of the Civic Federation published a paper demonstrating significant, poorer tree canopy and open public space access when residents were grouped by neighborhood median income, residence type, race, and elementary student race. These differences should be examined and remedied.¹

Tenants and those in low-income neighborhoods should have at least equal access to County resources for tree canopy funds, Storm Water Wise funds and other enhancements to livability and expanded green space. Barriers preventing full participation in these and similar programs should be examined and addressed. Given generally lesser tree canopy coverage in low-income neighborhoods a commensurate amount of funding should go to those areas. Programming aimed at planting trees, native plants, and rain gardens, as examples, should specifically encourage participation from BIPOC and Hispanic/Latinx persons.

Prison labor is inherently racist, and the County should examine its procurement practices regarding prison labor in its supply chain of products procured. The County should review the report linked in the footnote² and consider implementing the suggestions on page 32.

¹ White Paper: Equity in Arlington County Open Public Spaces, presented to the Arlington County Civic Federations Park and Recreation Committee, December 2020.

² Prison Labor in the United States: An Investor Perspective, Northstar Asset Management, April 2018, rev. May 2018, p. 32. https://northstarasset.com/wp-content/uploads/2018/05/revMay2018_Prison-Labor-in-the-Supply-Chain.pdf.

Encourage/Require Public Participation in Managing Green Spaces for Climate Change

The insect apocalypse will not subside, and carbon reduction goals will not be achieved by use of County property alone. All citizens should be encouraged to help, whether by regulation or by incentives (fees, discounts, subsidies). Taking down mature trees should be more strongly discouraged. Greater incentives should be provided for putting land in permanent conservation easement - tax abatement, for example, needs to be on the table. Arlington is one of the few jurisdictions in Virginia that do not provide this incentive.

Ongoing education and awareness efforts about the importance of reducing lawns, using native plants, and reducing carbon emissions will be critical to achieving natural resource protection during this era of climate change and mass extinction. The County should extoll the scientific research of Doug Tallamy by encouraging all in Arlington to reduce their lawns to create a “Homegrown National Park” in the private backyards and green spaces of Arlington³ and help connect fragmented natural areas into wildlife corridors for healthier ecosystems.

The County should 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.

EcoAction Arlington encourages expansion of the StormwaterWise program, Tree Canopy Fund program and other such programs through greater funding and increased scope across all County populations. Tenants, as well as home-owners, should be encouraged to plant trees and remove invasive species in the places where they live.

Regulations and incentives to encourage commercial and faith-based properties to improve natural resources on their properties should be robust and aggressive.

Arlington Public Schools

Arlington Public Schools (APS) should be more strategic in equitably managing its open spaces to expand opportunities for students to learn and play outside while expanding natural areas that will increase tree canopy, reduce stormwater runoff, mitigate the urban heat island, improve wildlife habitat, and mitigate climate change.

Research shows that increased time outdoors has a number of outcome benefits for students including better academic performance, enhanced attention, increased enthusiasm and engagement, and improved behavior⁴. The Children and Nature Network and National League of Cities have launched the Cities

³“In the past, we have asked one thing of our gardens: that they be pretty. Now they have to support life, sequester carbon, feed pollinators and manage water.” Doug Tallamy <https://homegrownnacrossstionalpark.org/>

⁴ Children and Nature Network “Nature Can Improve Academic Outcomes.” https://www.childrenandnature.org/wp-content/uploads/CNN_AcademicOutcomes_16-10-27_O_newlogo.pdf

Connecting Children to Nature initiative⁵ recognizing the national need to connect urban children to green spaces and outdoor experiences.

EcoAction Arlington encourages the Forestry and Natural Resources Plan to include a commitment to work with APS to integrate the management of APS properties into its goals as well as increasing opportunities to expand natural areas and plant more trees and native plants on school grounds which will directly benefit the students, teachers and staff learning and working at those schools.

There is also an opportunity to support a local project, the Arlington Living Schoolyard Initiative, which is working to increase equitable access to outdoor learning and natural play for all Arlington students. More information about the Arlington Living Schoolyard Initiative is available through this white paper: https://docs.google.com/document/d/1iymo0hccQCo0KtiwirBZD_xQPTvmQxzcbzy2QAvl50s/edit.)

Valuing Natural Resources in County Decisions

An important purpose of this plan is to ensure that trees and natural resources are cared for, and part of that charge includes ensuring that natural resources are appropriately valued in balancing competing priorities facing County decision makers. As a starting point, the County Board should establish a position or unit directly under the County Manager responsible for implementing the County's climate change, natural resources protection, and other sustainability goals across the County government, similar to the County's Chief Race and Equity Officer position. Elected leaders deserve very high level Staff support when facing decisions that pit County goals for energy reduction, biophilia implementation, protection of Arlington's natural resources, stormwater abatement, eradication of environmental racism, increased affordable housing, zero waste and new building development against one another.⁶ The County would be well served to invest in the technology and staff necessary to make transparent and credible assessments of the environmental pros and cons of park and outdoor space-related projects and plans. Global warming, the insect apocalypse, and sickness brought about by environmental racism are just a few of the urgent problems that climate change imposes on Arlington County and the world. To its great credit, Arlington County adopted an aggressive Community Energy Plan ("CEP") to reduce carbon emissions to zero by 2050. Although increased tree canopy is mentioned in the CEP,⁷ it is only slightly referenced in the proposed Implementation Framework.⁸ The County Board and staff face myriad decisions every year that require mediation between conflicting County priorities of reducing carbon emissions or enhancing recreational spaces on one hand, with preserving the forest and natural resources on the other hand. One recent example is the decision at the new elementary school at 1644 N. McKinley Street to cut down several trees to make way for a geothermal field to create a zero-carbon school. Another example is the request by NOVA Parks to widen the W&OD bike path⁹ to encourage more bike commuting, reducing carbon

⁵ Cities Connecting Children to Nature <https://www.childrenandnature.org/cities/cities-connecting-children-to-nature/>

⁶ See similar comments of EcoAction Arlington to the CEP Implementation Framework dated February 8, 2021.

⁷ "Gaining or losing tree canopy will affect local temperatures and the ability to meet the County's 2050 Carbon Neutrality Goal." CEP at p.23.

⁸ See proposed Strategy #46 "Reduce the urban heat island effect by promoting 'cool construction' practices, and using natural resources (biophilic) and emerging technologies to lessen urban heat island impacts, reduce the demand for cooling in by-right and special exception projects." <https://arlingtonva.s3.amazonaws.com/wp-content/uploads/sites/5/2020/10/Buildings-and-Education.pdf>

⁹Northern Virginia Parks Authority ("NOVA Parks") Application Number NOV-002, "Arlington W&OD Trail Enhancements" ("Project"), updated March 5, 2020. <https://thenovaauthority.org/wp-content/uploads/2019/12/NOV-002.pdf>

emissions from cars, but at the expense of cutting down mature trees (which absorb carbon from the atmosphere) and increasing storm water runoff.

An Arlington Civic Federation report documents a mismatch between the high value Arlington County residents place on natural spaces (vs. recreation), with the funding spent to acquire and maintain natural spaces.¹⁰ The report states:

Of the approved bond funds, approximately 86% has been dedicated to recreational uses, whereas less than 5% has been spent on land acquisition and just over 2% spent on natural habitat and open space combined

The . . . [Arlington] community has expressed strong preferences and needs for additional open space (including natural habitat and trails) that enable the public to enjoy nature. However, these preferences and needs have gone unmet or have been only partially met by bond-funding spent predominately on recreation projects approved over the last eight years.

The County is not listening to what Arlington residents are asking for--more open space. County goals expressed in the CEP as well as the need to address increased flooding and affordable housing create competition for the goal of preserving natural space.

While the 2010 Natural Resources Plan and the 2004 Forestry Plan acknowledged the environmental attributes of natural resources and trees, setting forth a cursory attempt at quantifying the attributes that forests and natural resources contribute, EcoAction Arlington is requesting that the new Plan take the exercise a step further and implement a mechanism, tool, or County wide staff position to help the County perform a credible, transparent analysis when such tradeoffs arise. For the W&OD project, for example, it would be useful to know how many less car trips are “worth” the cost of the natural resource degradation brought about by the project. Although the project might help fulfill the mandate of the CEP by reducing carbon emissions associated with less vehicular traffic caused by increased bicycle use, the project could *increase* carbon emissions by removing tree canopy, and by increasing sedimentation into the Chesapeake Bay, reducing its ability to sequester carbon through underwater sea grasses.¹¹ A transparent analysis including the robust valuation of natural resources should be performed to make a defensible determination.

In addition, the County staff should be equipped with tools and skills to evaluate where scarce financial resources are likely to have the greatest environmental benefit when evaluating projects and plans. For example, the County spends considerable funding each year to meet the requirements of its Municipal Separate Storm Sewer System (MS4) Permit, reducing stormwater and taking other actions that benefit the Chesapeake Bay. Projects such as the W&OD trail widening should be evaluated as to whether the project will require the

¹⁰ <http://www.civfed.org/newContent/2020-05/2020-05%20ParkRec%20Cmte%20Res%20Balanced%20Allocation%20of%20Bond%20Funds%20for%20Park%20and%20Recreation%20Uses%20WHITE%20PAPER.pdf>

¹¹ “Studies have estimated that underwater grasses globally can store approximately 10 percent of the carbon in the entire ocean in the form of rich aquatic soils. Ultimately, this means that efforts to protect and restore [Submerged Aquatic Vegetation] SAV can also help to reduce the effects of climate change.” <https://www.fisheries.noaa.gov/feature-story/submerged-aquatic-vegetation-habitat-worth-sav-ing#:~:text=Studies%20have%20estimated%20that%20underwater,the%20effects%20of%20climate%20change.>

expenditure of any additional funds by Arlington County to comply with the MS4 permit due to the increased quantity of impermeable surfaces. These types of questions should be addressed in the final cost/benefit analysis of all County projects.

Further, the County and its partners should widen their scope of review from the silo of a single project to considering whether offsetting environmental enhancements could be cost effectively achieved in other areas by planting trees and reducing runoff, as an example, keeping an eye on total County forests and natural resources. Preserving and expanding forest and natural resources in Arlington County will be even more compelling if accompanied by evidence of the collective environmental impacts of all the decisions.

Moreover, as a regional leader for advancing aggressive emissions reductions goals, Arlington County should insist that this type of evidence-based environmental scoring accompany not only every County proposal, but also proposals from its partners such as NOVA Parks.

The CEP Implementation Framework as proposed calls for incorporating “CEP goals and policies into other County plans, policies, and processes.”¹² The carbon emissions reduction goals in the CEP are laudable, and the Natural Resources and Forestry Plan should include measures that provide a robust defense of preserving habitat and natural areas for carbon sequestration, health and biophilia benefits to complement the CEP.

NOVA Parks

NOVA Parks properties in Arlington County should be included in the Plan. NOVA Parks, to its credit, stewards a large acreage and runs many parks and amenities on a shoestring budget. It receives funding from six jurisdictions, Arlington County, Fairfax County, Loudon County and the City of Alexandria, the City of Falls Church and the City of Fairfax, but this funding only accounts for 12% of its operating funds. In its financial statement for 2019, NOVA Parks touts the following achievement:

NOVA Parks is celebrating its 60th year of serving Northern Virginia with a demonstrated and sustainable funding model that allows for conservation of land and innovative programs. While the average park system in America receives over 70% of its operating revenues from tax dollars, NOVA Parks receives 12.6% of its operating funds from taxpayer support. The rest is from enterprise activities.¹³

NOVA Parks’ focus on identifying and acquiring program revenue has enabled it to operate with a smaller level of funding from local taxes. However, this may have come at the price of environmental stewardship in some cases. In any event, the elected officials of the six jurisdictions that own NOVA Parks deserve to be presented with the facts regarding NOVA Parks’ environmental stewardship practices and make their own assessments about whether taxpayers would prefer to increase taxes to acquire more environmental

¹² See Strategy #5 <https://arlingtonva.s3.amazonaws.com/wp-content/uploads/sites/5/2020/10/County-Govt-Resiliency.pdf>

¹³ NOVA Parks Comprehensive Annual Financial Report Year Ended June 30, 2019, page 5.
https://www.novaparks.com/sites/default/files/pdf/NOVA%20Parks%20CAFR%20-%202019_0.pdf

benefits from the parks, or whether it is acceptable to sometimes sacrifice environmental concerns to gain revenue from amenities. Now that Arlington and Fairfax Counties, at least, have set forth very clear carbon emissions reductions goals, it is more important than ever that NOVA Parks works in concert with the elected officials and Staff in these jurisdictions to be sure that all have consistent goals. Accordingly, it may be time for an environmental management audit of NOVA Parks to analyze how much funding would be required to manage the parks in a manner that would increase the environmental attributes that the elected officials in these jurisdictions have identified as paramount. Items such as tree canopy cover, watershed protection for the enhancement of MS4 Permits, and transportation issues are just a few of very many examples of environmental attributes of the NOVA Parks that may not be fully accounted for in the NOVA Parks' management practices, but which are of significant value to the taxpayers of Arlington.

Thank you for this opportunity to provide comments. Please contact either of us with any questions or concerns.

Sincerely,

Jill Barker, Board Chair
Elenor Hodges, Executive Director,