September 27, 2022

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

RE: Forestry and Natural Resources Master Plan

Dear Mr. Delaney:

EcoAction Arlington thanks the Department of Parks and Recreation and all the stakeholders who provided input into the draft Forestry and Natural Resources Plan (FNRP) released on August 1, 2022. It is a major undertaking. The dedication, seriousness, and integrity of the project shines throughout. We are very pleased that EcoAction Arlington-suggested elements and themes were largely included in the draft plan, including the importance of equity in public spaces, public participation in preserving green spaces for climate change reasons, involving Arlington Public Schools, valuing natural capital and inclusion of NOVA Parks in the Plan. We are disappointed that the importance of deer management is not mentioned and that the Tree Canopy Fund is not affirmed as a powerful public engagement tool to restore tree canopy in Arlington. We think the introduction could be improved with publication of an indigenous peoples' Land Acknowledgement in place of the language referencing native peoples on page one.

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 *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, to name a few. We support the concept in Action Step 4.5.1 to source funding for forestry and natural resources from the CIP as well as other action steps to secure robust funding to implement the plan.

[1] "[Natural] resources constitute our stock of natural capital. FNRP Draft on page 2.

The County Board and staff face myriad decisions every year that require mediation between various County priorities that can conflict with protecting and expanding our tree canopy and other natural resources such as providing adequate transportation, housing, and stormwater services or negotiating community benefits with private developers. The FNRP should go beyond Action Step 1.3.1 to incorporate the value of trees and natural areas in County planning decisions as performance measures for investment in urban forestry to assess decisions when natural resources are being sacrificed for a conflicting goal to ensure full awareness of costs and benefits.

Equity in Tree Canopy Cover

The draft acknowledges 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. For example, on pages 13-15 the FNRP states that, "the most diverse, racially mixed areas of the County have lower tree canopy than the less diverse ones," and paragraph 2.1 has similar affirming language. Lacking, however, are robust targets for correction of historical wrongs. The overarching but unambitious goal of maintaining the tree canopy coverage at 40 percent should not only be revised upward but be backed up with feasible, if challenging, neighborhood-by-neighborhood targets, with particular attention to these underserved neighborhoods.

Directing resources toward increasing tree canopy cover in underserved areas is a high priority for EcoAction Arlington because, as we discovered in our pilot Tree Canopy Equity Program, https://www.ecoactionarlington.org/community-programs/trees/tree-canopy-equity-program/, many more resources are required to deliver these services to low- and moderate-income BIPOC communities than other places in Arlington. *See also,* the article cited at the FNRP at footnote 51 regarding the hard work and commitment that is needed to recruit property owners in underserved neighborhoods to plant trees on their property. We feel strongly that the County should devote the resources required to take assessments of low-tree canopy areas, set targets for improving them, and follow through with action plans measuring results.

Action Step 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 10 years.

In Action Step 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 lessen heat island effects, negative health effects and many other environmental degradations that go accompany lower-than-average tree canopy coverage. This is especially true as the County considers the Missing Middle Housing policy 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, and healthy soil serve to sequester carbon.

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

We are encouraged that the FNRP embraces the principle of Communitywide engagement in achieving its goals, encompassing people, organizations, institutions, and businesses. We are pleased with all of Action 2.3, Deepen Arlington's commitment to the conservation of trees and natural resources, and believe the plan would be stronger by elevating this concept to a strategic direction focused on fostering stewardship throughout the Arlington Community. We encourage the County to prioritize efforts to build stronger partnerships with the already strong volunteer and organizational networks committed to the County's vision (EcoAction Arlington, Master Naturalists, Tree Stewards, Master Gardeners, and others) to educate residential and commercial property owners to plant native trees and shrubs, remove invasives, and reduce the sizes of their lawns to provide wildlife habitat and create wildlife corridors. EcoAction Arlington's active network of interested, concerned citizens has demonstrated repeatedly the value of this type of education and volunteerism.

Such engagement should be reinforced with incentives and programs that facilitate efforts by property owners to transform their properties into healthier ecosystems that add to the overall natural assets of the County.

- The FNRP should reaffirm the value of the Tree Canopy Fund in offsetting loss of tree canopy through development and consider options to secure more funding to build on the program's success to meet more ambitious goals for expanding the tree canopy, especially in neighborhoods with low tree canopy and higher rates of poverty and inequitable access to green space. As the Standard Site Plan Conditions have not increased the developer contribution to the TCF per tree since 2007, we encourage the FNRP to recommend increasing developer contributions per tree to more reasonably reflect the value of the trees.
- We encourage the development of regulations and incentives to encourage homeowners and commercial and faith-based properties to improve natural resources on their properties. Moreover, the County should encourage private property owners interested in protecting valuable natural resources on their land for future generations to consider establishing conservation easements through the Northern Virginia Conservation Trust by providing tax incentives.
- We encourage reviving the StormwaterWise program and introducing similar programs through greater funding and increased scope across all County populations to provide both financial and technical assistance for conservation landscaping. Means testing and outreach efforts can be used to ensure that proportionally more funds are going to lower income households

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* Action Steps 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 DPR role should be more clearly stated in the FNRP. Committing such environmental coordination and quality control 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. EcoAction Arlington would support 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 are touted in the FNRP.

Legislative, Zoning, Ordinance and Site Plan Changes to Meet FNRP Goals

We recommend that the FNRP prioritize actions to set standards through rezoning, form-based codes, and sector plans for development/redevelopment that balance increased density with opportunities 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 Blvd 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. Development of detailed guidelines for biophilia, especially in more densely developed neighborhoods, as part of the Site Plan Review process would provide further guidance to embedding natural elements into our built environment.

The FNRP should similarly prioritize a review and revision of zoning for single family and missing middle housing to meet its goals. Overall lot coverage allowance should be reconsidered and be better aligned with providing adequate space for healthy tree canopies and native plantings and reducing potential future impact on the stormwater system as a result of continued redevelopment. Setbacks for residential property redevelopment 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.

The County's weed ordinance should be reviewed and adjusted if necessary to prevent homeowners with conservation and native landscapes from being penalized and the County should continue to move forward with steps that 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 ordinances prohibiting the sale and planting of invasive plants, as permitted by state law. The County should continue to pursue legislative changes to restrict the sale of invasive plants and fund invasive removal efforts.

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, but more succinct goals should be included along with a commitment from APS to collaborate. In particular, EcoAction Arlington encourages the FNRP to include an Action Step to help APS implement the objectives of the Living Schoolyard Initiative. (For more information, see the Arlington Living Schoolyard Initiative white paper at this link: docs.google.com/document/d/1iymo0hccQCo0KtiwirBZD_xQPTvmQxzcbzy2QAvl50s/edit) Action Step 2.3.4 comes close to achieving this objective but should be more insistent on working toward a commitment from APS to abide by DPR recommendations in this regard.

Indigenous Peoples' Land Acknowledgement

We encourage the DPR Staff to publish an indigenous peoples' Land Acknowledgement at the beginning of this Forestry and Natural Resources plan in place of the mention of indigenous peoples in the introduction on page one. EcoAction Arlington developed an indigenous peoples' land acknowledgement at the direction of its newly formed Diversity, Equity and Inclusion ("DEI") Committee. www.ecoactionarlington.org/wp-content/uploads/2022/03/EcoAction-Arlingtons-Justice-and-Inclusion-Policy.docx.pdf It reminds our leaders of the importance of incorporating all voices including those of future generations in discussions of policy and actions. Here is a website with resources for drafting a respectful and meaningful land acknowledgement. https://americanindian.si.edu/nk360/informational/land-acknowledgmentegard.

Deer Management

Deer are ruining the forests, backyards, school yards, parks and other public places in Arlington. They eat the saplings of diverse species and/or damage saplings with antler rub, leaving only a few species to mature. The forests are becoming monocultures denuded of native trees that are critical as habitat or forage for local fauna. Most surrounding jurisdictions control deer populations, and we are strongly in favor of doing so too. Deer management should be specifically discussed as an important element and tool of the FNRP.

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

Sincerely,

*/s/*_____
Jill Barker, Board Member
Elenor Hodges, Executive Director

cc: Ms. Katie Cristol, Chair, Arlington County Board
Arlington County Board Members