

Mary Glass's personal comments on FNRP to FNRC 11/17/22:

Pause FNRP process to reevaluate -

- Wide range of different concerns including the document's lack of sense of urgency, sufficient data, priorities, timetables, responsiveness to citizen wishes, etc.
  - FNRC – 9/30/22 letter to the Board
  - EcoAction 9/27/22 letter to the Board  
<https://www.ecoactionarlington.org/fnrp2022/>
  - ATAG letter to Board  
<https://static1.squarespace.com/static/6061269755f3b36e45f7ba0c/t/63668306bff1ee2e74d36891/1667662600892/10-1-22+ATAG+letter+to+the+County+Board+re+FNRP+final.jpeg.jpg>
  - ACCF Collaborative report May 7, 2022 -  
<https://www.civfed.org/newContent/2022-08/2022-08%20ACCF%20EnvAff%20TreeCanopy%20Phase%203%20Priorites.pdf> and
  - On-line Engagement Summary – Major Themes and Sub-Themes  
<https://www.arlingtonva.us/files/sharedassets/public/Projects/Documents/Online-Engagement-Summary-Report.pdf>
  
- Make public the comments received from the community – both individuals and organizations - on the Aug. 1 draft
- All FNRC members should be fully informed about the directions taken to date and planned next steps to revise the Plan – transparency and real time participation
- Establish a working group with diverse stakeholders to collaborate with consultants/staff to improve transparency of the process and responsiveness of the product to the concerns above

FNRC should make their documents, and public comments at FNRC meetings, easily available on the website.



October 1, 2022

Via Email

Katie Cristol, Chair  
Arlington County Board  
2100 Clarendon Boulevard  
Arlington, VA 22201

Re: Forestry and Natural Resources Plan

Dear Chair Cristol:

The Arlington Tree Action Group has reviewed the draft of the Forestry and Natural Resources Plan that was released on August 1, 2022.

While there are many excellent recommendations in the plan to conserve or improve tree canopy in Arlington, the next draft should express a much stronger sense of urgency throughout the document about the importance of our natural resources and their potential to address climate change. We are living in the midst of a climate crisis that is severely exacerbated for Arlington residents with the rapid loss of trees and natural resources being replaced by impermeable surfaces. County leaders must act now to avert further deterioration of our natural resources and the functions they provide.

Below are several other recommendations that we hope will inform the next draft of the plan.

### **Measurable Goals, Metrics, and Timeframes**

Each of the strategic recommendations in Strategic Directions 1 – 4 should list after the description:

- A measurable goal or metric that determines when this action has been achieved
- A timeframe in which to achieve the action
- A person or department responsible for seeing the action to completion

Without these specific parameters, this document more closely resembles a list of aspirations rather than the actionable plan we need now.

## Stronger Language

Many of the actions listed in the plan use vague language rather than clear declarative statements. For instance, section 1.1.4 states: “Reflect FNRP-adopted policies in future Comprehensive Plan elements, sector and area plans.” This statement should read “FNRP-adopted policies **must** be reflected in future Comprehensive Plan elements, sector and area plans.”

In addition, often the only actions are for the county to “consider” or “explore.” These are not the sort of actions that this plan needs. For example:

“1.2.3.1.B **Consider** establishing caps on impervious surfaces that are not already counted as lot coverage under the Zoning Ordinance.”

“1.2.3.1.D **Consider** changes to the Zoning Ordinance that better align it with the County’s goals for forests and natural resources management while fostering diverse housing choices.”

“1.2.5 **Consider** revisions to Landscape Standards for new subdivisions, multifamily, institutional and commercial projects.”

These should be stated as actions, since they are within the County’s power to act upon:

- “**Establish** caps on impervious surfaces...”,
- “**Change** the Zoning Ordinance...”,
- “**Revise** the Landscape Standards...”

## 40% Tree Canopy

Section 1.1.1 talks about maintaining a 40% tree canopy county-wide. However, it does not list any specific recommendations as to how this can be achieved given all by-right new residential construction in Arlington only requires a 20% tree canopy – and that number will soon be slashed to 10% if Missing Middle passes. The plan needs to show the specifics and the math behind how we get to 40% from 10% if that becomes the new standard in our residential areas, which is where 70% of our canopy resides.

## By-Right Development

ATAG strongly recommends changes to zoning (particularly, reducing allowable lot coverage or increasing setbacks of re-developed or new houses) that will encourage both tree preservation and tree planting.

ATAG would also like to see bonding and escrow requirements for newly planted trees (mentioned in section 1.3.3) be enacted for by-right developments, similar to the one the City of Falls Church has.

## **Inaccuracies in the Missing Middle Housing Insert**

On page 30 of Section 1.2.3.1 there is an insert about the MMH Study. There are several statements in this section that are misleading or questionable and should be removed. For instance, the quote that says “potential tree canopy up to 50%” is misleading in that this is based solely on what a particular homeowner chooses to do at their own expense and on their own time. The county has no way of enforcing this percentage. ATAG also notes that the ability to reach 50% as shown on the consultant report for the study is not possible.

Also, the statement that “retention or replacement” of trees would “remain the same as the status quo” under MM is **completely** inaccurate since we know the required replacement percentage is about to be cut in half. Both statements should be removed.

## **Legislative Action**

The plan mentions seeking legislative changes at the state level in several places (1.2.1, 1.2.3.1-A). The plan would be much more effective if the ordinances, bills, or laws (VA Code: 15.2-961, for instance) were listed and with the exact changes that Arlington is seeking. This would help both the county and the various groups in Arlington that support trees target their lobbying efforts.

In addition, the plan should state that legislation affecting tree canopy or natural resources in Arlington should be one of the highest priorities on the annual list of Legislative Agenda items for the House of Delegates session in January. Typically, trees are mentioned as one of the last priorities on that list and consequently there are no initiatives arising out of that effort.

## **Establish a “Trees and Green Space First” Policy for Site Plans and Use Permits**

Given their importance in reducing heat, intercepting storm water, and reducing pollution, trees need to be driving the planning of projects - not an afterthought.

In section 1.2.3.2, the FNRP discusses site plan and use permit projects. On these types of projects, we hope that the revised plan will insist that well-positioned trees, plantings that support native wildlife, and permeable surfaces be considered among the highest priorities in approving these projects.

## **Improving How Trees are Valued**

Section 1.3 of the plan talks about ways to value a tree differently than the Council of Tree and Landscape Appraisers (CTLA) calculations. ATAG applauds the action of using i-Tree and other tools to quantify the environmental and community value of trees. Before trees are removed, the environmental and community losses should be made transparent to all who will be affected.

## **Partnership Between DPR and APS**

ATAG supports the recommendation in section 1.1.5 to formalize the relationship between APS and DPR. We recommend this take effect **immediately**. Each school should develop a specific landscape plan that shows how to maximize tree cover on its property. The FNRP should also stress tree **preservation** on APS property, in addition to planting/growing new trees.

### **Monitoring the tree canopy**

Section 4.1.1 recommends the county conduct a tree canopy study every 3 to 5 years. ATAG recommends changing this recommendation to be every 1 to 3 years. Since the cost for these studies continues to go down, and the technology continues to improve, we think an annual study should be the ultimate goal, given the rapid pace of development. This is the only tool we have to measure how the county is doing on its stated goal of a 40% overall tree canopy.

### **Transparency with Maintenance Schedules**

ATAG supports establishing a regular maintenance schedule for trees (section 4.4) and recommends moving to “pro-active” tree maintenance. We also concur with publishing these maintenance schedules on the county website (as is suggested in the plan) so they are available to residents.

### **Funding for Green Infrastructure**

Given the size and scope of the recommendations in this plan, the County needs to expand funding for natural resources, trees, and the Urban Forestry staff. ATAG fully supports the recommendation in section 4.5 that the county fund our “green infrastructure” the same way it funds its gray infrastructure – using the Capital Improvement Plan (CIP) process.

Note that the FY 2022 Arlington budget reduced Urban Forestry funding by 4% at a time when the number of development projects continues to increase, and the staff to review development plans is spread thin. A steady source of funding via CIP would be beneficial outside of the unpredictable nature of year-to-year budgeting.

We appreciate the county’s work and investment in this updated Forestry and Natural Resources Plan and look forward to reviewing the next draft.

Sincerely,

Arlington Tree Action Group (ATAG)

Cc: Mark Schwartz  
Ryan Delaney  
Adam Segel-Moss

**Summary of Priority Actions from the  
ACCF Collaborative on Preserving Arlington's Tree Canopy  
Phase 3 – May 7, 2022**

The priority actions have been grouped to reflect the ideas considered most important and to minimize overlaps and repetition. The items noted as “immediate” indicate ones considered options for quick action, however this is only notation not limitation.

**Zoning and Ordinances Actions**

- **Immediate:** Lot coverage changes to reduce the allowed impermeable surface by 10% and related items. According to a member of the Zoning team, “Earlier this year, the County Board directed Planning Division staff to include in their annual work plan a study of possible Zoning Ordinance reforms that could address this issue.” The team would engage with County staff to determine their current plans and make suggestions on improvements. These suggestions would be transmitted to the appropriate Commissions, cognizant County departments and Board. Base stormwater fees on impermeable surfaces.
- **Building on 1:** Conduct a similar exercise with the Planning Division and other cognizant County staff, Commissions and Board regarding modifications and harmonizing the tree, stormwater, and Chesapeake Bay ordinances. Discuss increasing penalties, enforcement options (e.g., stop work orders, “snitch” enforcement, etc.), modifying land disturbance requirements, etc. Discuss expanded citizen participation in the future.
- **Ongoing:** Meet with Board and Commission members emphasizing the need to actively pursue individually, and with other jurisdictions, more flexibility to regulate trees on private property (e.g., replanting requirements, Notable trees, etc.). Assist in developing strategies to address the urgency in Richmond by working with County’s lobbying consultant. Issues to include replacement planting standards.

**County Management Actions**

- **Building on 5:** Develop the case for establishing a dedicated leader to coordinate and ensure implementation of tree canopy related activities including design, preservation, and resources. Leader to have authority across departments and County Manager’s annual evaluation to include their success in ensuring effective management. Meet with County management, Board members, and other parties to review current practices and explore best options.
- **Immediate:** Increase intensity of enforcement of established ordinances before and during construction on both private and public lands. Dedication of resources to increase enforcement capabilities and education of staff in all cognizant departments. Provide concrete examples of frequent current failures in operations and discuss ways to improve. Recommendations to County staff and Board.

### Equity Actions

- Immediate: Using existing resources and new data, develop a county-wide central database with open access to identify and analyze equity issues including tree canopy, natural resources, and health effects in the context of key socio-economic indicators (e.g., income, housing, transportation, etc.). Identify required data sources, metrics, analytical tools, models, and data gaps. Relate data to needs identified by the affected communities. Communicate data to and from cognizant Commissions.
- Immediate: Citizens need wide-ranging, intensive education programs to understand and take action to protect and enhance their urban tree canopy. There would be a focus on underserved communities including lower-income and multi-family housing. Inventory existing resources, both public and private, to take advantage of the programs in place. Identify additions needed including resources, outreach tailored to the communities. Identify potential sources to achieve additions.

### Incentives Actions

- Immediate: Develop a list of incentives for private developers. Incentives could include permit or other process expediting where trees are preserved; tax credits for preserving larger trees; flexibility to preserve trees. Work with Arlington developers individually or through associations to explore options. Take options to County staff, Board and Commissions.
- Explore adoption of a “proffers” system as used in nearby jurisdictions to obtain significant improvements in the preservation or planting of trees as part of the plan approval process. Already used to fund hard infrastructure needs, this could be expanded to include tree canopy and related natural resources.