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Arlington County Board

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Ladies and Gentlemen:

I submit these comments on the final draft of Arlington County's Public Spaces Master Plan ("PSMP")<sup>1</sup> on behalf of the more than 4,500 members of the Audubon Society Northern Virginia ("ASNV"). The mission of ASNV is to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity. Many ASNV members reside in Arlington County and/or conduct surveys of avian wildlife and other natural resources in the County's parks and other areas in support of ASNV goals. ASNV urges the Arlington County Board to consider revising the PSMP so that it more forcefully and unambiguously reflects the need for preservation of natural resources in Arlington County and the expansion of natural areas for the public's benefit.

ASNV appreciates the PSMP's identification of natural areas and natural resources as amenities to be developed and protected, inclusion of natural resource protection goals and the need to acquire new public space to meet those goals;<sup>2</sup> however, ASNV recommends that the current draft of the PSMP should state more specifically the priority that Arlington residents, as documented in the 2016 ETC Institute Assessment ("2016 Assessment"),<sup>3</sup> place on hiking trails, natural areas and wildlife habitats. ASNV urges the Arlington County Board to ensure that the PSMP, which will guide public spaces decisions for the next 20 years, clearly and unambiguously states that limited County resources are to be directed as a priority at improving and expanding natural areas and providing for more "passive" use recreation desired by the vast majority of County residents, including walking, hiking, observing nature and cycling. Less attention and public funding should be directed at infrastructure improvements and

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<sup>1</sup> Public Spaces Master Plan, Arlington County, Final Draft dated October 24, 2018, available at <http://arlingtonparks.us/pops/PSMP-web.pdf>.

<sup>2</sup> PSMP, Sec. 3.1-3.5, regarding Resource Stewardship, and Appendix II.1, Land Acquisition.

<sup>3</sup> Arlington County 2016 Parks and Recreation Needs Assessment Survey, Findings Report, ETC Institute, May 2016, available at <https://arlingtonva.s3.amazonaws.com/wp-content/uploads/sites/31/2016/01/Arlington-County-Parks-Rec-Survey-Findings-Report-May-9-2016.pdf>.

hardscape that can reduce or degrade natural areas, reduce the mature tree canopy, consume energy and contribute to increased (and damaging) storm water runoff. ASNV's suggested adjustments to the PSMP are:

- citing the conclusions of the 2016 Assessment specifically and including it as an Appendix to the PSMP;
- revising and clarifying the level of service analysis and placing its recommendations in context, so that it is clear that numerical targets for constructed recreation facilities do not divert resources from priority natural resource goals; and
- revising the Comprehensive Plan hierarchy so that the Urban Forest Master Plan and Natural Resources Management Plan are not subordinate to the PSMP.

Those recommendations are discussed in more detail below.

### Findings of the 2016 Assessment

ASNV believes that the results of 2016 Assessment are worth mentioning and should be specifically cited in the PSMP. The outdoor facilities cited as “most important” to survey respondents (i.e., within the top four choices based on importance) were paved, multi-use trails (73 percent), hiking trails (52 percent) and natural areas and wildlife habitats (50 percent).<sup>4</sup> The 2016 Assessment identified top priorities for investment in outdoor facilities as hiking trails, natural areas and wildlife habitats, and paved, multi-use trails. That priority ranking was based on the importance residents placed on investment choices and identified unmet needs.<sup>5</sup> Programs and activities cited as most important to residents were nature programs (38 percent) and the programs rated highest for investment were nature programs.<sup>6</sup> Finally, 64 percent of households supported maintenance and preservation of existing trees and natural areas as in the top three most important improvements, and 55 percent cited acquisition of open space to develop passive facilities in the top three improvements.<sup>7</sup>

To ensure that the PSMP is implemented to address those needs and preferences, it should cite the results of the 2016 Assessment with specificity and include the final report as an Appendix. Unless the results of the survey are given greater prominence and incorporated in the PSMP, many years down the road the PSMP's bare numerical recommendations on levels of service (discussed in more detail below) could result in failure to balance numerical goals with the priorities identified in the 2016 Assessment. For example, although numerical goals for paved, multi-use trails are important, investment to meet those goals should not sacrifice other significant priorities, such as preservation of trees and natural areas. ASNV recently addressed such a conflict in response to a proposal to add bike trails through Huntley Meadows Park in Fairfax County, when the proposed bike trails would damage important natural resources.

### Level of Service Analysis

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<sup>4</sup> 2016 Assessment, at p. iv.

<sup>5</sup> 2016 Assessment, at p. v.

<sup>6</sup> 2016 Assessment, at pp. x-xi.

<sup>7</sup> 2016 Assessment, at p. xv.

The decision-making that resulted in the recommended level of service is not fully explained and ASNV believes it may result in future loss of natural resources that does not represent the priorities identified in the 2016 Assessment. Our concern arises from the identification of numerical targets for amenities, whether they are high or low priorities based on the 2016 Assessment. ASNV wants to emphasize that it is not enough that the PSMP factor the priority levels from the 2016 Assessment into the level of service calculations, if future decision-making looks to the identified target levels without taking identified priorities into account in selecting how to allocate resources.

The level of service analysis is not fully explained in many cases. For example, although natural lands are assigned a high priority, and the current level of service based on population is below the “typical” level (based on national averages), the analysis does not increase the proposed level of service, although the levels of service for hiking trails and paved multi-use trails (also both high priority amenities) are both uprated from the current level of service.<sup>8</sup> There is no explanation for the different treatment. ASNV is sympathetic to the County’s difficulty in acquiring or developing additional natural areas within the limited boundaries of Arlington County,<sup>9</sup> however, if that difficulty is the basis for the assigned level of service, the analysis should so state. The reader should not have to infer the reason for the disparate treatment of high priority goals. ASNV also believes that the PSMP should be clear that it balances those priority goals, so that work to achieve “incremental unit” recommendations, new trails (paved and unpaved), does not reduce available natural lands.

It is particularly important that the PSMP be clear on the priority of natural lands, because multiple governmental authorities can be involved in trail development (e.g., NOVA Parks as well as Arlington County), and the Arlington County goals should be kept front and center in any such joint project. The complexities of the public process for recently proposed new facilities at Upton Hill Park in Arlington County are a good example of the difficulties arising from involvement of multiple governmental authorities.<sup>10</sup>

The analysis of some of the low priority amenities that require land also is somewhat opaque, calling into question the validity of some of the recommended “incremental units” needed in the next twenty years.<sup>11</sup> For example:

- Rectangular fields are assigned a low priority based on the 2016 Assessment, and the current level of service (1 per 4,180 people) is better than the “typical” level from national averages (1

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<sup>8</sup> The current population-based level of service for natural areas is one acre/197 people, a typical level is 1/333, and the recommended level of service is adjusted to 1/200. The level of service for hiking trails is increased from the current 1 mile/15,242 in population to 1/10,000, and the level of service for paved multi-use trails is increased from the current 1 mile/4,577 in population to 1/3,300. PSMP, App. II, Level of Service, Figure 27, pp. 174-175.

<sup>9</sup> We note, also, that the PSMP includes as a priority action acquisition of 30 acres of new public space over the next 10 years, not limited to natural lands public space. PSMP, Sec. 1.1., p. 55. The “incremental units” identified as required to meet the projected level of service for natural lands is 98 acres (PSMP, p. 175), a target the PSMP has apparently determined cannot be met.

<sup>10</sup> See Scott McCaffrey, “Critics still object, but Upton Hill park improvements moving forward,” *Sun Gazette*, Nov. 20, 2018, available at [https://www.insidenova.com/news/arlington/critics-still-object-but-upton-hill-park-improvements-moving-forward/article\\_d975b5b2-ecd5-11e8-954f-1bc7d8333ae2.html](https://www.insidenova.com/news/arlington/critics-still-object-but-upton-hill-park-improvements-moving-forward/article_d975b5b2-ecd5-11e8-954f-1bc7d8333ae2.html).

<sup>11</sup> The source for the figures in the next two paragraphs is the PSMP, App. II, Level of Service, Figure 27, pp. 174-175.

per 6,000 people). That notwithstanding, the proposed level of service is not materially different from current levels, that is, it is not decreased to a more typical level. The consideration cited is “reservation data,” which is not provided or explained. The proposed level of service also does not appear to take into account the County’s initiatives to convert grass fields to synthetic turf and to add lighting in places, both initiatives reportedly designed to allow increased use of the existing fields.<sup>12</sup> The result of that unexplained, and possibly distorted, analysis is a projected need for 11 additional rectangular fields in the coming years. ASNV has doubts about the advisability of accepting that number as a reasonable goal, particularly because such new fields (again, a low priority) could divert resources from the County’s limited budget of available land, which could limit potential for achieving some of the higher priority natural lands goals.

- Off-leash dog parks also have a low priority based on the 2016 Assessment, and the current level of service significantly exceeds the levels cited for both peer localities and the national average; however, the proposed level of service is slightly uprated (from 1 per 27,695 in population to 1 in 25,000), reportedly based on “dog license data.” Again, such facilities can limit available land for higher priority goals. Our concerns about the resulting goal for new dog park facilities notwithstanding, ASNV notes with approval the standards for new dog parks that would require fencing,<sup>13</sup> but suggests that they include an outright prohibition on locating those facilities in a natural resource protection area. That recommendation is based on our experience of the continuing damage to natural resources in the Glencarlyn Dog Park, which is located in a resource protection area.<sup>14</sup>

Again, ASNV believes the PSMP should be clear that the “incremental unit” goals identified in the level of service analysis are not stand-alone goals that the County can implement without taking into account the clear mandate of the 2016 Assessment for priority treatment of natural area and natural resource goals.

### Comprehensive Plan Hierarchy

ASNV is concerned that as time passes over the 20-year life of the PSMP the strong preferences of Arlington County residents for natural areas and resource protection documented in the 2016 Assessment may be sidelined by other kinds of projects identified in the PSMP. Because of intensive development in Arlington County and continuing pressures for even more development (with the resulting loss in natural resources), it is critical that the County make natural resource management and restoration a higher priority. To that end, ASNV recommends that the Board consider making the Urban Forest Master Plan and the Natural Resource Management Plan components of equal importance to the PSMP in the Comprehensive Plan Hierarchy, instead of subordinate elements of the PSMP.<sup>15</sup> That

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<sup>12</sup> PSMP, App. III, Specific Policies, Fields: Synthetic Turf and Lighting.

<sup>13</sup> PSMP, App. III, Specific Policies, Dog Parks & Dog Runs, p. 228

<sup>14</sup> As an aside, ASNV suggests that Arlington County consider whether fencing the Glencarlyn Dog Park, or providing some other clear sign of its boundaries, is feasible, to limit the area of damage by making it less likely that visitors treat Glencarlyn Park as a whole as a dog park, a routine violation of leash laws that is not adequately controlled by limited enforcement.

<sup>15</sup> PSMP, Comprehensive Plan Hierarchy, p. 22.

reasonable and overdue structural change would help ensure that the priority natural area and natural resource goals identified in the 2016 Assessment are given the recognition they deserve and are not lost among multiple demands for other recreational amenities. Planning and implementation of recent park projects in the County often has resulted in loss of mature tree canopy and addition of impervious surface in natural resource protection areas, resulting in increased potential for downstream flooding and its associated losses (property losses and erosion). An example is the proposed destruction of mature tree canopy in the Upton Hill Park modifications, including in a sensitive resource protection area. While not a guarantee of protection, elevation of the status of those plans would help ensure priority for protecting natural resources.

If you have questions or need additional information, please feel free to contact me at [info@audubonva.org](mailto:info@audubonva.org).

Very truly yours,



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