

January 24, 2025

Jennifer Madello
Superintendent
George Washington Memorial Parkway
700 GW Memorial Parkway
McLean, VA 22101

Re: Public Engagement and the Viewshed Project in the GWMP

Dear Superintendent Madello:

The organizations listed below welcome you to your role as Superintendent of the George Washington Memorial Parkway. We hope to create a positive working relationship that contributes to achieving the goals of the National Park Service. As part of that, we request a time where a subset of us can meet with you to discuss what we believe is called the “Viewshed Project” prior to any future public engagement process. We believe it would be helpful to share our views and recommendations as you decide the next steps in your process. Please provide specific dates and times you could meet with us.

By way of background, in October 2024, we observed a large-scale tree removal north of Spout Run and shared our deep concerns. Commendably, the GWMP halted that work mid-project. A coalition of organizations sent the attached letter on October 28, 2024. In the letter, we thanked the Acting Superintendent for the decision to stop tree removal and initiate engagement with the public in the process of deciding the next steps in the Viewshed Project. The coalition has since expanded to the list of signatories to this letter.

In addition to meeting with you, we would appreciate answers to the following questions, which will help us engage in the most effective manner possible:

1. What will be the format and venue for public engagement?
2. When would public engagement likely begin?
3. What will be the length of the public engagement? We understand you have discretion and request a 90-day period so that we can adequately consider any documents you provide and prepare our responses.

We understand the challenges associated with stepping into your new role, including heavy demands on time, and wish you the best. We thank you for your consideration and look forward to meeting with you at your earliest opportunity.

Sincerely,

Glenn Tobin
Founder
Coalition to Protect GWMP Forests

Ann Jurczyk
Virginia Manager of Urban Restoration
Chesapeake Bay Foundation

Tom Blackburn
Advocacy Chair
Northern Virginia Bird Alliance
(formerly Audubon Society of Northern Virginia)

Glenda Booth
President
Friends of Dyke Marsh

Christopher Topoleski
Executive Director
Faith Alliance for Climate Solutions

Ken Wright
Virginia Policy Director
Potomac Conservancy

Betsy Martin
President
Friends of Little Hunting Creek

Sharon Shutler
Climate and Clean Energy Working Group
Virginia Grassroots Coalition

Susan Bonney
Chair
Sierra Club Great Falls Group

Dean Amel
Chair
Sierra Club Potomac River Group

Alan Ford
Potowmack Chapter President
Virginia Native Plant Society

Bill Richardson
President
Donaldson Run Civic Association

Cc: Christine Smith - GWMP
The Honorable Tim Kaine
The Honorable Mark Warner
The Honorable Don Beyer
The Honorable Gerry Connolly

October 28, 2024

Christine Smith
Acting Superintendent
George Washington Memorial Parkway
700 GW Memorial Parkway
McLean, VA 22101

Re: Removal of Trees Along the George Washington Memorial Parkway

Dear Superintendent Smith:

The nine undersigned environmental organizations commend your decision to suspend the cutting of trees along the George Washington Memorial Parkway (GWMP). We look forward to an opportunity to participate in the dialogue concerning the future of the project. The following are several points we hope the National Park Service will consider as it prepares a much-needed Environmental Assessment of the project.

Clear-cutting of trees will result in substantial environmental harm. A single mature tree can intercept 500 to 700 gallons of stormwater per year, and its root system anchors the soil, preventing erosion. The removal of large numbers of mature trees, particularly on the steep slopes between much of the Parkway and the Potomac River, will subject the Lower Potomac River Gorge to substantial increases in runoff and result in increased erosion and pollution. Also, removal of large swaths of trees will expose the cleared areas to an influx of invasive plants, including the invasive vines that are currently choking out much of the forests on GWMP land. The forest near the Donaldson Run Overlook, which has been overtaken by invasive vines, illustrates what can happen.

The tree removal is inconsistent with federal, state and local statutes, ordinances and agreements. The National Environmental Policy Act (NEPA) requires federal agencies to assess the environmental effects of their proposed actions prior to making decisions. The Chesapeake Bay Watershed Agreement (CBWA), to which the Department of Interior is a signatory, commits the signatories to restore and enhance land and water habitats and to protect forest buffers to improve water quality in the Chesapeake Bay Watershed. Clearcutting trees along the slopes above the Potomac River appears to be inconsistent with NEPA and the commitments of the signatories to the CBWA to collaborate with each other and to operate with transparency.

The Chesapeake Bay Preservation Act (CBPA), Virginia Code 62.1-44.15:67 *et seq.*, directs counties, cities and towns in Tidewater Virginia (defined as the jurisdictions in the

Chesapeake Bay watershed) to incorporate water quality protection measures into their comprehensive plans, zoning ordinances, and subdivision ordinances and commits the commonwealth to provide financial and technical support to them. Chapter 61 of the Arlington County Code implements the CBPA's directives. Section 61-5B.1.e permits the county to designate as Resource Protection Areas lands that are "necessary to protect the quality of State waters." The County has designated as Resource Protection Area Buffers all of the land between the GWMP and the Potomac River in the County.¹

Arlington County's RPA requirements provide that "Trees may be pruned or removed from an RPA Buffer in an area no greater than five thousand (5,000) square feet or 25% of the RPA Buffer, whichever is less, for all sight lines and vistas combined.... No more than twenty-five percent (25%) of trees six (6) inches or greater at breast height (four and a half (4.5) feet) may be removed from the areas designated for sight lines and vistas." Arlington County Code 61-7 B.2, 3.

Regardless of whether the Park Service considers itself to be subject to the Virginia law and the Arlington County Code, the fact remains that the extensive removal of trees along the Parkway is inconsistent with state and local legislation that was enacted to implement the Chesapeake Bay Watershed Agreement.

Improving vistas along the GWMP does not require removal of large numbers of trees.

We are supportive of removing invasive trees, particularly if that will improve views for drivers on the roadway. Integrating that invasive removal with the large volunteer and NPS effort already underway to clear invasives would be highly effective.

As many organizations and advocates have suggested before us, we recommend that the NPS develops and implements a comprehensive invasive management plan for the GWMP. Invasive vines overwhelm forested areas, destroy trees and degrade habitat, and completely obstruct views in many areas along the entire length of the parkway. Vistas could be improved by removing invasive vines, without removing a single native tree. The NPS should strive to align and balance the original recreational purpose of the parkway with its duty to responsibly steward and manage the land entrusted to it.

At the same time, the Park Service should bear in mind the importance of keeping the GWMP as safe as possible. Most of the users of the GWMP are commuters who drive the parkway, which is a two-lane road in each direction with little or no shoulder, at speeds in excess of 60 mph. Creating vistas may not only be of little interest to the commuters but may create safety concerns as drivers are distracted by the vistas.

¹ <https://www.arlingtonva.us/files/sharedassets/public/v/1/building/documents/codes-andordinances/watersheds-rpa-map.pdf>

It is important to rehabilitate the areas where the trees were removed. Since an Environmental Assessment was not prepared before the tree removal began, there was no consideration of the long-term effect of cutting the trees. The Park Service should ensure that comprehensive measures are undertaken to rehabilitate the cleared areas. The cleared slopes will be subject to significant erosion until new trees and shrubs are established. Rehabilitation will be difficult given the steep slopes in some locations. Also, the large numbers of deer on the river side of the Parkway will necessitate protecting new plantings from substantial damage from deer browse. Finally, it is essential to fund a long-term initiative to prevent the cleared areas from being overrun with invasive vines as has happened elsewhere along the Parkway.

The Park Service should consider other recreational opportunities along the Parkway.

We appreciate the desire of the NPS to improve the recreational opportunities within the GWMP. We suggest using the current situation to consider other ways to improve recreation. As an example, the NPS could use GWMP land on the Arlington side of the parkway to create a linked GWMP-Arlington County trail the full length of the Arlington palisades— from Rosslyn to Pimmit Run. Such a trail would offer numerous stunning views of the Potomac gorge and would create an entirely new set of hiking opportunities for the Washington DC area.

We look forward to participating in the process of deciding the next steps in the project. We commend you for the decision to engage the public in the process of deciding the next steps in the rehabilitation of the Parkway and the cleared areas. We plan to provide meaningful input to the process in the coming months.

Thank you,

Tom Blackburn
Advocacy Chair
Northern Virginia Bird Alliance
(formerly Audubon Society of Northern Virginia)

Ann Jurczyk
Virginia Manager of Urban Restoration
Chesapeake Bay Foundation

Christopher Topoleski
Executive Director
Faith Alliance for Climate Solutions

Glenda Booth
President
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Betsy Martin
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Hedrick Belin
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