



DATE: March 12, 2025

TO: Amanda Keyes, Dominion Capital Projects

FROM: Paul Gilbert, NOVA Parks

RE: Dominion Tree Clearing on the W&OD Park

Thank you, and your colleagues, for meeting with representatives from NOVA Parks, Fairfax County, Town of Vienna and Senator Salim’s office on February 28th to discuss the ongoing tree cutting on the W&OD Park. This memo has been developed with the input from our local government partners that were also in that meeting.

Virginia Freedom of Information Act (VFOIA):

Dominion rapidly went through a series of slides about their plans and wanted to consider this information confidential. We met with the VFOIA expert in the Fairfax County Attorney’s office, and determined that this plan does not meet any of the conditions that would allow the information to be exempt from the Freedom of Information Act. At the meeting, Dominion staff indicated that they would confer with their management about providing an alternative version of this presentation to the attendees, which has not yet been received, and we ask that Dominion pursue distribution of an alternative version.

Scope of tree cutting:

Dominion announced that it is planning to cut most of the trees on the 33 miles of W&OD Park that have transmission power lines. This area, stretching from Arlington, includes all of the Fairfax County portions of the park, and goes into Loudoun County to the west of Leesburg. This area includes hundreds of acres and tens of thousands of trees. We know from the first four miles that have been cut from Vienna to Dunn Loring that Dominion is clearing all flora across the entirety of the Dominion right-of-way, not just the trees posing a threat to or potentially interfering with the power lines. This is a significant departure from past practices and long-standing MOU

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Paul Baldino
David Gustafson

Loudoun County

James Bonfils
Cate Magennis Wyatt

where Dominion has cut trees selectively based on their proximity and direct threat to transmission lines.

Proposed Replanting and Management:

Meadows:

Responding to our 12/12/24 suggestion to plant pollinator meadows with native grasses and wildflowers that would provide habitat for pollinators, we were pleased to see a proposal to plant such meadows and maintain them for two years after initial planting (3 years total). Dominion proposed a total of 50 acres of such meadows spread across the 33 miles and hundreds of acres of impacted lands. The utilization of pollinator habitats with invasive species management is a good idea, but we believe the proposed 50 acres is insufficient to provide commensurate ecological benefits that would offset the loss of ecological function caused by this scale of tree removal.

Trees, Bushes and Shrubs:

There was a discussion about replanting trees, bushes, and shrubs in addition to the pollinator meadows. Dominion also announced that it would only allow trees to be replanted in the right-of-way that could grow no taller than ten feet. There are only a very few examples of native species trees that meet this extremely low, arbitrary height limit. Beyond a commitment to replant some in the Vienna Town Green, Dominion was non-committal on what additional replanting would occur or the process of determining locations for low-growing tree replanting. Even with a limited mix of low growing species, we ask that Dominion commit to planting more trees and shrubs in the impacted areas in addition to the meadows to support biodiversity and more resilient ecological function, and provide specifics about this plan.

Invasive species:

We appreciate Dominion's commitment to treat half of the park property each year to control invasive species beyond the use of herbicide and to manage the woody vegetation currently utilized. This is a commitment that goes on into the future beyond just the pollinator meadow establishment period. As the goal of this effort is to manage invasive plant encroachment to support the establishment of native flora that require less ongoing maintenance, we appreciate Dominion's commitment and help with this important effort.

We know Dominion wants to be a good neighbor to the hundreds of impacted homes and millions of impacted community members, most of whom are Dominion customers who enjoy using the trail. We appreciate the opportunity to collaborate and hope that we can work together on solutions.

Requested Actions:

1. We ask Dominion to consider a more selective approach to tree trimming and cutting, similar to how the W&OD Trail Park has been managed for decades, and considering that this public park with nearly three million visits per year also serves as important habitat and wildlife corridor through the urban areas of Northern Virginia. We would be happy to work with Dominion and the impacted communities to identify those existing trees of highest value for preservation.
2. We ask that meaningful efforts to replant trees and shrubs in the currently cut areas of Vienna and Dunn Loring be considered, and that tree replanting be a central part of future plans. Dominion told the public and elected officials that Dominion would replant trees from the earliest phases of this project. NOVA Parks could assist with identifying and planting trees.
3. We suggest that Dominion reconsider the technical basis for the 10 foot allowable tree height limit and consider revising the limit upward to at least 20 feet if there is no risk posed by trees throughout the entirety of the trail, or at least at locations appropriately located a safe distance from Dominion infrastructure. To manage expectations and increase our understanding, it would also be helpful for Dominion to share more information about the standards or regulations applicable to vegetation maintenance and allowable tree heights within your right-of-way.
4. If Dominion will not reconsider its actions related to tree cutting on the W&OD Park, it would increase transparency with the public for Dominion to survey the trees in the future cutting areas and provide to the public both the survey information as well as the specific areas that will be replanted in both pollinator meadows as well as replanting trees, bushes and shrubs. This would serve to both provide commitments on replanting as well as public transparency for this process.
5. We ask Dominion to provide a replanting plan 2.0 that greatly expands the areas of pollinator meadows and provides commitments and details on herbicide use practices as well as trees, bushes, and shrub replanting.
6. We request that improved notification be made in advance of clearing activities to all adjacent property owners, elected officials in the affected communities, and broader notifications to the community via all available communication channels to inform park users. Previous communications were not clear about the scope of the tree cutting. Additionally, we ask that Dominion update its public website to include maps and timelines for planned clearing and replanting activities.

Conclusion:

We appreciate that in the latest proposal, Dominion acknowledges the need to restore the environment in the area that has been so heavily impacted by tree cutting. Pollinator meadows are great, as are native trees, bushes, and shrubs. However, we ask Dominion to collaborate with us on further minimizing the ecological impacts and disturbance caused by the current vegetation removal. We look forward to continued dialog on all of these important issues.