



[VDOT Landscaping Guidance](#) Comments

To: VDOT

Cc: County Supervisors and Virginia legislators representing our watershed

The Friends of Accotink Creek (FACC) thank you for putting together this thoughtful document. It is a terrific start, and we look forward to any follow-up material. As the Commonwealth's largest land manager, your decisions are vital to the wellbeing of our natural heritage.

May we suggest that, as an early venue for implementing these guidelines, VDOT select [Americana Drive](#) in Annandale (3619), a street plagued by numerous problems, landscaping and aggressive invasives among them?

Below are FACC's comments about the Landscaping Guidelines and Appendices.

1. General Design Guidance, page 24, [Target percentage for native species and native cultivars \(nativar\)](#).
 - a. Recommend changing "target" to "required" or "standard" to strengthen the guidelines.
 - b. While the requirement is "100% native species in stormwater BMP facilities, riparian buffers, herbaceous/pollinator meadow, and reforestation areas", the requirement is only "[70% native and/or nativar species](#) for roadside or streetscape planting". We recommend changing the requirement to 100%.
 - c. The "Do not specify invasive species" statement. Thank you. This is music to the ears of those of us who toil as volunteers fighting back the scourge of invasive species.
2. [Existing Tree Management](#) (page 18), which provides "benefits that newly planted trees do not provide at the same magnitude for decades". The impulse to clearcut first, then sort things out is best avoided. Recommend an explicit statement that preservation is the default approach.
3. [Plant Species Selection: Prioritizing Native Plants](#)(page 24 and elsewhere in the guidelines).
 - a. For roadside and streetscape plantings, we suggest making native plants the default choice. With climate change's longer droughts and increased flooding driving some species further north, it is worth experimenting to see if plants native to more southern areas of the U.S. will thrive on VDOT sites.
 - b. Of your list of Preferred Plants (Appendix 2), many are non-natives. For example, your tree list includes such exotics as Hinaki cypress, Fales cypress, Leyland cypress, Katsura tree, Kousa dogwood, and Yoshima cherry. While these may be lovely trees, we have hundreds of trees native to Virginia that are also lovely. The problem with planting non-natives is that who knows whether that tree will one day become invasive. Such is the story of the Bradford pear and other exotics. The introduction of exotic species is also a known means of introducing exotic plant diseases - the Kousa dogwood is responsible for the plague that has devastated our native flowering dogwood. Moreover, exotic species provide little value to birds and other wildlife. The fruits of native trees have a higher nutritional profile.
4. [Noxious Weed and Invasive Non-native Species Management](#)
 - a. We appreciate VDOT's effort to address the loss of biodiversity, especially the alarming decline in insect and bird populations, by giving priority to native plants. Prioritizing native plants is a very positive step. However, given that invasive vegetation is rampant

- along our highways and VDOT's rights-of-way, we were disappointed to see a [blank page](#) in the invasive management part of your document. Throughout the Commonwealth, invasive vines are killing trees and driving out our native flora. Entire traffic islands by highway overpasses are colonized by Bradford pear. A rigorous approach to invasives control is imperative if the other goals of these guidelines are not to be frustrated by rampant infestations. We urge VDOT to create a robust program to combat invasives that integrates professional services and incentives for volunteers.
- b. We suggest that VDOT add explicit requirements for invasive species management to coordinate with local communities and adjacent states because invasive species often cross jurisdictional boundaries; thus, their detection and control often require interjurisdictional solutions.
 - c. It is encouraging to read elsewhere in the document (riparian buffer on page 58, reforestation on page 63, pollinator habitat on page 89, and wildflower planting on page 92) that if over 15% of an area to be planted consists of invasive species, you will treat the area prior to plant installation. How was that percentage determined? Invasive species are aggressive. The best way to fight the spread of invasives is to prevent them from establishing in the first place. Please consider adopting a zero-tolerance approach to invasives by treating all sections of an area that contain invasives, regardless of the percentage, i.e., if there are invasives, treat them prior to planting.
5. [Stabilization Planting](#) , page 44, reference to herbaceous meadow, which is "maintained through a conservation mowing practice of one mowing per year." Recommend adding a statement that mowing acreage increases habitat value, reduces air pollution, and saves funds.
 6. Preferred Plants List (Appendix 2).
 - a. Under Bulbs, Item 504, we were surprised to see daffodils. In the spring when sources of pollen and nectar are rare, daffodils offer poor value to hungry bees. Flowers most attractive to humans are often not those most attractive to pollinators. Over time, daffodils spread thereby taking up space native plants might otherwise occupy. Instead of daffodils, we suggest planting native spring flowers or native sedges.
 - b. On the Preferred Plants list most of the headings are missing. We assume you will complete this chart soon.
 7. [Reforestation](#) (page 60) as "a planting concept that is intended to replicate a forest condition". Please state that preserving existing forests is a much more effective and economical approach.
 8. [Pollinator Habitat Plot](#)(pages 87-89)
 - a. We suggest that VDOT talk with the Pennsylvania Turnpike Commission, which has been sowing the roadsides of the Turnpike with pollinator seed mixes, as described in the [May 2026 Bay Journal](#). The Commission's goal is to identify which mixes of seed best support pollinators, survive deer browsing, and are low maintenance. The Commission then uses the most promising mixes to convert more roadside land into pollinator habitat. We recommend that VDOT run some pilot tests along the same lines with native plant seeds as the default selection.
 - b. We also recommend that VDOT include in the guidelines some of the best practices described in the [May 2026 Bay Journal](#), such as selecting pollinator seed mixes that are appropriate to the specific region, elevation, and soil conditions; working with consultants to survey the pollinator plots each month from April or May through October to assess the hardiness and condition of the plant cover; and collaborating with other state departments of transportation and universities to share good ideas and discuss challenges.
 9. Establishing (and preserving) [Vegetated Riparian Buffer](#) (pages 55-59) to halt the declining health of Virginia waterways. Fortunately, this section (and several others) states that "30% of total tree planting shall be evergreen species" (page 56), recognizing that native, flood-tolerant evergreens are the top choice for stabilizing stream banks and filtering runoff in Virginia's riparian zones. In addition to the Loblolly Pine, the Eastern Red Cedar, and the American

Holly, we recommend that VTOD include the Eastern White Pine (*Pinus strobus*), a Virginia native, in Appendix II because it thrives in moist, well-drained soils and is a great mid-to-outer buffer choice.

10. [Wildflower plantings](#) (pages 90-93): Reference: their habitat and aesthetic value and reduction of mowing acreage. We suggest that the recommended species list consist entirely of the many attractive Virginia native wildflowers.
11. [Wildlife Crossing](#) to "Preserve habitat connectivity across roadway corridors" (pages 97-99). Every project offers opportunities for enhanced wildlife crossings, whether in a Nexus Area or not. We recommend that the guidelines include explicit statements that designs should accommodate a range of species. We are proud that a chosen example of a multispecies wildlife crossing is in our watershed ([Figure 48](#)).
12. Dark sky and lighting choices. Recommend adding dark sky and lighting choices that will not harm wildlife, including vital nocturnal pollinators like native moths, to the guidelines.
13. We concur wholeheartedly with the comments submitted by Margaret Fisher on behalf of www.FairfaxPRISM.org and PlantNovaNatives.org.

Friends of Accotink Creek

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