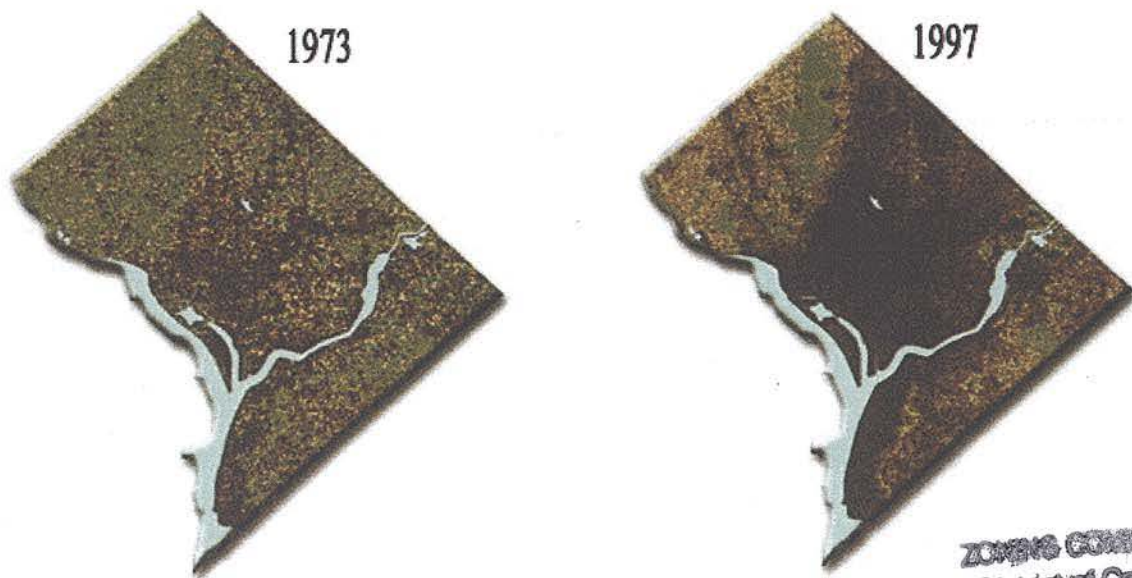


**Statement of Barbara Deutsch
Senior Director, Programs and Research
For the Casey Trees Endowment Fund
Washington, DC**

July 22, 2004

My name is Barbara Deutsch and I am Senior Director for Programs and Research at the Casey Trees Endowment Fund. I am a landscape architect, an active member of the American Society of Landscape Architects, and an ISA Certified Arborist. On behalf of the Casey Trees Endowment Fund, I thank you for the opportunity to appear before you this evening to comment on the proposed changes to the Forest Hills Tree and Slope Overlay— ZC 02-19.

Casey Trees was established in 2001 by a generous gift from Mrs. Betty Casey who was concerned about the extensive loss of the District's tree canopy cover in recent years. A study by American Forests completed in 1999 documented a loss of nearly two-thirds of the city's heavy tree cover from 1973 – 1997.



Key: % Tree Cover in the District of Columbia



ZONING COMMISSION
District of Columbia
Case 02-19
Exhibit 359

Casey Trees' mission is to restore, enhance, and protect the tree canopy of the District of Columbia in cooperation with local and federal government agencies, community groups, and individual citizens. It is our concern for protecting the remaining tree canopy of the District that brings me before this panel today. As you can see in the satellite images, the remaining tree cover is on protected land.

Trees, open space, and other elements of the green infrastructure provide important benefits and values for the District. Trees not only beautify our communities, but they help reduce energy costs and stormwater runoff, they add to the commercial value of our homes and businesses, and they help to define the character of communities. Recent studies have also documented the health and safety value of trees, demonstrating that tree-lined streets and communities can help reduce stress and anxiety in teenagers and that trees are even associated with lower incidences of crime and violence in certain neighborhoods.

We see trees as an asset, as important to the city, its neighborhoods and communities, as paved streets, good schools, and utilities. For this reason, we believe it is important to understand and carefully consider these values before moving forward with changes in planning or zoning rules that may result in the unnecessary loss of these valuable assets.

To give you some idea of the value of trees in the Forest Hills neighborhood, I am providing some information from a street tree survey that was conducted by Casey Trees and over 500 community volunteers in the summer of 2002. The volunteers gathered data on the species, size, and condition of each street tree in the city and also identified plantable spaces where trees were dead, dying, or missing. The information I will summarize for you is available on our website at Caseytrees.org.

From this information we can determine the value of street trees in the Forest Hills area. While this data is limited to street trees, I believe it offers important evidence of the value of trees in this community and adds to the argument that development in the area should proceed cautiously and with full knowledge of the potential effects on trees and their benefits and values to the community.

Looking at our inventory map for the Forest Hills area, there is a Red Oak tree near the intersection of Ellicott and Linnean Avenue that is 50 feet tall and 16 inches in diameter with an estimated value of \$4,746 (reference attached printout from Casey Trees website). On 29th Street, NW there is a 50 foot tall Sugar Maple that is 20 inches in diameter worth \$6,314. Near the intersection of Brandywine and 28th Street, NW is a Norway Maple, 45 feet tall and 22 inches in diameter that is worth \$6,655. And, finally, I found a Red Maple near the cul de sac on Chesterfield Place that is 55 feet tall and 26 inches in diameter that is worth nearly \$10,000. Again, this information is available on our website and was developed using a USDA Forest Service computer model referred to as UFORE, or the Urban Forest Effects model. The basic data was gathered by Casey Trees Citizen Foresters and volunteers. Information on how these values are derived from the model is also available on our website.

My point is that this is a high value area with very valuable trees— individual trees and the collective value of individual trees as a forest, hence the name “Forest Hills”. It is obviously a very desirable location to live with its high tree cover and close proximity to Rock Creek Park. And the part of the desirability of living in this area in close proximity to Rock Creek Park, is the abundance of trees.

Our understanding of the reasons for the proposed changes in the rules affecting trees in the Forest Hills area is that the existing rules have been difficult to implement and that the District’s Office of Planning was instructed by the Zoning Commission “to explore another approach to tree protection that could be potentially adopted city-wide” (Memo to Zoning Commission by Andrew Altman, Director of the District Office of Planning, July 12, 2004).

It is our further understanding that the alternative proposed by the Office of Planning would use a canopy cover approach to set minimum standards for the amount of tree canopy cover that must remain on a lot or be there 10 years after development.

We applaud the Office of Planning’s efforts to establish procedures and a standard for maintaining tree canopy cover in the community. According to OP’s own analysis using GIS data, current tree canopy coverage in the community is just over 54 percent.

The rules proposed by OP would require a tree plan and maintenance of a minimum canopy coverage based on the size of the lot in question. The rules would further require that a certified landscape architect or an ISA certified arborist affirm that the specified tree canopy coverage for the affected property would be achieved when construction is completed, or no later than 10 years from the application for a building permit. In addition, the rules would require that no tree greater than 24 inches in circumference be removed without certification or compliance with the relevant section of the proposed rules.

Casey Trees believes that these actions are helpful. However, we are concerned about a number of provisions of the proposed new rules.

First, we believe that permitting a reduction in the average tree canopy cover in the area from nearly 55 percent to 25 percent for lots less than 7,500 square feet in area and 32 percent for lots greater than 7,500 square feet in size is excessive. As I noted at the outset, the District **overall** has lost nearly two-thirds of its heavy tree canopy cover over the past quarter century. Further erosion of this canopy will only serve to further reduce the values and benefits of trees to this community. While establishing a minimum tree canopy cover for the area is appropriate and desirable, we believe that the minimum is too low.

Related to this, granting the permittee ten years to achieve this minimum tree canopy cover standard is inadequate. Ten years is a long time. I question the ability to adequately and accurately certify that trees planted today will achieve the crown canopy necessary to meet the minimum canopy area required ten years in the future. And, what is the penalty to the permittee or the certifying landscape architect or arborist if the minimums are not met **10 years** later? Drought, insects, disease, poor growing

conditions, inadequate care and maintenance can all affect tree health and development. While this provision is clearly intended to provide permittees flexibility, we fear that it will provide too great an incentive to remove more trees today while betting on new trees to take their place and meet the established tree canopy standard in the future. Instead, we believe that a minimum canopy cover should be required at the time the permit is granted.

Finally, although the Office of Planning has established a standard requiring compliance with the rules before any trees greater than 24 inches in circumference are removed, we fear that this provides little disincentive to remove large trees from existing lots. The value of these trees far exceeds the disincentive, which, according to the Office of Planning, would be “denial of future building/development permits on the property until the property is replanted to meet canopy requirements” (Memo to Zoning Commission by Andrew Altman, Director of the District Office of Planning, July 12, 2004). Again, this could allow large trees to be removed and replaced with smaller trees that, theoretically, would meet the tree canopy requirement for the lot in 10 years. We believe that this is inadequate.

Summary

In summary, Casey Trees is concerned that the proposed amendments to the Forest Hills Tree and Slope Overlay District Tree and Slope Protection overlay are inadequate to maintain and protect the highly valuable tree canopy in the area. The proposed rules would permit a reduction of more than half in the existing tree canopy in the area as determined by the Office of Planning. Given the extensive loss of tree canopy in the District in recent years, we believe that a greater effort should be made to minimize the effects of development on the trees that remain.

In the interest of flexibility, the proposed amendments would permit 10 years for trees to grow to a size necessary to meet established minimum canopy cover. We fear that without adequate disincentives and given the uncertainty that trees planted for this purpose will grow to meet this minimum, that a minimum canopy cover requirement should be established and met before a building permit is issued.

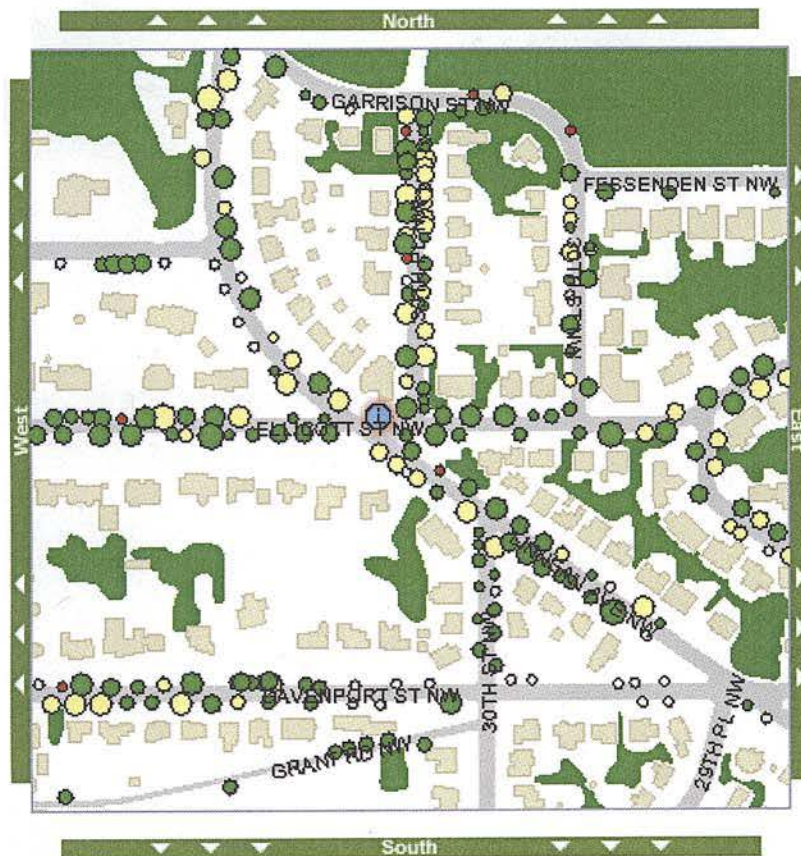
Similarly, we are concerned that given the high value of large trees in this community, and the city overall, that every effort should be made to preserve large, healthy, existing trees. The “24 inch rule” in the proposed amendment is a good attempt to provide this protection and to offer a disincentive for clearcutting, but we believe that it will not achieve its intended purpose.

We look forward to working with you and the Office of Planning to develop standards for tree canopy cover that will help maintain the values and benefits of trees for Forest Hills and all of the residents of the District of Columbia.

Thank you for the opportunity to present our comments tonight and for your interest and attention.



Casey Trees
ENDOWMENT
WASHINGTON DC

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Width of map is 0.29 miles.

Getting Started

Select a tool by clicking on the icon and click on map:

- Identify Tree
- Zoom In
- Zoom Out
- Recenter

[HELP WITH TOOLS](#)



[Zoom to DC](#)

Search

Select All

Unselect

check 2nd box for
Trees

- ☒ ☐ Exceller
- ☒ ☐ Fair/Poc
- ☒ ☐ Dead Tr
- ☒ ☐ No Tree

Points of Reference

- ☒ ☐ Building
- ☒ ☐ Public S
- ☒ ☐ Charter
- ☐ ☐ Metro S
- ☐ ☐ Metro Li
- ☒ ☒ Roads
- ☐ ☐ Alleys &
- ☐ ☐ Parking
- ☐ ☐ Parking
- ☐ ☐ Medians
- ☐ ☐ Sidewall
- ☒ ☐ Parks
- ☒ ☐ Woodlar
- ☐ ☐ SMD Bc
- ☐ ☐ ANC Bo
- ☒ ☐ Ward Bc

[Refresh Map](#)

Oak, Red (ID: CA-0186-043)

Scientific Name: *Quercus borealis*

Condition Rating: Condition 1 - 2

Tree Value: \$ 4,746

Height: 50 feet **Diameter at Breast Height:** 16 inches **Crown Radius:** 20 feet

SITE INFORMATION:

Overhead Wires: None

Tree Grate: None

Curb: Permanent

Sidewalk: Permanent

Tree Box: Potential Plant

TREE CONDITION INFORMATION: Condition 1 - 2

Tree has <5% deadwood and is leaning <5 degrees.

Foliage is normal.

Wounds/Cavity = <10% circumference. No decay in wounds/cavity.

No borer holes.

Cracks are absent.

Stem conks are absent and root conks are absent.

Stem girdling roots = <15% stem circumference.

ENVIRONMENTAL AND ECONOMIC VALUE:

Carbon Storage:	423.29 kg
Carbon Sequestration:	15.59 kg/year
Carbon Monoxide Removed:	62.248 g/year
Ozone Removed:	541.996 g/year
Nitrogen Oxide Removed:	180.560 g/year
Particulate Matter Removed:	319.095 g/year
Sulfur Dioxide Removed:	179.949 g/year
Total Pollution Removed:	\$ 6.6743 /year
Tree Value:	\$ 4,746

Tree data as of August, 2002[Click here](#) for Tree Map home.

Map developed by  using ESRI's ArcIMS and Microsoft SQL Server. For information email cmap@nypirg.org

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