



**Testimony of
Maisie Hughes, Director of Planning and Design, Casey Trees**

November 19, 2013

**Before the Zoning Commission
Zoning Regulations Review (ZRR)**

Good evening Commissioners. Casey Trees is a nonprofit organization with a mission to “restore, enhance, and protect the tree canopy of the nation’s capital.” Since 1950, Washington DC’s tree canopy has declined from 50% to its current level of 36%. To reverse this trend, the District has adopted a 40% tree canopy goal to be reached by 2032.

We applaud the District’s efforts to create a more sustainable city by implementing the Green Area Ratio (GAR), a zoning tool which can help mitigate the negative environmental impacts of intensive urban development. We also applaud the District’s inclusion of trees as one of the green elements in the GAR (Subtitle C Chapter 17 page 50 of the proposed DC Zoning Code), as a clear recognition that trees are an instrumental tool to help manage stormwater runoff, reduce the heat island effect, and mitigate air pollution.

However, the GAR has a critical flaw. The credit system values trees based on their size at planting, rather than their size at maturity. Thus it fails to incentivize the planting of trees that will provide the most environmental benefits - those that will grow to have large canopies. We believe this flaw is both unintentional and easily remedied.

According the Mid-Atlantic chapter of the International Society of Arboriculture, the largest “commonly transplantable” tree in the region is 5” in caliper. However, the GAR gives five times the credit for planting a 6” caliper tree than it does for planting 2.5” caliper tree, thereby incentivizing a practice scientist believe is unwise. Trees planted at larger sizes generally have lower survival rates and take longer to establish. Moreover, regional nurseries often do not stock trees larger than 3” inches in caliper.

We believe the intent for the GAR is to value green elements according to the environmental benefit. The environmental benefits of large canopy trees are exponentially greater than the environmental benefits of trees with smaller canopies. For example, a mature oak tree provides far greater environmental benefits than a mature crape myrtle. Therefore, we believe the GAR should score trees based on their size at maturity (as it does for shrubs). Seattle’s “Green Factor” (upon which the GAR was modeled) is widely recognized as the industry standard for environmental regulation. The “Green Factor” also prioritizes trees based on size at maturity.

By simply changing the language in lines B3 and B4 of the GAR Score Card, the District can create a smart regulation that works.

Line B3 of the score card reads “Tree canopy for all new trees 2.5” to 6” in diameter or equivalent- calculated at 50 square feet per tree”. We propose replacing this language with:

“Tree canopy for all new trees 40’ or less at maturity- calculated at 50 square feet per tree”.

Line B4 of the score card reads “Tree canopy for new trees 6” in diameter or larger or equivalent – calculated at 250 square feet per tree”. We propose replacing this language with:

“Tree canopy for all new trees greater than 40’ at maturity- calculated at 250 square feet per tree”.

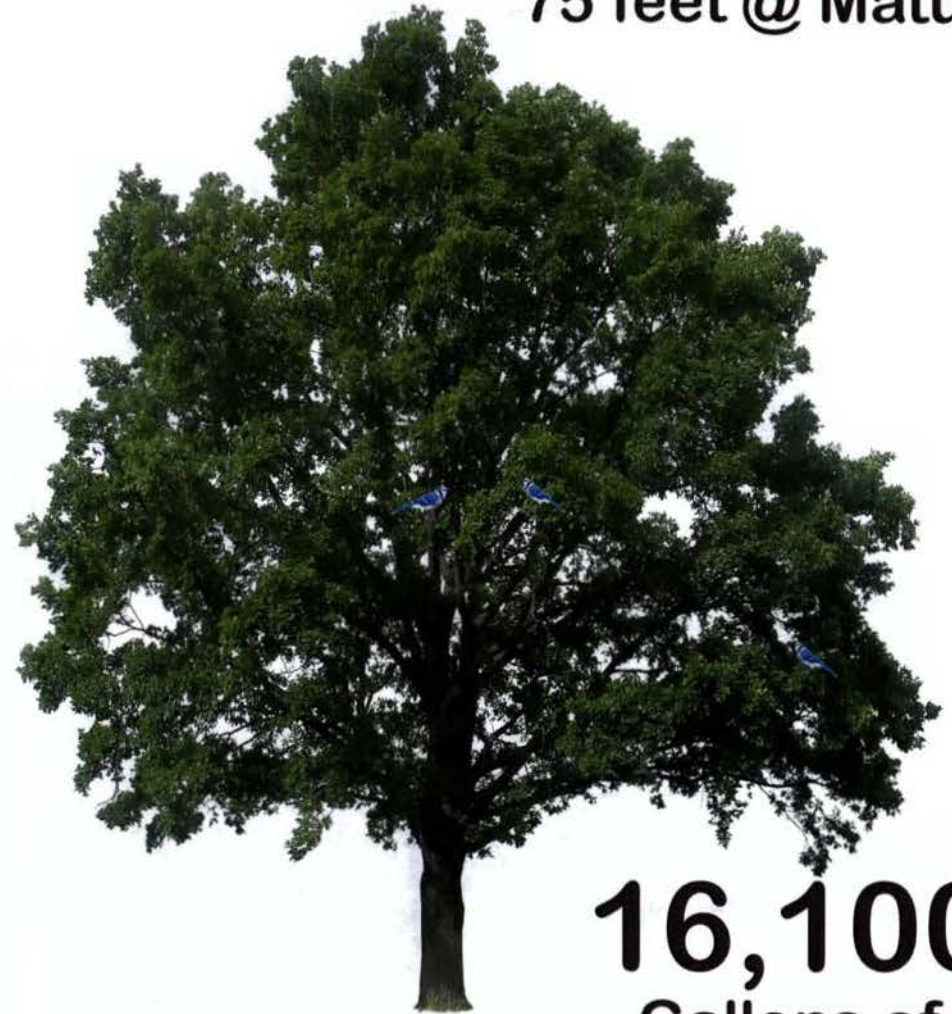
Thank you for your consideration

Apple Tree
25 feet @ Maturity



2,287
Gallons of
Stormwater

Oak Tree
75 feet @ Maturity



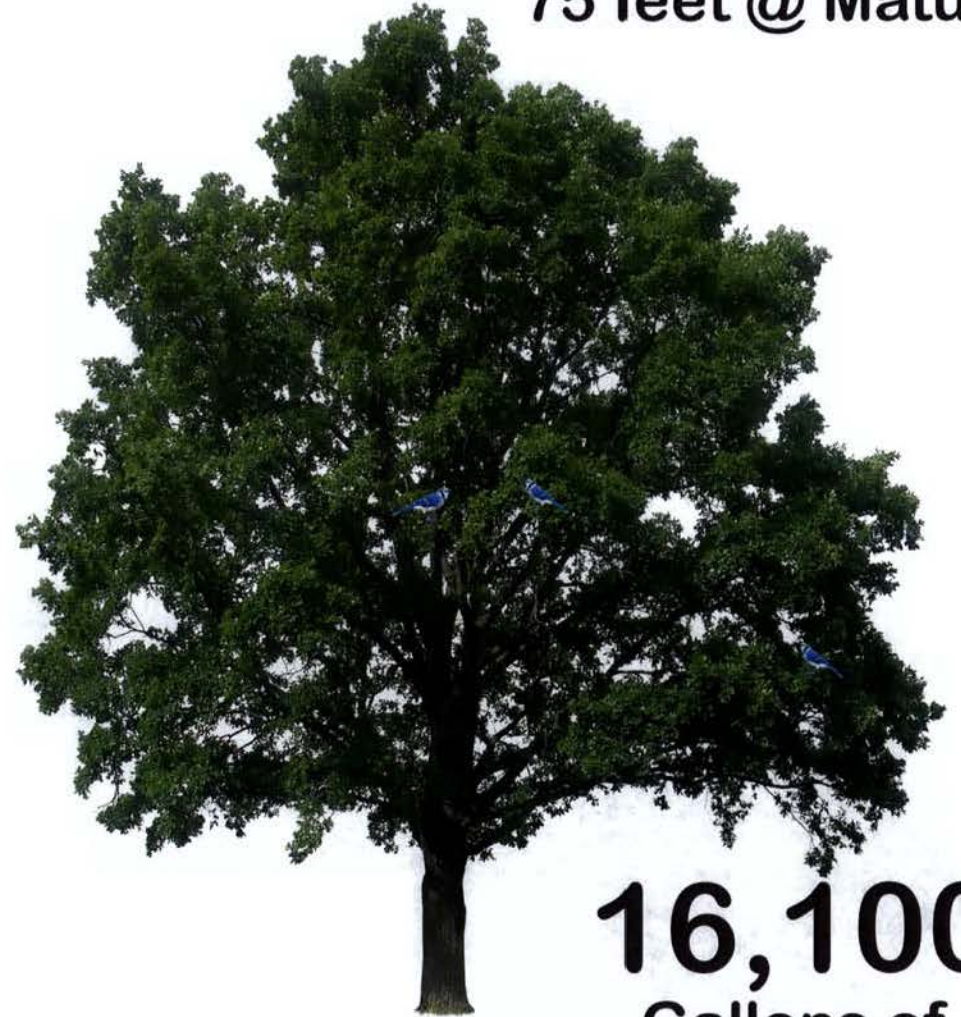
16,100
Gallons of
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25 feet @ Maturity



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