

Hello,

I am a resident of Ward 1 and I appreciate the effort to rewrite the zoning code to better reflect modern values and a growing city.

I am a certified arborist, and I am particularly interested in the green-area ratio section and tree protection aspects of the draft zoning code. I have some concerns about the language and requirements in the draft zoning code. I will note the section and a possible resolution of the issue. I will order them in order of appearance, not necessarily importance:

1702.7 Equivalent square feet of tree canopy and large shrubs

- Please change "Plants" to "woody plants", as to not confuse woody plants with herbaceous plants.
- Define "Tree canopy" in this section as "Tree canopy preserved", unless you expect people to plant trees of more than 24 inches in diameter.

{C}1702.9{C}Eligible Landscape elements

- Define "soil depth" as "uncompacted soil with significant organic content, free of debris and pollution", otherwise you risk construction fill or other "soil" being used for this credit.
- Trees should be given multipliers by their relative canopy, not the caliper at planting, as the current language does not encourage the restoration of Washington, DC's urban forest. The Urban Forestry Administration and the residents of Washington have set a target of 40% in the city, and with a current inventory of 35%, we still have a long way to go.

Solution: I suggest qualifying trees as "small", "medium", and "large". A fairly comprehensive list is present in Arlington's Tree canopy list, available at <http://arlingtonva.s3.amazonaws.com/wp-content/uploads/sites/21/2013/12/20-Year-Tree-Canopy-Worksheet-10-2011.pdf> . This list used the Virginia Nursery and Landscape Association measurements of future canopy, and the latter could also be used as a primary source.

- Clarify the use of native plant species. If a development uses one native plant, does it get the bonus, or does it need to use all native species?

Solution: Set a ratio for this bonus. It may be unrealistic to expect 100% native species planting, but perhaps a composition of 75% native plantings provides the bonus. This could be an argument for a higher bonus, which I would support (perhaps 0.2).

{C}1703 Landscape element conditions for green area ratio

- Please move section **1703.9(c)** to the general **1703** area, as it should apply to all plantings, not merely native plantings (which are unlikely to contain species from the exotic plant invaders list).
- Consider a more comprehensive invasive plant list, such as Alexandria's Invasive Exotic Pests list (found at <http://alexandriava.gov/uploadedFiles/recreation/parks/InvasiveExoticPlantsThatThreatenParksinAlexandria.pdf>) , which is supported by years of

research on threats to our ecosystem from urban plants.

1703.8 Enhanced Tree Growth Systems

- Under (a), use "supported pavement" instead of merely "pavement", to prevent subsidence issues with the uncompacted soils defined under (b).

1800 Tree Protection

1800:

I am concerned counting existing trees for the Green Area Ratio may face abuse if proper protection measures are not put in place. I fear projects which do not provide enough of the existing roots to survive construction, while still getting credit. Construction can cause serious damage to trees, and many developers do not know about the effects of disturbance on tree roots and survival. I suggest the following:

- Provide clearer tree protection guidelines, or refer to existing tree protection guidelines. Define a minimum clearance zone or critical root zone in which no disturbance should occur, otherwise the tree cannot be counted for the Green Area Ratio.
- Require an arborist report on trees to be saved, to ascertain the viability of the trees from an overall health perspective, as well as their likelihood of survival.
- Require review at the end of the project, or a set time after the project, to inspect survival of the trees that were to be protected. If the trees show more than 30% dieback, they should be rejected and replaced by similar canopy.

Thank you for taking on the significant task of rewriting the code that will define the future of our city,

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