

Good evening Commissioners:

My name is Jerry Malmo, and I am a Ward 1 resident and homeowner. I have concerns about the way the credit system in the Green Area Ratio (GAR) scores trees.

With regard to the GAR scorecard and new trees, all trees should be 2.5" caliper at the time of planting, with *incentives for trees that will grow larger* and *incentives for preserving existing trees*. You can do this with a few simple changes. Specifically -

Line B3 of the scorecard reads

"Tree canopy for all new trees 2.5" to 6" in diameter or equivalent - calculated at 50 square feet per tree".

Replace 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 scorecard reads

"Tree canopy for new trees 6" in diameter or larger or equivalent - calculated at 250 square feet per tree".

Replace this language with:

"Tree canopy for all new trees greater than 40' at maturity - calculated at 250 square feet per tree".

All new trees should be 2.5" caliper at the time of planting, with *incentives for trees that will grow larger*. These changes will do this.

The regulations must provide a higher ratio for trees based on their ***size at maturity***, not at the time of planting. This is subtle but critical and a win – win for developers and the community. Right now, a developer, working to meet the GAR has zero incentive to plant large-canopy trees. This is like creating a scholarship program for Math Teachers and then awarding the scholarships to English Majors.

Since 1950, the DC 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. Trees planted to meet the GAR are critical in reaching this goal. Our policy and regulations must align with this goal.

Also, the scorecard assigns a multiplier of 0.8 for preserving existing trees 24 inches in diameter or larger. This multiplier is too low. Please change this multiplier from 0.8 to 1.0 and add a new multiplier of minus 1.2 (-1.2) for the removal of existing trees 24 inches in diameter or larger. Again, we must align policy and regulations with our goals.

The decisions we make today will have a lasting impact on future generations. Trees are a perfect symbol of this maxim. It is important to protect our trees and encourage developers to plant more large-canopy trees.

Changing the zoning regulations to score trees based on their ***size at maturity*** and increasing incentives to preserve existing trees will greatly improve the GAR and our quality of life in DC.

Thank you for your consideration

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