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January 13, 2022

VIA IZIS

Anthony Hood, Chairman D.C. Zoning Commission 441 4th Street NW Suite 200 South Washington, DC 20001

Re: Post-Hearing Submission to the Zoning Commission re: Solar Facility for The Catholic

University of America ("University") – ZC Case No. 12-01E

Dear Chairman Hood and Members of the Zoning Commission:

This submission is in response to two items requested by the Zoning Commission at the close of the hearing on January 6, 2022. Specifically, we were asked to provide more detail on setbacks and the buffer between the proposed solar facility and the remnant forest. We were also asked for more information on the required tree removal. Set forth below is the requested information:

Setbacks/Buffer

As we presented at the hearing last week, the solar array will be sited to allow for a minimum setback of 60 feet from all property lines. We are confident that the proposed setback distance along with the ample landscaped buffer along Harewood Road will be more than adequate to address any potentially adverse visual impacts.

In addition, there has been great sensitivity to the relationship between the proposed facility and the remnant forest to the south. As shown in the attached plan, the distance between the two will vary and is, at some points, over 100 feet. We appreciate and agree with DOEE's interest in an ample buffer but are confident that a full distance of 100 feet is not needed for the entire buffer. The University's landscape architect has carefully studied the distance required to protect the remnant forest, including the critical root zones of every tree within the stand, and is confident that the facility at the proposed distances will not have an adverse impact on the health of the trees.

Trees

The University's strong commitment to trees has been acknowledged with multiple honors including the 2020 Tree Campus Higher Education recognition. The University has established an ongoing tree canopy enhancement and replacement program. In connection with its partnership with Casey Trees, which began in 2008, the University has planted approximately 250 trees over the past 13 years. A community tree planting event involving the planting of over 40 trees along Harewood Road and Michigan Avenue was delayed due to the pandemic but is being rescheduled. The University has consistently demonstrated that it values improvement of its tree canopy, and it will demonstrate further improvement when it returns to the Zoning Commission to consider the Campus Master Plan four years hence.

As we mentioned at the hearing, we have undertaken an extremely detailed inventory of all of the trees on the West Campus. There is a total of 1080 trees (10" DBH and larger) on the West Campus. This total includes 59 healthy heritage trees all of which will be preserved. The proposed project will involve the removal of approximately 220 trees, plus an additional 30 trees that are undesirable, invasive species. The removal of these invasive trees will actually improve the quality of the remnant forest.

The 100-foot buffer suggested by DOEE might lead to unanticipated consequences. It would limit the University's ability to apply other forest stewardship approaches in the intervening 15 to 25 years of solar operations. Examples in the immediate future are removal of invasives near the limits of land disturbance and edge feathering to promote desirable species and make the forest edges more hospitable for local wildlife.

The solar project includes the immediate planting of 20 trees along Harewood Road. In addition, plans are in process to plant a total of 44 trees in 2022 on the main campus in connection with two projects that are underway, the new Dining Commons and Angels Unawares sculpture plaza. And in 2024 the Conway School of Nursing and Campus Gateway project will increase the total by another 29 trees. As a result, within the first year of operations of the solar facility there will already be 93 new trees on the campus.

We trust that this information fully responds to the Commission's requests.

Sincerely,

/s/
Allison C. Prince

Certificate of Service

The undersigned hereby certifies that copies of the foregoing document were sent by electronic mail¹ to the following addresses on January 13, 2022.

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> /s/ Allison C. Prince

 $^{^{1}}$ Upon request, a hard copy can be mailed to you.