

The full list of comments received during the July 2020 draft release is available online: <https://www.ncpc.gov/initiatives/treereplacement/>.

#	Comment	Agency/Commenter	Date Received	Section	Policy #
1	The draft policy may be too prescriptive and rigidly formulaic for agencies to meet in certain specific circumstances. For example, the restoration of a cultural landscape may require removal of trees and vegetation to return it to its original historic character, and the addition of new trees or LID measures at that site may not be appropriate. As you are aware the NPS is responsible for preserving numerous cultural landscapes in the Washington area and we are charged with developing new landscapes, as often is that case for new memorials. In some of these circumstances a loss of trees is inevitable, and a rigid replacement requirement can become burdensome.	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2 and FE.G.6
2	In addition, the restoration of a landscape may not be conducive to replacing trees on a 1:1 basis, depending on its location and function. Rather, the restoration plan for a given area should include trees and other vegetation in the appropriate places and amounts to serve the environmental and cultural landscape function of that landscape, such as forest canopy, floodplain, historic landscape, and so on. Furthermore, while the ability to meet tree-planting goals offsite may offer some flexibility in meeting the requirements of Section G, it is not always a simple remedy as it introduces new complexities of location, funding, and compliance.	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2
3	We suggest that Section G allow agencies some flexibility with regard to prescriptive tree-planting goals in circumstances where their rigid application interferes with the appropriate restoration of a designed landscape or with a landscape's environmental function. We would be happy to work with your staff to develop narrowly defined exceptions that afford agencies like the NPS limited flexibility to address some of the special landscapes that we preserve and protect.	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	-

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4	<ul style="list-style-type: none"> • Use weed seed free certified materials • Migratory bird act removal/trimming time of year restrictions for migratory birds • Endangered Species Act removal/trimming time of year restriction for bats • Minimize mortality of newly planted vegetation through best management practices, which may include; regular visual monitoring, monitoring soil moisture to ensure proper moisture for the species. • Reduce the potential introduction of disease, insects or pests when planting vegetation such as shrubs or trees, staff and contractors shall provide the location/provider from which the vegetation was received (nursery etc...). The parks Natural Resource Program Manager or designee may inspect the vegetation and or the location/provider prior to planting. If the vegetation or location/provider is suspected to be a contaminated it will be refused. • Policies should differentiate between natural and ornamental or designed spaces. The requirements are different, and the policies need to reflect that. These policies seem more appropriate for designed spaces. 	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	-
5	Define “hazardous” in item 1(b). Also, other criteria to include would be tree health or condition. Trees that are expected to decline either through the course of the construction or right after are not worth saving and should be removed before project is implemented.	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.1
6	Make clearer what type and level of study is required prior to determining that “removal is critical to accomplishing the mission of the agency.”	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.1

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7	Somewhere in this statement the cultural value to strengthen the justification of preservation should be added.	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.1
8	Suggested edits to address cultural landscape preservation practices. The proposed policies are somewhat inconsistent with those practices: Preserve existing vegetation, especially individual trees, stands, and forests of healthy, native or non-invasive species. <i>Cultural landscape treatments to preserve and enhance the historic character of a landscape may include removal of individual trees and stands, as well as forest management.</i> Account for existing trees early in the planning and design processes when development occurs to maximize preservation and incorporate the natural landscape into the design.	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.1
9	It seems incongruous to list the witness trees for their historical and cultural significance under section FE.G.2. but then relegate cultural landscapes to a footnote. I propose to move the footnote and make it point (b) and list it prior to the witness tree verbiage, which would then become (c), and so on.	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2
10	If the tree species was a part of a larger design proposal, then it's a balancing act of replacing the specimen. For example, a commemorative tree planting needs to be retained.	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2

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11	Transplant healthy, native to mid-Atlantic region trees where practicable. No invasive trees should be planted.	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2.1
12	The NPS is shifting to use the term "Legacy tree or legacy vegetation" rather than "witness tree". Other agencies may also be making this shift.	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2(1b)
13	There will times that this will be more appropriate than others. Again, if the tree is a part of landscape design, then the tree species needs to be retained to the greatest extent possible. The same can be said regarding certain street corridors, memorials, monuments, the setting of particular buildings and public spaces.	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2(2)
14	Trees native to mid-Atlantic region is preferred. Never use invasive trees.	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2(2)

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15	The ratio of tree size to number of trees required as a replacement might be a little too prescriptive depending on the design. For instance, there should be some flexibility to plant one larger tree as a “replacement” for the loss of several smaller trees.	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2(2)
16	The policy does not distinguish between ornamental and canopy trees. It seems overly proscriptive to require the same replacement rates for ornamental trees as shade trees. Perhaps the policy should only apply to occasions when canopy trees are lost/replaced?	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2(2)
17	What type of analysis or study (if any) is required to demonstrate decision-making on where replacement trees are located (e.g., on site, on the property, another agency property, etc.)?	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2(3)
18	Provide for a connection to contiguous soil if possible. Canopy trees require at least 1000 sq ft of soil. See: https://environment.arlingtonva.us/2015/11/soil-volume-and-urban-tree-canopy-finding-the-space-to-grow/	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2(4)

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19	What type of analysis or study (if any) is required prior to determination that the “total quantity of replacement trees cannot be met?” Ditto for what “sustainable, low impact development practices on the project site or property” can be implemented in lieu of replacing trees? Why does Item 6 require that these “sustainable, low impact development” practices be implemented on the project site or property whereas Item 3 allows for the agency to look to other properties for alternatives? One suggestion could be to include the same list of property options in Item 3 as Item 6. What if a project cannot meet any of these options?	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2(6)
20	LID projects may provide stormwater benefits, but not the air quality benefits of a tree canopy. LID should not be considered an even replacement for trees.	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2(6)
21	The text from Footnote #1 at the bottom of page 4 should be copied and added as a second sentence to FE.G.7 on page 6.	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.7
22	Could add “where practicable” or “when appropriate” to conform these policies with the other advisements that leave some discretion up to the agency.	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.3 – FE.G.12

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23	Use clean fill, free from weed seeds and soil contaminants if fill is needed. When planting trees in poor soil, use soil amendments. See Susan Day's work at VA Tech: https://www.urbanforestry.frec.vt.edu/SRES/documents/SPR-Spec-full-2012.pdf	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.11
24	Define “recreational.” Grass lawn is often a design element that provides open space for flexibility in programming or use of the site. Regarding grass species, turf species should be expanded to include nontraditional turf species that could be utilized for ornamental lawns that do not require the same inputs as traditional lawns (recreational or sports fields).	National Park Service	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.12
25	It is our overall comment that these updated guidelines, if implemented as written, would beneficially result in increased preservation of trees in federal development projects, but the replacement policy would result in a large number of informally placed small trees likely inconsistent with space-constrained designed and cultural landscapes. The federal stakeholder feedback session emphasized the flexibility of the NCPC staff and commission in meeting these tree preservation guidelines where they are infeasible for a federal entity to implement; we would highlight the need for these guidelines to reflect that process.	Smithsonian Institution	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	-
26	<ul style="list-style-type: none"> - We strongly support these changes to emphasize the preservation of existing trees in construction and development projects, particularly the emphasis on ensuring trees are addressed early in the planning and design process. - It is not enough to simply not remove trees; consider updating this guideline to reflect that trees should be appropriately protected and preserved according to industry standards and best management practices related to protecting trees during construction 	Smithsonian Institution	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.1

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	<p>(e.g., ANSI A300 Part 5). We have seen a number of proposed and implemented projects that claim to preserve existing trees, but lack of appropriate tree protection practices predictably results in declining tree health or tree risk attributes.</p> <p>- The definition, qualification, and/or affiliation of the arborist evaluating trees for invasive or hazardous conditions should be defined.</p>				
27	<p>- We support transplanting certain trees that are significant, high-value, and/or in excellent condition where it can be practically accomplished. We also support the conscious consideration of transplanting as a first option to tree replacement. However, this update, as written, seems to overemphasize transplanting and has the potential to encourage the inadvisable or impractical transplanting of trees that may not be likely to succeed, may not provide significant benefits over a tree replacement, may not be tree selections consistent with contemporary horticultural practices (e.g, native), and/or may not be consistent with agency/unit missions. Depending upon how this guideline is applied to reviewing projects, this blanket emphasis on transplanting may significantly drive up project costs without improving canopy cover percentage, condition of the urban forest, and/or composition of the urban forest.</p> <p>- We would suggest re-framing this guideline to require the priority consideration of transplanting impacted trees as part of the early tree preservation planning and design process, but the guideline should more explicitly recognize that this is a practice is only appropriate when the trees exhibits certain exceptional characteristics and appropriate only in certain agency/development site contexts.</p> <p>- At Smithsonian, we must hold trees to be transplanted on the project site or that of a third party for a long period of time or find space to transplant trees from other locations on our space-constrained campus that is consistent with the designed and cultural landscapes. There are very significant feasibility considerations, if possible at all, for each of these options.</p>	Smithsonian Institution	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2 (1)

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28	<p>- This tree replacement formula is not practical for our Smithsonian campuses, where designed landscapes and recognition of cultural landscape attributes place significant constraints on the ability to locate the requisite number of replacement trees or alternative low-impact development practices. Smithsonian sites are further limited in the amount of available planting space due to outdoor programming and exhibit space, and large paved pathways for visitor queueing, accessible entrances, emergency exiting and movement of collections. Along the National Mall, seven out of ten of our museum buildings have basement levels that extend beyond the footprint of the at grade museum, presenting additional challenges for tree planting.</p> <p>- The formula implicitly encourages the planting of large numbers of small trees, whereas development in the Monumental Core and other affected areas is currently and should be characterized by a smaller number of larger trees (e.g., Eisenhower Memorial) but allow for smaller-size trees that cannot be sourced or successfully transplanted at larger sizes.</p> <p>- In these guidelines, we would suggest addressing the concerns above by considering a combination of:</p> <ul style="list-style-type: none"> o adjustment of the formula to reflect the unique conditions in the Monumental Core and other affected areas, o consideration of the size of replacement trees (i.e., 4 x 2.5" caliper trees or 1 x 10" caliper tree), o exceptions related to designed and cultural landscapes, and/or o option to locate replacement trees on third-party sites. <p>- It should be noted that the <i>Mid Atlantic Species Rating Guide</i> for tree species ratings is a legacy resource for tree appraisal that is not likely to be updated.</p>	Smithsonian Institution	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2 (2) and FE.G.2 (3)
29	This is a very necessary addition to these guidelines. Consider additional specificity or current references.	Smithsonian Institution	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2 (4)

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30	We support this addition. Long-term tree condition, longevity, canopy coverage, and overall output of ecosystem systems is highly dependent upon these best management practices that are too infrequently implemented in establishing urban trees.	Smithsonian Institution	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2 (5)
31	Similar to our comments about the formula to calculate the number of replacement trees, our campuses are very space-constrained and subject to constraints related to designed landscapes and cultural landscapes. While this is a good option to offset loss of tree canopy, potential to install these practices in a feasible way may be limited in the landscape of the Monumental Core and other affected areas.	Smithsonian Institution	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2 (6)
32	Federal projects located in Maryland are subject to the Forest Conservation Act (FCA) of 1991 administered by the Maryland Department of Natural Resources Forest Service. The FCA requires Forest Stand Delineation (FSD) and Forest Conservation Plans (FCP) prepared by a licensed forester, licensed landscape architect, or other qualified professional for any activity requiring an application for a subdivision, grading permit or sediment control permit on areas 40,000 square feet (approximately 1 acre) or greater. It will be helpful to clarify whether projects located in Maryland need to comply with both NCPC and FCA regulations.	General Services Administration	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	-
33	Revise parenthetical note to read (e.g. “witness tree” or contribution to historic city plans)	General Services Administration	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2 (1b)
34	What about the replacement or transplantation of trees on another site that is not within the agency's jurisdiction (i.e. abutting parks, forests, or public property)? There are many such sites adjacent to federal project sites or properties where additional trees could serve a valuable purpose.	General Services Administration	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2 (3)

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35	Change text to read "Provide a Forest Stand Delineation (FSD) plan prepared by an Arborist or Forester for forests and stands of trees located <u>on</u> and within 15 feet of the project site."	General Services Administration	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	Appendix B – Submission Guidelines
36	It will be helpful to include common tree categories defined in the National Capital Region under key definitions: Specimen Trees, Champion Trees, Heritage Trees, etc.	General Services Administration	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	Appendix C – Resource Guide
37	I think under 'b' it should be clarified what 'Hazardous' means. Does that mean it is in danger of falling? Is diseased and capable of spreading to other trees? Also, I think it would be good to add a provision allowing removal due to disease based on an arborist's recommendation. I believe there is an analogous provision in the DC Heritage Tree law.	General Services Administration	September 17, 2020		FE.G.1
38	Clarification needed that trees are to be measured as Diameter at Breast Height (DBH) or some other means. i.e.: what is a 10" diameter tree?	National Institutes of Health	September 10, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2
39	What is the direction for replacement if a tree on site is dead?	National Institutes of Health	September 10, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2
40	Provide a reference or hyperlink to a source for "species rating" used in the calculation.	National Institutes of Health	September 10, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2
41	Regarding: "Forests and Stands of Trees: Plant 1.5 acres for every 1 acre removed. Consult with federal and local stakeholders to determine the appropriate density, mixture, and size of replacement plantings."	National Institutes of Health	September 10, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2

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	This requirement seems extremely vague when compared with the detailed tree condition assessment and formula needed to calculate exact number and types of replacement trees.				
42	Regarding: “Offset the balance of replacement trees (if the total quantity of replacement trees cannot be met) with sustainable, low impact development practices on the project site or property. These practices should provide similar environmental benefits to those of canopy trees, such as stormwater capture and treatment, reduced urban heat island effect, and/or carbon sequestration.” This section also seems vague. It would be helpful if there were some sort of benchmarks provided that projects can prove they have met to be in conformance.	National Institutes of Health	September 10, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2 (6)
43	If the DC plan is to reach 40% canopy by 2032 and 216,000 trees will need to be planted over the next 20 years to meet this goal, then does the 2032 timeframe need to be changed to 2040?	United States Air Force	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	-
44	Consider adding the following: When preservation is not possible due, for example, to existing tree/forest growth that adversely impacts federal government mission safety or the health and welfare of federal government personnel; exceptions to this tree replacement policy will be decided on a case-by-case basis.	United States Air Force	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.1
45	Some tree species rating guides offer a range (e.g., Black Willow 40-50). This tree replacement policy should specify whether to use the lower, upper, or average species rating where applicable.	United States Air Force	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2 (2b)
46	Update current urban tree canopy percent from 36% (as of 2014) to 38.7% (as of 2015). Sources:	District Department of Transportation/Urban Forestry Division	September 10, 2020	G: Policies Related to Tree	FE.G.1

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	https://dcgis.maps.arcgis.com/home/item.html?id=a31d17744d5f48508e3172465af5b717 & https://caseytrees.org/resources-list/the-tree-report-card-2016/)			Canopy and Vegetation	
47	Replace “31.8-inches” with 31.85”, which more closely equals 100-inches in circumference.	District Department of Transportation/Urban Forestry Division	September 10, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.1 (1)
48	Double the replacement planting schedule. Under the proposed replacement planting schedule, no tree regardless of size, species or condition, would be eligible for replacement planting beyond 6 trees. Based on the likely condition and species ratings, DDOT estimates that most tree replacement under this schedule would result in 3 new trees for every single tree removed. The intent of DC’s Urban Forest Preservation Act of 2002 was to achieve replacement plantings that had an aggregate circumference equal to or greater than the circumference of the tree(s) removed. DDOT proposes doubling the replacement schedule described here to more closely align with existing District law. This comments further supports the goal established in FE.G.3 to “prevent a net loss of tree canopy in the development area.”	District Department of Transportation/Urban Forestry Division	September 10, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2 (2a)
49	Add https://ddot-urban-forestry-dcgis.hub.arcgis.com/ under “District of Columbia” section of “Applicant Resources.”	District Department of Transportation/Urban Forestry Division	September 10, 2020	G: Policies Related to Tree Canopy and Vegetation	Appendix C – Resource Guide
50	Continue use of terms “preserve” and “preservation” as proposed throughout document, as this reinforces the emphasis on tree preservation stated in FE.G.1.	District Department of Transportation/Urban Forestry Division	September 10, 2020	G: Policies Related to Tree Canopy and Vegetation	-
51	Change "preservation" to "conservation" throughout the document, as preservation in the urban context is rarely appropriate.	Arlington County	September 01, 2020	G: Policies Related to Tree	-

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				Canopy and Vegetation	
52	Add "Arlington county has a tree canopy of 41% (38% when counting the Airport and Department of Defense land), and approximately 750,000 trees". Source https://arlingtonva.s3.dualstack.us-east-1.amazonaws.com/wp-content/uploads/sites/13/2018/01/Arlington-County-Tree-Canopy-Report-2016-.pdf	Arlington County	September 01, 2020	G: Policies Related to Tree Canopy and Vegetation	-
53	When referring to "Washington, DC", include the region, as this policy applies to jurisdictions outside of DC.	Arlington County	September 01, 2020	G: Policies Related to Tree Canopy and Vegetation	-
54	Add "ISA-Certified" in front of Arborist, and define ISA as "International Society for Arboriculture."	Arlington County	September 01, 2020	G: Policies Related to Tree Canopy and Vegetation	-
55	Change "hazardous" to "high risk."	Arlington County	September 01, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.1
56	Provide a lower limit to the trees replaced. Arlington uses 3 inches. Not providing a lower limit could create severe hardship, where natural regrowth could create significant amounts of small seedlings.	Arlington County	September 01, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2 (2a)
57	Change "preserve" to "conserve."	Arlington County	September 01, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.3

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58	<p>As a Washington, D.C. resident, many of the projects happening in my city are impacted by these regulations. I appreciate the work done to strengthen these regulations. Our trees clean our air, provide critical wildlife habitat, remove pollutants from our water and provide a sense of relief to the stresses of everyday life.</p> <p>With many tree replacement regulations, they often focus significantly on the replacement component. I believe their need to be situations defined in the Federal Tree Replacement regulation in which all possible considerations are taken to protect the existing trees. Some ecosystems are irreplaceable. I suggest that any development on sites with old growth forests (as defined by the U.S. Forest Service) and/or with significant ecosystems, such as those defined as “rare highly” through “critically significant” in the D.C. State Wildlife Action Plan, be in compliance with all federal, state and local environmental and development regulations and restrictions. Preventing damage to these remnant spots of high biodiversity will become harder and harder over time. I look to the National Capital Planning Commission to look forward and conserve the resources we still have.</p> <p>I urge you to consider the above provisions to ensure that all trees and valuable ecosystems on federal land are given the opportunity to be protected.</p>	Certified Casey Trees Advocate - Vincent Verweij	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	-
59	<p>I am writing to you today to ask that you close the open ended exception to the proposed federal tree replacement policy. The trees in D.C. and its surrounding areas are iconic. People travel from around the world to see the cherry blossoms at the Tidal Basin, the elms that line the National Mall and the cypress at Kenilworth Aquatic Gardens. Our trees clean our air, remove pollutants from our water and provide a sense of relief to the stresses of everyday life. While there are many parts of the updated policy that we appreciate, like the addition of a tree replacement ratio and the new emphasis on preservation, I am concerned that the language in section FE.G.2.6 allows developers to use green building techniques instead of replacing the trees they removed. I can appreciate that in some cases, there really is no alternative and this section allows for flexibility within development plans. But, we at Casey Trees have seen flexibilities like this that exist in District policy get taken advantage of and we want to ensure the policy</p>	Certified Casey Trees Advocates - Kristin Taddei, Helen Schietinger, Raymond Nuesch, Kathy Jacquart, Brian Cipperly	September 11, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.2 (6)

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	<p>priorities trees on federal land. Therefore, we recommend you amend section FE.G.2.6 to read as follows:</p> <p>If none of the provisions in the above sections can be met, developers may offset the balance of replacement tree(s) with sustainable, low impact development practices on the project site or property. These practices should provide equal environmental benefits to those of the removed canopy trees, such as stormwater capture and treatment, reduced urban heat island effect, air pollution mitigation, and carbon sequestration. Identification and implementation of these offsets should be done using vegetative elements from Washington, D.C.’s Green Area Ratio. This includes all elements except those relating to:</p> <ul style="list-style-type: none"> - Vegetated roofs, - Permeable paving, and - Renewable energy generation. 				
60	<p>We also recommend adding a new FE.G section that would require the developer to work with the local government’s forestry agency during the design and development process. We urge you to consider the above provisions to ensure that all trees on federal land are given the opportunity to be protected.</p>	<p>Certified Casey Trees Advocate - Kristin Taddei, Helen Schietinger, Raymond Nuesch, Kathy Jacquart, Brian Cipperly</p>	<p>September 11, 2020</p>	<p>G: Policies Related to Tree Canopy and Vegetation</p>	-
61	<p>We appreciate NCPC’s amendments to the federal tree replacement policy and their efforts to pull in tree policies from all jurisdictions in order to create a policy consistent with regional ones. However, we would like to provide the following recommendations to the proposed language:</p> <ol style="list-style-type: none"> 1. Amend all sections to reflect the fact that this policy applies when both one or more than one tree is removed (proposed language in attached document - Appendix 1). Section FE.G.2.2 refers to the “...tree(s) removed.” and FE.G.1 refers to the preservation of trees, “especially individual trees”. However, outside of the aforementioned reference, section FE.G.2.2 frequently only refers to trees in the 	<p>Casey Trees</p>	<p>September 14, 2020</p>	<p>G: Policies Related to Tree Canopy and Vegetation</p>	<p>FE.G.1, FE.G.2, and FE.G.3</p>

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	<p>plural sense. Amending the language will provide consistency throughout the text and reflect the intent that this policy applies whenever a tree is removed.</p> <p>2. Insert the word “all” to FE.G.2.1 so it reads: “Transplant all healthy, native, or non-invasive trees where practicable”. Including this word will ensure that every tree that falls under one of these categories is given proper consideration for replanting.</p> <p>3. Modify section FE.G.2.6 to further specify what offsetting the balance of replacement tree(s) means and adding language that makes Washington, D.C.’s Green Area Ratio policy as the standard by which the environmental offsets are determined (proposed language in attached document - Appendix 2). Casey Trees is concerned that the existing language is vague and certain important terms, like “offsetting the balance of replacement” do not have definitions. The recommended additions will provide clarity as to when this section may be applied and a standard for how the offsetting of the lost benefits can be made up.</p>				
62	<p>In addition to these proposed changes, Casey Trees asks that NCPC add the following new sections:</p> <p>1. Add a new FE.G section that would require the developer to work with the local jurisdiction’s forestry agency during the design and development process. 57 percent of Washington, D.C. 's tree canopy is on federal land. This means that any tree removal, especially the removal of large canopy trees, will greatly impact the District’s overall tree canopy. Collaboration with the local government will help prevent this.</p> <p>2. Include a new subsection to FE.G.2.2, which requires the developer to replace any tree, newly planted or transplanted, that dies within three years of being sited (proposed language in attached document - Appendix 3). The first three years post tree planting are the most critical and the stresses of construction can make it</p>	Casey Trees	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	FE.G.1, FE.G.2, and FE.G.3

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	<p>hard for a tree to take root following planting. Requiring replacements for the tree(s) that dies during this time period will ensure that, in the medium and long term, both the lost tree(s) and their canopy are restored.</p> <p>3. Add a new subsection to FE.G.1 that requires all possible measures to be taken to preserve trees in areas determined to be critical to the region’s tidal waters, tidal wetlands, and tributary streams (please see proposed language in attached document - Appendix 4). Many of these water bodies are or feed into drinking water sources and removing these trees can create the opportunity for increased stormwater runoff, pollution not being filtered before entering water sources, and harming critical habitats in these areas.</p>				
63	I strongly support the proposed tree replacement policy.	Leanna Fenske	September 11, 2020	G: Policies Related to Tree Canopy and Vegetation	-
64	<p>As a former resident with considerable experience with and respect for comprehensive plans, I commend everyone involved with the effort revealed in the proposed draft and hope that it will be adopted in due course, much as proposed in the draft dated July 9, but also with provisions to be added that would provide a basis for additional or amended policies at some later stage as circumstances change or as more becomes known or distinctions I and others suggest should be reflected.</p> <p>My review is solely from my own reading and experience. Put another way, these comments, questions and recommendations are mine alone and not on behalf of any prior, current, or prospective client.</p>	Lindsley Williams	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	-
65	As to Appendix A, specifically “Section G: Policies Related to Tree Canopy and Vegetation,” my conclusion is that much of it is appropriate but that it should at least acknowledge that the overall region of the national capitol area has a range of natural conditions that should be distinguished and have policies in place, or a place for amendments, to provide for what could become critically different risks to trees and ground vegetation. To me, the main risk factors are those that relate to sources of water, including storm water, rises in	Lindsley Williams	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	-

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	rivers that overflow their banks, and even water that would reach shorelines and beyond along the lower Potomac and Anacostia rivers from Chesapeake Bay and the Atlantic Ocean from storms or just rising sea level or subsidence of what is now still land high enough to have not been flooded in the past century.				
66	<p>In addition, my reading of the draft found no place where it declares or finds the current tree canopy and vegetation are particularly wonderful, not just for recreation and hiking but that provide a buffer between areas of national importance, downtown core, and residential development adjacent to escarpments that descend from private developed areas to the streams they abut, be it the Potomac or Anacostia rivers or canals that were created along their shorelines, Rock Creek, or other streams in valleys over the region. To me, having a few places that would be names and mapped would be appropriate, but this need not be a full inventory and classification for all properties with trees or vegetation. Photo images would reinforce such a discussion.</p> <p>To my way of thinking, the report should include or at least reference diagrams that would show where the provisions of the overall policy would apply to some degree (about which more later), where the trees and ground cover that exists on public land that is within the scope of NCPCC's authority, approval, or advice/recommendation is substantially in line with the proposed policies, where the conditions are met to some degree but fall short in others, and where the present conditions are well short of what is proposed. A companion diagram should also be prepared and included or referenced to show the responsible government component for public lands or Federal entities including those of the Department of Defense, and ownership that is the State or locality (as in their public parklands).</p>	Lindsley Williams	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	-
67	<p>Moreover, where flooding is now occurring of land is so low that either descending land or rising ocean water levels or both could inundate areas at times or for extended periods, future plantings should be with trees or ground cover that can survive or even thrive when the water reaching its roofs has some degree of salinity. My reason for this is twofold. First the number of times in a year there is a "flood warning" or "flood risk" alert, typically when water may appear on land that is low lying or in an area with poor drainage." There should be maps showing where the happens and how often. Second, there is no mention to land levels that are stable and those that may be sinking</p>	Lindsley Williams	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	-

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	(noting this is a factor in increased flooding of some Maryland islands in the lower Potomac River basin). The Commission should take steps if it has not already done so to designate low lying and maybe sinking areas that could be lost and transportation systems and air shafts that significant floods of the Potomac River below Key Bridge and Three Sisters Island were to occur. To me, the areas at risk include Haines Point, portions of the National Mall, the Kennedy Center, Georgetown and other waterfronts, and many if not all bridges over and tunnels under the Potomac River and Anacostia River in the National Capitol Region. The regional public transportation organization such as WMATA should be asked to identify areas where operations had to be suspended due to flooded stations or portions of tracks that were inundated at any time in the past year, but adding the date the closure started and the date service resumed.				
68	Where the adopted policy lists species, I would urge that those species that can survive or thrive be designated in some fashion, and that the policies adopted include provisions that limit choices of plantings to those that are able to at least survive some periods of time when water will likely surround the trunk of a tree or the stalk or stem of other vegetation, or even survive ongoing salinity in the water reaching the roots of trees and other ground covers.	Lindsley Williams	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	-
69	The policy notes that trees and ground covers are not free and must be paid for almost always. The policy should, in my mind, distinguish the costs owners would face in general and provide some guidance where costs of viable species would be more than for those areas where a full range of species could be used. No public owner can just 'print the money' compliance would require. So, to my way of thinking, the cost factor should be discussed more fully. Where flooding is so likely that inundation rules out some species, that should be expressly allowed. Where flooding and/or salinity limit trees and vegetation types significantly, those who administer the plan should be open to receiving information on costs when the species are significantly more expensive to purchase, plant, and/or maintain.	Lindsley Williams	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	-
70	The overall plan, in my mind, would be even better if it would discuss how it would apply to the grounds of historic landmarks if the grounds themselves are specifically designated or are part of a National monument or have elevated prominence even if not officially designated. That would require a list of such places if they and their grounds are	Lindsley Williams	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	-

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	not already designated.				
71	<p>Finally, the policy’s applicability should be acknowledged. It would seemingly apply to affected Federal properties in the National Capitol Region, other than the area under the jurisdiction of the Architect of the Capitol. But would or should it apply to sites where the Federal government is contemplating to locate some function or staff cluster? More discussion may be the path to select prior to adoption. That said, the policy should likely note a range of conditions and uses where particular coverage percentages would create problems given the intended use or topography. Examples are the Federal land that is used for golf or spectator sporting events or rail-based transportation corridors for freight, passengers, or a mix of the two. The plan should, in my view, clarify what it applies to and what is excluded. Even then, private developers or private land may be directed by local permit authorities that their project must be submitted to NCPC on both a preliminary and final approval process. This will add time and significant costs to that the developer must absorb.</p> <p>To me, NCPC should add provisions to their tree and ground cover policies that provide a rapid way for a developer to submit a summary statement to NCPC setting out why any project is beyond the authority of the overall policies and provide that the Executive Director or officers can issue a finding to indicate exemption but must do so within two weeks of receiving the request but noting that when such a conclusion is not declared, then the project would be subject to the provision as they are applicable.</p>	Lindsley Williams	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	-
72	<p>The policies may also be ones that the government of the District of Columbia would want or need to incorporate in its own Comprehensive Plan, which will be reviewed by NCPC as it is amended over time, but NCPC has authority to require changes if it votes to do so where there is a conflict between Federal and DC plan provisions. At a minimum, the adopted tree and ground vegetation policy should be conveyed to the State and local governments and rail-based transportation providers in the National Capitol Area and urge them to see if they would consider ways to adopt relevant portions or encourage actions that are consistent with it or consider amending provisions that are contrary And, when the Federal tree policy amendment is adopted by NCPC, it should be conveyed to the</p>	Lindsley Williams	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	-

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	officials of the National Park Service responsible for the C & O canal upstream from the National Capitol Region so that that the upstream canal lands does not appear to be following standards that are vastly different than those along the canal downstream.				
73	And, one final detail: The policy would retain a definition for the diameter of a tree trunk. That definition seems appropriate when the tree involved is growing on land that is essentially flat. But where land slopes or has other irregularities such as those at and along the Potomac River’s northern side and its “Billy Goat Trail,” the definition falls short. Would it not make sense to say something like “at the height that is four feet above the highest surrounding ground into which the tree’s trunk extends” instead?	Lindsley Williams	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	-
74	My prior comments and recommendations include some that suggest adding maps and cost data, among other things, to the draft policy before it is adopted. Much of this involves details in the draft that are likely to be proper for its content but would not be found in many, if any, other NCPC comprehensive plan issuances. Several weeks ago, I received a suggestion to see what is being done and what is being recommended by the “Silver Jackets” efforts to address area environmental problems and risks. I got as far as their website but no further. With Federal staff not working in their regular offices, I was reluctant to try to reach anyone of the professionals who are involved in those efforts. But I sense that some of the policies proposed in the draft amendments for Trees and Ground Cover could be ones the Silver Jackets would endorse. But I also realize that some could conflict. Thus, I urge NCPC to seek input to ensure that any conflicts are known and seek to find ways to reduce or eliminate conflicts or resolve to retain the policies and practices proposed, at least as a starting point for these amendments.	Lindsley Williams	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	-
75	NCPC should be proud of its effort and the current draft. The National Capitol Planning Commission, its Board, its Executive, Officers, and staff should also be thanked for the way and time it has given not just listed contributors but the general public the opportunity to comment. While I find the statement to be generally clear, I worry that some well-intentioned citizens may request, urge, or demand that the policies be more widely applied. To me, that is far from what I see as being currently needed. Times have changed making what is proposed generally appropriate, at least for the present environment. Accordingly, I urge its revision in places noted above but adopt something and	Lindsley Williams	September 14, 2020	G: Policies Related to Tree Canopy and Vegetation	-

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	see how it works. Address any shortcomings that become known as further policy reviews and project reviews take place in the times ahead. Finally, I have to say as an urban planner how this policy proposal reflects sound urban planning but with a substantial enrichment from the field of landscape architecture and, as well, one staff member that I have never met in person, but gained an appreciation of in recent email and telephone exchanges, that being Stephanie Free, PLA, and those others in and beyond NCPC who were also involved in shaping what became the draft now under review.				