

Subject: Selection of trees for the Fallen Journalists Memorial (File No. 8449)

During its October 3, 2024, meeting, the National Capital Planning Commission (NCPC) considered the concept plans for the Fallen Journalists Memorial (File No. 8449) that the National Park Service has submitted. The proposed design includes a grove of honey locust trees (*Gleditsia triacanthos*).

However, a map in a [U.S. Forest Service publication](#) shows that the National Capital Region is outside of the native range of this tree. The publication's text confirms this when stating that the tree is native from central Pennsylvania westward to southeastern South Dakota, south to central and southeastern Texas, east to southern Alabama, then northeasterly through Alabama to western Maryland. As the tree is naturalized eastward only as far as the Appalachian Mountains, it is rarely, if ever, found outside of cultivation in the National Capital Region.

The NCPC's [Pollinator Best Practices Resource Guide](#) states on page 4 in its section entitled "Non-Meadow and Designed Landscapes": "*Choose plants that are best for your ecoregion; preferably native plants to which pollinators are most accustomed. Native plants evolved along with native pollinator species and are well adapted to thrive in local conditions.*" Further, non-native plants can become invasive over time, even when area officials have not yet designated them as invasive within their jurisdictions.

The Executive Director's recommendation for this project states on page 8 that "... staff suggests that *staff suggests the Commission requests the applicant evaluate additional approaches to enhancing visitor comfort and reducing the urban heat island effect, including additional trees and alternate species,*".

The loose foliage of honey locust trees produces only a light shade. As a result, the trees will not enhance visitor comfort and reduce the urban heat island effect during the warmer months much as an alternative species with denser foliage would.

For all of the above reasons, I suggest that the applicant replace the planned honey locust trees with an alternative species that has denser foliage and is native to the National Capital Region. It would also be beneficial for the applicant to select a species that has attractive fall foliage. Many species of trees that are native to the Region have this characteristic.

Thank you.

Bernard Berne