

Angela Dupont
Attn.: Comprehensive Plan Public Comment
National Capital Planning Commission
401 9th Street NW, Suite 500N
Washington, DC 20004

December 7, 2015

Re: Comments on the Comprehensive Plan for the National Capital's Federal Elements

Dear Angela Dupont,

Casey Trees is a Washington DC-based nonprofit with a mission “to restore, enhance and protect the tree canopy of the nation’s capital.” To fulfill this mission, we plant trees; monitor the city’s tree canopy; and work with elected officials, planners, and residents to prioritize the District’s trees and to encourage tree planting on both public and private property. We are dedicated to helping the District meet its 40 percent tree canopy goal by 2032 – an achievable goal only if existing trees are protected and the District adopts policies that grow the city’s urban forest.

We commend the Federal Elements outlined in the Comprehensive Plan for the National Capital for recognizing the District’s green spaces and trees as indispensable to the character and appeal of Washington, DC. Furthermore, the Plan acknowledges the fundamental role parks and open spaces like the National Mall serve as “gathering spaces for citizens to exercise their First Amendment rights,” and the need to preserve and maintain these sites so future generations of visitors can assemble peacefully.

The National Capital Planning Commission has the opportunity to promote smart growth in Washington, DC by strengthening the Federal Elements to incorporate sustainable design and adopting sensible tree management policy. Integrating these recommendations into the Plan will allow for larger tree canopy throughout the District and foster a more inviting and healthy city for residents and visitors.

Note: Many of our recommended modifications are in **bold**.

Urban Design Element

- On Page 1, amend the statement “Good urban design requires expertise in many disciplines including urban planning, architecture, landscape architecture, engineering, public policy, land use law, and social psychology” to include urban forestry, ecology, environmental science, and/or sustainability.
- In the description of the defining characteristics of Washington, DC on pages 4 and 5, include “tree-lined streets,” or “City of Trees,” as a historic quality that distinguishes Washington, DC from other cities.



- Amend UD.B.2.1.b to “In low-density, wooded, or hilly areas, new construction should **reference local tree protection laws** and preserve natural features, rather than alter them to accommodate development.”
- Amend UD.B.2.2.1 to “Retain and add trees on hillsides **to stabilize slopes and reduce erosion from heavy rainfalls.**”
- Amend UD.B.2.3.2 to “Improve the transition between the edges of these large, natural parks and the neighborhoods that abut them **by increasing tree plantings on nearby private properties.** Casey Trees’ [Urban Tree Selection Guide](http://caseytrees.org/resources/publications/urban-tree-selection-guide/) (<http://caseytrees.org/resources/publications/urban-tree-selection-guide/>) can serve as a reference.”
- Under UD.C.1.3, “The federal government should implement sustainable site and building design at the district-level scale, where possible,” add that green space and tree canopy should be preserved and prioritized where possible.

Federal Environment Element

- It is worth noting that tree canopy helps to mitigate impacts 1-5 under FE.A.8. Therefore, add a new policy that says **“FE.B.6: Plant and protect trees to absorb carbon dioxide, reduce flooding and erosion, and cool the urban environment.”**
- Add a new policy that says **“FE.F.11: Provide a minimum soil volume of 1,000 cubic feet per tree wherever possible to allow for a larger tree canopy and for trees to live longer lives.”**
- Amend FE.G.2.2 to “Trees of 10 inch diameter or less will be replaced at a minimum of a **three-to-one basis.**”
- Amend FE.G.3 to “Tree replacement should adhere to the standards and guidelines of the local jurisdiction, but at a minimum prevent a net tree **canopy loss** in the development area.”
- Amend FE.G.4 to “Incorporate new trees and vegetation into plans and projects to moderate temperatures, minimize energy consumption, **mitigate the urban heat island effect, reduce pollution,** and mitigate stormwater runoff.”
- Reference Casey Trees’ [Urban Tree Selection Guide](http://caseytrees.org/resources/publications/urban-tree-selection-guide/) (<http://caseytrees.org/resources/publications/urban-tree-selection-guide/>) within **Section G: Policies Related to Tree Canopy and Vegetation**, and reference relevant policies that appear in Section G in earlier sections for consistency. For example:
 - FE.G.10 should be referenced in Section A: Climate Change, and
 - FE.G.6 should be referenced in Section E: Wetlands and Waterbodies.

Foreign Missions & International Organizations Element

- Amend FM.A.2 to “Identify **underutilized, already developed** areas for the future location of foreign missions.”
- Add a new policy that says **“FM.A.5: Incorporate sustainable design practices while prioritizing green space when expanding or redeveloping embassies or chanceries.”**
- Amend FM.B.3 to “Locate chanceries where they would support neighborhood revitalization and economic development, **particularly on already developed sites to preserve existing green spaces.**”

- Amend FM.B.5 to “Renovate, expand, or reuse an existing chancery to the extent consistent with the Foreign Missions Act, **and while protecting existing trees.**”
- Referencing page 12, “The U.S. Department of State is preparing a master plan for a new foreign missions center on a 43.5-acre portion of the former Walter Reed Army Medical Center campus...” Casey Trees has performed an analysis of existing tree canopy (22.9%), proposed tree canopy (19.7%), and potential tree canopy (32.7%) for this site (see attachment). We recommend planting additional trees on this site wherever possible.

Historic Preservation Element

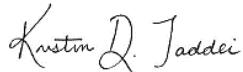
- Amend HP.D.3 to “Protect the settings, including viewsheds, **green spaces, significant populations of trees and other vegetation**, of historic properties, as integral parts of the property’s historic character.”

Visitors & Commemoration Element

Referencing VC.C.1, “Actively partner with public and non-profit entities on programs which can enrich the visitor experience and provide educational services related to the capital city’s history and role,” Casey Trees provides a number of no-cost educational programs, meetings, and events year-round and welcomes visitors to attend these events to learn more about preserving tree canopy as an iconic feature of the nation’s capital.

We appreciate this opportunity to comment on the National Capital Planning Commission’s updated Federal Elements. If you have any questions about these recommendations, please feel free to contact me at ktaddei@caseytrees.org.

Sincerely,



Kristin Taddei

Tree Canopy Cover



Proposed Cover (13.0%)
- as indicated in Final Illustrative Plan



Additional Cover (19.7%)
- as proposed to achieve greater canopy cover



Existing Cover (18.3%)

