Emily Garofalo
Attn.: Wardman Tower Planting Plan
The JBG Companies
4445 Willard Avenue Suite 400
Chevy Chase, Maryland 20815

February 16, 2016

Re: Wardman Tower Planting Plan

Dear Emily Garofalo,

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, developers, 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 reach its 40 percent tree canopy goal by 2032. This goal is achievable only if existing trees are protected and the District adopts policies that grow the city's urban forest.

We recognize that JBG's planting plan for the Wardman Tower property plants 94 new trees. It is important to note that 112 trees were removed for this project. Sixteen of those trees had a trunk circumference greater than 55 inches. The District's Urban Forest Preservation Act of 2002 designates any tree greater than 55 inches in circumference as "special." In order to compensate for the loss of mature tree canopy at Wardman Tower, the number of replacement trees must exceed the number of removed trees, at a ratio of at least 3:1.

A healthy tree canopy is essential for managing stormwater and maintaining community health, and will attract future residents. These benefits can be achieved only if a significant replacement ratio is selected, appropriate trees are planted, and a long-term tree maintenance plan is developed.

We recommend the following improvements to the Wardman Tower planting plan:

1. **Work with UFA to plant additional replacement trees nearby.**
   A tree replacement ratio of at least 3:1 is necessary to compensate for the extensive tree canopy loss due to construction. To achieve this ratio, we suggest JBG works with the District's Urban Forestry Administration (UFA) to designate a planting site at or near the Wardman Tower property for the additional replacement trees that will be planted by UFA. These replacement trees can be funded by the $32,600 paid into the Tree Fund when 16 "special" trees were removed from this site.

2. **Plant trees in the proposed rain gardens.**
   Trees in bioretention areas further slow stormwater runoff and reduce pollution through interception, evapotranspiration, and nutrient removal. Trees that perform best in bioretention require little maintenance, are salt and drought tolerant, and can survive in up to three days of standing water. We recommend JBG selects appropriate trees for the proposed rain gardens by consulting Casey Trees' Urban Tree Selection Guide.

3. **Develop a tree maintenance plan.**
   Newly planted trees are vulnerable as their root systems have not yet expanded far enough to gather water from a large area. It is crucial that trees less than 3 years old receive 25 gallons of water or 1.5 inches of rainfall per week to survive. Employing regularly scheduled maintenance and tree health monitoring will ensure establishment and survival of young trees, reducing the need for costly maintenance in the future. Therefore, we recommend developing a long-term maintenance plan for the 94 new trees at Wardman Tower.

Sincerely,

Kristin D. Taddei
Planning Advocate
Casey Trees

Susan Bass
Jessica Wasserman
The Ward 3 Democrats Task Force on Environment