

January 9, 2015

Robert Vogel, Superintendent  
National Mall and Memorial Parks  
Attn: Franklin Park EA  
900 Ohio Drive, SW  
Washington, D.C. 20024

Dear Mr. Vogel,

Casey Trees is a Washington D.C. nonprofit, with a mission “to restore, enhance and protect the tree canopy of the nation’s capital.” We appreciate the opportunity to provide comment to the National Park Service, the National Capital Planning Commission, the District of Columbia, and the DowntownDC Business Improvement District on the proposed revitalization of Franklin Park.

We are dedicated to helping the District reach its 40% tree canopy goal by the year 2032. This goal is achievable only if the District protects existing mature trees and fosters urban spaces where trees can live long, healthy lives.

Franklin Park is the largest of the parks that line K Street in downtown Washington, DC. With over 100 trees - including 34 canopy trees planted before 1946 – it serves as an essential respite for a growing number of residents, office workers and tourists from the city’s blare and bustle.

Efforts to update the park must maintain its historic quality and minimize the disturbance to its healthy trees. Furthermore, any new design must ensure that all of Franklin Park’s trees (both existing and newly planted) are properly maintained, as the park’s verdant canopy is one of its most-identifying factors. We believe that tree canopy preservation and maintenance goals can best be achieved through Alternative 2: Option A. This alternative would have the least impact on the park’s canopy and green space compared to the other proposals, excluding the No Action option.

We also urge NPS to safeguard Franklin Park’s tree canopy for future generations by:

- Preserving mature canopy trees;
- Taking every precaution to protect the critical root zone of existing trees during construction work;
- Providing sufficient soil volume to allow the newly planted trees to achieve the greatest possible canopy;
- Choosing large tree species. We recently produced an Urban Tree Selection Guide. I mailed a hard-copy of the Selection Guide and emailed a PDF version to Robert Vogel on January 9, 2015; and



- Employing regularly scheduled maintenance and monitoring of tree health to curb potential problems before they require tree removal. Proper care during establishment of a young tree is critical and can reduce the need for costly maintenance in the future.

We also believe that Alternative 3: The Edge would have an adverse impact on the park's tree canopy for decades and should not be considered a viable option.

Going forward, we welcome an opportunity to consult with NPS, NCPC and the city on striking a balance between revitalizing the park and preserving the lush canopy that gives Franklin Park its historic character.

If you have any questions, please contact me at [ssazawal@caseytrees.org](mailto:ssazawal@caseytrees.org) or 202.833.4092.

Sincerely,

/s/ Suraj K. Sazawal

Suraj K. Sazawal  
Advocacy Associate