

October 4, 2018

Public Space Committee
District Department of Transportation
1100 4th Street SW
Washington, DC 20024

RE: Small Cell Design Guideline Comments

Dear Committee Members:

My name is Mark Buscaino, Executive Director of Casey Trees, a D.C. based non-profit with a mission to *Restore, Enhance and Protect the Tree Canopy of the Nation's Capital*. We engage in a host of activities, including but not limited to: planting trees, monitoring the gain/loss of tree canopy over time, community advocacy aimed at encouraging more tree-centric development, and helping the District reach its 40 percent tree canopy goal by 2032. We appreciate the opportunity to provide comments on the District's proposed Small Cell Design Guidelines.

Based on our observations and comments below, we strongly suggest that the committee wait to approve these guidelines until the city completes a full assessment of the potential impacts these cells may have on D.C.'s street trees, and trees located on adjacent private lots.

Section 8.2.3 of DDOT's Small Cell Design Guidelines states that this infrastructure will not require "the removal of an existing street tree or prevent the planting of a street tree in the future." While this statement is undoubtedly well-intended, what we know about street trees tells us that it is quite possible – and even probable – that these cell structures will indeed have a long-lasting detrimental impact on both D.C.'s street trees and trees located on adjacent private lots.

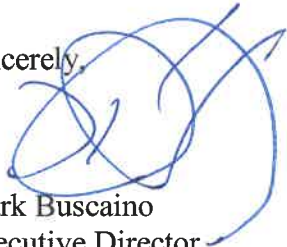
Based on the preliminary information we were able to obtain, it appears as though small cells require a clear line of sight from one to another to ensure clear transmissions. Therefore, even if the cells/structures are initially installed in a manner that avoids tree conflicts, trees do not respect these artificial boundaries and their limbs undoubtedly will need to be pruned and/or removed over time to maintain the sight line. When this occurs, how will the city pay for these additional pruning/removal treatments? Will they be conducted according to professional standards? And what will the long-lasting impacts be, not just to the tree(s) in question, but to the overall tree canopy which the city is working so diligently to increase?

In closing, strong considerations must be given to the potential impacts of these structures on both street trees and adjacent private property trees, in addition to determining who will conduct long-term maintenance of trees in/around these cells and what costs will be incurred. Further, we feel it imperative that a greater public voice be sought on the potential impacts of these structures, given the strong affinity that the public holds towards D.C.'s street trees.

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Thank you for the opportunity to comment. Please call should you wish to discuss.

Sincerely,



Mark Buscaino
Executive Director

cc: District Department of Transportation, Mr. Jeffery Marootian, Director
District Department of Transportation, UFD, Mr. Earl Eutsler, City Forester
District Department of Energy & Environment, Mr. Tommy Wells, Director
District Department of Energy & Environment, Mr. Jim Woodworth, Tree Policy
Coordinator
Committee on Public Works and the Environment, Council Member Mary Cheh, Chair
DC Environmental Network, Chris Weiss, Director