



March 18, 2019

Dear Public Space Committee Members,

Thank you for the opportunity to comment regarding the installation of small cell infrastructure in Washington, D.C. I would also like to add my thanks to DDOT for its commitment to preventing the removal of existing street trees and protecting their critical root zone in the Small Cell Design Guidelines ("the Guidelines"); however, these guidelines continue to lack protection for future trees.

I love living in D.C., in part, because of its beautiful, restorative, and soothing tree canopy. Time and again, whether through initiatives like its Sustainable D.C. 2.0 plan or partnership with environmental groups like Casey Trees, D.C. has shown its commitment to further increasing, sustaining, and conserving its trees for the enjoyment and benefit of residents and visitors. Sometimes, trees disappear as a result of development, as did one of my favorite trees near U and 7th Street NW. Where a lush, but lone tree once stood in a traffic triangle, now construction trucks drive over the freshly paved space. This may be the story of only one tree, but it highlights a threat that all trees face in a city bubbling with new development of all sorts at every corner. It is vital that we not only protect and preserve space for new trees, but also maintain space currently occupied by trees for that same purpose.

Paragraph 8.4.2 of the Guidelines states "...Excavation to install a replacement streetlight or third party pole may damage an existing trees critical root zone. As such DDOT reserves the right to deny a permit for a location where a tree has been recently removed..." This is not a commitment to re-plant a removed tree, but rather an opportunity for more small cell poles to take the place of a tree. Allowing small cell infrastructure to occupy space previously held by a tree would create new barriers towards reaching D.C.'s 40 percent tree canopy goal and be counterproductive to the city's Sustainable 2.0 Plan. Without a robust urban tree canopy, we lose the ability to provide critical wildlife habitat, manage stormwater, and build resilience to climate change.

Furthermore, there appears to be cause for future concern as a result of the provision related to pruning in paragraph 8.4.4. As trees grow, a small cell pole could enter within its protected zone or the trees' limbs may come into contact with the pole or other small cell infrastructure. There is no provision in the guidelines explaining what the solution would be in that situation. If "a tree [cannot] be pruned related to the installation or functioning of small cell infrastructure," then what options are there to make sure the trees can grow un-impeded and the small cell service providers do not take action into their own hands? What happens when a once ideal installation site becomes a problem? This needs to be further addressed by DDOT, with maximum consideration given toward the tree(s) in question.

I strongly urge you to consider EVERY impact of replacing space for trees with small cell poles before the Small Cell Guidelines are finalized. Small cell infrastructure provides none of the benefits to the community that trees do. Considering the positive physical and mental health effects of a full tree canopy, not to mention wildlife habitat and other aforementioned benefits, trading a dynamic living

object for a tall, metal cylinder is a net loss. Thank you again for the opportunity to comment and your attention.

Sincerely,

Pierre Gaunard

Casey Trees' Tree Advocate

Pierre.gaunard@gmail.com



March 18, 2019

Dear Public Space Committee Members,

Thank you for the opportunity to weigh in on the installation of small cells in Washington, D.C.

I am a long time volunteer with Casey Trees. I try to do my part in helping to restore, enhance and protect the tree canopy of Washington D.C. It takes a lot of work, care and time to assure trees are reaching their full potential.

Once cut down, damaged or cut back, the trees [if at all] take years to re-grow.

While I appreciate DDOT'S commitment to preventing the removal of existing street trees and protecting their critical root zone in the Small Cell Design Guidelines, we are concerned about the lack of protection for future trees. Trees in DC, especially in those neighborhoods with above ground power lines, already have to deal with a lot of restrictions and possible cut-backs. To be able to help trees experience less damage and to increase their life expectancy, I have joined the Casey Trees / DDOT Pruning Corps. Walking the city streets and pruning young and medium aged trees gives me a lot of appreciation as to how much effort and time it takes to have a city tree reach it's full growth and potential.

With no requirement to plant new trees once they die due to natural attrition or disease, those spaces could be taken up by small cell poles. This would create new barriers towards reaching D.C.'s 40 percent tree canopy goal. Without a robust urban tree canopy, we lose the ability to provide critical wildlife habitat, manage stormwater, and build resilience to climate change. I strongly urge you to consider the impact of replacing space for trees with small cell poles before the Small Cell Guidelines are finalized. Thank you for the opportunity to provide comments on this important issue.

Sincerely,
Astrid Joehnk
Casey Trees' Tree Advocate
Astrid.joehnk@yahoo.com



March 18, 2019

Dear Public Space Committee Members,

Thank you for the opportunity to weigh in on the installation of small cells in Washington, D.C. While I appreciate DDOT'S commitment to preventing the removal of existing street trees and protecting their critical root zone, we are concerned about the lack of protection for future trees in the Small Cell Design Guidelines. With no requirement to plant new trees once they die due to natural attrition or disease, those spaces could be taken up by small cell poles. This would create new barriers towards reaching D.C.'s 40 percent tree canopy goal. Without a robust urban tree canopy, we lose the ability to provide critical wildlife habitat, manage stormwater, and build resilience to climate change. I strongly urge you to consider the impact of replacing space for trees with small cell poles before the Small Cell Guidelines are finalized. Thank you for the opportunity to provide comments on this important issue.

Sincerely,

Brian Shaw

Casey Trees' Tree Advocate

briancshaw@gmail.com



March 18, 2019

Dear Public Space Committee Members,

I urge you to protect DC's trees! Please do not allow the city's trees to be damaged in the name of faster downloads of movies and video games!!

Sincerely,

Cynthia Franklin

Casey Trees' Tree Advocate

cwfranklin@aol.com



March 18, 2019

Dear Public Space Committee Members,

Thank you for the opportunity to weigh in on the installation of small cells in Washington, D.C. While I appreciate DDOT'S commitment to preventing the removal of existing street trees and protecting their critical root zone, we are concerned about the lack of protection for future trees in the Small Cell Design Guidelines. With no requirement to plant new trees once they die due to natural attrition or disease, those spaces could be taken up by small cell poles. This would create new barriers towards reaching D.C.'s 40 percent tree canopy goal. Without a robust urban tree canopy, we lose the ability to provide critical wildlife habitat, manage stormwater, and build resilience to climate change. I strongly urge you to consider the impact of replacing space for trees with small cell poles before the Small Cell Guidelines are finalized. Thank you for the opportunity to provide comments on this important issue.

Sincerely,

Henry Coppola

Casey Trees' Tree Advocate

Hcop1@yahoo.com



March 18, 2019

Dear Public Space Committee Members,

My name is Joanna London. I live in Ward 3 of the District and am a volunteer with Casey Trees, with whom I have planted, surveyed, and pruned many trees on multiple occasions. Following are my views about the small cell proposal currently before the Committee.

For more than 400 years here in the US we have gotten along without 5G technology. We're doing fine with 4G and lower. From what I understand, the 5G currently requires the installation of poles in the areas between sidewalks and streets where street trees are living, and the cells need an unobstructed sight line. Although the proposal talks about preventing tree removal and pruning, I, frankly, can't imagine that trees will not have to be removed or severely pruned so small cells can have unobstructed site lines.

We already know the benefits of trees: shade, cooling, uptake of carbon dioxide (a greenhouse gas), production of oxygen (what we breathe), interception of storm water (from many hundreds to several thousands of gallons per year for mature trees), beauty, greater feelings of serenity, and even crime reduction. To me, these benefits far outweigh whatever the benefits of 5G technology might bring.

I think we should wait to build 5G, so they can be built without having to sacrifice the multiple known benefits of trees.

Sincerely,

Joanna London

Casey Trees' Tree Advocate

JLondon10@msn.com



March 18, 2019

Dear Public Space Committee Members,

In the guidelines, there are protections for current trees, but there is no language for making sure future trees also are supported. A problem indeed.

While I appreciate DDOT'S commitment to preventing the removal of existing street trees and protecting their critical root zone, we are concerned about the lack of protection for future trees in the Small Cell Design Guidelines. With no requirement to plant new trees once they die due to natural attrition or disease, those spaces could be taken up by small cell poles. This would create new barriers towards reaching D.C.'s 40 percent tree canopy goal. Without a robust urban tree canopy, we lose the ability to provide critical wildlife habitat, manage stormwater, and build resilience to climate change. I strongly urge you to consider the impact of replacing space for trees with small cell poles before the Small Cell Guidelines are finalized. Thank you for the opportunity to provide comments on this important issue.

Sincerely,

Kate Kheel

Casey Trees' Tree Advocate

kkheel@verizon.net



March 18, 2019

Dear Public Space Committee Members,

Thank you for the opportunity to weigh in on the installation of small cells in Washington, D.C. While I appreciate DDOT'S commitment to preventing the removal of existing street trees and protecting their critical root zone in the Small Cell Design Guidelines, I am concerned about the lack of protection for future trees. As I'm sure you are aware, the tree canopy provides so many benefits crucial to maintaining quality of life.

With no requirement to plant new trees once they die due to natural attrition or disease, those spaces could be taken up by small cell poles. This would create new barriers towards reaching D.C.'s 40 percent tree canopy goal. Without a robust urban tree canopy, we lose the ability to provide critical wildlife habitat, manage stormwater, and build resilience to climate change. Some neighborhoods are already disadvantaged by having less tree canopy than others. Lack of a requirement to plant new trees risks exacerbating that problem.

I strongly urge you to consider the impact of replacing space for trees with small cell poles before the Small Cell Guidelines are finalized.

Thank you for the opportunity to provide comments on this important issue.

Sincerely,

Kathy Jacquart

Casey Trees' Tree Advocate

jacquartke@gmail.com



March 18, 2019

Dear Public Space Committee Members,

I am a resident of SW Waterfront in DC. Thank you for the opportunity to weigh in on the installation of small cells in Washington, D.C. While I appreciate DDOT'S commitment to preventing the removal of existing street trees and protecting their critical root zone, we are concerned about the lack of protection for future trees in the Small Cell Design Guidelines. With no requirement to plant new trees once they die due to natural attrition or disease, those spaces could be taken up by small cell poles. This would create new barriers towards reaching D.C.'s 40 percent tree canopy goal. Without a robust urban tree canopy, we lose the ability to provide critical wildlife habitat, manage stormwater, and build resilience to climate change. I strongly urge you to consider the impact of replacing space for trees with small cell poles before the Small Cell Guidelines are finalized. Thank you for the opportunity to provide comments on this important issue.

Sincerely,

Peter Murakami

Casey Trees' Tree Advocate

Polyphemus421@gmail.com



March 18, 2019

Dear Public Space Committee Members,

My name is Sean LeSane. Thank you for the opportunity to weigh in on the installation of small cells in Washington, D.C. While I appreciate DDOT'S commitment to preventing the removal of existing street trees and protecting their critical root zone, we are concerned about the lack of protection for future trees in the Small Cell Design Guidelines. With no requirement to plant new trees once they die due to natural attrition or disease, those spaces could be taken up by small cell poles. This would create new barriers towards reaching D.C.'s 40 percent tree canopy goal. Without a robust urban tree canopy, we lose the ability to provide critical wildlife habitat, manage stormwater, and build resilience to climate change. DC's tree canopy can be enhanced by filling in areas where coverage is needed as well as maintaining the coverage that exists by replanting dead or dying trees. This should be the case for public spaces as well as private property (i.e., residents who may request planting in front of their home). I strongly urge you to consider the impact of replacing space for trees with small cell poles before the Small Cell Guidelines are finalized. Thank you for the opportunity to provide comments on this important issue.

Sincerely,

Sean LeSane

Casey Trees' Tree Advocate

slesane@gmail.com



March 11, 2019

BY EMAIL TO PublicSpace.Committee@dc.gov AND FIRST CLASS MAIL:

Public Space Committee
c/o DDOT Public Space Regulation Division
1100 4th Street SW, Room E-360
Washington, DC 20024.

RE: Comments on the Small Cell Guideline

Dear Committee members:

Thank you for the opportunity to comment on the installation of small cells in the District.

I have been actively working on water quality improvements to the District's tributaries, streams, and rivers – particularly the Anacostia River system – for more than 20 years. As you surely know, healthy trees play a huge role in managing the stormwater runoff that severely impacts DC waterways, as well as other furthering other important environmental goals such as climate change resilience and habitat provision.

I understand from my friends and colleagues at Casey Trees that you will soon be considering policy with regard to the placement of small cells in the public space.

I appreciate DDOT's commitment to preventing the removal of existing street trees and protecting their critical root zone, but I remain concerned about the lack of protection for future trees in the Small Cell Design guidelines. With no requirement to plant new trees once they die due to natural attrition or disease, those spaces could be taken up by small cell poles. Without a robust urban tree canopy, we lose the ability to manage stormwater, provide critical wildlife habitat, and build resilience to climate change.

I strongly urge you to consider the impact of replacing space for trees with small cell poles before the Small Cell guidelines are finalized. Thank you for the opportunity to provide comments on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Doug Siglin".

Doug Siglin
Chief Executive Officer

