



MONTGOMERY COUNTY PLANNING DEPARTMENT
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

MCPB
ITEM #
December 2, 2010

MEMORANDUM

TO: Montgomery County Planning Board

VIA: Mark Pfefferle, Acting Chief *MP*
Environmental Planning Division

FROM: Amy Lindsey, Senior Planner *AK*
Environmental Planning Division

DATE: November 21, 2010

PLAN NAME: Town of Somerset Bathhouse

PLAN NUMBER: MR2010737

PLAN TYPE: Forest Conservation Plan

REVIEW BASIS: Chapter 22a of the County Code

APPLICANT: Town of Somerset

ENGINEER: VIKA, Incorporated

RECOMMENDATION

The Environmental Planning staff has reviewed the forest conservation for the project reference above. Staff recommends approval of the forest conservation plan subject to the following conditions:

1. Applicant must record a Category I conservation easement over all areas of forest retention prior to any clearing or grading occurring onsite.

DISCUSSION

The Town of Somerset bathhouse is associated with an existing pool. The subject property is 6.00 acres and is located at the intersection of Falstone and Warwick Avenues in the Town of Somerset. Adjacent and confronting uses are single-family and multi-family residential

properties. The proposed plan includes sidewalk additions, parking lot reconfiguration, and stormwater management facilities.

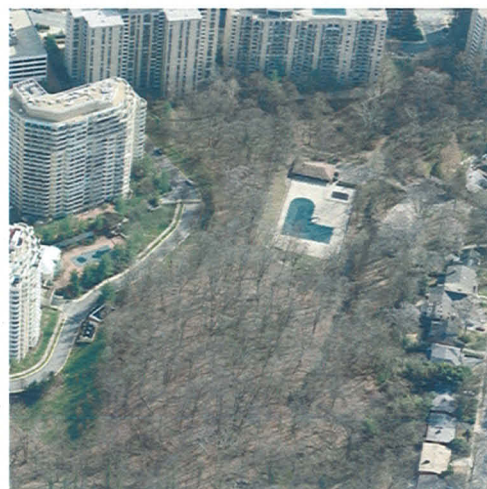
The Planning Board's action on the forest conservation plan is regulatory and binding. Planning Department staff approved the mandatory referral portion of this plan administratively; however Chapter 22A of the County Code does not have equivalent provision. According to Chapter 22A-11(e) of the County Code, the Planning Board must approve forest conservation plans associated with mandatory referrals.



REGULATORY FRAMEWORK

Environmental Inventory

The applicant submitted and received approval of a Natural Resources Inventory/Forest Stand Delineation (NRI/FSD) number 420101420 on July 19, 2010. Most of the property is located in the Little Falls Branch stream buffer and the floodplain associated with the stream. The stream bisects the property, running north south, with a bridge allowing access to the facility. There are steep slopes and floodplains on-site, as well as a small pocket of wetlands.



Areas of the property not currently developed are covered with high priority forest. There is 4.24 acres of high priority mixed hardwood forest, which is connected to forest off-site. All forest on the site is considered a high priority for retention for the following reasons:

- Presence of stream valley buffer;
- Presence of steep slopes;
- Presence of specimen trees;
- Connection of contiguous forest;
- High quality forest.

There are more than 29 trees greater than or equal to 24" diameter at breast height (DBH) on-site. The precise number is not known because the applicant, at staff discretion and direction, was not required to survey trees further than 100' from the proposed project area. Of the 29 trees surveyed, 17 are 30 inches and greater DBH and considered specimens of their species

There is 5.19 ac of environmental buffer on-site, encompassing the stream, wetlands, and floodplain. The property is within the Little Falls Branch subwatershed of the Middle Potomac watershed; a Use I watershed.

Forest Conservation

This property is subject to the Chapter 22A Montgomery County Forest Conservation Law and a preliminary forest conservation plan has been submitted for approval. There are 4.24 acres of forest in one stand on the subject property. The forest is considered high priority for retention, due to stream valley buffer, steep slopes, specimen trees and forest contiguity.

The applicant is proposing to remove 0.18 acres of forest and retain 4.06 acres. The forest is being removed in order to incorporate stormwater management facilities on a site that currently has none. While this forest is all high priority and located within the stream valley buffer, on balance, the addition of stormwater management is a positive contribution to water quality and will more than off-set the loss of forest. All forest conservation requirements are being met on-site for this property.

Forest Conservation Variance

Section 5-1607(c) of the Natural Resources Article, MD Ann. Code affects the Montgomery County Forest Conservation law by identifying the following trees, shrubs, plants, and specific areas as priority for retention and protection and shall be left in an undisturbed condition unless the applicant qualifies for a variance in accordance. More specifically the vegetation to remain undisturbed includes:

- A. *Trees, shrubs, or plants determined to be rare, threatened, or endangered under:*
 - (1) *The federal Endangered Species Act of 1973,*
 - (2) *The Maryland Nongame and Endangered Species Conservation Act, Natural Resources Article, §§10-2A-01—10-2A-09, Annotated Code of Maryland, and*
 - (3) *COMAR 08.03.08;*

- B. *Trees that:*
 - (1) *Are part of an historic site,*
 - (2) *Are associated with an historic structure, or*
 - (3) *Have been designated by the State or the Department as a national, State, or county champion tree; and*

- C. *Any tree having a diameter measured at 4.5 feet above the ground of:*
 - (1) *30 inches or more, or*
 - (2) *75 percent or more of the diameter, measured at 4.5 feet above the ground, of the current State champion tree of that species as designated by the Department of Natural Resources.*

Under Chapter 22A-21 of the County Code a person may request in writing a variance from this Chapter if the person demonstrates that enforcement would result in unwarranted hardship to the person. The applicant for a variance must:

- (1) Describe the special conditions peculiar to the property which would cause the unwarranted hardship;
- (2) Describe how enforcement of these rules will deprive the landowner of rights commonly enjoyed by others in similar areas;
- (3) Verify that State water quality standards will not be avoided or that a measurable degradation in water quality will not occur as a result of the granting of the variance; and
- (4) Provide any other information appropriate to support the request.

In accordance with Montgomery County Code, Section 22A-21(c) the Planning Board referred a copy of the variance request to the County Arborist in the Montgomery County Department of Environmental Protection for a written recommendation prior to acting on the request. The variance request was referred to the Montgomery County Arborist on September 23, 2010. The County Arborist has reviewed the variance request (see Attachment A) and recommended approval with unspecified mitigation for critical root zone replacement.

The applicant has requested a variance to impact the following 10 trees that are 30 inches and greater DBH.

Tree #	Species	Diameter (Inches)	Condition	Disposition	CRZ Area (sq ft)	CRZ Impacts (sq ft)	CRZ Impacts (%)
4	<i>Liriodendron tulipifera</i>	35" DBH	Good	Save	8659	1049	12.11%
6	<i>Fagus grandifolia</i>	34" DBH	Good	Save	8171	620	7.34%
8	<i>Quercus rubra</i>	40" DBH	Good	Save	11310	620	5.31%
13	<i>Liriodendron tulipifera</i>	36" DBH	Good	Save	9161	2001	21.84%
14	<i>Quercus falcata</i>	31" DBH	Good	Save	6793	23	0.34%
15	<i>Quercus rubra</i>	30.5" DBH	Poor	Save	5346	1175	21.98%
17	<i>Quercus alba</i>	45" DBH	Good	Save	14314	326	2.14%
18	<i>Fagus grandifolia</i>	44" DBH	Good	Save	13685	974	7.12%
19	<i>Nyctasycopsis glyptostroboides</i>	45" DBH	Good	Save	14314	1673	11.69%
27	<i>Platanus occidentalis</i>	38" DBH	Good	Save	10207	1940	19.01%

In accordance with Section 22A-21(e), Planning staff recommends a finding by the Planning Board that the Applicant has met all criteria required to grant the variance.

1. *Will confer on the applicant a special privilege that would be denied to other applicants.*

The requested variance will not confer on the applicant any special privileges that would be denied to other applicants. The applicant is voluntarily adding stormwater management features to a site that currently has none.

2. *Is based on conditions or circumstances which are the result of the actions by the applicant.*

The requested variance is not based on conditions or circumstances which are the result of actions by the applicant. The site was initially developed with the swimming pool in the stream valley. The applicant cannot move the existing pool but is trying to improve water quality by compensating for the existing development.

The applicant has submitted the following to explain the individual impacts and the steps taken to minimize damage:

Tree #4- This tree is at a corner of the existing parking lot and a significant portion of the CRZ is under the parking area. A small strip of asphalt is being removed to existing reduce impervious area, especially within the stream valley. This was a request of environmental staff during an early visit to the site prior to finalizing plans. A note on the FCP requires that the asphalt be removed without the use of heavy equipment in the CRZ.

Tree #6 - This tree resides approximately 10' from the existing parking lot. The green island here is being replaced with parking and a small area of re-grading. This tree also has a significant portion of the CRZ under the parking area. The preference is to try to save the tree even though the impact is close to the trunk. The impacted area is so small that the tree should survive. Root pruning is proposed.

Tree #8- Similar to tree #6, this tree resides approximately 10' from existing parking and will experience minor disturbances from the proposed re-grading. This tree is the mirror image condition of tree #6 and the same handling of the tree is proposed.

Tree #13- This tree is approximately 5'-7' from an existing storm drain pipe. The proposed storm water management plan adds a rip rap at the outfall at the end of the pipe. There will little to no regarding for the installation of the rip rap. The impact to the CRZ is the result of the grading for the bio-filter at the outskirts of the CRZ. Root pruning is proposed.

Tree #14- This tree is off-site by 26'. The proposed installation of retaining wall and storm drain pipe that will impact less than 1% if at all, of its CRZ. There is no evidence on the hillside coming down to the wall that tree roots are present. This construction should not affect the long term health of this tree. Root pruning is proposed.

Tree #15- This tree is off-site by 10'. The proposed installation of retaining wall and storm drain pipe that will impact approximately 22% of its CRZ should not affect the long term health of this tree, but the condition of the tree is listed as poor on the approved NRI and now appears dead.

Tree #17- This tree is off-site by 5'. The CRZ of this tree is impacted by the construction of a retaining wall that will be approximately 5' high on the pool side. The CRZ impact is negligible. Root pruning is proposed.

Tree #18- This tree is approximately 20'+ away from the existing parking lot. There is an impact area of 66 square feet of grading to install a submerged wetland bio-filter. Root pruning is proposed.

Tree #19- This tree is off-site but at least one third of its CRZ currently under the pool's parking lot. There is an existing walkway adjacent to the parking lot that will be relocated closer to the parking lot. The new sidewalk will be installed on grade with root aeration matting (detail on sheet FCP 5 of 5). There is also a small bio-retention facility proposed within the CRZ. The proposed root pruning & minor grading impacts for the bio-retention pond would not be detrimental to the long term health of this tree.

Tree #27- This tree is proposed to be saved with an impacted area of 19% to the total root zone. The impacts are the result of the installation of the proposed submerged wetland bio-filtration facility which has been designed to best avoid as much as possible direct impact to the tree. An onsite visit was done with an engineer from VIKA, and a reviewer from M-NCPPC to determine the location for the SWM facility. It was agreed upon that the location selected would have the least impact to the forest as this particular area was not as densely forested as the surrounding area. Soil type also played a role in the choice, as it was more suitable for a submerged wetland facility. The tree will provide shade during the establishment of the pond plantings.

3. *Arises from a condition relating to land or building use, either permitted or nonconforming, on a neighboring property.*

The requested variance is a result of the proposed site design and layout on the subject property and not as a result of land or building use on a neighboring property.

4. *Will violate State water quality standards or cause measurable degradation in water quality.*

The requested variance will not violate State water quality standards or cause measurable degradation in water quality. While some trees are proposed to be removed within the stream valley buffer, the site currently has no stormwater management controls on it. On balance, development of this site should be a positive contribution to water quality, even with the loss of trees.

Mitigation

The County Arborist recommended mitigation for the impact to the critical root zones of the specimen trees. When necessary, staff requests mitigation for the removal of trees, but never requests mitigation for impacts to critical root zones of individual trees. The typical mitigation requested by staff is based on the caliper of tree inches lost and the availability to replant on site. In this case, Environmental Planning staff does not believe any additional mitigation is necessary to offset the impact of critical root zones for the following reasons:

1. Removal and impact to the trees greater than 30 inches are internal to the site and unavoidable to achieve appropriate stormwater management.
2. The forest conservation plan retains 4.06 acres of forest in permanent long term protection. None of this forest is currently protection and all forest is in area found to be of high priority for retention and permanent protection.

As a result of the above findings Environmental Planning staff recommends the approval of the applicant's request for a variance from individual tree retention requirements of the Forest Conservation Law to impact the critical root zones of 10 trees. The variance approval is assumed into the Planning Board's approval of the forest conservation plan.

RECOMMENDATION

Environmental Planning recommends approval of the Preliminary Forest Conservation Plan with the conditions above.

Attachments:

- A. Letter from County Arborist
- B. Copy of forest conservation plan submitted for PB approval



DEPARTMENT OF ENVIRONMENTAL PROTECTION

Isiah Leggett
County Executive

Robert G. Hoyt
Director

October 5, 2010

Françoise Carrier, Chair
Montgomery County Planning Board
Maryland National Capital Park & Planning Commission
8787 Georgia Avenue
Silver Spring, Maryland 20910

RE: Somerset Bathhouse, MR 2009740-TOS-2, NRI/FSD applied for on 2/24/2010

Dear Ms. Carrier:

The County Attorney's Office has advised me that the provisions contained in Section 5-1607 of Title 5 (Natural Resources) of the Maryland Code apply to any application required by Chapter 22A of the Montgomery County Code submitted after October 1, 2009. Since the application for the above referenced request is required to comply with Chapter 22A based on a review by the Maryland National Capital Park & Planning Commission (MNCPPC) and was submitted after this date, I am providing the following recommendation pertaining to this request for a variance.

Section 22A-21(d) of the Forest Conservation Law states that a variance must not be granted if granting the request:

1. Will confer on the applicant a special privilege that would be denied to other applicants;
2. Is based on conditions or circumstances which are the result of the actions by the applicant;
3. Arises from a condition relating to land or building use, either permitted or nonconforming, on a neighboring property; or
4. Will violate State water quality standards or cause measurable degradation in water quality.

Applying the above conditions to the plan submitted by the applicant results in the following findings:

1. The granting of a variance in this case would not confer a special privilege on this applicant that would be denied other applicants as long as the same criteria are applied in each case. Therefore, the variance can be granted under this condition.

2. Based on a discussion on March 19, 2010 with representatives of the Maryland Department of Natural Resources Forest Service and the MNCPPC, the disturbance of trees, or other vegetation, is not interpreted as a condition or circumstance that is the direct result of the actions by the applicant and, therefore, the variance can be granted under this condition, as long as appropriate mitigation is provided for the resources disturbed.
3. The disturbance of trees, or other vegetation, by the applicant does not arise from a condition relating to land or building use, either permitted or nonconforming, on a neighboring property. Therefore, the variance can be granted under this condition.
4. The disturbance of trees, or other vegetation, by the applicant will not result in a violation of State water quality standards or cause measurable degradation in water quality. Therefore, the variance can be granted under this condition.

Therefore, I recommend that this applicant qualify for a variance conditioned upon mitigating for the loss of resources due to removal or disturbance to trees, and other vegetation, subject to the law. Until other guidelines are developed, I recommend requiring mitigation based on the area of the critical root zone lost or disturbed. The mitigation can be met using any currently acceptable method under Chapter 22A of the Montgomery County Code.

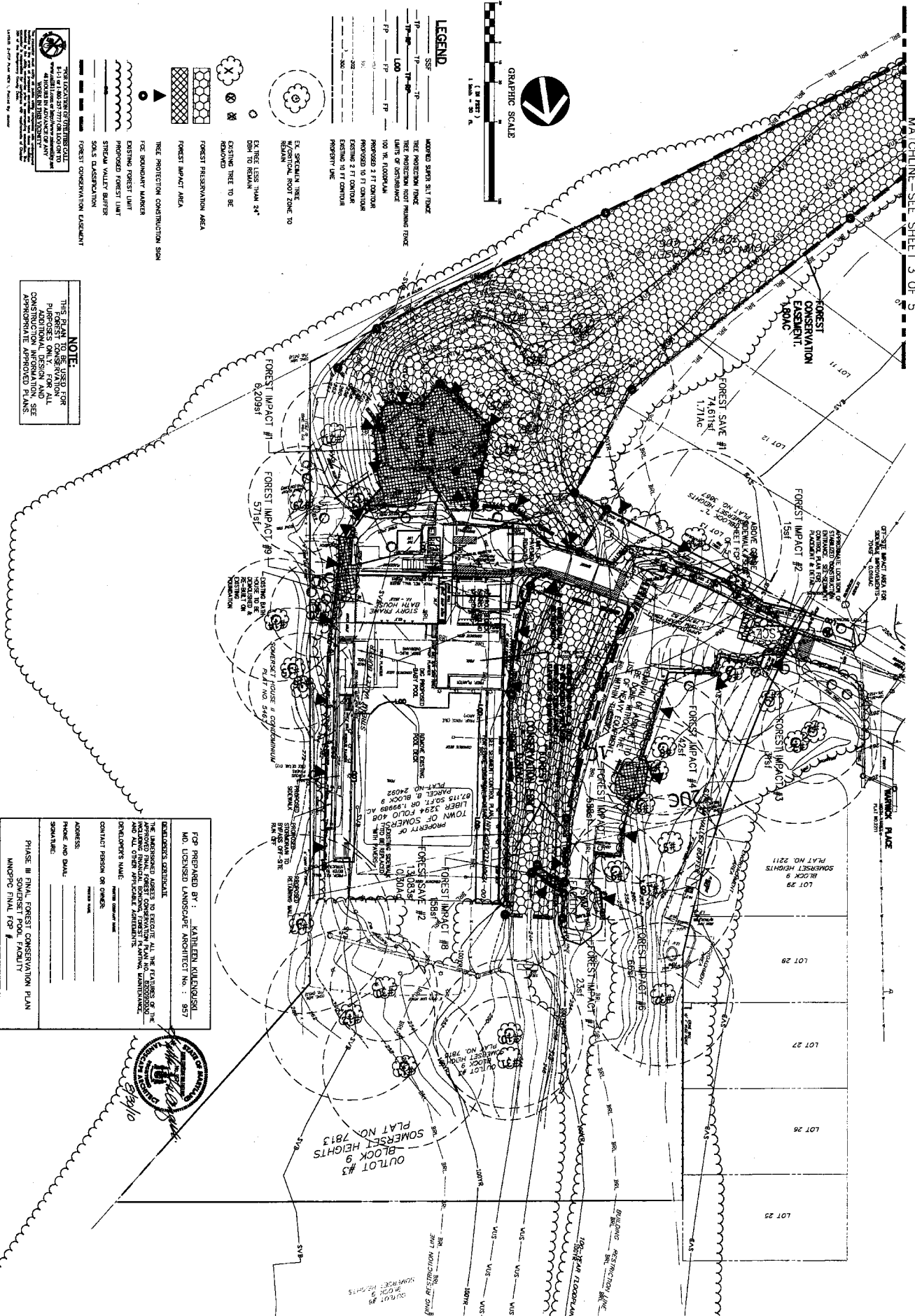
If you have any questions, please do not hesitate to contact me directly.

Sincerely,



Laura Miller
County Arborist

cc: Robert Hoyt, Director
Walter Wilson, Associate County Attorney
Mark Pfefferle, Acting Chief



LEGEND

MAPPED SHOWN SITE BOUNDARY
 THE PROTECTION FENCE
 THE PROTECTION FENCE
 LIMITS OF DISTURBANCE
 100' W. PROPERTY LINE
 PROPOSED 2 FT CONTOUR
 EXISTING 2 FT CONTOUR
 EXISTING 10 FT CONTOUR
 PROPERTY LINE

EX. SPECIALLY TREE
 EX. SPECIALTY TREE
 EX. TREE LESS THAN 24"
 DBH TO REMAIN
 EX. TREE TO BE
 REMOVED
 FOREST PRESERVATION AREA
 FOREST IMPACT AREA
 TREE PROTECTION CONSTRUCTION SIGN
 FCP BOUNDARY MARKER
 EXISTING FOREST LIMIT
 PROPOSED FOREST LIMIT
 STREAM VALLEY BARRIER
 SOILS CLASSIFICATION
 FOREST CONSERVATION EASEMENT

NOTE:

THIS PLAN IS TO BE USED FOR PURPOSES ONLY. FOR ALL CONSTRUCTION AND SEE APPROPRIATE APPROVED PLANS.

PROPERTY

TOWN OF SOMERSET
 BLOCK 9
 LOT 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100

SEAL

KATHLEEN KOLENOSKI
 M.D. LICENSED LANDSCAPE ARCHITECT No. 957

PROPERTY

OUTLOT #3
 BLOCK 9
 LOT 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100

PROPERTY

OUTLOT #4
 BLOCK 9
 LOT 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100

PROPERTY

OUTLOT #5
 BLOCK 9
 LOT 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100

PROPERTY

OUTLOT #6
 BLOCK 9
 LOT 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100

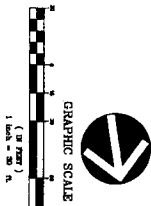
Sheet 4 of 5
FOREST CONSERVATION PLAN

Project Name and Address
Somerset Pool Facility Renovation Project
 Warwick Place, Somerset, Maryland 20854

Contractor
Vika, Incorporated
 20251 Century Boulevard Suite 400 Damascus, MD 20885
 Phone: 301.916.4100
 Fax: 301.914.2282

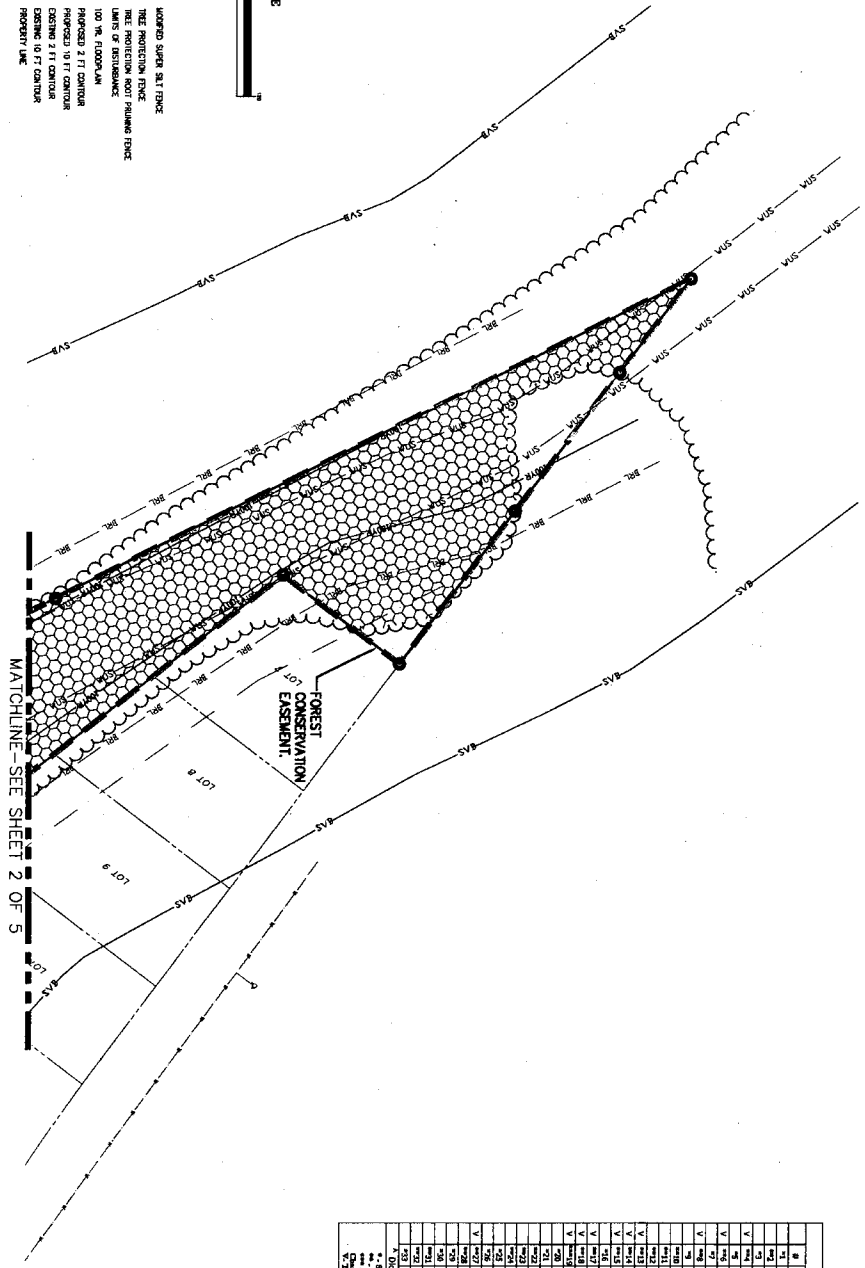
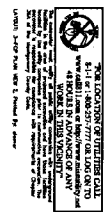
Architect
McInturff Architects
 4320 Leeward Place
 Bethesda, Maryland 20814
 Phone: 301.228.3700
 Fax: 301.228.4360

DATE: 05/10/10
 TIME: 12:18:48 PM



- LEGEND**
- SSP - MORGED SUPER BILT FENCE
 - FP - TREE PROTECTION FENCE
 - FP - TREE PROTECTION ROOT PROTECTING FENCE
 - FP - 100 YR. TULPODAN
 - FP - PROPOSED 2 FT. CONTOUR
 - FP - PROPOSED 10 FT. CONTOUR
 - FP - EXISTING 10 FT. CONTOUR
 - FP - PROPERTY LINE

- EX. TREE LESS THAN 3" DBH TO REMAIN
- EX. TREE MORE THAN 3" DBH TO BE REMOVED
- EX. SPECIALLY TREE / CRITICAL ROOT ZONE TO REMAIN
- FOREST PRESERVATION AREA
- FOREST IMPACT AREA
- THEE PROTECTION CONSTRUCTION SIGN
- FOR BOUNDARY MARKER
- EXISTING FOREST LIMIT
- PROPOSED FOREST LIMIT
- STEEL WALET BARRIER
- SOILS EXCAVATION
- FOREST CONSERVATION EASEMENT



SIGNIFICANT AND SPECIALLY TREES LIST

#	COMMON NAME	SCIENTIFIC NAME	DBH ¹	VISIB ²	COMMENTS	DATE / REMOVED
1	Red Oak	Quercus rubra	36"	Good	Tree to remain	None
2	White Oak	Quercus alba	36"	Good	Tree to remain	None
3	Black Oak	Quercus nigra	36"	Good	Tree to remain	None
4	White Pine	Pinus strobus	36"	Good	Tree to remain	None
5	Red Pine	Pinus resinosa	36"	Good	Tree to remain	None
6	White Pine	Pinus strobus	36"	Good	Tree to remain	None
7	White Pine	Pinus strobus	36"	Good	Tree to remain	None
8	White Pine	Pinus strobus	36"	Good	Tree to remain	None
9	White Pine	Pinus strobus	36"	Good	Tree to remain	None
10	White Pine	Pinus strobus	36"	Good	Tree to remain	None
11	White Pine	Pinus strobus	36"	Good	Tree to remain	None
12	White Pine	Pinus strobus	36"	Good	Tree to remain	None
13	White Pine	Pinus strobus	36"	Good	Tree to remain	None
14	White Pine	Pinus strobus	36"	Good	Tree to remain	None
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22	White Pine	Pinus strobus	36"	Good	Tree to remain	None
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26	White Pine	Pinus strobus	36"	Good	Tree to remain	None
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28	White Pine	Pinus strobus	36"	Good	Tree to remain	None
29	White Pine	Pinus strobus	36"	Good	Tree to remain	None
30	White Pine	Pinus strobus	36"	Good	Tree to remain	None
31	White Pine	Pinus strobus	36"	Good	Tree to remain	None
32	White Pine	Pinus strobus	36"	Good	Tree to remain	None
33	White Pine	Pinus strobus	36"	Good	Tree to remain	None
34	White Pine	Pinus strobus	36"	Good	Tree to remain	None
35	White Pine	Pinus strobus	36"	Good	Tree to remain	None
36	White Pine	Pinus strobus	36"	Good	Tree to remain	None
37	White Pine	Pinus strobus	36"	Good	Tree to remain	None
38	White Pine	Pinus strobus	36"	Good	Tree to remain	None
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42	White Pine	Pinus strobus	36"	Good	Tree to remain	None
43	White Pine	Pinus strobus	36"	Good	Tree to remain	None
44	White Pine	Pinus strobus	36"	Good	Tree to remain	None
45	White Pine	Pinus strobus	36"	Good	Tree to remain	None
46	White Pine	Pinus strobus	36"	Good	Tree to remain	None
47	White Pine	Pinus strobus	36"	Good	Tree to remain	None
48	White Pine	Pinus strobus	36"	Good	Tree to remain	None
49	White Pine	Pinus strobus	36"	Good	Tree to remain	None
50	White Pine	Pinus strobus	36"	Good	Tree to remain	None



NOTE:
THIS PLAN IS TO BE USED FOR FOREST CONSERVATION PURPOSES ONLY. FOR ALL CONSTRUCTION INFORMATION, SEE APPROPRIATE APPROVED PLANS.

FOR PREPARED BY: **KATHLEEN KULIENSKI**
M.D. LICENSED LANDSCAPE ARCHITECT NO. : 957

DESIGNER'S CONTACT:
THE LANDSCAPE ARCHITECTS TO DESIGN ALL THE FEATURES OF THE INCLUDING FINANCIAL, BOUNDING, FOREST PLANNING, MAINTENANCE, AND REMOVAL OF SPECIALLY TREES, AND REMOVAL.

DESIGNER'S NAME: **LANDSCAPE ARCHITECTS**
CONTACT PERSON OR OWNER: **LANDSCAPE ARCHITECTS**
ADDRESS: **LANDSCAPE ARCHITECTS**
PHONE AND DATE: **LANDSCAPE ARCHITECTS**
SIGNATURE: **LANDSCAPE ARCHITECTS**

PHASE III FINAL FOREST CONSERVATION PLAN
LANDSCAPE ARCHITECTS

B-3

