

## ATTACHMENT 13



April 21, 2017

Amy Lindsey  
Montgomery County Planning Department  
8787 Georgia Avenue  
Silver Spring, Maryland 20910

Re: WMAL Bethesda  
Tree Variance Request and Justification  
MNCPPC # 120160290

Dear Ms. Lindsey,

Please accept this letter and the accompanying Preliminary Forest Conservation Plan & Specimen Tree Variance Plan as a formal written request for a variance from section 22A-12(b)(3) of the Montgomery County Code. The referenced section concerns the requirement to not disturb *any tree with a diameter, measured at 4.5 feet above the ground, of (i) 30- inches or more; or (ii) 75% or more of the diameter, measured at 4.5 feet above ground, of the current State champion tree of that species.* There are seventy-seven (77) specimen trees located on, or immediately adjacent to, the site as delineated on the approved NRI/FSD<sup>1</sup>. The implementation of the proposed Preliminary Plan for the WMAL Bethesda project ("project") will retain forty-three (43) specimen trees. Thirty-four (34) trees have unavoidable disturbances that require their removal. Of the forty-three (43) specimen trees to be retained, sixteen (16) specimen trees require minor disturbances to the critical root zone. Since the implementation of the proposed Preliminary Plan for the WMAL Bethesda project ("project") requires the unavoidable disturbance or removal of fifty(50) (34 removed + 16 retained) trees 30" or greater a variance is necessary under Section 22A-21.

### A. Background

The Applicant has filed an application for Preliminary Plan 120160290 to redevelop the WMAL property, which for more than 50 years has been home to four radio transmission towers for the WMAL radio station. The property, known as the WMAL Radio Transmission Site (the "property") is located in the northeast quadrant of the Capital Beltway, I-495, and I-270. The project provides the opportunity to offer needed single family detached and attached housing in a down-county location, in close proximity to existing infrastructure.

There are four forest stands on the site, as delineated on the approved NRI/FSD.<sup>2</sup> Forest Stand F-1 is along I-495, along the southern edge of the property. Forest Stand F-2 is along the northern property line. Forest Stand F-3 is located in the northeast corner of the site. Forest Stand F-4 is located in the northwest corner of the site.

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<sup>1</sup> NRI/FSD #420160220.

<sup>2</sup> NRI/FSD #420160220

There are seventy-seven (77) specimen trees located on, or immediately adjacent to, the site as delineated on the approved NRI/FSD<sup>2</sup>. The implementation of the proposed Preliminary Plan for the WMAL Bethesda project (“project”) will retain forty-three (43) specimen trees. While every effort has been made to reduce specimen tree impacts to the greatest extent possible, the removal of thirty-four (34) specimen trees and unavoidable impacts to sixteen (16) specimen trees are necessary to implement Preliminary Plan 120160290. The following is a tree-by-tree analysis for each tree to be removed or impacted. A chart is provided at the end of this letter containing information for each tree discussed in the tree-by-tree analysis.

## **B. Tree-by-tree Analysis- Removals**

### **Master Planned Roads & DOT Supported Right-of-way Connections**

The Applicant, in coordination with M-NCPPC staff, is providing publicly dedicated, master planned and DOT required roadway connections into the site. These connections to the surrounding existing roadway infrastructure are vital for community safety and maneuverability. All existing public rights-of-way that surround the WMAL site terminate into areas of existing forest that contain specimen trees. Failing to allow these roadway connections, in order to save the specimen trees, will preclude ideal roadway networks necessary to make the proposed community functional and safe. This would leave undesirable and inefficient options for connecting proposed roadways to the existing infrastructure that surrounds the site and may result in fewer access points into the site, thus creating maneuverability and fire safety concerns. Crossings that will not align with existing roads, in order to avoid disturbance to the specimen trees, will create additional, unnecessary intersections, and increase the likelihood of accidents occurring. Other right-of-way locations were evaluated, with the Applicant and staff agreeing that the proposed locations are the best choice.

**Tree #'s 88, 91, 93, 134B, 136, & 139.** These trees are all located with forest stand F-1. Tree #88 is a 35” Tulip Poplar in fair health. Tree #91 is a 33” Red Maple in fair health. Tree #93 is a 34” Tulip Poplar in fair health. Tree #134B is a 31” Silver Maple in fair health. Tree #136 is a 31” Red Maple in fair health. Tree #138 is a 33” Silver Maple in fair health. The trunks and critical root zones for each of these trees are located within the proposed right-of-way connecting Greentree Road to Renita Lane as well as the associated public utility easement and disturbance required to tie out to existing grade.

**Tree #'s 173, 175, 223, 225, & 228.** These trees are all located with forest stand F-2. Tree #173 is a 32” Tulip Poplar in fair health. Tree #175 is a 31” Black Cherry in good health. Tree #223 is a 33” Tulip Poplar in fair health. Tree #225 is a 31” Tulip poplar in fair health. Tree #228 is a 34” Tulip Poplar in good health. The trunks and critical root zones for each of these trees are located within the proposed right-of-way connecting Greentree Road to Greyswood Road as well as the associated public utility easement and disturbance required to tie out to existing grade.

**Tree #'s 69, 80, 81, 82, 83, 85, 90, 98, 112, & 119.** These trees are all located with forest stand F-1. Tree #69 is a 35” Tulip Poplar in good health. Tree #80 is a 34” Tulip Poplar in fair health. Tree #81 is a 33” Tulip Poplar in good health. Tree #82 is a 32” Tulip Poplar in good health. Tree #83 is a 30” Tulip Poplar in good health. Tree #85 is a 32” Tulip Poplar in good health.

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<sup>2</sup> NRI/FSD #420160220.

Tree #90 is a 34" Tulip Poplar in fair health. Tree #98 is a 34" Red Maple in poor health. Tree #112 is a 30" Tulip Poplar in fair health. Tree #119 is a 31" Tulip Poplar in fair health. These trees are all located within proposed lots located along the public-right-of-way connecting Greentree Road to Renita Lane providing a continuation of houses sited along the public road right-of-way, similar in character to the existing lots adjacent to the site along Renita Lane. Even if these trees could be saved, the construction necessary to provide the public road right-of-way connection and tie out to existing grade will result in significant impacts to the critical root zones of these trees making their removal unavoidable.

**Tree #102.** This 38" Tulip Poplar is located within Forest Stand F-1 and is in fair health with multiple leaders. Impacts to 28% of the Critical Root zone are required to provide ESD to treat the road connecting Greentree Road to Renita Lane, and to provide ESD in the rear of two lots. Every effort will be made to save this tree in the field but may need to be removed due to the extent of impacts to the critical root zone.

### **Public School Land Dedication**

The Applicant is voluntarily dedicating a 4.3-acre school site contained within the WMAL site to Montgomery County, Maryland. The area of public dedication is shown on the Preliminary Forest Conservation Plan. A storm drainpipe and public trail connection is required from the proposed development to the intersection of Greentree Road and existing Grubby Thicket Way. This storm drain has been placed on an HOA parcel north of the dedication to avoid encumbering the school site.

**Tree #'s 161, 162, 165, 166, 167, & 170.** These trees are all located with forest stand F-4. Tree #161 is a 30" Tulip Poplar in good health. Tree #162 is a 31" White Oak in good health. Tree #165 is a 33" Tulip Poplar in good health. Tree #166 is a 31" Tulip poplar in good health. Tree #167 is a 31" Tulip Poplar in good health. Tree #170 is a 35" Black walnut in fair health. The trunks and critical root zones for each of these trees are located within the proposed storm drain easement. The removal of these trees are necessary to construct a storm drainpipe and public trail connection from the proposed development to the intersection of Greentree Road and existing Grubby Thicket Way without encumbering the school site.

### **Trees Outside of a Forest Stand**

**Tree #'s 140, 141, 142, & 143.** These trees are all located north of forest stand F-1 along the eastern property line of the site. Tree #140 is a 31" Silver Maple in fair health. Tree #141 is a 30" Silver Maple in fair health. Tree #142 is a 35" Northern Red Oak in good health. Tree #143 is a 40" American Sycamore in good health. These trees are located along the rear property line of proposed lots and require impacts to the critical root zone in order to grade out the lots and provide ESD required to treat stormwater. The applicant will work with a certified arborist in the field to reduce impacts to trees 140, 141, 142 and 143 to the greatest extent possible with the goal of retaining these trees. Due to the critical root zone impacts anticipated at this time, these trees are shown as removed on this plan and mitigation plantings at a 1:4 caliper ratio will be provided even if the trees are saved.

**Tree #149.** This 36" Black Cherry is located south of forest stand F-3 along the eastern property line and is in poor health. This tree is located along the rear property line of proposed lots and

requires impacts to the critical root zone in order to grade out the lots and provide ESD required to treat stormwater. Unlike the trees above, tree #149 is in poor health. Grading and construction activities within the critical root zone will likely further degrade the health of this tree. The construction of houses will provide a target for this tree creating a hazardous condition requiring the trees removal.

**Tree #158.** This 27" Eastern red cedar is located south of forest stand F-3 along the eastern property line and is in poor health. This is the only specimen tree located well within the center of the site outside of a forest stand. Tree #158 is in poor health and is being choked out by extensive vine coverage. As this tree is already demonstrating signs of stress the anticipated construction activities uses around the location of this tree, such as sidewalks, structures, and infrastructure, combined with any attempts to retain the tree, will further degrade the health of this tree. The construction of houses will provide a target for this tree creating a hazardous condition requiring the trees removal.

### **C. Tree-by-tree Analysis- Disturbed/Retained**

**Tree #8.** This 41" Pin Oak is located within a 4.3-acre parcel of land being dedicated to Montgomery County for a future school site. The need for a variance for the removal of this tree will be addressed by Montgomery County Public Schools in the future, prior to the construction of the school site. Impacts to 2% of the Critical Root zone are required to construct a roadway adjacent to the school site dedication and tie out to existing grade.

**Tree #9.** This 32" Red Maple is located within a 4.3-acre parcel of land being dedicated to Montgomery County for a future school site. The need for a variance for the removal of this tree will be addressed by Montgomery County Public Schools in the future, prior to the construction of the school site. Impacts to 17% of the Critical Root zone are required to construct a roadway adjacent to the school site dedication and tie out to existing grade.

**Tree #19.** This 35" Tulip Poplar is located within Forest Stand F-1 and is in good health. Impacts to 7% of the Critical Root zone are required to provide a Public Utility Easement, ESD and grading along a master planned right-of-way connecting Greentree Road to Renita Lane.

**Tree #25.** This 32" Tulip Poplar is located within Forest Stand F-1 and is in good health. Impacts to 7% of the Critical Root zone is required to provide ESD and grading at the rear of one lot.

**Tree #56.** This 32" Tulip Poplar is located within Forest Stand F-1 and is in good health. In order to mitigate noise from Interstate I-495, as recommended by Planning Staff, the Applicant has proposed to construct a noise wall just outside of the boundary of the property within the forested SHA right-of-way. A noise wall was not originally provided by SHA along the subject property because of its previous use as a radio tower site. The proposed noise wall will connect with the existing noise walls that were previously provided by SHA along properties adjacent to each side of the project site. The wall was redesigned to avoid the removal of this specimen tree. However, unavoidable impacts to 20% of the Critical Root zone are required to provide a noise wall.

**Tree #61.** This 31" Tulip Poplar is located within Forest Stand F-1 and is in good health. Impacts to 12% of the Critical Root zone are required to provide ESD to treat the road connecting Greentree Road to Renita Lane, a trail connection from the forest trail to this same road, and to provide ESD in the rear of one lot.

**Tree #103.** This 33" Red Maple is located within Forest Stand F-1 and is in fair health. Impacts to 16% of the Critical Root zone are required to provide ESD in the rear of two lots.

**Tree #131.** This 31" Tulip Poplar is located within Forest Stand F-1 and is in good health. Impacts to 9% of the Critical Root zone are required to provide ESD and grading for a master planned right-of-way connecting Green Tree Road to Renita Lane.

**Tree #155.** This 43" White Oak is located just off the property near Forest Stand F-3 and is in fair health. Impacts to 23% of the Critical Root zone are required to provide ESD behind two lots. This tree is located along Derbyshire Court on the low side of a retaining wall. Impacts to the actual critical root zone are unlikely given the tree is about 6 feet below the existing elevation of the WMAL site and critical root zones are typically located within the first few inches of existing grade.

**Tree #171.** This 37" Tulip Poplar is located along the property line within Forest Stand F-4. This tree is considered to be in poor health because it is leaning and covered extensively with vines. Impacts to 25% of the Critical Root zone are required to provide ESD on a parcel that separates the forest stand from proposed lots. This tree is not marked to be removed due to reasons given for the poor health rating and distance from a target on the property subject to preliminary plan.

**Tree #172.** This 42" Black Gum is located off-site near the property line north of Forest Stand F-4. This tree is in fair health and is covered extensively with vines. Impacts to 15% of the Critical Root zone are required to provide ESD on a parcel that separates the forest stand from proposed lots.

**Tree #181.** This 51" Red Maple is located within Forest Stand F-2. This tree is in fair health. Impacts to 28% of the Critical Root zone are required to grade, provide ESD and a noise wall/fence to mitigate noise coming from I-270 behind two lots along a master planned right-of-way connecting Greentree Road to Greyswood Road.

**Tree #204.** This 35" Red Maple is located within Forest Stand F-2. This tree is in fair health. Impacts to 8% of the Critical Root zone are required to provide a noise wall/fence to mitigate noise coming from I-270 behind two lots along a master planned right-of-way connecting Greentree Road to Greyswood Road.

**Tree #243.** This 40" Red Maple is located within Forest Stand F-2. This tree is in fair health. Impacts to 19% of the Critical Root zone are required to provide an alley and grading on one lot.

**Tree #246.** This 34" Red Maple is located just off the property near Forest Stand F-3 and is in fair health. Impacts to 23% of the critical root zone are required to provide grading on a parcel

behind proposed lots. This tree is located along Derbyshire Court on the low side of a retaining wall. Impacts to the actual critical root zone are unlikely given the tree is about 6 feet below the existing elevation of the WMAL site and critical root zones are typically located within the first few inches of existing grade.

**Tree #177.** This 31" Tulip Poplar is located within Forest Stand F-2 and is in fair health. Impacts to 21% of the Critical Root zone are required to provide a public road right-of-way, Public Utility Easement, ESD and grading connecting Greentree Road to Greyswood Road.

#### **D. Requirements for the Granting of a Variance**

The requirements for the granting of a variance are provided below, followed by the applicant's presentation of how those requirements are met.

*(1) Describe the special conditions peculiar to the property which would cause the unwarranted hardship:*

The Applicant, in coordination with M-NCPPC staff, is providing publicly dedicated, master planned and DOT required roadway connections into the site. These connections to the surrounding existing roadway infrastructure are vital for community safety and maneuverability. All existing public rights-of-way that surround the WMAL site terminate into areas of existing forest that contain specimen trees. Failing to allow these roadway connections, in order to save the specimen trees, will preclude ideal roadway networks necessary to make the proposed community functional and safe. This would leave undesirable and inefficient options for connecting proposed roadways to the existing infrastructure that surrounds the site and may result in fewer access points into the site, thus creating maneuverability and fire safety concerns. Crossings that will not align with existing roads, in order to avoid disturbance to the specimen trees, will create additional, unnecessary intersections, and increase the likelihood of accidents occurring. Other right-of-way locations were evaluated, with the Applicant and staff agreeing that the proposed locations are the best choice.

In order to mitigate noise from Interstates I-495, as recommended by Planning Staff, the Applicant has proposed to construct a noise wall just outside of the boundary of the property within the forested SHA right-of-way. A noise wall was not originally provided by SHA along the subject property because of its previous use as a radio tower site. The proposed noise wall will connect with the existing noise walls that were previously provided by SHA along properties adjacent to each side of the project site. The wall was redesigned to avoid the removal of this specimen tree. However, unavoidable impacts to the Critical Root zone are required to provide a noise wall. Additionally, as recommended by planning staff, some impacts to specimen trees are required to mitigate for noise coming from I-270.

The Applicant is voluntarily dedicating a 4.3-acre school site contained within the WMAL site to Montgomery County, Maryland. The removal of specimen trees are

necessary to construct a storm drainpipe and public trail connection from the proposed development to the intersection of Greentree Road and existing Grubby Thicket Way located north of the school site. Relocating the storm drainpipe and trail to the south to avoid specimen tree impacts would encumber the school site.

Additionally, the property contains specimen trees located outside of the forest stands. The majority of these trees are located along the eastern property line and have critical root zones that cross into the proposed limits of disturbance. Every effort will be made in the field to save these trees. Given the disturbances anticipated at this time, they have been counted as removed and will be mitigated for at a 1:4 caliper ratio even if they are retained. Only one tree, an Eastern Red Cedar in poor health, is located entirely within the limits of disturbance. Site construction and the anticipated improvements will further deteriorate the health of this tree. For this reason, it is not feasible to retain this tree.

*(2) Describe how enforcement of this Chapter will deprive the landowner of rights commonly enjoyed by others in similar areas:*

Given the number and distribution of 30" and greater trees on this property, combined with the location of existing public right-of-ways adjacent to the site that terminate into areas containing specimen trees, failing to grant a variance will preclude the landowner from providing ideal roadway networks and infrastructure necessary to make the community functional and safe. This would leave the applicant with undesirable and inefficient options for connecting proposed roadways to the existing infrastructure and may result in fewer access points into the site creating fire safety concerns. Crossings that will not align with existing roads in order to avoid disturbance to the specimen trees will create additional, unnecessary intersections, and further increase the likelihood of accidents occurring.

Additionally, noise mitigation measures would not be able to be implemented to bring noise levels within County standards for noise coming from Interstates I-495 and I-270.

In order to provide Montgomery County with an unencumbered 4.3-acre school site the removal of specimen trees is necessary. Finally, impacts to six (6) trees located along the property line and one tree in poor health are necessary to provide storm water management using environmental site design. Steps will be taken in the field to work with an arborist to reduce impacts to the greatest extent possible for trees in fair to good health while still mitigating for their removal at a 1:4 caliper ratio. Trees in poor health will be removed as their condition will likely worsen under the stress of construction and the addition of targets will create a hazardous condition.

*(3) Verify that State water quality standards will not be violated and that a measurable degradation in water quality will not occur as a result of granting the variance,*

The redevelopment of this property and the implementation of the proposed Preliminary Plan are subject to Chapter 19 of the Montgomery County Code, which controls Sediment Control and Stormwater Management consistent with State water quality standards and includes measures to improve watershed quality through the provision of a comprehensively designed and integrated stormwater management system that relies on Environmental Site Design (ESD) practices. The goal of ESD is to provide stormwater quantity and quality controls that are nearly equivalent to woods in good condition. The existing site and surrounding communities were developed prior to modern stormwater management practices and standards. The redevelopment of the property will improve water quality conditions on-site and downstream through the integration of ESD.

*(4) Provide any other information appropriate to support the request.*

The WMAL site contains approximately fifty-nine acres of open field and has been in this condition for at least fifty years. Because of this application, approximately 550 trees will be planted, significantly enhancing the tree canopy coverage of the property.

The removal of specimen trees located within forest stands will be mitigated for in accordance with Section 22-A. All specimen tree removals outside of forest stands will be mitigated for by providing mitigation plantings at a 1:4 caliper ratio.

In addition to meeting the criteria of subsection (a), the granting of this variance:

*(1) Will not confer on the applicant a special privilege that would be denied to other applicants,*

Granting the variance will not confer a special privilege on the applicant. As described above, the removal of specimen trees is necessary to connect proposed roadways as part of the county master plan or as required by County staff. In order to make these connections as efficiently as possible these disturbances are necessary. Other specimen trees are being impacted to provide required noise mitigation measures from Interstates I-495 and I-270. The remaining specimen trees are to provide the County with an unencumbered 4.3-acre voluntary public school land dedication, impacts to critical root zones of trees along the eastern property line where special measures will be taken in the field using a certified arborist to reduce impacts and the removal of trees in poor health. Additionally, the applicant will mitigation at a 1:4 caliper replacement ratio for all specimen tree removals outside of forest stands.

*(2) Will not be based on conditions or circumstances which result from the actions by the applicant,*

The requested variance is based upon the nature of the existing site, distribution of the subject trees, coordination with M-NCPPC staff to provide master planned and County-required roadway connections, noise mitigation, and the other considerations discussed above. Without the removal of specimen trees, the community will be deprived of master planned road connections, noise mitigation from Interstates I-495



and I-270, an unencumbered 4.3-acre school site dedication, critical root zone impacts that can be minimized in the field in coordination with a certified arborist and the removal of trees in poor health.

- (3) *Will not be based on a condition relating to land or building use, either permitted or nonconforming, on a neighboring property,*

The requested variance is based upon the nature of the existing site, distribution of the subject trees, surrounding roadways, and coordination with M-NCPPC Staff and not on a condition relating to land or building use on a neighboring property.

- (4) *Will not violate State water quality standards or cause measurable degradation in water quality.*

The redevelopment of this property and the directly associated need for a variance will improve water quality conditions on site and downstream through the integration of Environmental Site Design. The redevelopment is subject to Chapter 19 of the Montgomery County Code, which has been determined by the Maryland Department of the Environment to be in conformance with the State's water quality standards.

#### **E. Conclusion**

The project provides the opportunity to offer needed single family detached and attached housing in a down-county location, in close proximity to existing infrastructure. The features described above are vital to creating a successful community. With land dedicated to provide master planned and DOT required roadway connections, noise mitigation from Interstates I-495 and I-270, the dedication of an unencumbered 4.3-acre public school site and other considerations, impacts to the forest are unavoidable. Without these impacts, the community and existing communities that surround the project will be deprived of necessary features that would allow functionality under modern day standards.

Thank you for your consideration of this request and feel free to call or email with any questions or to discuss these matters. I can be reached at (240) 912-2150 or [mwessel@rodgers.com](mailto:mwessel@rodgers.com).

Sincerely,  
Rodgers Consulting, Inc.



Matthew J. Wessel, PLA, ISA Certified Arborist

Encl: Preliminary Forest Conservation Plan

Cc: File

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WMAL: Specimen Trees Variance & Mitigation								Mitigation	
Tag Number	DBH	Botanical Name	Common Name	Condition	Comments	Field Observations	Status	Mitigation Type	Caliper Mitigation Required
8	41	<i>Quercus palustris</i>	Pin Oak	Poor	Impact to Provide road adjacent to School Site Land Dedication	Roots damaged, Broken branches, Wounded, Galls and Poor Limb	Impact/Save	2% CRZ Impact- Saved	
9	32	<i>Acer rubrum</i>	Red Maple	Fair	Impact to Provide road adjacent to School Site Land Dedication	Poor form	Impact/Save	17% CRZ Impact- Saved	
19	35	<i>Liriodendron tulipifera</i>	Tulip Poplar	Good	Greentree Road/Renita Lane Connection PUE and grading		Impact/Save	7% CRZ Impact- Saved	
25	32	<i>Liriodendron tulipifera</i>	Tulip Poplar	Good	Rear lot ESD and grading	Forked- Height Measured approx 3'	Impact/Save	20% CRZ Impact- Saved	
56	32	<i>Liriodendron tulipifera</i>	Tulip Poplar	Good	I-495 Noise Wall	Forked- Height Measured approx 3.5'	Impact/Save	20% CRZ Impact- Saved	
61	31	<i>Liriodendron tulipifera</i>	Tulip Poplar	Good	Greentree Road/Renita Lane ESD and Grading and ESD in rear of lot		Impact/Save	12% CRZ Impact- Saved	
69	35	<i>Liriodendron tulipifera</i>	Tulip Poplar	Good	Building/Lot Impact		Remove	Mitigation per Section 22A	
80	34	<i>Liriodendron tulipifera</i>	Tulip Poplar	Fair	Rear lot grading	Forked- Height Measured approx 3.5', Extensive vines	Remove	Mitigation per Section 22A	
81	33	<i>Liriodendron tulipifera</i>	Tulip Poplar	Good	Building/Lot Impact		Remove	Mitigation per Section 22A	
82	32	<i>Liriodendron tulipifera</i>	Tulip Poplar	Good	Building/Lot Impact		Remove	Mitigation per Section 22A	
83	30	<i>Liriodendron tulipifera</i>	Tulip Poplar	Good	Building/Lot Impact	Forked- Height Measured approx 3'	Remove	Mitigation per Section 22A	
85	31	<i>Liriodendron tulipifera</i>	Tulip Poplar	Good	ESD and Grading in rear of lot	Forked- Height Measured approx 3.5'	Remove	Mitigation per Section 22A	
88	35	<i>Liriodendron tulipifera</i>	Tulip Poplar	Fair	Greentree Road/Renita Lane Right-of-way, PUE and grading	Extensive vines, Poor form	Remove	Mitigation per Section 22A	
90	34	<i>Liriodendron tulipifera</i>	Tulip Poplar	Fair	ESD and Grading in rear of lot	Extensive vines, Poor form	Remove	Mitigation per Section 22A	
91	33	<i>Acer rubrum</i>	Red Maple	Poor	Greentree Road/Renita Lane ESD and Grading in rear of lot	Forked- Height Measured approx 4', Bad habit, Broken branches	Remove	Mitigation per Section 22A	
93	34	<i>Liriodendron tulipifera</i>	Tulip Poplar	Fair	Greentree Road/Renita Lane Right-of-way, PUE and grading	Leaning	Remove	Mitigation per Section 22A	
98	34	<i>Acer rubrum</i>	Red Maple	Poor	ESD and Grading in rear of lot	Trunk cavities, Bad habit	Remove	Mitigation per Section 22A	
102	38	<i>Liriodendron tulipifera</i>	Tulip Poplar	Fair	Rear lot grading, ESD	Multiple leaders	Remove	28% CRZ Impact- Remove	
103	33	<i>Acer rubrum</i>	Red Maple	Fair	Rear lot grading, ESD	Multiple leaders	Impact/Save	16% CRZ Impact- Saved	
112	30	<i>Liriodendron tulipifera</i>	Tulip Poplar	Fair	Building/Lot Impact	Forked- Height Measured approx 4.5', Multiple leaders	Remove	Mitigation per Section 22A	
119	31	<i>Liriodendron tulipifera</i>	Tulip Poplar	Fair	Building/Lot Impact	Bad habit	Remove	Mitigation per Section 22A	
131	31	<i>Liriodendron tulipifera</i>	Tulip Poplar	Good	Greentree Road/Renita Lane ESD and Grading		Impact/Save	9% CRZ Impact- Saved	
134B	31	<i>Acer saccharinum</i>	Silver Maple	Fair	Greentree Road/Renita Lane Right-of-way, PUE and grading	Multiple leaders, Trunk cavities, Leaning, Vines	Remove	Mitigation per Section 22A	
136	31	<i>Acer rubrum</i>	Red Maple	Fair	Greentree Road/Renita Lane Right-of-way, PUE and grading	Forked- Height Measured approx 3.5' Multiple leaders	Remove	Mitigation per Section 22A	
139	38	<i>Acer saccharinum</i>	Silver Maple	Fair	Greentree Road/Renita Lane Right-of-way, PUE and grading	Multiple leaders	Remove	Mitigation per Section 22A	
140	31	<i>Acer saccharinum</i>	Silver Maple	Fair	Rear Lot Grading Impact	Multiple leaders, Extensive vines	Remove	64% CRZ Impact- 1:4 Caliper Replacement	7.75
141	30	<i>Acer rubrum</i>	Red Maple	Fair	Rear Lot Grading Impact	Poor form	Remove	44% CRZ Impact- 1:4 Caliper Replacement	7.50
142	35	<i>Quercus rubra</i>	Northern Red Oak	Good	Rear Lot Grading Impact		Remove	40% CRZ Impact- 1:4 Caliper Replacement	8.75
143	40	<i>Platanus occidentalis</i>	American Sycamore	Good	Rear Lot Grading Impact		Remove	53% CRZ Impact- 1:4 Caliper Replacement	10.00
149	36	<i>Prunus serotina</i>	Black Cherry	Poor	Rear Lot Grading Impact	Extensive vines, Broken branches	Remove	61% CRZ Impact- 1:4 Caliper Replacement	9.00
155	43	<i>Quercus alba</i>	White Oak	Fair	Parcel Grading/ESD Impact	Extensive vines	Save	23% CRZ Impact- Saved	
158	27	<i>Juniperus virginiana</i>	Eastern Redcedar	Poor	Grading/Lot/Alley Impact	Extensive vines, Multiple leaders	Remove	1:4 Caliper Replacement	6.75
161	30	<i>Liriodendron tulipifera</i>	Tulip Poplar	Good	School Site Land Dedication		Remove	Mitigation per Section 22A	
162	31	<i>Quercus alba</i>	White Oak	Good	School Site Land Dedication		Remove	Mitigation per Section 22A	
165	33	<i>Liriodendron tulipifera</i>	Tulip Poplar	Good	School Site Land Dedication		Remove	Mitigation per Section 22A	
166	30	<i>Liriodendron tulipifera</i>	Tulip Poplar	Good	School Site Land Dedication		Remove	Mitigation per Section 22A	
167	31	<i>Liriodendron tulipifera</i>	Tulip Poplar	Good	School Site Land Dedication		Remove	Mitigation per Section 22A	
170	30	<i>Juglans nigra</i>	Black Walnut	Fair	School Site Land Dedication	Poor form	Remove	37% CRZ Impact- Mitigation per Section 22A	
171	37	<i>Liriodendron tulipifera</i>	Tulip Poplar	Poor	Grading/ESD Impact	Leaning, Extensive vines	Impact/Save	6% CRZ Impact- Saved	
172	42	<i>Nyssa sylvatica</i>	Black Gum	Fair	Grading/ESD Impact	Extensive vines	Impact/Save	8% CRZ Impact- Saved	
173	32	<i>Liriodendron tulipifera</i>	Tulip Poplar	Fair	Greentree Road to Greyswood Connection	Leaning, Extensive vines	Remove	Mitigation per Section 22A	
175	31	<i>Prunus serotina</i>	Black Cherry	Good	Greentree Road to Greyswood Connection		Remove	Mitigation per Section 22A	
177	31	<i>Liriodendron tulipifera</i>	Tulip Poplar	Fair	Greentree Road to Greyswood Connection	Extensive vines	Impact/Save	21% CRZ Impact- Saved	
181	51	<i>Acer rubrum</i>	Red Maple	Fair	Grading/Lot Impact	Multiple leaders	Impact/Save	28% CRZ Impact- Saved	
204	35	<i>Liriodendron tulipifera</i>	Tulip Poplar	Fair	Noise Fence Impact	Extensive vines	Impact/Save	8% CRZ Impact- Saved	
223	33	<i>Liriodendron tulipifera</i>	Tulip Poplar	Fair	Greentree Road to Greyswood Connection	Forked- Height measured approx 3.5' Multiple leaders	Remove	Mitigation per Section 22A	
225	31	<i>Liriodendron tulipifera</i>	Tulip Poplar	Fair	Greentree Road to Greyswood Connection	Extensive vines	Remove	Mitigation per Section 22A	
228	34	<i>Liriodendron tulipifera</i>	Tulip Poplar	Good	Greentree Road to Greyswood Connection		Remove	Mitigation per Section 22A	
243	40	<i>Liriodendron tulipifera</i>	Tulip Poplar	Fair	Alley, Grading and ESD Impact	Multiple leaders	Impact/Save	19% CRZ Impact- Saved	
246	34	<i>Acer rubrum</i>	Red Maple	Fair	Parcel Grading and ESD, Rear Lot Grading Impact	Growth affected by placement in well	Save	35% Regulatory CRZ Impact- Saved	
								Total	49.75
								Min. Tree Caliper (Inches)	3
								Number of Trees	17