



## Reforest Rockville

[www.ReforestRockville.org](http://www.ReforestRockville.org)

May 3, 2024

Dear Mayor and Council,

As discussion begins about changes to the tree code in Rockville, we commend the Mayor & Council for their strong support for trees and green spaces during the recent campaign. Building on this momentum, we ask for your support in the following areas:

- **Update the city tree master plan** to prioritize native and near-native trees that will thrive as street trees in our shifting weather patterns.
- Continue to **support homeowners to plant trees** (financially, native tree giveaways, outreach).
- **Protect existing trees**, especially mature native trees.
- Develop a comprehensive plan to **address invasive plants** in Rockville, especially **vines** which kill trees.
- **Trees before sidewalks!** Each square of sidewalk concrete produces 10 gallons of runoff per one inch of rain. With increasingly heavy, punctuated downpours, this is a safety issue as we have seen with flooding in Twinbrook.
- For developers, require replanting and extended care for trees at the **highest level possible**.

The above recommendations require little in budget resources and will have a tremendous impact on the quality of life in Rockville.

Thank you,

The Reforest Rockville Team  
[trees@ReforestRockville.org](mailto:trees@ReforestRockville.org)  
[www.ReforestRockville.org](http://www.ReforestRockville.org)

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**From:** Wayne Breslyn <[waynebreslyn@gmail.com](mailto:waynebreslyn@gmail.com)>  
**Sent:** Monday, August 5, 2024 8:07 AM  
**To:** mayorcouncil <[mayorcouncil@rockvillemd.gov](mailto:mayorcouncil@rockvillemd.gov)>  
**Subject:** Public Hearing: Tree Ordinance Revisions

**WARNING - External email. Exercise caution.**

Dear Mayor and Council Members,

I'd like to express gratitude to City Staff as well as the Mayor & Council for their diligent and thorough approach in revising the tree ordinance. I do appreciate the commitment to enhancing our city's tree canopy, parks, and green spaces.

Based on the information in the agenda packet there are two areas I would like to address.

**Clarifying what types of trees will be required as replacements.**

I ask that two out of three trees be native to our area and one of the trees be a canopy/shade tree (e.g. white oak, red maple). This approach would bring significant environmental benefits, including mitigating flooding and the heat island effect, while also supporting our local ecosystems. **Space, location, site distance and etc should be the first guiding principal for tree selection.**

**Extending range values across all categories.**

Lowering the threshold for replacement to six inches is a welcome addition. To be consistent, the change should be applied across all ranges (p281). For example:

Size of Significant Tree Removed (inches)	Minimum 2½-Inch Caliper Tree Replacement (number of trees)
6-12 DBH	1
13-18 DBH	2
19-24 DBH	3
25 and greater DBH	6

Note that the difference in cross-sectional area for a 18 inch DBH tree is 255 sq in. A 2.5 in caliper tree is 4.91 sq in. This is over 50 times bigger. Modifying the table better reflects this loss.

Thank you once again for this important update to our tree ordinance and for all the hard work from the City of Rockville to make this happen.

Sincerely,

Wayne Breslyn  
Stanley Avenue, Twinbrook

## Public Hearing Written Comments

Monday, August 5, 2024

### Amendments to Chapter 10.5 of the City Code, the Forest and Tree Preservation Ordinance

	Name	Address Phone Number Email
1.	Caryl McNeilly Twinbrook	carylmcneilly@gmail.com
2.	Sarah Salazar Twinbrook	mariposarah@gmail.com
3.	Lei Liu Tilden Woods	lydia_liu10@yahoo.com
4.	Sandra Robinson Bethesda	granitesong@aol.com
5.	Maya Chauls 14101 Manorvale Rd	jonandmaya@yahoo.com
6.	Anne Goodman, PhD 9807 Veirs Dr., Apt 120	communitywildlifehabitat@gmail.com
7.	Carol Hannaford Twinbrook	carol.hannaford@gmail.com
8.	Jeff Schloss Rockshire	scalja1@gmail.com
9.	Dr. Robert E. Williamson Twinbrook	skipcaryl2@aol.com

## Judy Penny

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**From:** Caryl McNeilly <carylmcneilly@gmail.com>  
**Sent:** Monday, August 5, 2024 9:46 AM  
**To:** mayorcouncil  
**Subject:** M&C Tree Discussion Monday: Please strengthen FTPO further  
  
**Importance:** High

**WARNING - External email. Exercise caution.**

To the Honorable Mayor Ashton and Council Members: **I appreciate Rockville's commitment to increasing forest canopy** to achieve the city's climate change and flood mitigation goals. And I welcome any strengthening of city code to reflect the goals of SB256 to protect more forested land in Maryland, within Rockville's flexibility as a priority funding area under the law. **I have concerns and questions about some of the proposed amendments to Chapter 10.5 of the City Code, the Forest and Tree Preservation Ordinance (FTPO).**

**Bravo for the proposed requirement to replace trees 6" in diameter at breast height (DBH) [pg 248: "The current replacement requirements allow trees below 12" in diameter at breast height (DBH) to be removed without replacement requirements. The staff has found this results in the removal of valuable trees that provide significant canopy within the City."]** **And I urge you to strengthen the replacement requirements for trees 19" - 29" in diameter, including larger diameter replacements for larger diameter trees (they provide disproportionately more environmental benefits) [pg 281]:**

<u>Size of Significant Tree Removed (inches) (number of trees)</u>	<u>Minimum 2½-Inch Caliper Tree Replacement</u>
126 – 18 d.b.h. DBH	1
greater than 18 19 – 24 d.b.h. DBH	2
Greater than 24 25-29 d.b.h. DBH	3
Replacement of a specimen or champion tree shall be at twice the above rate. 30 and greater DBH	6

**Please codify the City Forester as responsible for the FTPO**, in line with previous practice, rather than designating a "Code Administrator" [pg. 247]. This would better reflect the intent of SB 256, in contrast to the recent change to administering the FTPO through the Community Planning and Development Services Department. I welcome the code change "The definition of "street tree" will be expanded to include trees planted within private roads." [pg 247]

**I urge you to require more than three trees per lot for single family homes, and increase the required number with lot size.** [pg 249: • While encouraging the retention of existing trees, require a minimum of three trees per lot for all new detached single-family homes, both on vacant lots and teardown/rebuilds – FASTER & SMARTER. The discussion on pg 253 implies fewer could be considered on smaller lots; I urge you to expand the provisions to require more trees on larger lots.

**The proposed code revisions lack a complete discussion of “replacement with what”. I welcome the statement that “staff support the prioritization of native and “near-native trees”, while recognizing the various factors involved in species selection in an urban environment.” [pg 250] But that appears to apply only to the separate Master Street Tree Plan. I also applaud the statement that “... applicable sites are subject to nonnative invasive management plans. Such plans span the duration of the associated warranty and maintenance period (5 years).” [pg 250] But **revision of the FTPO in regard to tree replacement would benefit from prohibiting replacement with invasive non-native trees and requiring (or at least incentivizing) developers and homeowners to plant native and near-native trees**, emphasizing “keystone” species, which create the most productive and sustainable habitat for pollinators, butterflies, birds and other wildlife <https://www.nwf.org/Garden-for-Wildlife/About/Native-Plants/keystone-plants-by-ecoregion>.**

**In sum, I applaud your commitment to expanding tree canopy and urge you to refine the amendments to Chapter 10.5 of the City Code to better achieve that goal.**

Thank you for your attention and your service to Rockville.

Sincerely,

*Carol McNeilly  
Twinbrook neighborhood*

## **Judy Penny**

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**From:** skipcaryl2@aol.com  
**Sent:** Monday, August 5, 2024 10:04 AM  
**To:** mayorcouncil  
**Subject:** Trees tonight: Please strengthen FTPO Provisions

**WARNING - External email. Exercise caution.**

Dear Mayor Ashton and Council Members,

**Thank you for your commitment to increasing forest canopy.** I appreciate all measures to strengthen the FTPO to achieve to achieve it.

**I welcome the proposed requirement to replace trees 6" in diameter at breast height (DBH), and expanding the definition of "street tree" to include trees planted within private roads.**

**I urge you to strengthen the replacement requirements for trees 19" and larger in diameter, including larger diameter replacements for larger diameter trees (they provide disproportionately more environmental benefits). The code should require a minimum share of "keystone" species--a small number of large native species (e.g. oaks) are key to support the entire ecosystem.**

**In sum, I applaud your commitment to expanding tree canopy and urge you to refine the amendments to Chapter 10.5 of the City Code to better achieve that goal.**

Thank you for your attention and your hard work on our behalf.

Sincerely yours,  
Dr. Robert E. Williamson  
Twinbrook, Stillwell Road

## Re: Suggestions for Tree Ordinance Changes

Shaun Ryan <sryan@rockvillemd.gov>

Fri 8/30/2024 9:46 AM

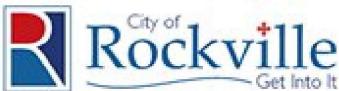
To:dbreslyn@yahoo.com <dbreslyn@yahoo.com>

Cc:ElectedAppointed <ElectedAppointed@rockvillemd.gov>;Barack Matite <bmatite@rockvillemd.gov>;Linda Moran <lmoran@rockvillemd.gov>;Ricky Barker <rbarker@rockvillemd.gov>;John Foreman <jforeman@rockvillemd.gov>;Mary Grace Sabol <msabol@rockvillemd.gov>;Shayda Musavi <smusavi@rockvillemd.gov>

Hello Donna,

Thank you for providing feedback on the amendments to the Forest and Tree Preservation Ordinance. Public feedback strengthens our processes and decision making and is greatly appreciated. Your input will be included in the public record.

V/R,



[www.rockvillemd.gov](http://www.rockvillemd.gov)

**Shaun Ryan M.A.**

**DEVELOPMENT REVIEW SUPERVISOR**

ISA Certified Arborist FL-9504A & Qualified Tree Risk Assessor

MD DNR Qualified Preparer

Community Planning and Development Services

111 Maryland Avenue

Rockville, MD 20850

**DIRECT EXTENSION: 240.314.8233**

**OFFICE MAIN LINE: 240.314.8200**

**How was your experience with us? Take a quick survey and let us know  
<https://www.surveymonkey.com/r/JD9CWXC>**

I sometimes send emails out of hours; I do not expect others to do so.

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**From:** Donna Breslyn <dbreslyn@yahoo.com>

**Sent:** Thursday, August 29, 2024 9:19 AM

**To:** mayorcouncil <mayorcouncil@rockvillemd.gov>

**Subject:** Suggestions for Tree Ordinance Changes

### **WARNING - External email. Exercise caution.**

Dear Mayor and Council,

Thank you for your commitment to protecting and increasing the number trees in Rockville.

Recently I learned about changes to the city's tree ordinance. Please be sure to be very clear that developers replace any trees removed with native trees. And the replacements should include large trees, like oaks, that improve the tree canopy in our city, keep our streets and sidewalks cool, and support our environment.

Please also require that the expansion of the tree size replacement chart applies to all categories, not just the first category in the table.

Thank you,

Donna Neiderheiser

The Village at Rockville

**Rockville Mayor and Council Meeting**  
**September 9, 2024**  
**Sam Freedenberg - Testimony on Behalf of Rockville Cemetery**

Honorable Mayor and Council Members:

My name is Sam Freedenberg, and I am Community Director for Rockville Cemetery. I would like to append my remarks to those given by Hannelore Quigley and Will Pozzi.

The one thing that strikes anyone entering Section 1 of Rockville Cemetery is the incredible cultural, religious, and ethnic diversity of those for whom the cemetery is their final resting place.

There may be no other place in this city where one can see that diversity more clearly - burial site markers engraved in a multitude of languages - Spanish, Farsi, Russian, French, Chinese, Japanese, Korean, Arabic, Hebrew, Tagalog - from countries of origin spanning every continent on the globe.

Sadly, this being not only an historic cemetery but an active one, in a short period of time we see the funerals of:

- a physician's assistant, born in Sri Lanka,
- the young child of a family of the Bahá'í faith,
- a doctor and his wife who emigrated from Indonesia,
- two centenarians, one born in Russia, the other the widow of a man who served in the White House during the Cuban Missile crisis,
- and a Vietnam War veteran - one of more than 400 from every war this country has fought buried in the cemetery - who was born and raised in Rockville in the first electrified house on Baltimore Road.

We have promised the families of these people, and everyone from 1742 until today, that Rockville Cemetery will be here *in perpetuity*. I can't imagine a Rockville without this wonderful resource, this tranquil place of historical inspiration, pastoral beauty, and calm reflection. Can you or anyone else?

I urge you to grant Rockville Cemetery an exemption for the tree ordinance.

Thank you.

## **David Hill Testimony re: Tree Ordinance Impact on Rockville Cemetery, Sept. 9. 2024**

I'm a friend of Rockville Cemetery and have been following there, and I also speak to you as a long-term land use commissioner in both the city and the county.

This is a state law that is pushing the FTPO to change, and the State, since Rockville is in a priority funding area, provided the option for local jurisdictions exercising their discretion towards exemptions for purposeful land uses. I suggest to you the Cemetery is one.

I also served as a RORZOR commissioner in the naught years, which was the major rewrite to the city ordinance, that maybe getting updated this fall, but is still in operation. I think we committed an inadvertency in that process for the Cemetery. I don't have enough time to explain that further. We can work with staff about this.

I encourage you: You've heard about the cemetery operations and history, I speak to the land use. Cemeteries are necessary. Where do we put people when they die? It's a fundamental need of a community and Rockville Cemetery is probably the leading cemetery in the town. It's an ecumenical cemetery; anyone can be buried there and that's important.

The cemetery only uses about 40% of its land now and needs to use more in the future. It's uncertain when that timeframe happens, but certain. The forestry ordinance mentioned was really written towards the idea of accommodating buildings, not accommodating gravesites. And we know there's a problem with it that we have been waiting until the time for sectional enlargement within the cemetery land, to come forward with.

The State is pushing that right now because they're making the forestry requirement more strenuous, and the cemetery, I do not think, can absorb that strenuousness. The cemetery can make a beautifully forested area eventually, but that takes 20 or 30 years between the time where someone buys a plot to someone gets buried in it, and the trees grow back in. That's the problem that the forestry ordinance does not address and I think it's worthwhile for the City to think about addressing it. Or at least in this situation, not make the hole deeper that the cemetery must have already for near-term tree replacement. That's the purpose an exemption would serve.

So the Cemetery Association and its friends can work with staff on doing this. They came a bit late to the table in this process because they didn't hear about it to know. We've already met with staff once and I think we can meet further. Thank you.

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