City of Alexandria, Virginia

MEMORANDUM

DATE:	FEBRUARY 6, 2019
TO:	ACTING CHAIR MACEK AND MEMBERS OF THE PLANNING COMMISSION
FROM:	KARL W. MORITZ, DIRECTOR, DEPARTMENT OF PLANNING & ZONING
SUBJECT:	FEBRUARY 7, 2019 PLANNING COMMISSION HEARING - DOCKET ITEM #3

The 2019 update of the Landscape Guidelines was published to the February 7, 2019 Planning Commission hearing docket on January 25, 2019. Upon further review of the document following its publication, Staff recommends the following minor adjustments to the text prior to its forthcoming adoption by City Council on February 23, 2019:

- Correction of some typographical errors, in-text references and adjustments to sentence structure/phrasing in limited areas;
- Adjustments to two landscape plan preparation checklist items, which are incorrectly listed due to an editing error:
 - Clarify timing for the submission of the Invasive Management Plan (if applicable),
 - \circ Clarify timing for the submission of the tree soil volume diagram plan; and
- Adjustment to the order of the text on page 26 through page 30 for clarity.

Staff finds the above adjustments are necessary to provide a more user-friendly document for those preparing and reviewing landscape plans in the City.

City of Alexandria Planning Commission;

I am a Virginia Licensed Landscape Architect, who has practiced in the City, and whose employer is very active in the city. I have more than 20 years experience, and have been involved on various stakeholder levels in providing commentary on landscape codes for Prince Georges County, MD, DC's Green Area Ratio, Loudoun County, and on the National Level with the American Society of Landscape Architects ASHRAE 189.1 advisory subcommittee of the Professional Practice National Committee. I first became aware of these revisions through a colleague on the NVBIA, who were invited by the City to offer review. I pride myself on keeping current with the latest in landscape trends and technology. Much of the commentary I had previously provided to the City is along the same lines as with the other regional jurisdictions.

I would like to encourage the Commission to reject the current draft of the Landscape Guidelines and have the guidelines more broadly reviewed by the public, and by invitation to professional groups to whom these regulations would create undue difficulties in their practice, such as the Potomac and Maryland chapters of the American Society of Landscape Architects. I would also suggest having a larger meetings to be held by the Planning and Zoning Department to discuss commented items to obtain a broader range of opinion, and to work out more practical regulations.

The reasons for further revision and commentary to the document are many. Here are a few examples:

- The new native requirements are overly restrictive and are not of the very latest thinking in the industry. Often, true natives are not the best
 plant choice for landscapes as they can be quite fragile outside of their native habitat. For instance, red maples. A very popular tree in the
 region. However, the true native is prone to leaf scorching and bark split, as natively it's not open grown. This makes them terrible trees for
 most urban applications, where not much will survive (especially natives) And in some cases, there is not a full native replacement that will
 perform as well in the landscape and provide desired aesthetics. Trees such as Crepe Myrtles and Ginkgoes fall into this category.
- The exclusion of a "nativars" or certain hybrids as being excluded as natives. Many nativars, or varieties of native trees selected for certain desirable traits, has become an acceptable in the 'native' category. These trees generally perform better in the landscape than the species. Using the red maple example, varieties of the Native have been introduced that will survive and thrive in harsher urban environments. Added benefits are better aesthetics, more range of mature canopy sizes (lager trees in smaller spaces), better disease and pest resistance. Research is being done on these plants for their effects with pollinators (some are sterile to prevent fruiting), but can be easily compensated for by including other pollinator plants in the same landscape utilizing "high performance" landscape techniques.
- The "provenance" requirement of plant material. While good intentioned, this is often not practical. A huge amount of plants, especially "patent" plants, originate in the Northwest US where the growers are. These plants are then sold to local growers for "finishing". This regulation, as authored, would eliminate a huge quantity of available plants, as their origin is not in the states mentioned in the Landscape Guidelines. This is also too restrictive in finding the proper materials in certain times of year. I have had plants come from Georgia and Florida when local availability was thin, and did not have any issues. If the tree or plant is young enough, such as calipers less than 2" for trees, it should not have any issues adapting to the local environment.
- The City should not be maintaining lists, such as for invasive species. It should, however, point to State or certain third party resources which maintain the lists more often without the need for a legislative process for approval.
- "As-Built" process. This is an outdated and expensive practice that, to my knowledge, no other local jurisdiction uses. There should be no reason to as-built a landscape. It is either installed to the approved plan, or its not, and needs to be rectified. A simpler certification process would be more practical, more economical for the City and developer, and achieve the same outcomes, if not better.
- Minimum sizes of plants. For instance, the shrubs minimum height requirement for all shrubs is 18". There are numerous shrubs that do not
 ever naturally achieve 18" in height. This needs to be changed to an industry "gallon" or pot-number size, or explicitly state that shrubs used
 for screening must be of a certain height.

There are many other issues that still exist in the revised draft that should be further investigated and re-written to make these regulations practical and in-line with the latest thinking in the landscape industry. Feel free to contact me with any questions or comments.

Regards,

Jason T. Radice, RLA, ASLA, LEED-AP BD+C

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MEMORANDUM

DATE:	FEBRUARY 7, 2019
TO:	ACTING CHAIR MACEK AND MEMBERS OF THE PLANNING COMMISSION
FROM:	KARL W. MORITZ, DIRECTOR, DEPARTMENT OF PLANNING & ZONING
SUBJECT:	FEBRUARY 7 PLANNING COMMISSION HEARING DOCKET ITEM #3 – 2019 LANDSCAPE GUIDELINES UPDATE

Staff offers the following points in response to the comments from Mr. Jason Radice on the 2019 Landscape Guidelines Update:

In regard to the overall concerns about outreach and input from design professionals and specifically landscape architects, Staff actively engaged Landscape Architects and other design professionals throughout the process. Staff specifically invited area landscape architecture and engineering firms to participate in input sessions to discuss the potential revisions to the Landscape Guidelines. Additionally, Staff presented the proposed revisions at NVBIA to receive further input. Further, the primary Staff on the project are all registered Landscape Architects who have worked extensively in the area, both in the private and public sectors.

Native plants: Plant selection is an important design consideration on projects to ensure that the correct plant is used to fit the environmental conditions of the site. Native plants are not naturally less fit than exotic plants as broad categories – instead it is important that the design team select the appropriate species. Further, the native plant standards do address the availability and appropriateness for urban situations, where the percentage of native plant species has been lowered compared to more favorable sites, allowing selection of the appropriate plant from a wider palette.

"Nativars": Cultivars, selections, or hybrids of native plants have not been excluded from use. The only caveat is that native plants that are hybridized with non-native plants are not considered native.

"Provenance": City Staff have direct experience with problems of survivability of plants originating from significant distances and different latitudes. There is also strong academic research to support this. Further, the Landscape Guidelines includes a broad geography that encompasses a significant number of nurseries. Invasive species lists: The revised Landscape Guidelines will contain references that link to invasive species lists generated by the State and others.

As-builts: The requirement for as-built drawings for the landscape is the current practice per City Code.

Minimum size of plants: The minimum sizes stated follow nursery standards, specifically referencing AmericanHort, which was formerly the American Nursery & Landscape Association. This reference has not changed with the update (except to reference the organizations new name).