

Memorandum

To: Chery Chrusz, Planning Coordinator

From: Richard Bartolone

Date: February 7, 2024

Subject: HMH Carrier Clinic, Inc. – Adolescent Patient Unit

252 County Road 601

Block(s): 2001; 1001, Lot(s): 2, 14.02

Case: PB-08-23

This office has reviewed the application prepared by Dewberry Engineers, Inc. dated 9/08/2023, last revised 11/07/2023 for the above referenced application. The following comments are offered for your consideration.

1. Township code section 16-5.6d.3 requires the planting of 14 trees per acre on all residential and non-residential properties. Street trees and landscape buffer vegetation are not included in the planting requirement. The property contains 86.645+/- acres. However, the applicant has requested a variance to calculate the amount of required planting to be based on the amount of disturbance, not the total lot area. 6.27 acres are proposed to be disturbed for the proposed improvements. Base on the proposed area of disturbance (6.27 acres x 14 trees/acre = 87.78 = 88 trees (rounded) will be required to be installed to satisfy this requirement. The Landscape Schedules on sheets C-501, C-502 and C-503 identify 32 shade trees with a minimum 2½” -3” caliper, 52 flowering trees with a minimum 2½” -3” caliper and 63 evergreen trees at a minimum 6’ tall for a total of 147 proposed trees that qualify as acceptable replacement trees. The proposed buffer along East Mountain Road contains 28 trees -7 flowering trees at a minimum 2½” -3” caliper and 21 evergreen trees at a minimum of 6’ tall. The total number of trees required to be installed (147) minus the proposed buffer trees (28) (147-28) illustrates that the 119 proposed non-buffer and non-street trees satisfies the shade tree requirement for this application.

2. Township Code section 16-5.6d.15 requires the installation of street trees at 50’ on center spacing along all roadways. Two of the four existing street trees have been specified to remain after construction. A vegetated buffer has been proposed along East Mountain Road in the location where street trees are typically located. The majority of the proposed buffer is composed of evergreen trees. The proposed evergreen trees range in size from 6’-7’, 7’-8’ and 8-10’ tall and are located in a staggered pattern, approximately 12’ on center spacing. The applicant has proposed a variance to decrease the required 50’ vegetated buffer for the proposed improvements. It is the opinion of this office the proposed buffer is sufficient to satisfy the street tree and buffer requirement and will supply an adequate visual buffer for the improvements within a reasonable amount of time,

3. Township code section 16-5.6d.2 requires the protection of existing vegetation specified to remain after construction. The location of the limit of disturbance shall be marked out in the field and inspected by this office prior to any site disturbance.

4. Township Code Section 16-5.6.d.10 specifies the plant guarantee period to be 2 years after Township approval. The following note shall be added to the landscape plans.

“All plant material shall be guaranteed for at least two (2) years from the date of landscape inspection for approval and any plant material that does not survive within that time period or is in poor condition based upon the opinion of the Township Landscape Architect shall be replaced by plant material of the same size and species at the expense of the developer.”

5. The following plant species are listed as being invasive and are not allowed to be installed in the Township, alternate species shall be specified: ‘Goldflame’ Spirea (*Spirea bumalda* ‘Goldflame’), ‘Little Princess’ Spirea (*Spirea japonica*, ‘Little Princess’), ‘Snowmound’ Spirea (*Spirea nipponica* (‘Snowmound’), Dwarf Fountain Grass (*Pennisetum alopecuroides* ‘Hameln’), Kousa Dogwood (*Cornus kousa* Chinensis). Whenever possible, the use of native plant species is strongly encouraged.

6. The Township strongly recommends the use of native trees species whenever possible. Please substitute a native shade tree species for the specified Japanese Scholar Tree (*Sophora japonica* ‘Regent’) and substitute American Basswood (*Tilia americana*) for the specified ‘Greenspire’ Linden (*Tilia cordata* ‘Greenspire’).

7. The specified Willow Oak (*Quercus phellos*) is a member of the red oak family. Members of this oak family are highly susceptible to a number of significant issues, including Bacterial Leaf Scorch and Oak Wilt and are no longer recommended to be installed in the Township. An alternate shade tree native to the area shall be specified to replace Willow Oak.

8. There are a number of existing trees specified to be removed on the Tree Removal Plan, Sheet C-010 that have the potential to be transplanted and relocated on the site. Considerations should be made to transplant the following trees identified to be removed:

Tree #1: 6” caliper Flowering Crabapple

Tree #2: 6’ caliper Flowering Crabapple

Trees #27-41: 8” caliper Norway Spruce. These trees have been identified as candidates for possible relocation in Note #1 on the Landscape Plan-1, Sheet C-501.

Tree #83: 8” caliper American Holly

Tree #84: 8” American Holly

9. An evergreen hedge specified as 15 TPGG, located in the northwest corner of the proposed improvements has not identified in the plant list.

10. Six ‘Kwanzan’ Cherry trees have been specified on the west side of the proposed improvement area within an area specified to be planted with an upland meadow mixture. The meadow mixture has been designed to provide “food and cover for wildlife and pollinators” per the supplier’s website. Please substitute native flowering trees that will provide similar wildlife and pollinator benefits of the meadow mixture for the specified non-native flowering trees.

11. 57 of the 67 proposed evergreen trees are Norway Spruce. Additional varieties are recommended.

The following landscape-related comments were contained in the other review memoranda prepared for this application. The intent is to have a single source of comments/potential resolution comments in one location. The applicant has already agreed to work with this office to resolve all of issues list in their reviews and update the plans accordingly.

Shade Tree Committee

1. From §16-5.6(d)3 where 14 trees per gross tract shall be planted throughout the site in the case of nonresidential or multifamily development. The site contains 85 acres, which would equate to 1190 trees; based upon the total limit of disturbance (6.27 acres), a total of 88 trees should be planted. The applicant should discuss how this section of the Township ordinance will be met. A design waiver may be required.

2. The Shade Tree Committee recommends that the following non-native and potentially invasive trees and shrubs be replaced with the following suggested native species:
Replace *Tilia cordata* “Greenspire” with *Tilia americana* “Redmond”
Replace *Spirea japonica* “Little Princess” with *Ceanothus americanus* (New Jersey tea) or *Fothergilla gardenii* or *Itea virginica*. Replace *Kousa dogwood* with the native dogwood, *Cornus florida*. *Applicant’s response: This office has been in contact with Montgomery Township’s Board Landscape Architect on the landscape plan design and plant selection. The applicant will work with the Township Landscape Architect and other professionals on the plan selection and update the plans accordingly.*

3. It is unclear how many acres are on the property or what the disturbed acreage is, but in any case, the Shade Tree Committee would like to remind the applicant that Ordinance 16-5.6d3 requires the planting of a minimum of 14 trees per acre, plus street trees and required buffers. *Applicant’s response: Design waiver being requested to accept calculation based on limit of disturbance. Refer to response to Montgomery Township Planner Consultant’s review comment 5.7 within their January 18, 2024 memorandum.*

4. If the applicant is granted relief from planting the required number of trees, the applicant should: 1) install the remaining number of trees on public property, as directed by the Township landscape architect, or 2) contribute to the Montgomery Township Tree Replacement Fund, per Land Development Ordinance Amendment #09-1340. *Applicant’s response: Design waiver being requested to accept calculation based on limit of disturbance. Refer to response to Montgomery Township Planner Consultant’s review comment 5.7 within their January 18, 2024 memorandum.*

Montgomery Township Environmental Commission letter dated December 15, 2023

C. Landscaping

1. The applicant has identified 98 trees in the area of the project, and we are sorry to see that they propose to cut down 38 trees, ranging in diameter from 2-1/2” to 24”.

2. We do not regret the loss of the invasive callery Bradford pears, but most of the other trees are valuable to wildlife. Trees and other greenery promote human health and happiness, which we believe must be very beneficial to a facility such as this. There has been a study showing that birdsong increases happiness in people who can hear it, and the greater the variety of birdsongs, the greater the happiness. Another study has shown that birds build nests where there are at least 70% native trees, because birds feed caterpillars to their babies, and caterpillars feed on native vegetation. Birds must carry many thousands of caterpillars to their nests to raise every clutch of eggs, and the shorter the trip, the more caterpillars they can bring their hungry babies.

3. We suggest that this application provide all-native landscaping, from flowers to trees. Native oak and pine trees are the only ones that provide caterpillars early enough for the first clutch of eggs in spring. Oak trees host over 500 different species of moth and butterfly caterpillars, native black cherry trees over 400 species, native birch trees over 350, and native pines over 200. We recommend white oak, willow oak, and swamp white oak trees, river birch, black willow, redbud, quaking aspen, red maple, hackberry, and tupelo trees. These trees all support native birds and pollinators, and have features that people enjoy, such as fall color, attractive bark, flowers, or the fluttering leaves of the aspen. American basswood, whose flowers perfume the air, should replace Eurasian linden; white pine could provide evergreen screening where it is needed, if American holly fills in the gaps as the pine trees limb up. Native pine trees also emit more chemicals into the air than any other type of tree that, when breathed, improve our immune systems. Hornbeam is an attractive small tree with nice fall color, and bayberry and inkberry holly are native shrubs that provide berries for migrating birds in autumn. Birds also eat the fruits of Bradford (aka callery) pears, but those berries lack the nutrients that native birds need, and barely repay them for the energy they expend foraging. Blackhaw viburnum is a large, attractive, deer-resistant, native shrub, with spring flowers, fall color, and berries for birds, and host to over 100 moths and butterflies. We would also like to see some shagbark hickories planted to provide roosting sites under their shaggy bark for the endangered long-eared bats that are found on the site. Golden ragwort should replace Liriope as an evergreen groundcover, scarlet beebalm can attract hummingbirds, and obedient plant grows so densely in sun that it crowds out weeds. Dozens of Liriope were planted in front of Montgomery's new Municipal building, and barely half remain alive; meanwhile the native golden ragwort planted nearby is spreading vigorously. If ornamental grasses are needed, purple love grass grows well in full sun, and northern sea oats in shade. There are so many beautiful choices of native trees, shrubs, flowers, and groundcovers!

Applicant's response: See response to Montgomery Township Shade Tree Committee's comments within their December 15, 2023 letter. In addition, this office has been in contact with Montgomery Township's Board Landscape Architect on the landscape plan design and plant selection. The applicant will work with the Township Landscape Architect and other professionals on the plan selection and update the plans accordingly.

4. Meanwhile, we must wait for any non-native plants to become invasive, as so many seemingly innocuous non-native plants have in the past. Only twenty years ago, Bradford pear was not invasive; in fact, it didn't even produce any fruit. Some of your proposed plantings are emerging invasive species. Please replace Kousa dogwood with eastern redbud or a native serviceberry,

and *Spirea japonica* with one of our many beautiful native shrubs, such as fragrant sumac or ninebark. Over a million species are at risk of extinction worldwide, and the Environmental Commission believes that we should do what we can to protect the plants and animals native to Montgomery.

Applicant's response: See response to Montgomery Township Shade Tree Committee's comments within their December 15, 2023 letter. In addition, this office has been in contact with Montgomery Township's Board Landscape Architect on the landscape plan design and plant selection. The applicant will work with the Township Landscape Architect and other professionals on the plan selection and update the plans accordingly.

Montgomery Township Parks & Recreation Memorandum dated December 14, 2023

C. Tree Planting and Landscaping

1. Tree Removal: The Applicant's EIS and sheet C-010 indicate that 38 trees will be removed, generally ranging in size from 8" to 24" diameter.

a. Four of the trees indicated for removal are Callery Pear (*Pyrus calleryana*) which are highly invasive trees that proliferate by seeds and will colonize natural landscapes, crowding out native species. This office encourages the Applicant to remove any Callery Pear trees on the property to prevent their spread onto adjacent agricultural fields and open spaces.

Applicant's Response: Statement. No response required.

2. Shade Trees: 14 trees per acre are required for residential and non-residential development per Township Code Section 16-5.6d.3. Any trees proposed to meet the buffering and street tree requirements (described below) do not count toward meeting the shade tree requirement.

a. Based on the total area of 86.645 acres, the Applicant is required to plant 1,213 trees.

b. The Applicant is seeking a waiver from this requirement to calculate based on area of disturbance, rather than gross tract area.

i. Sheet C-401 indicates a calculation of 273,107 SF of disturbance, equal to 6.27 acres.

ii $6.27 \text{ acres} \times 14 \text{ trees/acre} = 87.78 = 88 \text{ trees (rounded)}$ required by ordinance

iii According to the Landscape Schedule on sheet C-501, there are 15 shade trees proposed, 39 evergreen trees and 19 ornamental trees.

iv. Ordinance requirement not satisfied.

v. The Applicant proposes to remove the existing tennis court and add a 30' x 30' greenhouse. The remainder of the area of former tennis court is proposed as lawn. The Applicant may want to consider adding fruit trees to this area to add another horticultural experience for their clients.

Applicant's Response: Area of former tennis court to be removed to be revised to add additional trees. Design waiver being requested to accept calculation based on limit of disturbance. The applicant has agreed to work with the Township professionals to address the required number of trees either through additional planting of trees of the appropriate size or through contribution to the Township.

3. Street trees are required along all streets at 50' intervals (Township Code Section 16-5.6.d.15). This office defers to the Board Landscape Architect to determine if the existing landscaping is sufficient to satisfy the street tree requirement.

4. Landscape buffer screening is required by Code Section 16-5.6d.13. c. This office defers to the Board Landscape Architect to determine if the proposed buffer plantings are sufficient.

5. Native plant species are required by Township Code Section 16-5.6.d.5. This office defers species review to the Board Landscape Architect.

6. All plant materials must include a two (2) year guarantee as required by Township Code Section 16-5.6.d.10:

“All plant material shall be guaranteed for at least two (2) years from the date of landscape inspection for approval and any plant material that does not survive within that time period or is in poor condition based upon the opinion of the Township Landscape Architect shall be replaced by plant material of the same size and species at the expense of the developer.”

Site Plans to be revised to include note on guarantee.

7. The Applicant should add deer protection to the tree and shrub protection details on sheet C-706. The Open Space Committee and Shade Tree Committee have the best outcomes when using 4' high weld wire fencing and wooden stakes around each plant.

Applicant's response: Site Plans to be revised to add details.

Township of Montgomery Planner Consultants Memorandum dated January 18th 2024

5.4 Utilities Within Buffer (East Mountain Road): Pursuant to §16-6.5.j.6(d)(4), utilities and passive recreational facilities may be located within the required landscape buffer, provided that landscape treatments are provided to effectively screen the interior of the site. Existing sanitary sewer lines and gas lines are located within the required 50-foot buffer area along East Mountain Road.

Applicant's response: The plan proposes a landscape buffer area of 34.6 feet in front of the utilities composed of evergreen trees planted in a staggered row with shrub masses, perennials, and lawn. This office defers to the Township Landscape Architect regarding the composition effectiveness and planting species within the proposed buffer.

5.5 Equipment Screening. Pursuant to §16-6.5.j.7.(d), mechanical and emergency electrical equipment serving a building or buildings shall be screened from view. The plan proposes a concrete generator pad to the rear of the proposed building addition that is screened on two sides by evergreen plantings. This office recommends additional plantings on the western side of the concrete pad to further screen the generator from East Mountain Road, size and species to be determined by the Board Landscape Architect. 5.6 Trees Required, Gross Tract Area: *More information is required.* Pursuant to §16- 5.6.d.3, a minimum of 14 trees per acre of gross tract shall be planted throughout the tract in the case of nonresidential development. The site is 86.645 acres, requiring a total of 1,213 trees. A design exception may be required unless the Board favors calculating tree requirements based on disturbed land, below.

5.7 Trees Required, Limit of Disturbance: Pursuant to §16-5.6.d.3(b), where the applicant has demonstrated to the satisfaction of the Board that it is impractical or undesirable to provide the required number of trees then the Board may require the applicant to plant a minimum of 14 trees per acre of disturbed land, which shall be of a substantially larger caliper based on consultation with the Township Landscape Architect. Per this standard, 88 total trees are required for the proposed 6.27 acres of land disturbance, whereas 60 existing trees are proposed. It appears that the tree removal plan may not include all existing mature trees on the site such as trees located in the rear and near the traffic circle. The plans should be revised to determine compliance with this standard. A design exception may be required.

Applicant's response: No response required. Design waiver being requested to accept calculation based on limit of disturbance. The applicant has agreed to work with the Township professionals to address the required number of trees either through additional planting of trees of the appropriate size or through contribution to the Township.

5.8 Label Discrepancy: The planting plan indicates 15 plantings labeled "TPGG" around the proposed generator pad, whereas no such label is included in the plant lists. The plans should be revised.

Applicant's response: The applicant has agreed to work with the Township professionals to address the required number of trees either through additional planting of trees of the appropriate size or through contribution to the Township.