

CT DEEP's Remediation Project Manager Jeffrey Wilcox at jeff.wilcox@ct.gov

Thank you for offering the opportunity to comment on the project of remediation of the playing fields at Western Middle School (WMS) in Greenwich, CT. The Greenwich Tree Conservancy is a 1000 strong non-profit organization with the mission to preserve and enhance the tree canopy of Greenwich for the benefit of all residents. Tree canopy in Connecticut gives our towns and cities a sense of place, and yet our forests and trees are under increasing assault. Extensive tree cutting practices result in increased noise, air pollution, flooding, pesticide use and in many areas a decrease in property values.

The playing fields at Western Middle School (WMS) have been closed since September 2016 and now finally the end is in sight with remediation beginning this summer. The Tree Conservancy is in full support of this remediation. At the same time, it must be noted that this school is in an area of town with little tree canopy. An area with this level of canopy is defined as Environmental Justice as residents are unable to enjoy the benefits tree canopy provides in other parts of towns. CTDEEP's definition states where the community "bears a disproportionate share of the risks and consequences of environmental pollution." *CTDEEP's Environmental Equity Policy, 1992*. Indiscriminate clear-cutting is deforestation. With over 100 mature trees surrounding the fields slated for removal this is in effect deforestation, even more disturbing given its proximity to I-95, rail corridor and Route 1.

We write to ask you to work thoughtfully and closely with the town to save as many trees as possible. Based on the contaminate mapping, there appear to be areas where little or no contamination has been found, specifically in the existing wooded areas.

At a time when there is widespread acknowledgement of the importance of trees in combating the ill effects of a changing climate, the removal of valuable woodlands should not be allowed without indisputable data proving the necessity. Loss in such a densely populated area will undoubtedly result in unforeseen consequences for nearby residents and particularly unfair to the many school children and their families who will be using the adjacent fields.

A plan to judiciously tag trees for removal using low-impact guidelines while sparing as many mature specimen trees as possible, will result in a healthier neighborhood for all who live, work and play there. It is also critical to replant as soon as possible with larger caliber native trees to allow these areas to restore this environmentally challenged area as soon as possible. In the past, replanting on school properties has not been done in a timely manner. Please do not let that happen here.

Dr. Gregory Kramer, Town Tree Warden, has spoken with Patrick Haskell of AECOM about this project. In addition, Dr. Kramer has engaged Davey Tree to do an analysis of the trees and will be able to incorporate this data into the decision-making process. Dr. Kramer's expertise is a great asset and GTC is confident his planning will provide the ecological benefits this community deserves. We ask and urge DEEP to work with Dr. Kramer to meet the goals of remediation and reforestation at Western Middle School for the health of its surrounding community.