My name is Kathleen Samiy, I am a Silver Spring resident, I am speaking on behalf of myself on Bill 24-22, ZTA22-10, SRA 22-01 ALL meant to align with the “Complete Streets Design Guide” (CSDG). This County Policy Guide is 308 pages long. It was approved and adopted by you [County Council] in Feb 2021. There are many comprehensive environmental recommendations in this Policy Guide- but they are not yet reflected in the Law.

Missing in these 3 bills are Policy recommendations for the Natural Environment and Green Streets Chapter 7. They need to be integrated, reconciled, prioritized, and considered together with the recommendations in the 3 text amendments before you today, so there will be no conflicts in another section of the code. As the amendments are currently written, the Environment and Green Streets policy recommendations will not be requirements; we will continue seeing tree canopy loss, increasing flooding and heat island effects, and business as usual.

Get us closer to the Climate Action Goals you passed and want to achieve in 5 years. Update the Laws to align with the entire County Policy, not just some pages- but all pages. A piecemeal approach updates just road standards, road terms and engineering, and puts the environment as an after-thought for another year or more. This will not help achieve your CAP Goals.

Plan through the prism of a complete green street ecosystem, not through a technical separation of roads from the environment. Put Environmental specialists in the lead, and not generalists from DEP and Planning, review and update the language to encode natural environmental solutions, align policy and law, ensure integration, conformance and prioritization of the Green Street ecosystem and Roads:
These amendments before you [Bill 24-22, ZTA 22-10, SRA 22-01] are written by MC-DOT, DPS and Planning Department Road Engineers. They ONLY update road standards and systems for pedestrians, bicyclists, transit riders, and motorists. They also update new terminology, methodologies and road sections, and technical road descriptions and technical standards.

The Issue is we have a Climate Crisis, and this County Council has set CAP goals to reduce carbon emissions by 80% in 5 years. Our roads and parking lots and urban areas are too hot, upwards of 130-155 degrees in the summer sun. We urgently need our roads covered in shade to reduce the heat, and we need all our roads covered by large mature canopy trees in the ROW, medians, and sidewalks to absorb excessive heat, flooding and carbon dioxide.

Roads are not complete without Green Streets Policy in the law. Here are a few examples of what is missing:

- Ensure CSDG Policy and Road Standards are in agreement in the Law
- Reflect CSDG Chapter 7 “Green Streets’ in the County Code
- Require Street trees and landscaping in medians on ALL streets, not some
- Add Summer shade. That means a metric of 50% of our streets, roads, and sidewalk surfaces must be lined with tree canopy to reduce surface heat.
- **Good Stream Health. We need 45% tree canopy for streams, clean air, and to reduce carbon emissions.** A Large mature tree (over 18” in diameter) stores 1,809% more carbon than a small 4- inch tree. They sequester 345% more carbon and absorb 180% more stormwater runoff and remove more pollution per ounce by 174%. *(from tree fact sheet, April 2022, and Silver Spring Downtown and Adjacent Communities Appendix E, Environment)*

- Chapter 49 needs a requirement that roads conform to your approved and adopted master plans. Master plans must REQUIRE 35% Green Cover (trees, vegetation, green roofs) Add this statement to the Road Code and ensure it conforms with Streetscapes.
- Amend the Zoning Ordinance to reinstate the requirement for placing utilities underground during development or redevelopment. Underground Utility requirements, strategically placed, means large street canopy trees can grow tall (and not interfere with overhead wires)
• MC-DOT Design Standards must be modified to conform to the CSDG
• 1,500 cubic foot tree pits, along all streets means the tree roots of trees on the MC-DOT major tree list have room to thrive
• Structural soils must be used where space is limited, so soil volumes can help extend tree roots under the road and sidewalk

And, so much more in the 308-page policy is missing from these amendments. Please Assign the environmental staff scientists, specialists to sort this all out. And align, update, integrate all CSDG Environmental and Green Streets Policy with the Road and Street Laws.

Thank you for providing me with the opportunity to comment on these items.