

December 22, 2022

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Subject: Supplemental Report–Herbicide claims by Urban Forestry
Division, Elms at Shannon Place

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American Society of
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BCMA PD-0008B
International Society
of Arboriculture



ISA Tree Risk Assessment
Qualified

Dear Mr. Buckman:

At your request, I examined and reviewed additional aerial and street level images of the Shannon Place property and the two elm trees (*Ulmus americana*) the had been growing on that site. Washington, D.C. DDOT Urban Forestry Division (UFD) had submitted a citation for the removal of these trees, as described in my previous report.

The claim made by UFD was that the two elm trees had died from direct herbicide infusion. The only evidence presented in their citation report were two low-resolution photographs of the base of one of the trees, taken from several feet away. These two photographs purport to show holes in the basal flare of the trunk. Even with photographic enhancement of the images I cannot clearly identify an holes in the base. If holes are present, there is no indication or even just a visual estimate, of the size of the holes. As previously stated in my first report, holes may have been made for the purpose of preventive treatments for Dutch elm disease.

The UFD relies heavily on the two laboratory tests for herbicides performed by Pacific Agricultural Labs. The results were included in their citation report. The levels of herbicide found in tests of stump grindings were very low, and probably below toxic levels.

Two aerial images are relevant here. Figure 1 (below) shows the trees on April 23, 2019. The northernmost tree (smaller, Special-sized tree) has noticeable discoloration of the top center of the live crown. This suggests a physiological disruption to the crown. There could be many possible reasons for this, with Dutch elm disease among them.

The second image of note, Figure 2, shows the site on July 1, 2019. The turf areas on the subject property are completely brown and void of any low vegetation. This appears to be an area-wide treatment with a herbicide to control low growth vegetation. The actual application

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date of an area-wide treatment would have been at least 1 to 5 weeks prior to the capture of the aerial image.

Such an application would explain the low levels of herbicide found in the tests, and could mimic symptoms of other types of problems. While the concentrations of herbicide were too low to cause direct death of the trees, it would have stressed the trees and left them more susceptible to the Dutch elm disease.

The personnel at UFD did not thoroughly document the evidence they are claiming, nor thoroughly examine alternatives for the causes of tree death. They raised the question in their report of the use of an Arborjet® injector or similar system for infusion of materials into the trunk, but then simply assumed that herbicides were injected. They also relied on third party hearsay as evidence of injection of the trees, although no first-hand testimony of actual treatments were given.

With all of the assumptions UFD made about the possible causes of death, the only ones explored were that the elms were intentionally poisoned, yet there is little direct evidence of this. There is no evidence presented of actual dates of treatment. If the trees were poisoned as claimed, there is no factual evidence of who actually performed any injections. UFD simply followed their assumptions and suppositions without factual proof that the two elm trees were intentionally poisoned.

Sincerely,



Russell E. Carlson, RCA, BCMA
Tree Tech Consulting

Enclosures: Photographs
Cc: Chris Miller, H2 Design Build



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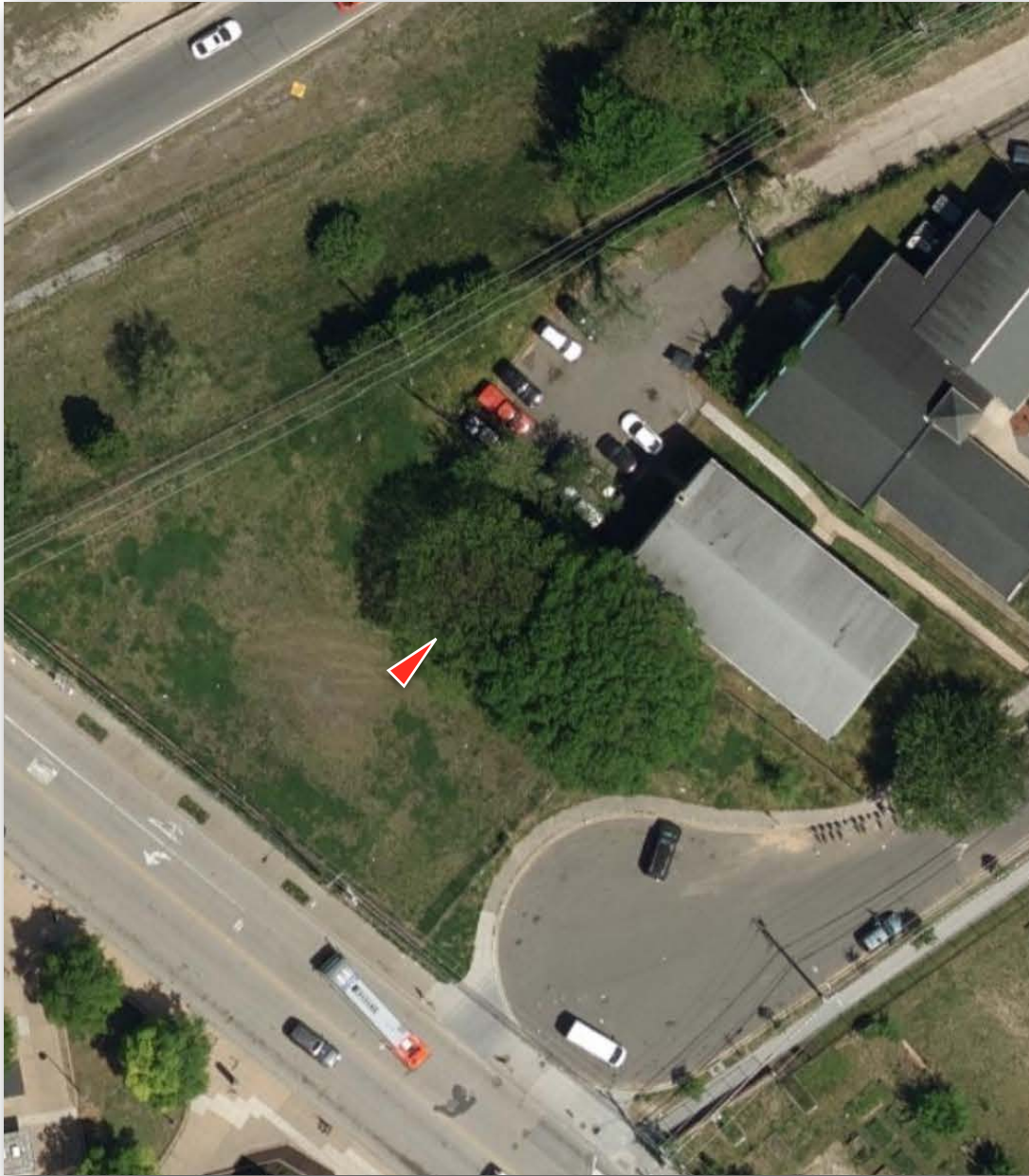


Figure 1: The center of the live crown of the northern-most trees is discolored, suggesting some physiological disruption of the crown. This time frame does not fit with the claimed introduction of herbicides.

Image from Google Earth, 4/23/2019

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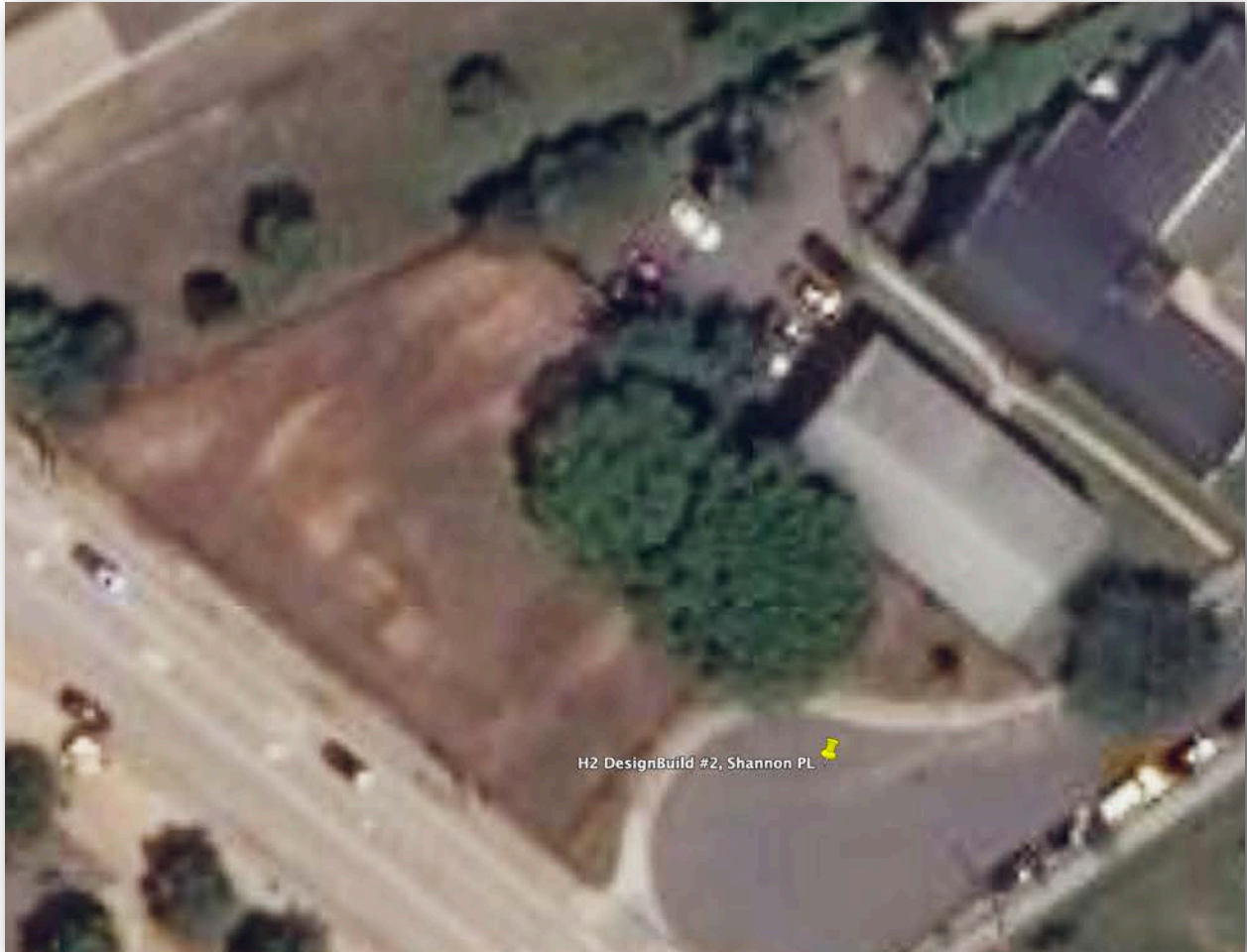


Figure 2: This image was captured on July 1, 2019. It shows the entire area of the subject property had been treated with a herbicide to kill the turf grass, weeds, and other ground vegetation.

Image from Google Earth, 7/1/2019