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DEPARTMENT OF PARKS AND COMMUNITY SERVICES

July 18, 2023

Justin Kilgore
Planning Manager
El Paso County Development Services Department

Subject: Landscape Code Update 2023 (LDC233)

Justin,

The Parks and Community Services Department has reviewed the Landscape Code Update 2023 and has the following comments on behalf of El Paso County Parks.

This is an updated of the County's Land Development Code, section 6.2.2 and the Landscape and Water Conservation Manual, Planting List. The Landscaping and Water Conservation Manual (Manual) supplements the landscaping, buffering, and screening requirements established by the El Paso County Land Development Code (LDC). The list of recommended "water wise" plants appears to be generated from the Colorado Springs Utilities Water Wise Plants list. The list is broken out into categories of trees, shrubs, and grasses. Most of the plants on the list are fine, however ash trees should be removed from the list.

Autumn Purple Ash and Green Ash are in the ash family (genus *Fraxinus*). Ash trees should not be planted due to Emerald Ash Borer (EAB). EAB is an invasive beetle, discovered in the Detroit, Michigan area in 2002. Since 2002, it has killed 40 million ash trees in Michigan alone and has spread to 36 states. In Colorado, EAB was first discovered in Boulder County in 2013 and was recently found in Littleton, CO. The Colorado State Forest Service recommends not planting ash trees. <https://csfs.colostate.edu/forest-management/eab-what-you-can-do/>. Further, the Colorado State Forest Service recommends to focus on tree and landscape diversity so that one tree species should not comprise more than 10 percent of the planted trees growing in any urban setting. Communities should plan for emerald ash borer by planting new trees that will replace the shade and other benefits that ash trees provide.

These comments are being provided administratively and do not require Park Advisory Board review or approval. Please let me know if you have any questions or concerns.

Sincerely,

Greg Stachon
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El Paso County Parks and Community Services Department
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