



February 27, 2024

Mayor Mike Turner
Members of the Woodstock City Council
121 W. Calhoun Street
Woodstock, IL 60098

Re: Riverwoods subdivision proposal

Dear Mayor Turner and members of the Woodstock City Council,

The Land Conservancy, a regional non-profit land trust, has worked closely with cities and organizations throughout McHenry County for the past 30 years, including an 18-year-long budgeted relationship with the City of Woodstock. Through creation of public conservation areas, and facilitation of private conservation easements, TLC has preserved and sustains 3,200 acres of meadows, woodlands and agricultural beauty, protecting the very environmental features and eco-systems that make this region so desirable for current, and new, residents and businesses.

TLC is not an “anti-growth” organization; we encourage responsible planning and development that respects and retains the irreplaceable natural landscapes around us. We have worked with the City of Woodstock starting in 1996 to preserve and manage natural areas and open space within subdivisions including Prairie Ridge, Country Ridge, Spring Ridge and Apple Creek.

The proposed Riverwoods development not only would lead to unavoidable destruction of hundreds of oaks and other high-quality trees, the location directly contradicts prescribed Smart Growth criteria due to lack of proximity to sufficient roadways, utilities and public services such as schools and fire protection.

TLC’s Request for the Riverwoods Proposal:

Our request in this instance is simple—that the City require the developer to adhere to the criteria in the City’s Unified Development Ordinance (UDO), both the letter and the spirit of the Ordinance.

Due to the large number of irreplaceable, old-growth oaks and hickories in the woodlands on the property, TLC asks that prior to approving annexation, conditional use, PUD and rezoning, the City Council:

1. Require a new tree surveyⁱ that includes native trees 4” and larger, and all trees 8” and larger.ⁱⁱ Note: The Tree Survey provided by Lennar is not current but was produced in 2004 (20 years ago!) and was not even included in the Plan Commission packet for

public review at the December 2023 meeting when this project was voted against by the Woodstock Plan Commission.

2. Require a tree preservation planⁱⁱⁱ that includes:
 - detailed information about the trees to be removed and those preserved
 - description of the number, size, species and locations of trees that will be planted to replace the trees to be removed, following the replacement standards in the Woodstock UDO
 - restoration plan, long-term maintenance plan, and budgets for both
 - mechanism for ensuring the woods will be preserved and maintained in perpetuity.
3. Require a tree replacement plan^{iv} now, rather than waiting until final engineering, that includes:
 - Species, size and location of all removed desirable native tree species (Table 8.A.1)
 - Species, size, number and planting location of corresponding replacement trees
 - Management plan to ensure the health and survival of all planted replacement trees.
4. Consider sending the proposal back to the Planning Commission with complete information after the new Comprehensive Land Use Plan has been adopted to ensure that the public and the Commission have the benefit of complete information and the guidance from an updated plan.

This is the best time in the development process to require these items. Once rezoning, fee waivers, conditional use permits, PUD and annexation are approved, any changes to the subdivision will be minor.

Additionally, we recommend that the preliminary plat, rezoning and annexation request be sent back to the Woodstock Planning Commission with a new Tree Survey as required in the UDOⁱ so that the Commission can evaluate complete information about the project.

Tree Preservation is Important to Woodstock

Through the City's actions and the language in its development codes, Woodstock has a history of valuing trees. Quoting from the Unified Development Ordinance (*emphasis added*):

8A.1.3 Tree Standards

A. While allowing for reasonable development of land, it is stated public policy of the City to add to the tree population where possible and to maintain existing trees within the City. The planting of additional trees and the ***preservation of existing trees*** is intended to accomplish the following objectives:

1. To preserve trees as an important public resource enhancing the quality of life and the general welfare of the City;
2. To conserve and enhance the City's unique character and physical, historical and aesthetic environment;

3. To encourage the protection of healthy trees and provide for the replacement and/or replanting of trees removed during construction, development and redevelopment;
4. ***To prevent clear cutting and to minimize mass grading;...***

There are 11 items listed, including protecting and increasing property values, providing wildlife habitat, reducing air pollution, replenishing groundwater, reducing storm water run-off...

Woodstock values its oak-hickory woods

Since 2006, Woodstock has contracted with TLC to manage several properties that the City owns to ensure that the oak woods and other natural lands are healthy. Ryders Woods, 23 acres; Westwood Conservation Area, 63 acres; Donato Conservation Area, 27 acres.

In 2011, Woodstock chose to dedicate Westwood Conservation Area as an Illinois Nature Preserve and Nature Preserve Buffer, a level of recognition for those lands that are one of the last remnants of Illinois' wilderness.

The oak woodland on the Riverwoods property is just as precious as any of these other oak woods – it just needs some attention like Ryders, Donato and Westwood needed when TLC started managing them for the City in 2006. Please require preservation and restoration instead of permitting the woods to be destroyed.

There is an Old-Growth Woodland on the Property

There is a forest on the property, not just some old trees. And the oldest tree is easily 300 years old, nearly 4-feet across 20 years ago.

The 2004 tree survey included 3,200 trees that were 6 inches or larger in diameter. Of the 3,200 trees, 1,138 were native trees 6" or larger in diameter, including 256 shagbark hickories, 99 red oaks, 200 Hill's oaks, and 578 bur oaks. And, ***there is no physical way to build the subdivision as proposed with that many homes and roads and not clear cut the trees and mass grade the land. The developers own engineering plans show this.***

The property in question has one of the largest remaining old-growth oak-hickory woodlands in Woodstock, at 35 acres. Globally, oak woods are one of the most endangered types of habitat. In McHenry County, over 90% of the oak woods that were here historically have been lost – first to farming, then to development.

Some Riverwoods History

I remember when Riverwoods subdivision was proposed at this location by Realen Homes in 2004. I still have copies of the 2004 wetland report and the 2004 tree inventory and map.

Back then, the developer, Al Eriksen (now with Lennar, and still the property owner), proposed 200 large lots. I was talking with him and the City staff at the time (Jim Kastner) about having smaller lots and actually establishing 20 acres of tree preservation areas. That never happened because the housing market collapsed.

But that doesn't mean it couldn't happen now.

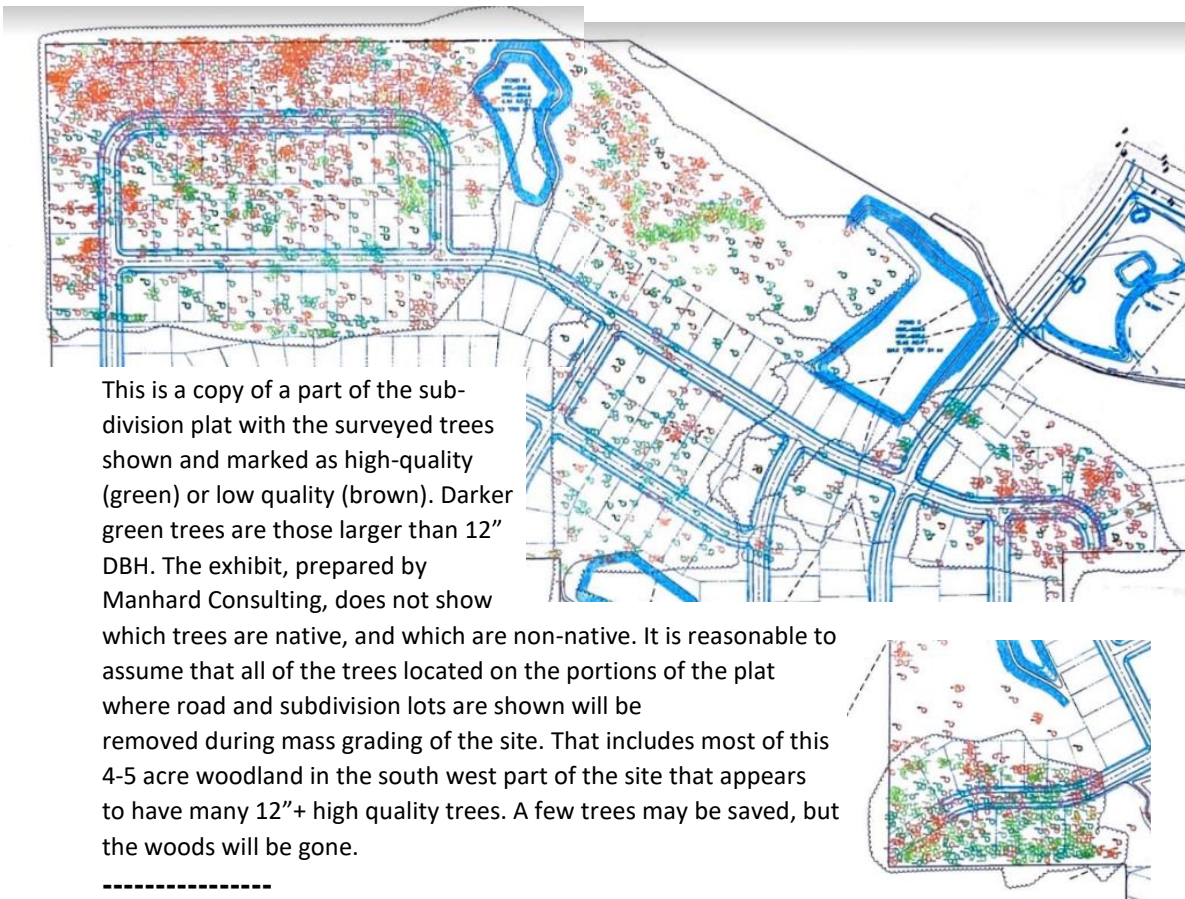
Since then, the City of Woodstock adopted a Comprehensive Plan in 2008, and updated its development codes in 2009-2010 to, among other things, include strong tree preservation standards.

In fact, at its Annual Meeting in 2012, TLC recognized Woodstock with our "Living with Oaks" award because of the thoughtful standards that the City had adopted as well as its commitment to taking care of the oak woods that it owns. Mayor Sager attended the event and accepted the recognition on behalf of the City.

Lisa Haderlein

The proposed design for this subdivision appears to ignore the standards that the City adopted in 2010, in that the vast majority of the native trees – oaks, cherries and hickories – that were identified on the property in the 2004 tree inventory will be removed, including dozens of oaks that were in excess of 30” diameter at breast height (dbh) 20 years ago.

Think about that - those trees were big old trees when Woodstock was founded, and some of them were growing when the Declaration of Independence was signed. One bur oak was 44” dbh (diameter at breast height), making it quite possibly the oldest resident of Woodstock – likely 300 or more years old.



This is a copy of a part of the subdivision plat with the surveyed trees shown and marked as high-quality (green) or low quality (brown). Darker green trees are those larger than 12” DBH. The exhibit, prepared by Manhard Consulting, does not show which trees are native, and which are non-native. It is reasonable to assume that all of the trees located on the portions of the plat where road and subdivision lots are shown will be removed during mass grading of the site. That includes most of this 4-5 acre woodland in the south west part of the site that appears to have many 12”+ high quality trees. A few trees may be saved, but the woods will be gone.

Require the developer to follow Woodstock’s Tree Replacement standards found in Section 8A.1.3.C of the UDO.

In 8A.1.3.C.4. the UDO states: Any protected tree removed pursuant to City approval shall be replaced as provided below:

Diameter of Removed Tree	Number and Diameter of Replacement Trees
4 inches	1 tree @ 4” or 2 trees @ 2 ½”
5-6 inches	1 tree @ 6” or 2 trees @ 3”
7-8 inches	1 tree @ 8”, 2 trees @ 4” or 3 trees @ 3”
9-10 inches	2 trees @ 5”, 3 trees @ 3 ½” or 4 trees @ 2 ½”
11-12 inches	2 trees @ 6”, 3 trees @ 4” or 4 trees @ 3”

13-25 inches	Minimum 2 trees @ 6 ½” or 3 trees @ 4 ½”, 6 trees @ 4” or 8 trees @ 3”
26 or more inches	Minimum 9 trees @ 3” or 6 @ 4 ½” or 4 @ 6 ½”

Based on the original tree survey from 2004, the average DBH of a tree on the property was 18 inches 20 years ago. If the City chooses to approve a plan to remove hundreds of mature trees on the property for the subdivision, the UDO says you shall require the planting of hundreds (or thousands) of replacement trees based on the size of the trees that are removed.

If planting all of the replacement trees on site is not practical or feasible, a fee in lieu of tree replacement and ecological restoration may be approved by the City Council^v.

If this route is chosen, please require that any fee in lieu is equal to the cost of replacement trees, their planting and care for a period of not less than 10 years.

Whichever route is taken, an up-to-date tree survey and preservation plan will be necessary.

Tree City USA

Woodstock is talking about applying to become a Tree City USA through the Arbor Day Foundation. From their website:

A thriving urban forest offers many advantages to communities. Here are just a few:

- *Trees help absorb the sounds of traffic in urban areas by 40%.*
- *Neighborhoods with trees are seven to nine degrees cooler than those without.*
- *Trees reduce energy costs up to 25% by shading buildings and protecting them from winter winds.*
- *Homes with trees have higher property values.*
- *Green space plays a major role in improving mental and physical health.*
- *Planting and maintaining trees absorbs carbon dioxide in the atmosphere, mitigating the effects of climate change.*

Publicly demonstrating your commitment to the environment is a great way to build pride among residents, as well as position your community as an attractive place to live.

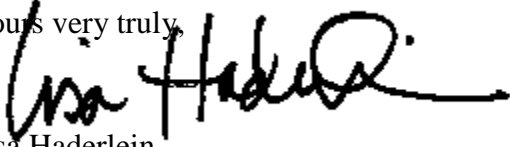
TLC applauds Woodstock’s desire to become a Tree City USA; however, allowing the destruction of hundreds of old-growth native trees in the Riverwoods development would be extremely contradictory to achieving that designation.

TLC appreciates the City’s desire for additional development, especially after a long dry spell. Please make sure that anything that is developed on this property is something that the City will be proud of 30 years from now – a development that ensures Woodstock remains “a growing, vibrant community with strong commitments to long-held historic, cultural, educational, healthy-living, and healthy-environment values.”

The Land Conservancy values our longstanding partnership with the City of Woodstock and communities throughout McHenry County. We welcome the opportunity to serve in an advisory

role on projects such as the Lennar proposal, using our professional expertise to help the City of Woodstock offer the most beneficial projects possible for residents and the environment. Thank you for your consideration.

Yours very truly,



Lisa Haderlein
Executive Director

ⁱ Section 8A.1.3.B.2. “As part of the preliminary plat and final engineering plan submittal, a tree survey as defined and provided for in this ordinance is required. Trees intended to be preserved shall be depicted. A tree preservation plan prepared by a qualified arborist, forester or similarly qualified professional in the field of natural resources is also required as part of the final engineering plan submittal. Failure to submit these items is a valid reason to delay consideration of a preliminary plat....”

ⁱⁱ UDO Section 8A.1.3.B.3 “The tree survey shall consist of a scaled drawing that shows the location of all desirable native tree species listed in Table 8.A.1 having a diameter at breast height (DBH) of 4 or more inches and all other existing trees with a DBH of 8 or more inches....”

ⁱⁱⁱ UDO Section 8A.1.3.B.5.

^{iv} UDO Section 8A.1.3.C.6

^v UDO 8A.1.3.C.5