

April 30, 2015

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Mr. Nicholas DiPasquale  
Chair, Chesapeake Bay Program Management Board  
410 Severn Avenue, Suite 109  
Annapolis, MD 21403



**RE: Tree Canopy Management Strategy Comments**

Dear Mr. DiPasquale and Management Board Members:

The undersigned members of the Choose Clean Water Coalition—a coalition of organizations from Delaware, Maryland, New York, Pennsylvania, Virginia, West Virginia and the District of Columbia with the common goal of restoring the thousands of streams and rivers flowing to the Chesapeake Bay—respectfully submit the following comments on the draft Tree Canopy Management Strategy.

Members of the Choose Clean Water Coalition recognize the importance of urban tree canopy cover offering stormwater control and other water quality benefits. This strategy focuses on increasing the urban tree canopy capacity with a strong goal of 2,400 acres by 2015. We believe the goal represents good public policy. However, we have several comments to make this strategy stronger.

**A. The Tree Canopy Strategy, as Written, Will Not Achieve the Outcome**

The 'State Targets' chart takes into account the current annual target (new acres) and the 2025 target (new acres). The annual state targets, even if met annually over the next 10 years, do not add up to the 2025 target. For example, if Delaware achieves its target of 5 acres a year, it will only achieve 50 acres by 2025, which is 10 acres short of the 60 acre target.

This means that even if each state hits its yearly target, the 2025 goals will not be met. The strategy suggests state targets "may" be increased over time, but there is no guarantee of this in the strategy. The Bay Program and the partnership must work together to set annual targets that ensure that, collectively, the partnership will meet the 2025 target. Otherwise, the strategy will fail to achieve the outcome even if all state partners act as pledged.

**B. The Tree Canopy Strategy Correctly Focuses on Establishing Baseline Data for a Watershed-Wide Urban Tree Canopy Baseline in the Next 1-2 Years, But Should Not Discount The Current Local Baseline That Already Exists.**

The Chesapeake Bay Watershed Agreement Tree Canopy Outcome is: "Continually increase urban tree canopy capacity to provide air quality, water quality and habitat benefits throughout the watershed. Expand urban tree canopy by 2,400 acres by 2025."

Currently, there is no baseline for watershed-wide urban tree canopy coverage. One of the major goals of the strategy is to build on current data and incorporate new data to determine this baseline. The strategy correctly acknowledges that certain counties and localities are already conducting high resolution urban tree canopy assessments. These were developed in the Urban Tree Canopy Goal Setting: A Guide for Chesapeake Communities, a document which led to the use of high-resolution tree canopy assessments to set policy goals. However, a

watershed-wide urban tree canopy estimate has not yet been developed. This strategy seeks to develop this through building on the high resolution data that is already available.

Unfortunately, it is difficult to work toward any state-wide or 2025 target without an accurate depiction of tree canopy in the entire watershed. Because high resolution pictures of the entire watershed are necessary, part of the strategy itself is to develop a baseline. The main suggestion we have is that the final strategy use the current existing local tree canopy coverage data as an interim baseline until the final baseline is established. Therefore, we can begin counting urban tree canopy coverage now instead of waiting 1-2 years.

**C. The Tree Canopy Strategy Should Require Urban Tree Canopy Goals to be Incorporated into State Stormwater Plans.**

Because tree canopies are recognized as providing air quality, water quality, and habitat benefits, the Bay Program considers them a priority practice and began setting goals in 2003. One way to meet the goals set forth in this strategy is to integrate urban tree canopies into the state stormwater programs. This idea is mentioned in Table 1 under the “Tree Planting” row which states, “tree planting has not been well integrated into TMDL/WIP/stormwater goals. This idea is mentioned a few times in passing in the strategy, but should be a focus in the final strategy. A great example of this is Washington D.C. which has tree planning targets in their MS4 permit. Urban tree canopies often reduce stormwater runoff by catching the water before it reaches the ground, thus it naturally fits into the idea of stormwater management.

Along these lines, any incorporation into stormwater plans should focus on older trees, which are inherently better for stormwater management. For example, the Baltimore Watershed Implementation Plan does not address maintenance of tree canopies at all, focusing only on new planting. If older tree maintenance is incorporated, this would compel local governments to fund tree maintenance and not just new tree planting. Maintaining trees will play a critical function in watershed wide stormwater runoff reduction.

**D. The Tree Canopy Strategy Should Incorporate Environmental Justice by Expanding on the Management Approaches for Reaching Diverse Audiences.**

Studies show that there are more trees in advantaged and wealthy neighborhoods, and in disadvantaged and impacted neighborhoods there are fewer. We commend the strategy for suggesting a collaboration with the Diversity Action Team to reach diverse audiences. We agree that engaging the correct civic organizations, providing proper education, increasing outreach, and identifying these communities will address the environmental justice issues at hand. To this point, we have a few suggestions:

- The strategy should make it obvious that Urban Tree Canopies are an Environmental Justice issue. The Bay Program partners have taken steps to promote Environmental Justice and this management approach is one of those very important steps.
- Under “Education, Communications and Outreach,” the education portion should be more specific. In the strategy, education begins with involving new communities in data collection. But these communities need to know why tree canopies are important, why they need to collect this data, and how it will benefit their neighborhood.
- Since densely populated areas are heavily impacted when storms occur, it is important to increase coordination between local agencies, non-profits, and utilities. These groups

are able to assist homeowners with maintaining overhanging tree limbs, which threaten property and human health. This is of particular interest to less engaged homeowners who are concerned about the cost-benefit from added canopy shade and damage.

We are happy to discuss our comments on the draft Tree Canopy Management Strategy further. Please contact Jill Witkowski by phone at 443-842-7525 or by email at [witkowskij@nwf.org](mailto:witkowskij@nwf.org).

Respectfully submitted,

Anacostia Watershed Society

Audubon Naturalist Society

Blue Water Baltimore

Conservation Pennsylvania

Conservation Voters of Pennsylvania

Eastern Pennsylvania Coalition for Abandoned Mine Reclamation

Float Fishermen of Virginia

Friends of the North Fork of the Shenandoah River

Friends of the Rappahannock

Friends of the Rivers of Virginia

Izaak Walton League of America

Lackawanna River Corridor Association

Maryland Conservation Council

Maryland Sierra Club

Mid-Atlantic Council of Trout Unlimited

National Aquarium

National Parks Conservation Association

Nature Abounds

Neighbors of the Northwest Branch, Anacostia River

New York League of Conservation Voters

NWF Mid-Atlantic Regional Center

Penn Future

Potomac Riverkeeper Network

Rock Creek Conservancy

Sleepy Creek Watershed Association

South River Federation

St. Mary's River Watershed Association

Susquehanna Greenway Partnership

Virginia Conservation Network

Waterkeepers Chesapeake  
West Virginia Rivers Coalition