



08/24/2021

Via email

Christine O'Donnell  
City Council Staff  
[christine.odonnell@boston.gov](mailto:christine.odonnell@boston.gov)

**Re: City Council Committee on Government Operations Hearing on Docket #0858, Ordinance establishing protections for the City of Boston Tree Canopy**

Dear Chair Edwards and Members of the Committee:

Thank you for the opportunity to submit comments on behalf of Charles River Watershed Association (CRWA) in support of Docket #0858, an Ordinance establishing protections for the City of Boston Tree Canopy. CRWA is an advocacy organization working to protect and restore the Charles River and its watershed through science, advocacy, and the law.

We know that climate change impacts in Boston are consequential and require urgent responses. Trees are critical to climate resilience because they reduce the risk of extreme flooding by absorbing rainfall and prevent heat-related deaths and illness by lowering ambient temperatures. Trees also improve air quality by trapping air pollutants and water quality by filtering pollutants before they reach the water. We fully support the promulgation of a tree ordinance for the City of Boston to protect the City's tree canopy.

Boston faces flooding from heavier, more frequent downpours and urban heat effects from low tree canopy and large expanses of dark, heat-absorbing pavement. The City of Boston currently has a tree canopy of 27% of all city land area, but the 2014 Climate Action Plan calls for increasing our tree canopy to 35% by 2030. A tree ordinance would allow Boston to preserve and grow its tree canopy to protect residents from the most severe impacts of climate change.

To create a strong tree ordinance that will build our urban tree canopy equitably, we suggest that the Committee consider (1) increasing tree removal fees to encourage tree preservation and deter non-compliance with the ordinance; (2) stronger tree replacement requirements as newly-planted trees may not survive, especially without adequate care; (3) giving special protections for the remaining forested areas in Boston, as forest ecology and canopy provide greater benefits than individual street trees; (4) greater analysis of the impacts of tree removal, especially for environmental justice communities; and (5) aligning the ordinance with the City's Urban Forest Plan.

The time for action is now. The 2021 Intergovernmental Panel on Climate Change (IPCC) report states, "The number of hot days is projected to increase in most land regions..." And according to the 2016 Climate Ready Boston report, 7 percent of the total land area in the city could be exposed to frequent stormwater flooding from 10-year, 24-hour rain events by the 2050s. The City must respond with the urgency this moment calls for and enact a tree ordinance to address these threats.



Charles River Watershed Association

Thank you for considering our comments. We urge the Committee to proceed with adopting a robust tree ordinance for the City of Boston.

Sincerely,

Dira Johanif,

Program Associate for Community Resilience