

June 28, 2022

Dear Shade Tree Commission,

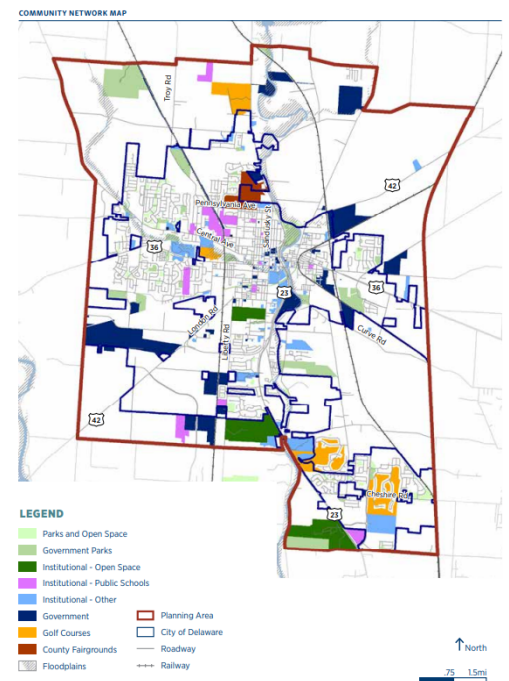
Thank you for your important work on our city's trees. You are an integral part of keeping the City of Delaware a Tree City USA. I appreciate your dedication to our city's tree canopy.

For your consideration, please see the following comments that relate to the Urban Forestry Management Plan:

- 1) Please revise definitions that limit the urban forest to trees on city property, including references on page 2 of the plan's draft. An urban forest includes all trees growing inside city limits. For example, see the definition used in the 2021 Columbus Urban Forestry Plan:

*"What is an urban forest, and where does it grow? An urban forest is simply a term that refers to all trees within a city, across all lands (both public and private). It is important to manage the entire forest because natural systems do not distinguish between property boundaries. In Columbus, 70 percent of our trees grow on private property, such as residential property, businesses and industrial areas. The other 30 percent grow on public property, such as streets and parks."* (Available at <https://www.columbus.gov/UrbanForestryMasterPlan/>)

- 2) Information on page 4 of Delaware's draft Urban Forestry Plan states "Using ArcGIS Pro, it was determined that 58% of the total area within the city of Delaware could be planted with trees." Does the boundary used for this determination match the planning boundary used in the *Delaware Together* comprehensive plan? (See red boundary in image right, from p. 59 of the [comprehensive plan](#) with related information starting on p.54.) If not, it should be adjusted to match the comprehensive plan boundaries, and the percentage of potential tree cover updated accordingly.



- 3) The information on p. 15 of the Urban Forestry Plan compares the impact of trees on property value for single-family homes to that of multi-family homes, parks and businesses. This information should not be included in the urban forestry plan.

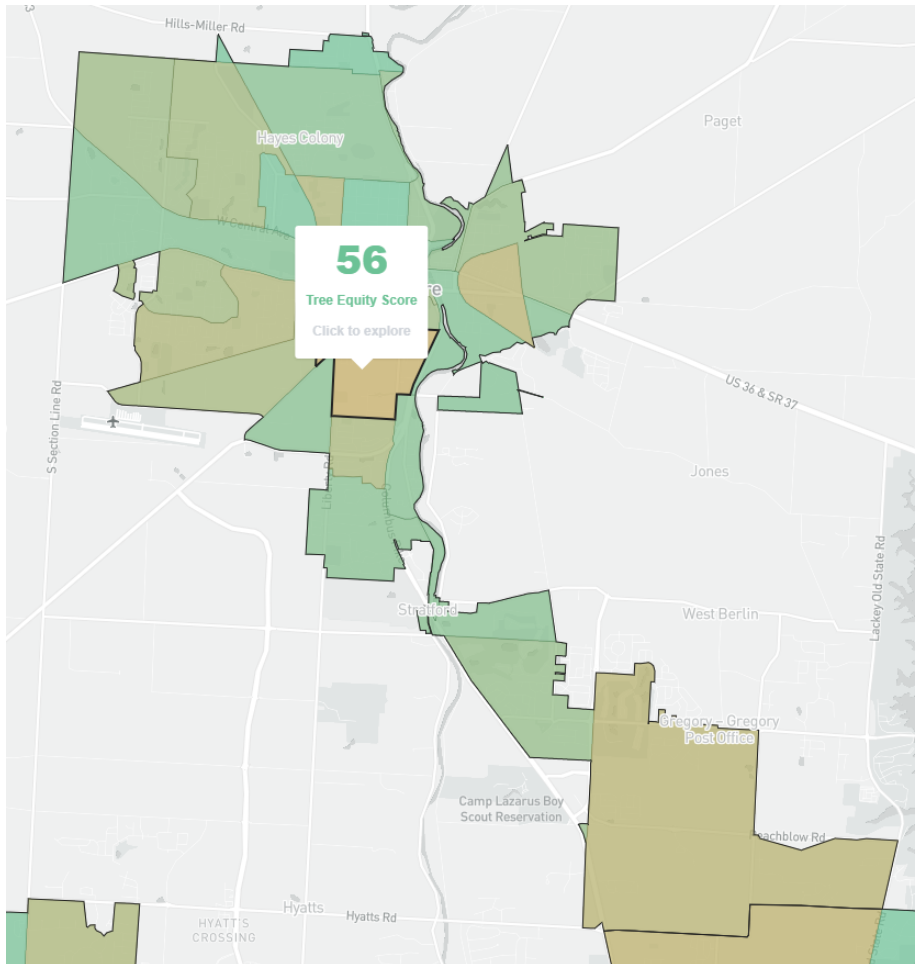
First, the values cannot be compared. Parks are not bought and sold, and so presumably have no real estate value. Commercial properties and multi-family homes (especially rentals) are more often bought and sold due to their income potential for people who do not live in them, rather than their local appeal. The largest concern here is that including this information could lead to a slippery slope where apartment-dwellers have less trees than single-family homes.

Second, including this information may negate the fact that trees provide many benefits in commercial areas and multi-family homes beyond real estate value. They are important in reducing land and air temperatures through shade and evaporative cooling; this is especially important for multi-family housing. They mitigate heat islands and improve the watershed through slowing runoff and improving filtration, and this is important in areas that have large amounts of built surfaces, such as commercial areas and multi-family homes. Additionally, they clean the air, which can be especially important in commercial settings.

For these reasons, please remove the information on page 15 from the urban forestry plan before passing it.

Other goals the urban forestry plan should address:

- 4) Plan for tree bank sites. This should include identifying appropriate locations and planning for that land acquisition. (Tree bank sites are a solution offered in the Planning process for tree preservation, Chapter 1168 of the City's code.)
- 5) Make ending tree canopy inequity a focus. (See the image from [treeequityscore.org](https://treeequityscore.org), below). Do an assessment of areas with lower tree canopy cover and identify opportunities for plantings, whether by planting in the tree lawn (or similar right-of-way) and on other public lands (e.g. parks) or through land acquisition and reforestation. The latter effort will require a dedicated funding source that can purchase property as it becomes available.



- 6) Review Chapter 1168 for the appropriate use of developer funds as they relate to trees. Does the current use of the tree bank fund for street tree replacement wholly meet the goals of [Chapter 1168](#)? Will planting street trees alone account for tree canopy removal in new developments? Are street tree replacements the best and intended use of those funds, or can it go to land acquisition either of forested areas or for reforestation?
- 7) Address tree maintenance needs of public lands with forested areas not identified in the plan, such as tree preservation zones.

- 8) Remove and replace invasive species on city-owned property, and educate residents about identifying and removing invasive species on private property.
- 9) Further recognize the importance of trees to the watershed by partnering with the City's Watershed and Sustainability Coordinator. You may also benefit from regular updates from the ODNR Scenic River experts (who oversee the Olentangy River).
- 10) Incentivize citizen tree planting on private property, such as through education and rebates.
- 11) Make long-term funding plans for urban forestry maintenance, including staffing, and urban forest initiatives. (This must go beyond developer-contributed tree replacement fees.)

Other notes:

- The works cited on page 20 should include a citation for the Davey Tree Calculator.
- On page 12 of the draft, what is meant by the 4th bullet point for FY2022-2023: "Propose a stormwater fee that aligns with the urban forestry value contributing to stormwater management"? (p.12)
- On page 12, bullet point 2 for FY2023-2028, I believe has a typo, and the correct goal is 40% (not a range).
- On page 12, bullet point 3 for FY2023-2028 "Evaluate sidewalk issues and update standard construction methods as necessary." Why can't that be moved up to an immediate recommendation? The information on sidewalk base material on page 8 makes it seem like an appropriate change to make more immediately.

I hope that you will be able to pass an Urban Forestry Management Plan for the City of Delaware soon. Thank you for your work on this important document.

Regards,  
Stacy Chaney-Blankenship  
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