

September 4, 2015

Damien Ossi
Wildlife Biologist
The Department of Energy and Environment
1200 First Street NE
Washington, D.C. 20002

Re: Comments on the Draft 2015 District of Columbia Wildlife Action Plan

Dear Damien Ossi:

Casey Trees strives to connect District residents with the many benefits trees provide. Trees and help manage stormwater, reduce the urban heat island effect and provide much needed habitat for wildlife in our city. However, in the past 60 years, tree canopy in the District has declined from 50 to 36 percent. Therefore, Casey Trees appreciates the opportunity to provide comment to the Department of Energy and Environment (DOEE) on the Draft 2015 District of Columbia Wildlife Action Plan (the Plan).

We are dedicated to helping the District reach its 40 percent tree canopy goal by 2032, which has the potential to improve habitat for birds, invertebrates, mammals, and other Species of Greatest Conservation Need (SGCN) across the District. This goal is achievable only if the District protects existing mature trees, chooses to plant hearty, tolerant species in restoration efforts and fosters urban spaces where trees can live long, healthy lives.

We support the Plan's draft recommendations. However, in order to ensure a verdant tree canopy in the District's future, we recommend that DOEE prioritizes the following conservation and management strategies in the Plan:

First, we applaud DOEE's recommendation to limit the removal of mature trees in closed canopy forests, as this will contribute to achieving the District's tree canopy goal. As such, tree canopy should be included as a Conservation Target in Table 27, and percent tree canopy should be an indicator of success for this Conservation Target.

Second, while we agree that native trees provide habitat value, native trees are not always the best option for urban streets or areas that will be impacted by climate change. Naturalized, non-native trees may be heartier, more drought-tolerant, and more resistant to the harsh conditions in these areas, increasing the chance of survival to maturity. To reflect this, we recommend the following language changes:



Current Language:

*“The aging of the street tree and suburban tree canopy may result in the loss of mature tree canopy and reduce the value of these areas. Increasing the use of native street trees where practicable instead of non-natives such as Norway maple (*Acer platanoides*) or Japanese zelkova (*Zelkova serrata*) could improve the value of urban habitats” (page 101).*

Recommended Language:

The aging of the street tree and suburban tree canopy may result in the loss of mature tree canopy and reduce the value of these areas. Planting a mix of native and naturalized non-native street trees could increase resilience to the harsh conditions of our urban streets and improve the long-term value of urban habitats.

Current Language:

“When planting, restoring, or maintaining riparian buffers, managers will attempt to plant only native tree and shrub species that can tolerate flood conditions, and inundation tolerance will be considered when selecting plant species (page 118).”

Recommended Language:

When planting, restoring, or maintaining riparian buffers, managers will plant native and/or naturalized, non-native tree and shrub species that can tolerate flood conditions, and inundation tolerance will be considered when selecting plant species.

Finally, we were excited to see eight conservation opportunity areas (COAs) selected as targets for conservation efforts. The Plan separately describes the current status of District habitats, and many of these habitats are present in the eight COAs. We recommend that DOEE prioritize the following four COAs because there are few young trees in these areas, and because trees in these areas are also being impacted by fragmentation or climate change:

- **Potomac River and Floodplain (COA 1):** As stated on page 47 of the plan, the “Northeastern Wetland Forest; Northeastern Floodplain Forest; Central Appalachian River Floodplain” habitat is found in the Potomac River Floodplain. This habitat typically includes oak and red maple trees but there are currently few tree seedlings and few saplings less than 15 years old in the Potomac River Floodplain.
- **Theodore Roosevelt Island (COA 2):** As stated on pages 47 and 49 of the plan, the “Northeastern Wetland Forest; Northeastern Floodplain Forest; Central Appalachian River Floodplain” and “Northeastern Wetland Forest; Coastal Plain Swamp; Northern Atlantic Coastal Plain Tidal Swamp” habitats are found on Theodore Roosevelt Island. These habitats typically include oak and red maple trees; and ash, black gum, red maple, American elm, and black willow trees, respectively. However, currently, Theodore Roosevelt Island is being impacted by fragmentation, and has few tree seedlings and few saplings less than 15 years old.

- **Northern Rock Creek Park (COA 4):** Central Oak-Pine habitat, which is found in Northern Rock Creek Park, is listed as vulnerable in the Plan. As stated on pages 46 and 112 of the Plan, there are few seedlings and saplings less than 15 years old in Northern Rock Creek Park, and the number of northern red oaks, present in this location, are predicted to decline due to climate change.
- **Large Fort Circle Parks (COA 7):** According to page 46 of the Plan, the Large Fort Circle Parks have the highest quality forest habitat in the District. However, Central Oak-Pine habitat, which is found in these parks, has been listed as vulnerable.

Casey Trees commends the District government for preparing this comprehensive Wildlife Action Plan. Thank you for your time and for the opportunity to comment. If you have any questions, please feel free to contact me at ktaddei@caseytrees.org or 202.349.1892.

Sincerely,

/s/ Kristin D. Taddei

Kristin D. Taddei
Planning Advocate