


FROM	NAME & TITLE	Ava Richardson AVA RICHARDSON, DIRECTOR	CITY of BALTIMORE MEMO	
	AGENCY NAME & ADDRESS	BALTIMORE OFFICE OF SUSTAINABILITY ON BEHALF OF THE BALTIMORE COMMISSION ON SUSTAINABILITY 417 EAST FAYETTE STREET, 8TH FLOOR		
	SUBJECT	CITY COUNCIL BILL #26-0161/ Natural Resources – Forest and Tree Conservation – Conforming Amendments		

DATE:

TO

The Honorable President and
Members of the City Council
City Hall, Room 400
100 North Holliday Street

May 4, 2026

Position: Support

The Baltimore Commission on Sustainability is in receipt of City Council Bill #26-0161 – Natural Resources – Forest and Tree Conservation – Conforming Amendments. CCB#26-0161 advances goals of preserving and growing Baltimore City’s urban tree canopy by adopting new State Forest Conservation Act requirements. This bill updates the City’s Forest Conservation code to reflect two recent State bills modifying the Maryland Forest Conservation Act (FCA) and voluntary code updates to better align the City’s Forest Conservation Program with other City policies and regulations.

The Commission on Sustainability recommends approval of CCB#26-0161

Maryland’s Forest Conservation Act and Baltimore City’s Forest Conservation code protect individual trees and forests associated with development projects occurring within Baltimore outside of public rights-of-way. Despite Maryland’s strong Forest Conservation regulations, the State has experienced significant canopy loss over recent decades. According to a [study](#) released by the Harry R. Hughes Center for Agro-Ecology, the State lost ~19,000 acres of forest and tree canopy between 2013 and 2018, caused mostly by new construction. According to the [most recent available canopy data](#) for Baltimore, the City lost ~150 acres of canopy between 2018 and 2021, likely due to a combination of natural and development losses.

In response to this canopy loss, and in acknowledgement that development pressures and forest conditions in Maryland have changed since the FCA was enacted in 1991, State advocates championed the General Assembly’s passage of SB526/HB723 (2023) and HB1511 (2024). These bills institute stronger protections for existing trees and forests. Significant changes made by these bills that must be implemented locally by the City include:

- **“No net loss” of canopy cover** as a standard for local Forest Conservation Program evaluation. If the City loses canopy cover over the State’s evaluative period, we jeopardize local control of our Program.

- Local jurisdictions can now offer **mitigation credits for the restoration of on- or off-site degraded forest**. This new tool can help direct additional funding towards the preservation, restoration, and invasive species management in the City's forests.
- New designation of Baltimore's urban forests as priority forests for retention. This will also require the establishment of a new **public notice and comment period** associated with the clearing of these priority retention areas.
- Reinstate the use of **qualified forest conservation mitigation banks**. Mitigation banks are forests established or preserved to supply credits to applicants that are unable to meet their Forest Conservation mitigation obligations through on-site plantings. There are currently no mitigation banks in Baltimore City.

Trees and forests are essential to healthy, vibrant communities in Baltimore City - they buffer noise, soften hard edges, provide shade in the summer and a buffer against wind in the winter, filter the air to improve air quality, slow and absorb storm water serving a nature-based flood mitigation infrastructure and even reduce incidences of crime. Despite the many benefits that trees and forests provide, the city's tree canopy is perennially threatened. This bill further protects these resources for years to come and contributes to the City's overall tree canopy by codifying new tools for the City to reduce canopy loss and restore existing degraded forests.

Baltimore's tree canopy currently stands at 28% coverage, with a citywide goal to reach a 40% tree canopy coverage by 2037. The 2019 Baltimore Sustainability Plan addresses urban trees in multiple chapters, including one dedicated to "Trees and Forests." Specifically, the Plan includes four actions related to this bill:

- Strategy #2: Assess and manage the city's tree canopy for long-term health.
 - Action 2: Create and implement plans to reduce harm to trees from invasive plant and animal threats, like the emerald ash borer and white tail deer, as well as from climate change.
 - Action 3: Develop unified, long-term strategies to increase support and funding for managing forests and forest patches, and for planting and caring for trees.
- Strategy #3. Preserve the city's existing tree canopy.
 - Action 3: Investigate the creation of a forest land-banking credit program and other methods for supporting and promoting forest preservation, such as land trusts and permanent easements.
 - Action 4: Investigate a mechanism for monitoring long-term forest protection on public and private property to preserve and improve the health of forests.

At their regular meeting on April 15, 2026, the Baltimore Commission on Sustainability voted to recommend **approval** of City Council Bill #26-0161, as it aligns with actions outlined in the Sustainability Plan to preserve the city's existing tree canopy.

Please contact me at 410-396-8630 or ava.richardson@baltimorecity.gov with questions regarding this bill report.

cc: Ms. Nina Themelis, Mayor's Office
 The Honorable Phylcia Porter, Council Rep. to the Commission on
 Sustainability and Chair of the Health, Environment, and Technology Committee

Ms. Renata Southard, Interim Director, Department of Planning
Ms. Nancy Mead, Council Services