

To the members of the Beyond 2025 Steering Committee,

Thanks for the opportunity to provide comments on the draft report “A Critical Path Forward for the Chesapeake Bay Program Partnership Beyond 2025”. **The Forestry Workgroup supports the recommendations presented in the Beyond 2025 Steering Committee’s report and encourages adoption by the Principal Staff Committee (PSC).** The recommendations reflect the importance of taking a holistic and integrated approach to watershed restoration, elevating the need to implement restoration practices that will have the greatest benefits for ecosystems and communities. We support the focus on integrating climate change considerations more comprehensively throughout the program, as this will be critical for ensuring the resilience of forests and forest restoration to future climate conditions. Forest buffers and tree canopy restoration are foundational nature-based solutions for mitigating and adapting to the impacts of climate change, including increased flooding and heat, while also providing substantial water quality improvement benefits.

The Forestry Workgroup would like to express particular support for the recommendation to “elevate Conservation as a key guiding pillar alongside Science, Restoration and Partnership”. This recommendation is critical and a cost-effective approach for meeting our goals to restore ecosystems and living resources in the Bay and watershed. Although we have made impressive progress in recent years with forest buffers and tree canopy planting, the land use data has demonstrated that we are losing riparian forests and tree cover at a much faster rate. This underscores the importance of putting more focus and resources towards conservation and stewardship. Programs like Maryland’s CREP Permanent Easement Program, which provides additional financial incentives to put restored forest buffers into conservation easements could provide a great model for coupling restoration and conservation efforts. Agricultural easement programs could also require farms to protect riparian forest buffers and forest cover in order to be eligible for cost-share funding.

We further suggest that this recommendation could be strengthened by identifying a need to prioritize the conservation and stewardship of particularly high-valued forests and wetlands. A renewed focus on stewardship should also include an integrated watershed approach to address invasive species and forest health issues that threaten the ability of forests to continue to provide the ecosystem services we rely on. Adequate funding and capacity to maintain tree plantings is essential for ensuring the long-term success of these efforts.

Here are a few other specific recommendations to consider:

- Executive Council Recommendation #1 calls for considering the impacts of changing environmental conditions as part of the review of Watershed Agreement outcomes. **We also recommend considering the impacts of changing social conditions, given the relevance of development pressures and urbanization on our restoration and conservation objectives.**
- Executive Council Recommendation #2 calls for “identifying ways to simplify and streamline the partnership’s structure and process”. However, the Synthesis report also identifies many potential areas of focus, including a more comprehensive approach to addressing climate change and land use change. In some cases, these issues may not benefit from simplified structures and processes. For example, to improve the resilience of forests to climate change, there may need to be additional focus areas to address forest health and stewardship. Adding these new areas of focus may add complexity to our existing outcomes and structures but could

nonetheless better meet our objectives of restoring healthy and resilient forests that will continue to provide water quality benefits over the long-term. **We would recommend that in addition to simplifying and streamlining the partnership, there should also be a focus on right-sizing and updating the partnership structure to improve efficacy.**

- **In multiple places, the report identifies the need to better account for the impacts of climate change in any updates to the Agreement. We agree this is a foundational issue to address but would also suggest that land use change be considered in tandem.** The high-resolution land use data has revealed large-scale habitat loss issues (with over 100,000 acres of tree cover lost to development alone between 2013/14- 2017/18) that must be directly addressed and prioritized. There are opportunities to utilize the high-res land use and land cover data to monitor and guide adaptive management, to better understand the implications of land use change for meeting watershed agreement goals, and to more strategically prioritize our conservation and restoration efforts.
- **Strengthen recommendations on climate change to more comprehensively address climate resilience, adaptation and mitigation throughout the watershed** as outlined in the Climate Small Group recommendations. This could include adding a more specific focus on promoting soil health and regenerative agriculture, including agroforestry practices. The Bay Program should pursue opportunities to better align with state/local efforts focused on climate adaptation and mitigation and leverage synergies with regional climate goals and funding streams. The Steering Committee should also consider opportunities for the Program to integrate land management, restoration and conservation into climate planning to support multiple benefits, including water quality improvement.
- In the section focused on “Recognizing our progress toward meeting the Chesapeake Bay Watershed Agreement” the report mentions that the PSC “committed to strengthening effort and investment in addressing nonpoint sources of pollution, forest buffers, urban tree canopy and both tidal and nontidal wetlands”. **The Charting a Course to 2025 report includes a section focused on how we can best strengthen forest buffer and tree canopy restoration efforts, so we’d recommend directing readers to the strategies identified in that report for more detailed information.**
- **In the notable partnership accomplishments, consider adding in a reference to recent progress on the Tree Canopy outcome.** From Chesapeake Progress: “In both 2022 and 2023, there was an increase in annual tree planting (454.7 and 2,577.4 acres respectively, up from 354.2 in 2021), with a particularly large increase in 2023. The 2,577.4-acre total in 2023 is the highest reported since tracking via the National Environmental Information Exchange Network began in 2014.”
- **Recommend adding a definition of watershed health** so it is clear that this should encompass both terrestrial and aquatic ecosystem structure, function, and services (including upland forested ecosystems).