



OFFICE OF RACIAL EQUITY AND SOCIAL JUSTICE


Marc Elrich
County Executive

Tiffany Ward
Director and Chief Equity Officer

MEMORANDUM

January 13, 2023

To: Jennifer Bryant, Director
Office of Management and Budget

From: Tiffany Ward, Director
Office of Racial Equity and Social Justice 

Re: Racial Equity and Social Justice Impact Assessment (REIA) for Supplemental
Appropriation (SA) #23-58 Tree Canopy Fund

- I. **FINDING:** The Office of Racial Equity and Social Justice (ORESJ) finds that Supplemental Appropriation #23-58 *Tree Canopy Fund* is well positioned to advance racial equity and social justice in Montgomery County given that it significantly reduced barriers to tree planting on residential and in other non-right-of-way. areas. However, available information and prioritization required under the Tree Canopy Law make it difficult to determine whether tree equity gaps are well addressed with this program.
- II. **BACKGROUND:** The purpose of Supplemental Appropriation #23-58 is to respond to the demand for tree planting under the County's Tree Canopy Law, Section 55-10 (b) of the County Code. This supplemental appropriation will fund the Tree Montgomery Program, enabling tree planting for the remainder of FY23.

Multiple disciplines have concluded that urban tree cover produces many benefits to the environment and communities, but inequalities in the distribution of urban tree cover prevent those benefits from being equitably shared. As with other indicators of well-being, structural inequities produce racial and ethnic disparities in outcomes. American Forest, the creator of the Tree Equity Score, explains “with few exceptions, trees are sparse in socioeconomically disadvantaged and neighborhoods of color and more prominent in wealthier, whiter neighborhoods. Redlining policies, dating back to the 1930s, helped lay the groundwork for this inequity.”¹ In the case of tree replacement, it's important to note that in a 2021 study conducted by researchers from the Nature Conservancy, the relationship between tree coverage in urban areas and factors like income and

race/ethnicity was statistically significant². In fact, the study concluded that the strongest predictor of the difference in tree cover between high- and low-income blocks was income inequality, noting that urbanized areas with greater income inequality had greater differences in tree cover between high and low-income blocks³.

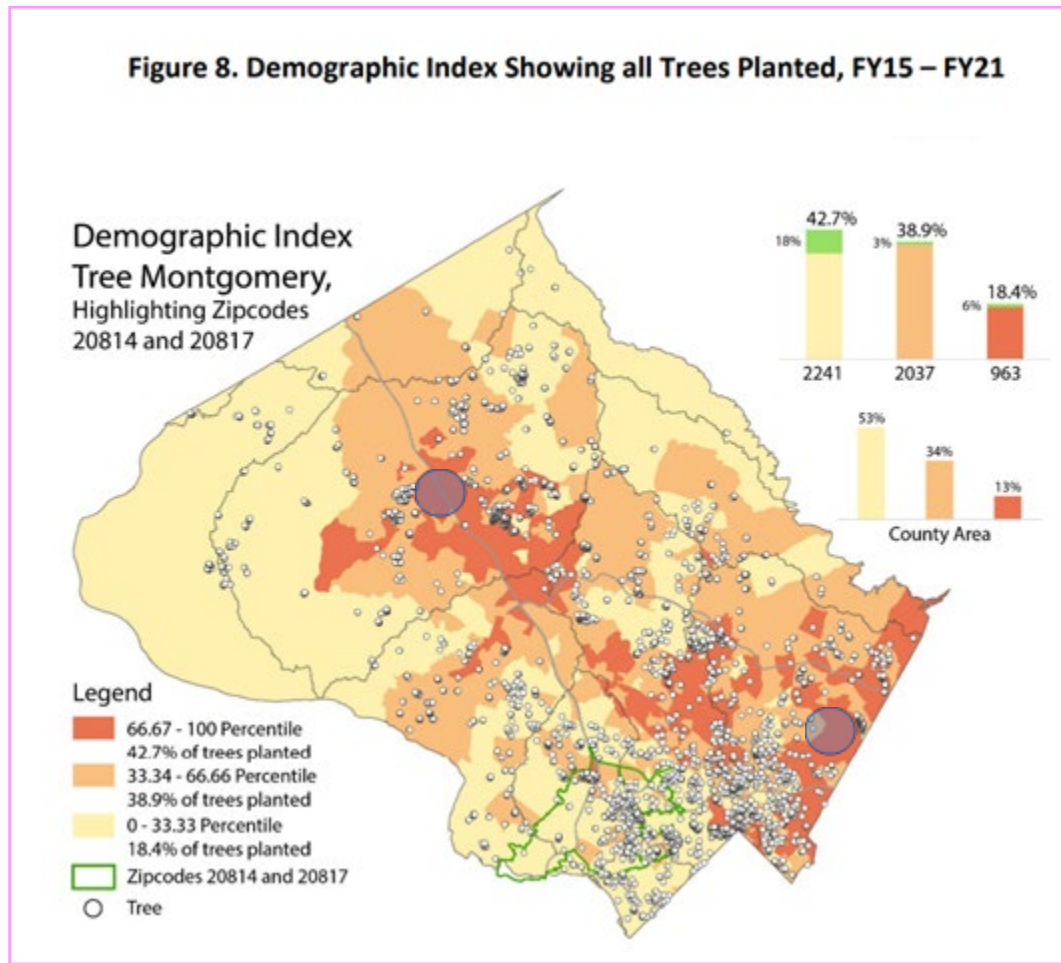
ORESJ has analyzed supplemental appropriations (#22-29 and #23-18) related to the Street Tree Planting Fund. In the REIAs⁴ it produced, ORESJ highlighted an absence of demographic data and income characteristics about the neighborhoods where tree replacement is taking place as well as limited information about the factors considered in the tree replacement process. ORESJ also recommended the use of a tool like the Tree Equity Score⁵ to bring tree equity gaps into sharper focus and inform targeted outreach and or replacement efforts.

In contrast with the Street Tree Planting Fund, the Tree Montgomery program monitors, and reports (via annual report) the placement and distribution of trees using a demographic index map. While the Tree Canopy Law requires prioritizing planting efforts in areas where development occurs⁶, the program also uses a demographic index and zip codes to monitor the distribution of trees. Based on its 2021 Annual Report, the most tree planting took place in areas of the county in the 66.7-100 percentile (the highest percentile) of the demographic index. *See the data analysis section for an excerpt from the 2021 Annual Report.* At the time of this analysis, ORESJ did not have access to the methodology used in the demographic index or underlying data. However, the map and annual report more generally indicate that the Tree Montgomery Program may be considering some of the tree inequities previously described.

To further center racial equity and social justice in the process of tree planting and monitoring the program, ORESJ recommends the following:

1. To measure outcomes, the program could overlay its existing planted trees map with the Tree Equity Score to determine whether there are locations where a tree canopy gap exists. Locations with low tree equity scores and lower percentages of total tree planting should be targeted for additional community engagement and outreach. While there is no financial barrier to requesting a shade tree, other barriers to accessing the program may exist including a lack of targeted outreach. It appears few if any trees have been planted in certain areas of East County and areas west of Gaithersburg (noting that the program doesn't operate within Gaithersburg or Rockville city limits). The program could conduct outreach, community focus groups, and an analysis of tree canopy to understand whether there is an unmet need and if any barriers exist.
2. In terms of process, the Tree Canopy Law requires prioritizing planting efforts in areas where development occurs. Areas of development are not necessarily congruent with areas experiencing the largest tree equity gaps, so this aspect of the law likely needs attention. Where possible additional prioritization factors that center on racial equity should be considered. This would bring the law and program into closer alignment with Bill 44-20 and likely reduce tree equity gaps in the County.

III. DATA ANALYSIS:



Note: Areas highlighted in Blue appear to be in the highest percentile of the diversity index and have what appear to be lower percentages of trees planted. This assessment is based on visual analysis, not on the underlying data; however, it appears these areas may present opportunities for further inquiry to determine if there is an unmet need or if there is overlap with areas receiving a low tree equity score.

cc: Adriana Hochberg, Acting Director, Department of Environmental Protection
Ken Hartman, Director, Strategic Partnerships, Office of the County Executive