

Trees Atlanta

Response to City of Atlanta

“Tree Protection Ordinance – Draft Outline”



6/17/19

We believe Atlanta can meet the needs for affordability and mobility for a rapidly growing population while protecting and growing our canopy to 50%. Updates to the Tree Protection Ordinance must be stronger than our current standards and result in improved, measurable outcomes.

A weak ordinance or inconsistent enforcement displaces the true cost of lost canopy as short-term profit for a few, while increasing long-term burdens for the many. Our city’s growth must honor and benefit the urban ecology of all of Atlanta’s diverse communities.

The City of Atlanta presented its first (v1.0) “draft outline” for the Tree Protection Ordinance (TPO) at public meetings on June 3-6, 2019. We understand that draft version 1.0 was presented to solicit public consideration, input, and discussion. The City announced the next step will be delivered as a “draft text” (version 2.0) in late July. We appreciate the opportunity to provide input to shape the draft text.

1. We support a goal of 50% canopy.

- The Tree Protection Ordinance must include specific goals and milestones, including how progress will be measured and a schedule of annual, quarterly, and periodic reports.
- A scientific city canopy analysis needs to be conducted every 4 years.
- A current canopy analysis, along with current permit and tree removal data (e.g., Accela) needs to be delivered immediately so we can make informed decisions for the TPO rewrite.

2. No rollback of existing canopy protection.

- First, do no harm: no new formula or standard should make it easier or cheaper to remove trees.
- We oppose allowing the removal of one healthy “tree per year no matter the condition.”
- We oppose reducing or eliminating the recompense fee, posting, and appeals process, unless changes are designed to make it easier for applicants and impacted residents to use (e.g., modify to one 15-day posting).
- We support raising standards in “protected zones” but not by lowering current standards or formulas that protect trees in other areas of the city.
- No community should be denied the ecosystem benefits of trees. Building higher density should not create hot zones.

3. Define “High Value” trees.

- We support a “high value” definition if it is enforceable and provides as much or more protection to these trees as is currently provided, and does not decrease protection of other trees of value.
- A single tree on a parcel can be “high value” when it contributes to a low canopy area or yard.

4. Arborist Review needs to be at the start of the building permit process.

- We support a reordering of permit reviews that puts the arborist review at the beginning of the process with tree protection in mind.
- We support testing a pilot “pre-submittal meeting.” This should be in addition to moving the arborist review to the start.
- Create better coordination and communication structures among the various functional areas involved in zoning, building, and arborist review processes.
- Reduce allowable impervious surface and construction zones to protect existing critical root zones, including trees within setbacks and boundary trees.
- Provide adequate space to plant shade trees, including guidance and incentives for builders to use healthy soil volume and building techniques.
- Monitor and evaluate compliance throughout the permitting process and ensure enforcement with staffing levels, fees, and non-compliance penalties that match the economic value of trees to the economic value of the developed parcel.

5. The next draft needs to include all the components of the Tree Protection Ordinance.

- We understand the first draft is an outline, and we recognize that several important standards were not addressed in version 1.0.
- Standards regarding protecting soil, buildable area, parking lots, recompense fee formulas, green space requirements, forested land acquisition, approved planting list, etc. needs to be reviewed.



Trees Atlanta is a nonprofit citizens' group that protects and improves Atlanta's urban forest by planting, conserving, and educating.

For more information from Trees Atlanta about the City of Atlanta Tree Protection Ordinance, please contact:

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All public materials from the **City of Atlanta's Urban Ecology Framework** and the [Tree Protection Ordinance](#) rewrite projects are available for download on the city website:
www.atlantaga.gov/government/departments/city-planning/urban-ecology-framework