

Public Tree Code Input Summary Report

Fall 2023

This document provides a summary of the final round of comments received as part of the Public Tree Code Revision project. An online form was made available at ColumbusUFMP.org from August 25 to September 22, 2023, as a final opportunity for the public to comment on the proposed code. A total of 149 individuals or groups provided comments. This report summarizes this input.

Comments were received from residents in the following neighborhoods:

Comments Received	% of all responses	Columbus Community Area	
23	15%	Clintonville	
21	14%	Far Northwest/Northwest	
14	9%	Harrison West / Victorian Village / Italian Village / Milo Grogan / Fort Hayes / Downtown	
9	6%	Olentangy West / University District / Fifth by Northwest	
9	6%	Northland	
6	4%	Greater Hilltop	
5	3%	North Linden / South Linden / State of Ohio	
5	3%	Northeast / Airport / East Columbus	
5	3%	Near East / Wolfe Park / East Livingston Avenue	
4	3%	German Village / Brewery District	
4	3%	Hayden Run/ Far West	
3	2%	Dublin Road / Franklinton / Harmon Road	
3	2%	Far East	
3	2%	West Scioto	

3	2%	Southwest
2	1%	South Side
2	1%	Mid East
1	1%	Rocky Rock-Blacklick
1	1%	South East
1	1%	Far South
23	15%	Other - Areas Outside Columbus (11) - Within Columbus (or from an organization) (12)

Recurring Themes

All compiled comments have been submitted to the Columbus Recreation and Parks Department for potential revisions to the proposed public tree code and manual. For ease of consumption, all comments were grouped into the most prevalent themes or topics, as shown in the table below, and described further in the following pages.

Theme or Topic	# of Comments	% of All Comments
Support / Accolades	90	60%
Development Concerns	57	38%
Need to Preserve Existing Mature Trees	39	26%
Site Specific Request or Issue	32	21%
Species Related Comments	31	21%
Need for Adequate Staffing and Enforcement	19	13%
Equity Issues	16	11%
More is Needed	14	9%
Education Will be Important	12	8%
Concern for Issues Related to Utilities	8	5%
Competing Priorities and Challenges	8	5%
Trees for Food and Wildlife Habitat	7	5%
Use of Tree Fund	6	4%
Total Submissions Received:	149	

Support of Code / Accolades (90 comments, 60% of respondents)

Just over 60% of respondents specifically cited their support or accolades for this work to-date and for the resulting proposed code. Sample comments follow:

- This is awesome. I fully support and approve the proposed changes to the public tree code outlined in the plan. The comprehensive approach, including the creation of a Tree Technical Manual, "inch-for-inch" replacement system, and emphasis on tree mitigation, demonstrates a well-researched strategy that will enhance our urban forest's health and resilience. The incorporation of expert consultation, industry standards, and enforcement mechanisms showcases a commitment to responsible urban development while ensuring our city's trees are well-protected. This plan's thoughtful revisions will undoubtedly contribute to the long-term sustainability and beauty of our city. Thanks so much for your hard work making this a reality.
- Thank you for your thoughtful, excellent work on this public tree code update. It commits Columbus to value trees much more strongly, which every study shows is so important as a way to mitigate global warming and keep all neighborhoods cooler. And anything we can do to increase our poor rate of 22% tree coverage will make us more livable and responsible to do our part locally to address climate change. As the pastor of a congregation that is a member of BREAD, I am grateful for Council's courageous approach to this. Sincerely, Pastor Dave Shull
- I support the changes being proposed to Columbus' public tree code. The stronger valuation of trees, the inch-for-inch replacement framework, and the closing of major loopholes regarding when protections apply are all necessary changes that will improve the health and well-being of our community. Large trees are the most powerful way to combat the effects of climate change locally, effects that Columbus is already experiencing like extreme heat, increased rainfall, and worsening air quality. The City's tree canopy is already well below that of peer cities at just 22%, so we cannot afford more canopy loss. These changes will lay the necessary groundwork for creating a strong private tree protection ordinance that is effective and enforceable.
- I am grateful to see that the public trees will be protected. It looks like most of the protections are focused on companies or their employees, rather than individual citizens, which is refreshing. Please continue limiting construction and other activities that diminish the quality of what is already present in Columbus. It's unclear to me if there will be enforcement officers from this department? It says the director will be in charge of enforcement, but I assume that means representatives of the director.
- I am glad to see Columbus finally taking meaningful responsibility for its tree canopy. I am particularly pleased by the creation of the dedicated tree fund, and that its monies may not ever be diverted for other city needs. I am concerned, however, that developers might simply choose to pay into the tree fund rather than replace the trees that they remove, and hope that the levies for removing trees will be high enough to discourage those kinds of flat buyouts. It would be a shame to lose some of our wooded/treed infill lots, for example, to developers who pay to cut them down. I am also concerned that the language for the Columbus tree sub-commission specifies "citizens" rather than "residents" -- not all of Columbus' permanent resident taxpayers are citizens! If there is no legal requirement that these figures have American citizenship, I would reconsider this language.
- I have lived in cities with and without tree codes. I am pleased to see Columbus step up to protect this important resource.
- "I commend Mayor Ginther and City Council for undertaking and addressing the overall and far reaching importance of assuring that Columbus has a healthy and sustainable Tree Canopy and tree growth now and into our future. So often we, as a society, take for granted the very assets that have made our lives so much better in so many ways. This report accurately describes the long term negative impacts our failure to care

for our mature trees, control deforestation and replace those we have allowed to be destroyed will have on Columbus and our quality of life. Once a large tree is lost, the landscape will never be the same in our lifetime. Delay in planting younger healthier trees delays this for future generations. ""The one who plants trees, knowing that he will never sit in their shade, has at least started to understand the meaning of life."" Rabindranath Tagore Thank you for your work and your foresight. I support this 100%."

Concern for Trees During Development (57 comments - 38% of respondents)

While not relevant to this public tree code revision effort, just under 40% of the respondents reiterated the need for tree protections during development. Many signaled that this first step of the public tree code serves as a lead into the upcoming project of tree protection during development and on private land. Sample comments include:

- The City's tree canopy is already well below that of peer cities at just 22%, so we cannot afford more canopy loss. These changes will lay the necessary groundwork for creating a strong private tree protection ordinance that is effective and enforceable
- All the significant tree destruction in our neighborhood has happened (and continues to happen) on private
 property, so we are following with great interest the prospect for changes to protect trees on private land.
 They cannot come soon enough.
- I am all for the changes to the code that have been proposed. Unfortunately, I don't think it goes far enough. In our neighborhood, development is running rampant and private property owners are the biggest part of the problem as commercial developers and private individual homeowners/property owners come in and remove all the old growth (or even smaller, younger trees) and either don't replace them at all or replace a whole row of towering shade trees with a couple little 1 inch twig-like ornamental trees. Please make the code even stronger to prohibit trees on private property and commercial developments from being removed. Please make these trees covered in the new Forestry plan as well.
- My wife and I strongly support the proposed tree code. We also think the city needs to pass a code that regulates the removal of trees on private property.
- From a personal perspective I am glad to see the code being updated. I would like to see the code add
 mitigation to private land when development occurs. Having worked on development projects in several
 states and cities, it is very common and would not be overly burdensome to include a development
 mitigation policy in the new manual.
- Currently developers are moving in to build apartments and housing on low lying land by Alum creek and clear-cutting. is feared--promises are always made and ignored. We want the area green and safe for low to middle groups.
- I think these changes are a step in the right direction; however, the city should really look toward its peer cities to implement policies on private property tree maintenance and removal. I live in Franklinton, which is seeing a burst of reinvestment and development. However, l've noticed many examples of trees being cut down on private property by house flippers and others from outside of this community. Franklinton has something like 14% tree coverage, well below what we need to have a healthy, equitable community. There should be steps taken to ensure that all trees that are not diseased, posing a hazard, etc. are preserved as much as possible. Otherwise, we'll continue fighting an uphill battle and remain stagnant in terms of our canopy.
- There needs to be some type of penalty for developers cutting down trees on private land prior to constructing new developments. We lost so many trees near Mt Carmel several years ago and nothing has

been built. Franklinton desperately needs a more dense tree canopy yet our median trees are not healthy and schools like Avondale do not have enough trees planted. This makes the neighborhoods less desirable to be outside in.

Need to Preserve Existing Mature Trees (39 comments, 26% of responses)

Just over one quarter of responses included comments on the need to preserve the large trees and tree canopy that are still in existence in Columbus. Sample comments follow:

- Large trees are the most powerful way to combat the effects of climate change locally, effects that Columbus is already experiencing like extreme heat, increased rainfall, and worsening air quality. The City's tree canopy is already well below that of peer cities at just 22%, so we cannot afford more canopy loss.
- I am fortunate enough to live in a neighborhood with a canopy of mature trees. I would like all of Columbus neighborhoods to have this protection from global heating.
- If anything, we should increase the canopy cover goal and stop net canopy loss even sooner.
- I support the implementation of protections for mature trees. They are the best investment we have to combat climate change.

Site-Specific Request or Issue (32 comments, 21% of responses)

Multiple comments were received highlighting specific sites and questions by respondents. Some highlighted specific areas of tree loss, areas in need for replanting, issues in specific parks, and questions on specific trees. These have been delivered to the CRPD staff for attention.

Species Related Comments (31 comments, 21% of all responses)

A number of comments focused on tree species and planting locations of species. These included the need for natives, ensuring the right trees are planted in the right spaces, and that trees are used that will last for decades. Sample comments follow:

- We are very happy to see native trees included in the Street Tree List. Our comment here is that we'd like to see them either be a larger proportion of the list (add more native tree species to the list) or be given a preferred status when recommendations are made."
- I would like to see an emphasis on native trees any place that the site is appropriate. Previous leaders in the department made it clear that it was not a priority. I hope things have changed in the past 12 years or so since I was a student at OSU, studying forestry and environmental management.
- There should be more stipulation on what can be chosen as a public tree and where in the public area it can
 be located. This was not done in prior decades, and we have some issues resulting from that. Many public
 trees and shrubs in my neighborhood happen to be invasive, and/are species not suited to be near public
 sidewalks, public sewer lines, and streets.
- When the commission is considering trees, please keep in mind the tree in the long-term, not a tree that is popular (see Callery Pear fiasco). Please make a big deal of using native trees. Brag about the slow-growing but structurally strong trees sometimes used. Depending on the location, please think to avoid trees that "drop" things locust trees. Keep the public on your side. I was heartened to see emphasis and equitable tree coverage. This is SO important for property values and pride.

- Section 912.03(D): Please be mindful of natural activities by animals which do not constitute a threat to the
 health of a tree. Section 912.07: Please make the list of prohibited species available to the public once
 codified. Section 912.08: Please use all best available science and professional recommendations for
 determining what makes a tree a "public nuisance". Removal should be a last resort and in lieu of any less
 drastic measures.
- Looks good, thanks for your work. Will there be canopy trees on the approved tree list? Some of the
 approved street trees are very "vertical" and don't have enough spread to create shade canopies over the
 street.
- My only concerns would be that I want to see an emphasis on planting native trees and a mixture of male and female varieties. As you may be aware, air quality in allergy season is made worse by having very few female varieties. The trees are able to sense that and put out so much more pollen than they would usually, to try to out compete. Thus increasing the particulate matter in our air. My second concern would be provisions/ guidelines be in place to not plant trees too tightly together, not have a massive mound of dirt and mulch on top suffocating the roots, enough room along city sidewalks so that they have enough room while growing related to the variety of tree and have other things our forester would recommend to improve the health of the trees in our city
- We are concerned about 912.07: Approved and Prohibited Tree Species (A) due to the current approved species list in the Tree Technical Manual. This list: Includes nearly 70% of species not native to Central Ohio or even North America. This poses threats to our biodiversity and ecosystem productivity in Central Ohio. We would like to see more native trees predicted to survive climate change by the USDA Climate Atlas included in the species list. The trees planted should include species native to Central Ohio as well. While we recognize that street trees endure harsh conditions, we request that plantings in parks, natural areas, and other appropriate areas be composed of species native to Central Ohio. Includes problematic invasive species including golden raintree and hedge maple, listed in neighboring states. Moreover the term "invasive" should not be applied to a native tree such as box elder- this does a disservice to awareness about the serious threat of invasive non-native pathogens and pests that harm the economy, environment, and human health. The list is heavy on cultivars which are typically cloned. This does not reflect local biodiversity and poses a problem for genetic resilience.
- Please do not plant silver maples. They damage drainage and sidewalks. Their roots are too shallow. Please think about the impact of surrounding structures and not just how a tree looks. For instance, who decided to plant male and female gingko trees on South High Street? Now, every year, the residents have to deal with the pink seeds that smell like vomit. Does a tree litter an area? Is it indigenous or invasive? What about planting a crop forest that provides food to a neighborhood? These are all important considerations. I was an environmental science teacher for 30 years. We have the OSU Extension program right here. They have master gardeners who can help.
- Section 912.08- Private Nuisance Trees -I would like to see "known invasive species" added to the definition of "nuisance trees." Many of the trees in my neighborhood are tree of heaven and white mulberry. Some are quite large and provide a not insignificant amount of tree cover, but I believe the detrimental ecological impact they pose greatly outweighs any benefit they provide. Removing and replacing them with native trees would greatly improve the overall future health of the neighborhood tree canopy.

Need for Adequate Staffing and Enforcement (19 comments - 13% of respondents)

A number of comments reinforced the need for additional staffing to meet this level of care described in this effort. In addition, some had concerns on enforcement. Sample comments follow:

- As I read the manual I was concerned about the workforce needed to help bring everyone into compliance. I
 can see through the discussion yesterday that thought has been given to having enough foresters to do
 inspections and work on trees. With the new guidelines, I am sure the demand will go up. Thank you for this
 effort.
- Thank you for making these changes to the code and encouraging the expansion of trees and our tree canopy throughout the city! I have a few questions/thoughts. I see dead trees next to roads and there doesn't seem to be a quick process in place to replace them with a new tree. It seems they are left up for a while, or are not replaced is there a process/funds in place to expedite tree replacement? Would there be an opportunity to partner with landlords, apartment complexes, strip malls, or homeowners in a way that would encourage more tree planting in their yards/grass areas to help with these goals? Is there an opportunity to add more trees to sidewalk areas or use them as a means to separate bike paths from car paths on the road? Or add to the middle of roads as outcroppings that slow down vehicles? Essentially, how can we use trees and planted areas to encourage or discourage other behavior in our city (i.e. slowing down vehicles)? Thanks again for making these changes, protecting our trees and making more tree planting possible!
- Love that Columbus is planting more trees, but must have a pruning plan to maintain limbs from sidewalks and streets for pedestrian and driver safety. Pruning plan should be done by street, not by address. More efficient. Look at whole street. In Karmel Village Woodward Park, we had a Neighborhood Pride program in 2008 trees planted and those trees were never maintained. Now we have dead trees, dying trees, and tree limbs hanging over sidewalks and in street being hit by trucks. Must have a pruning maintenance plan by street along with tree planting plan.
- This code should also obligate the City to take care of the public trees rather than just prohibiting private persons from doing so and authorizing the City to create policies. For instance, Parks and Rec removes street trees routinely -- which are public trees -- but then does not grind the stumps or replace the trees for years, if at all. Similarly, the median parks in our neighborhood are severely neglected by Parks and Rec. Nuisance trees allowed to proliferate. There is a responsibility on the part of the City to appropriately staff, fund, and follow through on the commitment to preserving public trees. That is not apparent in the code revision proposed.
- The city doesn't care for the trees they plant. Dead branches, stressed trees, dead trees etc are all over our neighborhood. Why plant more trees when you don't take care of the ones already planted. Pruning is never done routinely. New trees have plastic tubes around the bottom that remain for years and eventually grow into the bark. I would love more trees but not til all the trees are pruned and taken care of. The only time trees in my neighborhood get attention is when a 311 request is submitted. That includes The parks too! I've called personally and have been told there is a year wait list to prune and there isn't enough staff to take care of the trees. So why plant more?
- I don't mind saving trees...it's a good idea. But the city should be forced to trim and maintain them regularly. I'm tired of branches hitting my car.
- Planted trees need to be maintained. The number of trees dead or removed is equal to the amount planted.
 Currently it's a waste of money and seeing dead or dying trees brings down property values. Sawmill Rd near West Case is embarrassing

- At first glance by a non-professional this looks like a very thorough manual. I have comments on current practice. Knowing that the city forestry staff can be busy it's still concerning that issues reported thru 311 concerning neighborhood trees cannot be handled in a more timely manner. We have a street, Rosemary Parkway, with a stretch of gorgeous walnut trees that are in need of pruning. The replies have always been that they needed to wait until it was their turn on the pruning schedule. In the meantime more dead branches are appearing and the health of the whole parkway between W. Dominion and W. Schreyer looks to be in question. I think a more timely response to citizen input for tree care is important.
- It's unclear to me if there will be enforcement officers from this department? It says the director will be in charge of enforcement, but I assume that means representatives of the director.
- It seems that Rec and Parks is responsible for policing itself. Aren't they responsible for trees and tree removal in city easements? For example, what if R&P removes trees due to disease, but doesn't replace them? They are not going to fine themselves? Also, you might want to consider different penalties based on the section of the code. Some sections, like deliberately damaging trees or hanging signs, might be a misdemeanor. Others may be committed by companies/owners by not replacing damaged trees and perhaps there should be a fine.

Equity Issues (16 comments, 11% of responses)

Just over 10% of responses included comments related to equitable tree canopy across all neighborhoods, especially for those most vulnerable. Sample comments follow:

- With the rising heat and risk of blackouts, I am very concerned for the neighborhoods that do not have adequate shade. When my power went out last summer, my food spoiled and I had to take my cat and stay at a friend's house until it came back on which is not a luxury everyone has. With more trees, I believe Columbus can start protecting those most at risk so they aren't plagued with environmental injustices on top of everything else they are dealing with.
- Additionally for the neighborhoods most in-need of greenery and trees, in addition to 'invest in equitable
 canopy access by 2030', I believe considerations should be made for exceptions or public funding to offset
 personal cost of tree removal for low-income individual/family homes.
- I live in a neighborhood with a beautiful tree canopy. But I've provided childcare for my granddaughter for the past 4 years in the Linden area. The difference in tree canopy while walking with her each day on streets with very few trees is stark and unpleasant. We need to do everything possible to improve and increase the tree canopy in ALL our Columbus neighborhoods.

More is Needed (14 comments, 9% of responses)

A number of comments included a call for stricter or additional requirements for tree preservation and planting. Sample comments follow:

- For every tree removal there should be the requirement to do BOTH replace inch for inch AND pay a fee to the tree fund. If it is only one or the other it will be too easy for a person to just pay the fee and move on.
- The city needs to increase penalties for removal of mature trees, and prioritize planting more street trees citywide. Every major road that has any green space beside it should have a row of trees, and every greenfield or brownfield development should plant trees between the roads or parking lots and the development, if space permits. And as part of this, Columbus needs to stop clear-cutting trees in areas where homeless people are sleeping. Spend that money on building shelter, not on removing trees.

- I find the code revision to be sufficient but it should go farther in requiring public street trees for new development that impacts the public right of way. For example, development along the commercial corridors, like High Street, Sawmill Road, and 5th Avenue for example, should be required to include a sufficient number of street trees along the sidewalk and roadway to create a canopy.
- I like the proposed changes, even though, to me, it doesn't go far enough. Thanks for listening.

Education Will Be Important (12 comments, 8% of responses)

Comments were submitted highlighting the importance of education for future success, not just in successful enforcement of code, but more broadly in the city's long term tree canopy goals as well. Sample comments follow:

- The changes to the code and manual are all steps in the right direction but we need far more public education on the value and benefit of planting and maintaining trees. Far too often I have seen trees reach a certain size and they are cut down out if unfounded fear of some possible limb falling. Those are never replaced. During the time I have lived on my street (7+ years) there have been 7 shade-giving trees cut down without replacements. There needs to be knowledge or pressure encouraging keeping trees or a penalty for removing a tree without a replacement.
- I 100% support keeping trees and planting more. As we all know trees provide valuable health benefits both mental and physical. Additionally, what a great way to beat the heat. I hope the city moves towards regulating the removal of private trees as well. I think education is the key to this.
- I appreciate the city's efforts in increasing the tree canopy. The manual is helpful. I think it would be better to have a class or presentation to accompany it for homeowners who it applies to.

Concern for Issues Related to Utilities (8 comments, 5% of responses)

Comments received highlighted challenges with trees and utilities. Sample comments follow:

- As President of the Short North Civic Association, I write in general support of the proposed Code changes for city tree protection and the adoption of the new Tree Technical Manual. The Short North's tree canopy, much of which is over 100 years old, is a priceless and irreplaceable community resource, and is so viewed by area residents. Sadly, in recent years, we have lost many trees to carelessly-performed utility work, signal replacement, and general development. We would hope that future efforts include: (1) seeking additional ways to cooperate with civic & other organizations to increase the neighborhood tree canopy; (2) where rows of established trees exist, such as the London Plane trees lining Neil Avenue, that the City continue to plant trees of the same species in those areas; and (3) better coordination between the Forestry Division and others, such as utility providers, to reduces the proliferation of above-ground wires that result in excessive pruning of street trees, and to vigorously protect root systems from below-ground utility installation. Thank you for the opportunity to comment.
- I would like to see public utilities, especially AEP, given strict guidelines on how they treat neighborhood trees. Its a scandal that AEP has gotten away with killing many mature trees in our neighborhood. Over the years I have seen trees hacked at by AEP wood butchers, resulting in the slow death of magnificent trees. Power lines need to be put underground for several good reasons, even though it will trim the massive profits of companies like AEP. Let's get serious about providing shade so that we don't need to be turning on ac every day of summer and having overhead power lines damaged in winter because AEP is too greedy to put them in a first world place.

• There are several cases where expansion of above ground utility lines has occurred. In some cases, both sides of the street are now lines with significant utility lines, leaving little opportunity for tree canopy. An example includes Fifth Avenue between High Street and Neil Ave, where the Columbus Division of Power has installed poles that now occupy both sides of the street. Placement of some of these poles obstruct the ability of pedestrians and this with ADA needs to use the sidewalk. Please consider guidelines for utilities that enable at least one side of a street to accommodate a significant public tree canopy.

Competing Priorities and Challenges (8 comments, 5% of responses)

Some comments highlighted the balance required to achieve the many priorities within Columbus, including tree canopy. Sample comments follow:

- I am also concerned about the potential adverse impacts the public tree plan and tree protection requirements may have on development of affordable housing. Although I understand the reasons behind these rules, I'm concerned that the additional cost burden may be prohibitive for smaller-scale developments, particularly developments pursued by individuals or small firms.
- How does tree canopy work when you have solar on your home and the tree growth is limiting direct sunlight? I would live to have a few trees trimmed at the top for greater sunlight. I do love the master plan. It doesn't always work with solar. Thanks

Trees for Food and Wildlife Habitat (7 comments, 5% of responses)

Beyond the call for native species, a number of responses highlighted the need for food forests and wildlife habitat specifically. Sample comments follow:

- Would like to see more trees in public parks and on public lands around the city, less mowing of grass and more habitat for native pollinators.
- Non-native species should not be used as proposed street trees. There are many native trees, which benefit native wildlife and have fewer negative ecological consequences.
- Please consider adding trees that produce fruit and nuts to trees that could provide food for animals like deer, squirrels, and birds! Thank you so much for this consideration!

Use of Tree Fund (6 comments, 4% of responses)

A number of comments contained thoughts or questions on the Tree Fund and its permitted uses. Sample comments follow:

- I wonder if the Tree Fund should only be dedicated to public trees, or that this could be a source to support the management of trees on private land for underprivileged people.
- Section 5.3: if a payment in lieu of replacing a tree is allowed at one site in a specific region of the city, will the city use this payment to plant a tree or trees within the same region? For example, a tree in the Far West Side area has to be removed and instead of installing a replacement, the city requires the property owner to pay a fixed amount in lieu of planting a replacement at that location. Does the city use these funds to plant a tree elsewhere in the Far West Side? Or can the city use the funds for tree replacement anywhere in the city? (My apologies if I missed specifics, but I didn't see them.) For parkland, developers pay in lieu of parks but the funds go to the city for use anywhere, not in that region.

- Please use the funds from fees collected for public tree removal to plant and maintain Tiny Forests (or Miyawaki forests) in the Columbus area.
- I would love to see funds allocated to a program to assist homeowners with the removal of invasive species trees and replacement with native tree species that support native ecological diversity. Especially keystone species such as Oak, Willow, and Cherry