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Tree Preservation Ordinance Public Input Group
Final Work Product – August 2025

The Tree Preservation Ordinance Public Input Group (TPO PIG) brought together neighbors, neighborhood associations, local advocates, and residents with technical expertise to strengthen Saint Paul's approach to protecting urban trees during development and public projects.

Guided by a commitment to equity, transparency, and practical implementation, the group worked collaboratively over five meetings to provide focused input on ordinance language, identify critical gaps, and develop actionable recommendations that balance ecological health with community priorities.

Through robust discussion and partnership with consultants, Ward 2 staff, and the Parks Commission, the TPO PIG finalized priority thematic "buckets" to organize ordinance drafting and guide detailed recommendations. Within their recommendations, the group emphasizes clear, enforceable language that eliminates ambiguity and discretionary "wiggle words," and calls for early, accessible public engagement to build trust and reduce conflict. A central focus is placed on protecting trees on city-owned land—including boulevards, rights-of-way, parks, and trails—with future phases anticipated to address private property protections.

Key themes emerging from the group's work include:

- Clarity and Strength: Use prescriptive, binding language with strong enforcement and accountability measures.

- Early and Inclusive Planning: Require tree preservation plans to shape project design from the outset and ensure meaningful, accessible public input.

- Balance and Flexibility: Incorporate expert-driven rulemaking for technical detail while grounding core protections in the ordinance to allow adaptability.

- Transparency and Trust: Foster open communication through multilingual notifications, clear timelines, and visible oversight.

- Equity and Environmental Justice: Recognize that canopy protection and investment in the least-canopied, heat-vulnerable neighborhoods is a highly desirable outcome.

- Full Lifecycle Stewardship: Emphasize not only tree preservation but also maintenance, replacement, and long-term establishment to secure lasting urban canopy health.

The recommendations presented in this final work product reflect a shared vision of a well-managed, equitable, and resilient urban forest that enhances the quality of life for all Saint Paul residents while supporting the city's broader climate goals. The TPO PIG offers this work with the expectation that the identified themes will inform ordinance revisions and support informed City Council decision-making ahead of anticipated action on this important city-wide issue.

If you have any questions about the information presented in this document, please contact Megan Jekot, Legislative Aide to Saint Paul City Council President Rebecca Noecker, at megan.jekot@ci.stpaul.mn.us.

Overview of TPO PIG Meetings and Presentations

- Meeting #1 (May 28): Launched the group, gathered initial input, highlighted gaps, and discussed early draft ordinance language based on the January proposal and public comments received.
- Meeting #2 (June 30): Held an in-depth discussion with Third Horizon consultants, identifying key opportunities and areas of concern.
- Presentation to City of Saint Paul Parks and Recreation Commission (July 10)
- Meeting #3 (July 15): Focused on debriefing Parks Commission feedback and organizing ideas into core topics or "buckets" for deeper exploration.
- Meeting #4 (July 24): Finalized and prioritized the thematic "buckets" to guide ordinance drafting and identified key next steps to carry the work forward ahead of August 27.
- Meeting #5 (August 11): Reviewed and discussed the finalized TPO PIG work product to guide detailed recommendations ahead of the August 27 City Council meeting.

Overview of TPO PIG Members & Meeting Attendees

Name	Org/Connection	5/28	6/30	7/15	7/24	8/11
Bridget Ales	Save Our Street & Pedestrian Advocate	X	X	X	X	X
Lindsey Alexander	Third Horizon Consultant	- - - - -	X	- - - - -	- - - - -	- - - - -
Stacy Becker	Third Horizon Consultant	- - - - -	X	- - - - -	- - - - -	- - - - -
PJ Bensen	Community Member	X	Excused Absence	X	X	X
Tom Darling	Summit Avenue Residential Preservation Association	X	X	X	X	X
Noah DeVlaminick	Community Member	X	X	X	Excused Absence	X
Meg Duhr	Fort Road Federation	X	X	X	X	X
Tim Greenfield	Saint Paul City Council – Chief Policy Officer	- - - - -	- - - - -	X	X	
Michael-jon Pease	Saint Paul Parks Conservancy	X	X	X	X	X
Colleen O'Connor Toberman	Friends of the Mississippi River	X	X	X	X	X
Jacob Walls / Dan Reed	Ramsey Hill Association	X - Met 5/27		X		

Key Themes and Recommendations

Building on robust discussions with consultants, Ward 2 staff, and the Parks Commission, the TPO PIG identified priority thematic areas—referred to as "buckets"—to organize the ordinance drafting process. The following sections present the group's detailed recommendations within these themes.

These recommendations are offered with the expectation that they will guide ordinance revisions and support City Council decision-making as the city moves toward finalizing this important tree preservation policy.

Scope and Applicability

The group recommends the ordinance focus on protecting trees located on city-owned land—including boulevards, rights-of-way, parks, and trails—while supporting future efforts to extend protections to private property. Due to jurisdictional complexity, especially where state or county land overlaps city boundaries, clear definitions are needed to distinguish areas (e.g., boulevard vs. trail vs. park) and clarify which department (Public Works vs. Parks) has responsibility. Members also raised concerns about equity and consistency in areas managed by state or county agencies, noting that without broader adoption of tree protections, neighborhoods along state or county roads may face inconsistent or lower standards despite experiencing greater environmental burdens. The group recommends the ordinance acknowledge this gap and identify it as an area for further study and future collaboration with MnDOT, Ramsey County, and other external partners.

In terms of scope, the ordinance should explicitly carve out restoration and invasive species projects to avoid unintended constraints on ecological management. To strengthen implementation and accountability, the group also urges the removal of vague terms like "feasible" or "reasonable," advocating instead for binding language paired with a transparent public process that allows internal decisions to be reviewed and challenged when necessary.

In terms of implementation, the group emphasized the importance of clear guidance on how the ordinance will apply to projects already underway. While broad applicability to City projects is preferred, flexibility for exceptions is recommended, as members expressed concern that too narrow a definition of "underway" could lead to projects being accelerated to circumvent new requirements. One suggested threshold is to apply the ordinance fully to projects less than 50% through design, while considering partial implementation—such as tree protections—for later-stage projects.

The group also highlighted the need for public understanding and awareness of this new ordinance, noting that outreach components like yard signs and postcards will require time for planning, budgeting, design, and manufacturing. As a result, these public noticing measures may require a staggered rollout. Tree protection measures, however, should be implemented immediately wherever feasible.

Tree Definitions and Thresholds

A member of the group recommends updating the City's 2010 canopy report, which is outdated and no longer reflects current conditions. A new assessment would provide accurate, ward- and district-level data on existing canopy cover, opportunities for canopy expansion, and areas unsuitable for planting. This data is critical for informing equitable investments and supporting location-specific, evidence-based decisions.

The group also supports retaining existing definitions for "heritage" and "significant" trees, while recommending the creation of a new category— "locally significant trees"—to capture trees with high value based on context. These may include smaller trees that provide critical canopy in under-canopied or heat-vulnerable areas. Suggested criteria for this designation include block-level canopy loss and equity indicators, such as location within the least-canopied neighborhoods. This approach ensures that environmental justice and local conditions are meaningfully reflected in tree protections citywide.

Preservation Planning Requirements

The group believes that it is imperative that tree preservation plans be developed early and used to guide project design. They should not be completed after key decisions are made. A two-phase

approach was proposed: first, identify at-risk trees and site constraints; second, determine how to avoid or mitigate impacts to all existing trees – especially significant and heritage trees. Plans should be publicly shared before final decisions are made, and outreach should go beyond minimal notice—using multiple meetings, varied formats, and targeted communication to affected neighborhoods. The group emphasized that early, accessible engagement can build trust, prevent conflict, and reduce the likelihood of residents feeling forced to take legal action to protect trees.

Protection During Construction

The group identified enforcement during construction as a critical gap and strongly supports clear, enforceable requirements to protect trees on active job sites. Recommendations include using protective fencing around trees and root zones and preventing root damage from heavy equipment—not just surface coverings. Members cited successful examples where close collaboration between foresters and contractors preserved trees even in constrained spaces. To ensure compliance, the group calls for real-time accountability, including on-site supervision, feedback loops, and follow-up audits throughout construction.

Tree Replacement & Mitigation

The group emphasized that tree protection must extend beyond planting to include full-cycle stewardship—removal, replacement, and long-term establishment. Members expressed deep concern about the number of trees that die after the initial one-year warranty period due to lack of follow-up care. To address this, they recommended that the ordinance require measurable post-planting maintenance and clear accountability for tree health, while allowing for flexibility in how care is provided. What qualifies as "reasonable maintenance" should be defined based on location and context—for example, distinguishing between a high-traffic median and a residential boulevard.

The group agreed that tree removal during construction should be avoided if at all possible and must automatically trigger replacement, not just documentation. In cases where replanting on-site isn't possible, replacement trees should be planted in under-canopied neighborhoods to advance equity. They also discussed how tree replacement ratios should reflect both ecological value and feasibility. While some supported tying replacement requirements to the diameter of the removed tree, others warned against overly high ratios that might lead to poor-quality or "jump" trees. Members supported referencing publicly available national or international standards to avoid overly prescriptive local rules and promote consistency—particularly for smaller trees under 12 inches in diameter, which are often overlooked in current policy.

To prevent a common pattern in which trees are removed, grates are left empty, and no replanting occurs for years, the group emphasized the importance of full-cycle planning and compliance checks. Ultimately, their goal is to ensure that replacement trees not only get planted but survive and thrive to maturity—contributing to a healthy, resilient, and equitable urban forest.

Oversight and Accountability

The group emphasized the importance of maintaining direct, city-led engagement for projects involving potential tree removal, strongly recommending against outsourcing these activities. A centralized point of contact or a dedicated forestry staff role—potentially an ombudsman-like position focused on tree protections—was suggested to streamline communication, oversee public engagement, and ensure consistent ordinance implementation. While acknowledging financial and staffing constraints, the group noted that investing in dedicated coordination could improve project delivery, leverage community support where available, and prevent future costs, including legal disputes. This approach frames outreach and enforcement not as an added expense but as a cost-saving measure that supports both long-term urban forest health and fiscal responsibility.

The group further emphasized that accountability must be built into every phase of tree protection, from planning to implementation. They called for ordinance language that is strong, clear, and enforceable—not vague or open to internal interpretation. Phrases like "too expensive" or "not feasible" should not be used to dismiss tree protections without a transparent process that allows for scrutiny and challenge. The group stressed that tree protection plans must be proactive rather than aspirational. It's not enough to say "we'll try to save them"; instead, plans must anticipate potential impacts and commit to specific strategies for avoiding harm to trees.

Clear public communication was also a recurring theme. Residents and stakeholders should be informed about what will happen, how, and when—particularly when it comes to tree removal, replacement, and maintenance. The group advocated for rooting decision-making in expert guidance, supporting the use of professional standards such as ANSI A300 and recommending the involvement of at least two qualified arborists to ensure balanced, technically sound input. Members also emphasized that the standards and criteria used should be publicly available to ensure transparency and build trust in the process.

Finally, members raised concerns about follow-through. "Tree holes"—the empty spaces left when removed trees are never replaced—were cited as ongoing sources of frustration and safety risk in neighborhoods. To address this, the group urged the city to establish clear timelines, enforceable commitments, and visible accountability measures so that tree protections are not just promised on paper but delivered in practice.

Equity and Environmental Justice

Equity and environmental justice were central themes in the group's recommendations. Members emphasized that a strong tree preservation ordinance advances equity by making protections the default—reducing the burden on residents to advocate, navigate complex systems, or rely on insider knowledge to benefit from a healthy urban forest. The group stressed that protections and investments must be the norm, with historically under-canopied or heat-vulnerable neighborhoods receiving equal—or greater—attention. If tree planting priorities are developed, members stressed the need for clear public communication about both the rationale and intended outcomes.

One guiding principle emerged clearly: "hold harmless" the areas that already have substantial canopy, while investing deeply in places where canopy is lacking. At the same time, the ordinance's fundamental purpose is to preserve and protect trees citywide. When removal is necessary, it should require clear, enforceable replanting plans—with specific timelines and locations—not vague promises. Where new planting is concentrated in particular neighborhoods, that prioritization should be backed by publicly available data and criteria to build trust and understanding.

To ensure fairness, the group called for consistent and automatic enforcement of protections, so that benefits don't skew toward those with more resources, time, or connections. Lowering barriers to protection is itself an equity strategy—ensuring that all neighborhoods and residents, regardless of income or capacity to engage, benefit equally from healthy tree coverage.

The group also discussed potential tensions between tree preservation and accessibility requirements, such as ADA-compliant ramps or sidewalks. Rather than treating these goals as contradictory, members encouraged a balanced approach that recognizes the cooling benefits trees provide, especially for people with disabilities. They observed examples of sidewalks meandering around existing trees, which preserves trees while maintaining accessibility, and noted that some trees pre-date sidewalks, highlighting how creative placement can balance public infrastructure needs with tree protection. The group emphasized the importance of considering ADA accessibility in tree and sidewalk planning. They recommended consultation with ADA experts and possibly including ordinance language that affirms both environmental and accessibility priorities.

Public Process and Transparency

The group emphasized that public engagement around tree protection must become more accessible, equitable, and effective. Although the existing petition-based review process is intended to empower residents, members observed that it often benefits individuals with greater resources, legal knowledge, or district council support, while those without such resources are left without relief. This disparity can lead to inconsistent outcomes across neighborhoods. To address this imbalance, the group supported a hybrid model that retains the petition option but significantly strengthens proactive, city-led notification and engagement.

There was strong interest in ensuring that the city fulfills its responsibility to keep residents clearly, consistently, and accessibly informed in a timely manner about tree-related projects. Notices should use plain, multilingual language and be delivered through multiple channels, including postcards, signage, and online platforms. On-site signage was especially popular as a visible, low-cost, and trustworthy way to reach people directly affected by nearby tree removals or construction. Supporting materials should help bridge the gap between technical documentation and everyday understanding by using QR codes, timelines, maps, and straightforward summaries explaining how and when residents can get involved.

The group also expressed support for objective, threshold-based triggers—such as the number of trees involved, project size, or budget—to require automatic reviews or public notifications, rather than relying solely on petitions. Whether triggered by petition or criteria, independent review processes were viewed as essential to building public trust and accountability. Even a small number of trees removed in a limited area can be as detrimental as larger removals in bigger projects.

Another recurring theme was the importance of early involvement by forestry staff. Too often, staff are brought into city projects after critical decisions have already been made, limiting their ability to influence tree outcomes. The group recommended codifying early forestry engagement in the ordinance, alongside clearer enforcement roles and stronger accountability mechanisms, especially during construction.

Ultimately, the group acknowledged that building transparency and trust will take time, and that progress may need to be incremental given the history around this issue and current staffing constraints. Still, even small improvements—like clearer notices or better online tools—can make a meaningful difference. The ordinance should be designed not only to inform residents, but to empower them, especially those who may not otherwise have the time, language access, or insider knowledge to participate in shaping their urban forest.

Rulemaking vs. Legislative Detail

The group focused on finding the right balance between what should be codified in the ordinance and what should be addressed through administrative rulemaking. There was strong support for a hybrid approach: establishing clear values and guardrails within the ordinance while delegating technical implementation and evolving best practices to staff-driven rulemaking—provided that such rulemaking includes meaningful opportunities for public input. Importantly, rulemaking must never be used to weaken the tree protections that form the ordinance's core purpose. This balance was seen as key to ensuring both clarity and adaptability, especially given long-term factors like climate resilience, infrastructure changes, and shifts in forestry best practices.

A recurring theme was the importance of putting tree preservation experts at the right point in the process. Members cautioned against overly prescriptive ordinance language—for example, listing physical symptoms of tree stress—arguing instead for referencing professional standards that can be updated more easily over time. By grounding technical decisions in expert judgment rather than

legislative minutiae, the ordinance can remain responsive to changing conditions without sacrificing transparency or accountability.

Communication and public notification were viewed as baseline expectations, regardless of project size. The group expressed support for simple, accessible notifications (like postcards) for even minor projects, especially where tree impacts might otherwise go unnoticed—such as routine utility replacements. Scaling communication and tree protection strategies to match project complexity was another important consideration. For large developments, tree-related updates should be built into existing public engagement processes; for smaller or piecemeal projects, online logs or public records could provide a lightweight form of notice and transparency.

Group members also raised questions around thresholds and what qualifies a tree as significant enough to warrant heightened protection or mitigation. There was interest in defining categories such as "notable," "locally significant," or "champion" trees—especially to safeguard older or unique specimens that offer substantial ecological or cultural value.

Saint Paul's existing Tree Preservation District, located south of Lower Afton Road in the Highwood Neighborhood, was referenced as a model. The district's purpose is to preserve the area's natural, wooded character by ensuring that development minimizes the loss of existing trees and, in some cases, requires planting replacement trees. Within this district, a Tree Preservation Plan must be submitted and approved before the City will authorize any grading permit, lot split, plat, or site plan— unless the applicant can demonstrate that no existing trees are within the limits of disturbance—or any building permit that involves removing a tree with a diameter of 12 inches or more.

The structure and timing of rulemaking also came up, with some group members referencing past Council discussions. While some favored concurrent rule development alongside ordinance adoption, others supported a phased approach—as long as staff had a clear mandate, and public input was built into the process. Members expressed differing views on the level of detail appropriate for the ordinance text itself. Some cautioned that too much specificity could reduce flexibility and erode public trust if it leads to delays, legal challenges, or difficulty adapting over time. Others felt that greater detail could help build public trust by increasing clarity, transparency, and accountability.

Throughout the discussion, group members emphasized the importance of accessible, ongoing engagement. Examples like the Grand Avenue office hours were held up as good models for transparent, responsive city practice. At the same time, frustrations were voiced about gaps in existing protections—especially for mature trees lost during major infrastructure projects like West 7th. These stories reinforced the group's overarching belief that a transparent, expert-informed, and adaptable ordinance is necessary to rebuild public trust and ensure the long-term health of Saint Paul's urban forest.

Creative Ideas

The group explored creative strategies to engage residents and local businesses in supporting Saint Paul's urban forest, with a focus on voluntary programs that enhance equity, stewardship, and community pride. One key idea was to offer tax credits or other incentives for residents—especially property owners with the capacity to contribute—to plant and water trees, including those on public property adjacent to their homes. These programs would not replace public responsibility but rather complement it by encouraging private investment in tree care where resources are more available. This approach could help expand the urban canopy, reduce the burden on City maintenance crews, and foster a broader sense of shared responsibility—while ensuring that City-led efforts remain concentrated in neighborhoods with the greatest canopy needs.

The group also expressed strong interest in launching a local version of Minneapolis' "Brewing a Better Forest" initiative in partnership with Saint Paul breweries. The program, which engages

neighborhood taprooms to promote tree care and raise funds for public tree planting, was seen as a promising model for combining environmental action with community gathering spaces. Members envisioned hosting tree-themed events, sharing tree-watering tips with patrons, and directing proceeds to areas with low tree cover and heightened climate vulnerability. By tapping into local business networks and cultivating a culture of collective care, this strategy offers a way to blend environmental justice with creative civic engagement—building a greener, more resilient Saint Paul in the process.