



Guelph's Private Tree Protection By-law Update:



Key Directions Report



Prepared for the City of Guelph

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This report was developed with input and support from the consulting team members, and with input and guidance from the City project team members.

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Executive Summary

The review and update of Guelph's Private Tree Protection By-law which was launched in late 2022 is now complete. Research, analysis and engagement to inform this update was led by a multi-disciplinary consulting team with the support and direction of a multi-departmental project team from the City of Guelph.

This report presents (a) the outcomes of the final assessments that informed the identification of the recommended by-law scope and (b) a high-level summary of the other key recommended directions identified through this process to support effective implementation of the updated By-law.

Background

Having a by-law that regulates trees on private land is a generally recognized best practice which municipalities in Ontario can implement. Having a private tree by-law generally means that landowners undertaking work on their property expected to damage or remove regulated trees need to get a permit from the municipality. While a private tree by-law adds some work and expense (for the municipality and for residents), it also typically provides an enforceable process for ensuring the trees of greatest value to the community are removed and replaced in ways that help sustain and enhance the local tree canopy cover.

The City of Guelph was one of the first municipalities in Ontario to implement a private tree by-law in 1986 and last updated this by-law in 2010. The purpose of updating Guelph's private tree by-law was to ensure that it

- can be implemented effectively and equitably along with other planning and regulatory tools, to help the City meet its tree canopy cover targets and urban forest objectives; and
- supports a healthy and climate resilient community by maximizing opportunities for tree retention on private lands and ensuring tree replacement through education and regulation.

Process

It was recognized from the outset the process of updating the City's Private Tree Protection By-law could be controversial and potentially divisive. Therefore, there was a concerted effort by both the consulting team and City staff to take the time to

- keep Council informed throughout the process;
- engage with a broad cross-section of representatives from the community including key stakeholders who may be impacted by these updates;
- consider the research and engagement findings in an open way to inform the key directions; and
- identify key direction appropriate for the City of Guelph given the current environmental, planning and socio-economic context.



This process has included completion of:

- a review of best practices and precedents including tree by-laws among Guelph's 30 comparators;
- analyses of the City's tree canopy cover data in terms of what is currently, and what could be, regulated;
- two rounds of engagement with a broad cross-section of the community and City staff;
- a Key Issues and Options Report (GS *et al.*, 2024a) openly presenting the results of the research and analyses completed, and the assessment of alternatives and options for updating the by-law; and
- an updated Private Tree Protection By-law and this Key Directions Report.

Overview of key recommended directions

The key recommended directions outlined in this report have been developed with careful consideration for the findings and outcomes of the research and engagement undertaken as part of Guelph's Private Tree Protection By-law review and update process.

In 2010, Guelph's by-law was updated to regulate trees of at least 10 centimetres (cm) diameter on private lots greater than 0.2 hectares. The recommended updates for 2025 are to (a) build on the existing regulation and (b) expand the regulation to trees of at least 50 cm diameter on all private lots.

This updated Private Tree Protection By-law will continue to focus the City's tree regulation efforts (a) on trees of all sizes on larger lots and expand this focus to include (b) larger trees across the City.

To help implement the updated private tree by-law effectively, it is also recommended that the City

- update certain City by-laws and guidance required to help implement the updated private tree by-law, including a simpler approach to tree replacement and tree replacement fees that helps sustain and enhance the City's tree canopy cover (i.e., in the City's Tree Technical Manual);
- update the approach and processes for administering the private tree by-law, including moving to an online permit application process; and
- develop and implement a communications plan to support broader understanding and facilitate implementation of the updated private tree by-law.



Concluding remarks

The updated Private Tree Protection By-law, which reflects the recommended directions outlined in this report, is going to Council April 1, 2025, for approval.

It is broadly recommended that

- Guelph's updated Private Tree Protection By-law be implemented with other City policies and regulations, as well as voluntary tree establishment programs, to help achieve the City's tree canopy cover target of 40 per cent by 2065 and help the community adapt to climate change; and
- the other key directions in this report (e.g., a simpler approach to tree replacement, an online permit application process, and a communications plan) be implemented in tandem to support the effective implementation of this private tree by-law.

The Guelph Urban Forest Study (2019) estimated **there are about 3 million trees across the city that provide more than \$5.6 million in environmental services (e.g., cooling, pollution removal) each year, plus store about 200,000 tonnes of carbon.** Effective implementation of the updated Private Tree Protection By-law is estimated to require about \$184,000 in additional resourcing annually. As pointed out by several people engaged through this process, a strong financial case can be made for this investment which represents

- a very small fraction (i.e., less than four (4) per cent) of the services provided by trees in the City;
- a relatively small investment in the broader context of the City's operational budget, which will help the City better sustain and enhance its tree canopy cover; and
- an investment in helping the community plan for and adapt to climate change.



1 Introduction

The review and update of Guelph's Private Tree Protection By-law which was launched in late 2022 is now complete. Research, analyses and engagement to inform this update was led by a multi-disciplinary consulting team with the support and direction of a multi-departmental project team from the City of Guelph.

This report presents (a) the outcomes of the final assessments that informed the identification of the recommended by-law scope and (b) a high-level summary of the other key recommended directions identified through this process to support effective implementation of the updated By-law.

Background

In Ontario, the Municipal Act enables municipalities to implement by-laws that prohibit or regulate activities expected to damage or require the removal of trees on private lands. This is recognized as a useful planning tool and many municipalities across southern Ontario, including two thirds of Guelph's comparators, have implemented private tree by-laws tailored to their local context and issues (GS *et al.*, 2023a). While no two tree by-laws are the same, private tree by-laws are generally implemented as regulatory tools and used to discourage unnecessary tree removals, create opportunities to educate people about the vital services provided by trees, and require trees approved for removal to be replaced (on the subject property or elsewhere in the municipality).

The City of Guelph was one of the first municipalities in Ontario to implement a private tree by-law in 1986 and last updated this by-law in 2010. At that time, Council decided to focus on regulating trees on larger lots (i.e., greater than 0.2 hectares) where most of the City's development was anticipated. However, since 2010 the planning and environmental context in Guelph has changed in many ways. Key changes include

- establishment of a 40 per cent tree canopy cover target for Guelph in the Official Plan, which was confirmed by the One Canopy Tree Planting Strategy as achievable by 2065 (City of Guelph 2023b);
- the need to accommodate more intensification and infill, while also providing homes in livable, safe and complete communities that include trees; and
- formal commitments to sustain and enhance Guelph's tree canopy cover¹ to help the community adapt to advancing climate change (Matrix 2023).

¹ In Guelph's the term "tree canopy cover" is used to capture trees across the city on public and private lands, both within and outside the City's Natural Heritage System (NHS). Although the term "urban forest" is typically used to capture all trees in an urban area, in Guelph the City's Official Plan defines "urban forest" as specifically applying to trees outside the NHS, and so "tree canopy cover" is used instead.



These changes made updating Guelph's private tree by-law a priority once again, as directed in the City's 2024-2027 Strategic Plan.

- Initiative 9.3: Mitigate the impacts of climate change by increasing tree canopy coverage
 - Improve urban forest sustainability and enhance our climate change resilience by increasing Guelph's tree canopy coverage, providing more shade, cleaner air and improved water filtration.
- Action 9.3.1: Update the Private Tree Protection By-law to regulate the destruction and injuring of trees

Process

It was recognized from the outset the process of updating the City's Private Tree Protection By-law could be controversial and potentially divisive. Therefore, there was a concerted effort by both the consulting team and City staff to take the time to

- keep Council informed throughout the process;
- engage with a broad cross-section of representatives from the community including key stakeholders who may be impacted by these updates;
- consider the research and engagement findings in an open way to inform the key directions; and
- identify key direction appropriate for the City of Guelph given the current environmental, planning and socio-economic context.

As illustrated in [Figure 1-1](#), this process included completion of

- a review of best practices and precedents including tree by-laws among Guelph's 30 comparators;
- analyses of the City's tree canopy cover data in terms of what is currently, and what could be, regulated;
- two rounds of engagement with a broad cross-section of the community and City staff;
- a Key Issues and Options Report (GS *et al.*, 2024a) openly presenting the results of the research and analyses completed, and the assessment of alternatives and options for updating the by-law; and
- an updated Private Tree Protection By-law and this Key Directions Report.



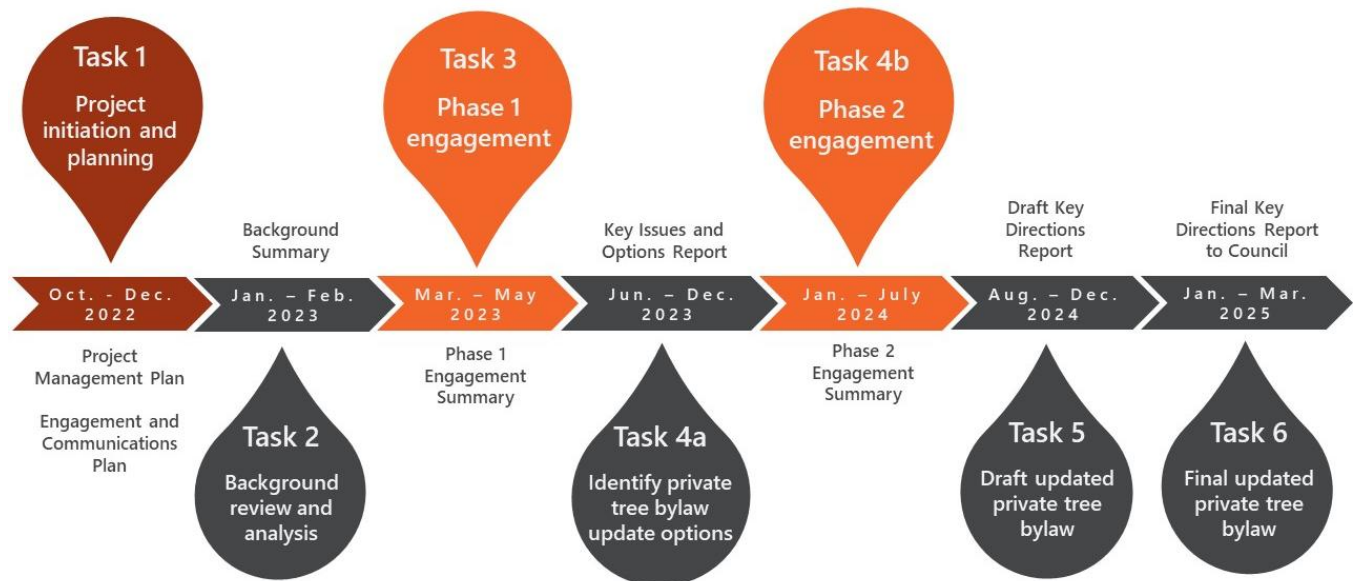


Figure 1: Overview of the timeline, tasks and key deliverables for Guelph's private tree by-law update

The first round of engagement was intended to inform the community that the Private Tree Protection By-law was being reviewed and to gather their ideas on how it could be updated. For the second round of engagement, four feasible options for updating the by-law were put forward for consideration. These options were identified based on the research and engagement to date (as described in the Key Issues and Options Report) and were presented to the community with Council's support (City of Guelph 2024b).

Although the feedback collected was very informative, no option emerged as the clear preference through the second round of engagement held over April and May 2024 (see GS *et al.*, 2024b) or through discussions with City staff. Therefore, further analysis was required over the summer of 2024 to inform a final direction for the scope of the updated private tree by-law. This supplemental analysis is provided in [Section 2](#) of this report for transparency.

Key Recommended Directions

Based on this analysis, and as discussed in [Section 2](#), the final recommended direction is to build on the current Private Tree Protection By-law (which regulates trees of at least 10 centimetres (cm) diameter on private lots greater than 0.2 hectares) by also regulating larger trees (i.e., of at least 50 cm diameter) on all private lots, irrespective of their size.

This direction is considered an appropriate balance for the City of Guelph given the current planning, environmental and socio-economic context and has been supported by City staff at all levels, including the Executive Leadership Team. This direction is reflected in the updated Private Tree Protection By-law provided under separate cover.



A number of other key recommended directions were identified through this process to support effective implementation of the updated By-law. These include updates related to

- certain City by-laws and guidance documents (e.g., the Tree Technical Manual);
- the processes for administering the private tree by-law (e.g., moving the private tree by-law permit application online); and
- communications related to the launch and implementation of the City's updated private tree by-law.

These recommended directions are outlined in [Section 3](#).

What do "private lots mean in the context of this by-law?

Notably, for the purposes of this By-law, "private" lots are all lots in Guelph not owned by a municipal, provincial or federal government agency, plus active pits and quarries². This includes cemeteries and lands owned by the Grand River Conservation Authority (GRCA), residents, businesses, industries, school boards and academic institutions, as well as lands associated with railways and utility lines³.

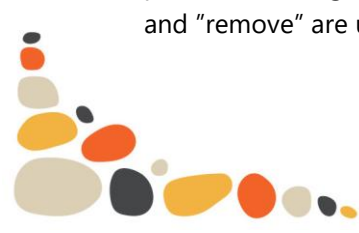
1.1 What will having an updated private tree by-law mean for residents?

Having a private tree by-law generally means that a landowner doing work on their property that is expected to result in the damage or removal⁴ of one or more regulated trees needs to obtain a permit from the municipality before undertaking the work. While private tree by-laws can be used to prohibit tree removals, they are typically used to regulate the process so that unnecessary tree damage and/or removals are avoided, and tree replacements and/or fees to plant trees elsewhere in the municipality can be secured.

² Although active pit and quarry lands are usually privately owned, under the Municipal Act works impacting trees on these lands cannot be regulated by a private tree by-law.

³ This differs from the classification of private versus public lands used for the Guelph Urban Forest Study (Lallemant and KBM 2019) which included tree canopy cover on the GRCA, school board and University of Guelph lands was counted separately. However, using the approach described above for this process, the proportion of canopy cover on private lands in Guelph is 69 per cent (see Section 3.3 for more detail).

⁴ Note that in private and public tree by-laws the legal terms (from the Municipal Act) for the activities potentially prohibited or regulated in relation to trees are "injure" and "destroy". However, in this report the terms "damage" and "remove" are used as plain language alternatives.



In Guelph, the current Private Tree Protection By-law (number 2010-19058) already regulates trees of at least 10 cm in diameter⁵ on private lots greater than 0.2 hectares⁶ in the city.

Under the updated By-law, this regulation will remain in place and, in addition, larger trees (i.e., of at least 50 cm diameter) on all private lots in the City will also be regulated. This will mean that more residents will need to be aware of the City's private tree by-law, and how it might apply to the trees on their lots, which is one of the reasons a communications plan is being recommended in conjunction with this by-law update (see [Section 3](#)).

1.2 Where can I find more information about this process?

More information about the Private Tree Protection By-law update process and its findings are summarized in the

- Phase 1 engagement backgrounder (City of Guelph 2023a);
- Key Issues and Options Report (GS *et al.*, 2024a);
- Phase 1 Engagement Summary (GS *et al.*, 2023b); and
- Phase 2 Engagement Summary (GS *et al.*, 2024b).

Links to the documents above are included in [Section 5](#) of this report.

2 How the final recommended scope was identified

As part of Guelph's Private Tree Protection By-law update process, the consulting team was tasked with

- identifying feasible options for updating Guelph's private tree by-law; and
- using a transparent and balanced process for selecting the options and the final recommended direction, including use of evaluation criteria to screen and assessing the options in a consistent and unbiased way.

The following five principles for determining the feasibility of a given private tree by-law update option emerged from the Key Issues and Options Report (GS *et al.*, 2024a).

⁵ Tree diameter is generally measured to determine the width of the tree trunk. To ensure consistency this measurement is made using the diameter at breast height (DBH) at about 1.4 metres (m) (equivalent to 4.5 feet) from the ground. In this report the term tree "diameter" means "DBH" for all trees taller than 1.4 m.

⁶ For reference, 0.2 ha is about the size of a standard hockey rink and only applies to about 5 per cent of the lots in the City.



1. The by-law scope maintains or exceeds the level of regulation provided by the current by-law.
2. The by-law scope considers relevant best practices and precedents as well as the local context.
3. The by-law scope considers and reflects local community perspectives.
4. The by-law will be able to work with other City policies, regulations, guidelines and stewardship programs to accommodate development while also helping to meet tree canopy cover and urban forest objectives.
5. It is anticipated that adequate resources to effectively administer and implement the by-law already are, or can be, made available.

The five options for updating the scope of Guelph's Private Tree Protection By-law that were considered for further analysis all adhere to the principles above. They are as follows.

Option A: Most trees on larger lots (i.e., same scope as current private tree by-law)

Trees of at least 10 cm diameter on private lots greater than 0.2 hectares (0.5 acres)

Option B: Most trees on semi-large lots

Trees of at least 10 cm diameter on private lots greater than 0.1 hectares (0.25 acres)

Option C: Many trees on all private lots

Trees at least 20 cm diameter on private lots of any size

Option D: Most trees on larger lots plus mature trees on all private lots

Option A plus trees of at least 50 cm diameter (mature trees) on private lots of any size

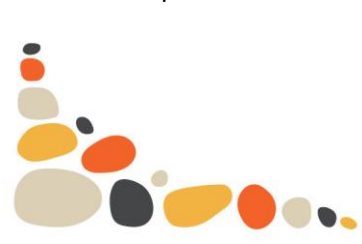
Option E: Most trees on semi-large lots plus mature trees on all private lots

Option B plus trees of at least 50 cm diameter (mature trees) on private lots of any size

These five options include:

- Options A through D, which were recommended by the project team and presented to the community for consideration with the endorsement of Council (City of Guelph 2024b) through the Phase 2 engagement over April and May 2024; and
- Options E, which was suggested in the Phase 2 engagement process by the Natural Heritage Advisory Committee and considered feasible by the City project team, so carried forward.

This section includes a description of the rationale for further analysis of the five options above (Section 2.1), an overview of the key findings used to screen each of the options (Section 2.2), the outcome of the screening process (Section 2.3), a qualitative assessment of the pros and cons of each option (Section 2.4), and a discussion of the scope that was ultimately recommended as the basis for Guelph's updated Private Tree Protection By-law (Section 2.5).



2.1 Rationale for further analysis of the by-law update options

A range of different alternatives for updating the private tree by-law were explored. The Key Issues and Options Report (GS *et al.*, 2024a) describes in detail how nine possible alternatives for updating the City's private tree by-law were initially identified and assessed, and how this assessment resulted in four feasible options being identified. These options were shared with the community for feedback through the Phase 2 engagement process (GS *et al.*, 2024b) with the approval of Council (City of Guelph 2024b).

Efforts to gather a representative cross-section of community and landowner perspectives was central to this process. However, as noted in the Phase 2 Engagement Summary (GS *et al.*, 2024b), no single private tree by-law update option emerged as the clear preference either among the community or City staff engaged through the process. Several themes did, however, emerge as follows.

- More than half of the participants supported expanding the current private tree by-law in some way, although opinions were divided on how the scope should be expanded.
- About a third of the survey respondents and some engagement session participants were strongly opposed to expanding the current private tree by-law in any way.
- The importance of regulating mature trees as a priority was expressed by more than half of the engagement participants in both phases of engagement.
- The majority of Phase 2 survey respondents and many other participants were supportive of the City investing in administering and enforcing an updated private tree by-law. However, many engagement participants also expressed concern about any additional costs on residents.

These themes, and the outcomes of the Phase 1 and Phase 2 engagement process, were important considerations in the further assessment completed (as outlined in [Section 2.2](#) through [Section 2.4](#)) as well as in the identification of other recommended key directions (as outlined in [Section 3](#)).

2.2 Key findings used to further assess the by-law update options

As part of Guelph's private tree by-law update process various analyses of the City's 2019 tree canopy cover data were undertaken from the perspective of what was already and what might be regulated under different by-law scopes being considered. The findings of these analyses, along with findings of the background and best practices review, are presented in detail and summarized in the Key Issues and Options Report (GS *et al.*, 2024a). An overview of the key metrics from these analyses considered in the supplemental screening of the five feasible private tree by-law update options to inform a final recommended direction are included in [Table 1](#).

[Table 1](#) provides the key tree-related metrics from the background analyses and the consolidated feedback from the Phase 2 engagement summary as well as the updated resource estimates developed by the City project team for each of the five options. Notably, these cost estimates include some cost



recovery based on the current permit fees (i.e., \$122 per permit). If the recommended updates to permit fees are implemented, a bit more cost recovery is anticipated.

Table 1: Overview of the key metrics used for screening the five options for updating the private tree by-law

Option	Column 1: Total per cent (number) of private lots captured ⁽¹⁾	Column 2: Estimated per cent (number) of trees captured ⁽²⁾	Column 3: Estimated per cent (area) tree canopy cover captured ⁽³⁾	Column 4: Surveyed per cent level of community support ⁽⁴⁾	Column 5: Estimated cost of new funding required (annually) ⁽⁵⁾
A. Trees of at least 10 cm diameter on private lots greater than 0.2 hectares (same as current by-law scope)	5% (1,929)	33%	50% (1014 hectares)	28%	\$0
B. Trees of at least 10 cm diameter on private lots greater than 0.1 hectares	10% (3,882)	35%	55% (1089 hectares)	32%	\$20,000
C. Trees at least 20 cm diameter on all private lots	100% (37,187)	22%	69% (1403 hectares)	48%	\$309,000
D. Option A <u>plus</u> trees of at least 50 cm diameter on all private lots	100% (37,187)	35%	59.5% (1202 hectares)	44%	\$184,000
E. Option B <u>plus</u> trees of at least 50 cm diameter on all private lots	100% (37,187)	37%	62% (1252 hectares)	44%	\$214,000

⁽¹⁾ Based on 2022 parcel data from the City.

⁽²⁾ Based on estimates of the number of trees in different size classes from Guelph's 2019 Urban Forest Study. About 15,000 trees per percentage point.

⁽³⁾ Based on tree canopy cover from Guelph's 2019 Urban Forest Study and the proportion of land area covered by each option. About 20.2 hectares per percentage point.

⁽⁴⁾ Based on the mean of the results from Phase 2 survey questions 1, 2, 3 and 4 each weighted equally. See the Phase 2 Engagement Summary (GS *et al.*, 2024b) for more details.

⁽⁵⁾ Based on estimates updated by City staff to reflect the anticipated additional resources required in Parks. Possible increases in cost recovery through changes to permit fees are not included.



As noted in the introduction, having a private tree by-law as part of the municipal planning toolkit is considered a best practice in Ontario (e.g., OWA 2013; PCCP 2021; Webber *et al.*, 2020; Yung 2018), however this best practice guidance includes the following caveats that to be effective a private tree by-law must be implemented with

- other complementary planning tools;
- ongoing education and communication; and
- adequate resourcing to administer and enforce it.

Given these best practices, the consulting team agreed from the outset of this process that only Private Tree Protection By-law options with new resourcing requirements that could reasonably expect to be supported by both City staff and Council would be carried forward, as is the case with Options A through E outlined above.

Starting in 2025, the Parks division of the City's Public Services department will be assuming primary responsibility for administering and implementing the Private Tree Protection By-law, and it is therefore expected the Parks will be where most of the new resourcing for implementing the updated by-law will be required. The City's project team was careful to estimate the anticipated new resource costs for Parks based on current and actual costs with consideration for the level of effort required to implement the current by-law, as provided by Planning and Building Services staff. The resourcing estimates in [Table 1](#) then extrapolated the anticipated needs of Parks for administration and implementation for each option based on assumptions about numbers of inquiries and permit applications under each option. These estimates will be verified in relation to actual needs over the first few years of implementing the By-law.

Notably, Legal and Planning and Building Services staff have noted that the options capturing all private lots (i.e., Options C, D and E) are also expected to have some resourcing implications for their division (e.g., additional involvement in Committee of Adjustment, Building Permit review, etc.) which may also require some additional resourcing, and that this would need to be monitored as well. City staff in By-law Enforcement and Strategic Communications have, however, indicated that any anticipated additional work would be addressed in their annual budget reviews and could be accommodated within their existing capacities.

2.3 Screening the feasible by-law update options

To inform the recommended direction for updating the scope of Guelph's private tree by-law in a transparent and balanced way, the five options (outlined above) were screened against the same six criteria developed to identify the original options put forward to Council and the community. However, for the supplemental analysis in this report, the measures in [Table 1](#) were updated based on more current information (i.e., Criterion 4 and Criterion 6).



Descriptions of each of these criteria and how they were initially applied to identify the private tree by-law update options for community consideration can be found in the Key Issues and Options Report (GS *et al.*, 2024a). These criteria were developed with consideration for applicable best practices, selected to reflect a balance of environmental, social/community and economic interests, and tailored to the local context (by including measures and scoring based on the outcomes of the local tree canopy cover analyses, engagement outcomes and financial cost estimates).

For each option, the screening criteria were used, as illustrated in [Table 2](#), to assess

- Criterion 1: About how many trees are regulated?
- Criterion 2: About how much tree canopy cover is captured?
- Criterion 3: How does the level of regulation compare to the current private tree by-law?
- Criterion 4: What have we heard from the community?
- Criterion 5: How complicated would this be to implement?
- Criterion 6: How much new resourcing will be required for effective implementation?

Table 2: Screening options for updating the private tree by-law against established criteria

Feasible options	C1. Proportion of trees regulated ¹	C2. Proportion of tree canopy cover regulated ²	C3. Level of protection compared to current private tree by-law	C4. Alignment with community perspectives	C5. Level of complexity	C6. Impact on City resourcing ³	Total score
A. Trees of at least 10 cm diameter on private lots greater than 0.2 hectares	2	1	1	1	3	3	11
B. Trees of at least 10 cm diameter on private lots greater than 0.1 hectares	2	1	2	1	3	3	12
C. Trees at least 20 cm diameter on all private lots	1	3	2	2	2	1	11
D. Option A plus trees of at least 50 cm diameter on all private lots	2	2	3	2	2	2	13
E. Option B plus trees of at least 50 cm diameter on all private lots	2	2	3	2	1	2	12

Note: Each option was scored 1 (low), 2 (moderate) or 3 (high) against each criterion.

¹ Based on estimated number of trees captured. See [Table 1](#), column 2.

² Based on estimated per cent canopy cover captured. See [Table 1](#), column 3.

³ Based on high-level cost estimates provided by City staff in June 2024. See [Table 1](#), column 5.



2.4 Qualitative assessment of the feasible by-law update options

In addition to the quantitative screening (described in [Section 2.3](#)), the five feasible by-law update options were assessed qualitatively based on information gathered to date to help inform the recommended direction for updating the scope of Guelph’s private tree by-law.

The pros and cons of each by-law update option are outlined in [Table 3](#). These pros and cons build on the assessments completed for the Key Issues and Options Report (GS *et al.*, 2024) and have been updated with the additional information and insights gathered during and following the Phase 2 engagement process.

Table 3: Key pros and cons of the feasible options for updating Guelph’s private tree by-law

Option	Pros	Cons
<p>A. Trees of at least 10 cm diameter on private lots greater than 0.2 hectares</p> <p>(Note: Same as current by-law scope)</p>	<ul style="list-style-type: none"> • Alignment: Same as current private tree by-law and aligns with existing guidelines requiring trees of at least 10 cm diameter to be captured for tree inventories. • Community impact - low: Will apply to about 5 per cent of landowners, limiting direct procedural or financial impacts to a relatively small number of private property owners. • Level of complexity – low: Some communication challenges anticipated but only applies to 5 per cent of private lots making it simpler to implement than a city-wide private tree by-law. • Resourcing: Can be implemented with the available resourcing; no new funding required. 	<ul style="list-style-type: none"> • Community support: Based on the Phase 2 engagement results, just under a third of the community support keeping the scope of the private tree by-law as is. • Canopy cover objectives: Same scope as the current private tree by-law so will not enhance the City’s ability to sustain and enhance tree cover through regulation (e.g., by deterring unnecessary removals and requiring replacement for approved removals). • Trees regulated: This would result in continued focus of most trees on larger lots. All trees on lots smaller than 0.2 hectares, including mature trees, would remain unregulated. • Precedents: Only one known precedent of a comparable private tree by-law in Kitchener



Option	Pros	Cons
<p>B. Trees of at least 10 cm diameter on private lots greater than 0.1 hectares</p>	<ul style="list-style-type: none"> • Alignment: Aligns with existing guidelines requiring trees of at least 10 cm diameter to be captured for tree inventories. • Community impact - low: Will apply to about 10 per cent of landowners, limiting direct procedural or financial impacts to a relatively small number of private property owners. • Level of complexity – low: Some communication challenges anticipated but only applies to 10 per cent of private lots making it simpler to implement than a city-wide private tree by-law. • Resourcing: Can be implemented with a small amount of new operational funding annually. 	<ul style="list-style-type: none"> • Community support: Based on the Phase 2 engagement results, just over a third of the community support keeping the scope of the private tree by-law focused on semi-large lots. • Canopy cover objectives: About 5 per cent more canopy regulated than the current private tree by-law, enhancing the City's ability to sustain and enhance tree cover through regulation, but only on 10 percent of the private lots in the City. • Trees regulated: This would result in a focus on most trees on semi-large lots. All trees on lots smaller than 0.1 hectares, including mature trees, would remain unregulated. • Precedents: None among comparators.
<p>C. Trees at least 20 cm diameter on all private lots</p>	<ul style="list-style-type: none"> • Alignment: Consistent with regulatory threshold for trees in the Brooklyn and College Hill Heritage Conservation District. • Trees regulated: This would significantly expand the current regulation from smaller trees on larger lots to slightly larger trees on all private lots. • Community support: Based on the Phase 2 survey results, although there was no single option preferred by most, this option received close to 50 per cent support. • Canopy cover objectives: About 69 per cent of Guelph's canopy cover (i.e., almost all the canopy on private lands). • Precedents: Many precedents for this tree size being regulated on all lots among comparators (e.g., Cambridge, Burlington, Markham, Richmond Hill, Vaughan) 	<ul style="list-style-type: none"> • Trees regulated: There would be loss of regulatory control over trees between 10 and 19 cm diameter on lots over 0.2 hectares. • Canopy cover objectives: This option would regulate all mature trees but would not regulate or be able to seek replacement for trees between 10 and 19 cm diameter, including the larger and semi-large private lots. • Community impact - high: Will add procedural and financial burden to any private property owner seeking to remove one or more trees of at least 20 cm diameter. • Level of complexity – moderate: One rule for all private lots makes communication simpler but application to all lots adds significant implementation complexity for City staff. • Resourcing - high: Will require significant new operational funding annually (at least \$300,000), although this may be offset in part by permitting fees.



Option	Pros	Cons
<p>D. Option A plus trees of at least 50 cm diameter on all private lots</p>	<ul style="list-style-type: none"> • Alignment: Aligns with current private tree by-law and existing guidelines requiring trees of at least 10 cm diameter to be captured for tree inventories. • Community support: Based on the Phase 2 survey results, this option received 40 per cent support. The importance of regulating mature trees as a priority was expressed by more than half of the engagement participants through the survey and was also reflected in the supplemental verbal and written feedback in Phases 1 and 2. • Canopy cover objectives: About 10 per cent more canopy regulated than the current private tree by-law, so will enhance the City’s ability to sustain and enhance tree cover through regulation. <ul style="list-style-type: none"> Between 50 and 69 per cent of Guelph’s canopy cover (i.e., excluding trees between 10 and 49 cm diameter on lots 0.2 hectares and smaller). • Trees regulated: Builds on the current regulation of smaller trees on larger lots by adding regulation of larger/mature trees on all private lots. • Precedents: The 50 cm diameter threshold is used in a couple of comparator municipalities (e.g., London and Ottawa). 	<ul style="list-style-type: none"> • Community impact - moderate: Will add procedural and financial burden to private property owners of lots smaller than 0.2 hectares seeking to remove one or more trees of at least 50 cm diameter. Notably, only a small proportion of the trees in Guelph are 50 cm diameter or greater (i.e., about 2 per cent on private lands) • Level of complexity – moderate: As it builds on the existing private tree by-law communication and implementation are only expected to be increased moderately, mainly related to the regulation of mature trees on all lots. • Resourcing - moderate: Will require substantial new operational funding annually (at least \$200,000).



Option	Pros	Cons
<p>E. Option B plus trees of at least 50 cm diameter on all private lots</p>	<ul style="list-style-type: none"> • Alignment: Builds on current private tree by-law. Aligns with existing guidelines requiring trees of at least 10 cm diameter to be captured for tree inventories. • Community support: Based on the Phase 2 survey results, this option received 37 per cent support. The importance of regulating mature trees as a priority was expressed by more than half of the engagement participants through the survey and was also reflected in the supplemental verbal and written feedback in Phases 1 and 2. • Canopy cover objectives: About 12 per cent more canopy regulated than the current private tree by-law, so will significantly enhance the City's ability to sustain and enhance tree cover through regulation. • Trees regulated: Expands the current regulation of smaller trees to semi-large lots and adds regulation of larger/mature trees on all private lots. • Precedents: The 50 cm diameter threshold is used in a couple of comparator municipalities (e.g., London and Ottawa). 	<ul style="list-style-type: none"> • Community impact - moderate: Will add procedural and financial burden to private property owners of lots between 0.1 and 0.2 hectares as well as owners of lots smaller than 0.1 hectares seeking to remove one or more trees of at least 50 cm diameter. Notably, only a small proportion of the trees in Guelph are 50 cm diameter or greater. • Level of complexity – high: Communication and implementation challenges anticipated with different rules applying to different lots and tree sizes. • Resourcing - moderate: Will require substantial new operational funding annually (over \$200,000).

2.5 Recommended direction for updating the by-law scope

All of the feasible options ranked similarly based on the quantitative screening and the further qualitative assessment of the relative pros and cons of each option, but Option D emerged as the most preferred based on the quantitative and qualitative considerations.

Based on consideration of these analyses, it was agreed in consultation with City staff that Option D should form the basis for the updated private tree by-law.

This recommendation was presented and supported by City staff at both the management and senior leader levels.



It was recognized that this option is not the most aggressive from an environmental perspective. However, it was generally agreed that given the current planning and socio-economic context in the City, that Option D is the most appropriate because it

- builds on the scope of the current Private Tree Protection By-law, which is expected to simplify communication and implementation;
- received as much or more support from the community than any of the options presented for feedback, including the broad support for regulating mature trees as a priority that was voiced in both phases of engagement; and
- helps advance Guelph's urban forestry and climate change objectives by regulating trees in the City considered most at risk and/or of highest value to the community, while limiting the additional procedural and financial burden to the community and the City.

It was also recognized that implementing a private tree by-law that is applied differently on different sized lots will present some communication and implementation challenges (i.e., on the five (5) per cent of lots above 0.2 hectares trees of at least 10 cm diameter will be regulated, as they are currently, while the updated regulation will also regulate trees of at least 50 cm on all private lots in the City, irrespective of their size).

Key Recommendation 1: Guelph's Private Tree Protection By-law should be updated to regulate trees of at least 10 cm diameter on private lots greater than 0.2 hectares (like the current by-law) and, in addition, regulate trees of at least 50 cm diameter on all private lots.

Guelph's private tree bylaw review process also found that irrespective of the private tree by-law option selected, better and more sustained outreach and education will be required to support implementation (GS *et al.*, 2023b; GS *et al.*, 2024b). City staff are committed to improving communications about this by-law, simplifying and improving the accessibility of the application and permitting processes, and keeping both permitting and tree replacement fees reasonable (in alignment with the recommendations in [Section 3](#)).

As noted above, best practice guidance indicates that to be effective a private tree by-law must be implemented with other complementary planning tools, ongoing education and communication, and adequate resourcing to administer and enforce it. Based on the analyses completed by City staff, about \$184,000 in additional resourcing annually is expected to be required to support effective administration and enforcement of this private tree by-law.



To help put this in context

- the Guelph Urban Forest Study (2019) estimated there are almost 3 million trees across the city that provide well over \$5.6 million in environmental services (e.g., cooling, pollution removal) each year⁷ plus store about 200,000 tonnes of carbon; and
- the City's overall annual operating budgeting from 2024 to 2027 is between \$551 million and \$684 million based on the most recent projections and commitments⁸.

Therefore, there is a strong case to be made that under \$200 thousand is a relatively small investment that will generate many returns based on the immense value of the services trees provide, particularly in a context of climate change.

Key Recommendation 2: The updated Private Tree Protection By-law should be approved with a respectful request that the Mayor include the additional required resourcing identified by City staff to administer and enforce the by-law effectively in the next (i.e., 2026) budget update, recognizing that full implementation of the By-law will not be possible until the required resources are in place.

3 Other recommended key directions

Once the final direction for the scope of the Private Tree Protection By-law was confirmed (August 2024), the work of drafting the updated by-law took place (August to December 2024). Through this process, a suite of recommendations for key directions to support and facilitate effective implementation of this by-law were identified and confirmed.

These other key directions have been grouped into three "baskets" as follows.

1. Planning: To update certain City by-laws and guidance required to help implement the updated private tree by-law, including a simpler approach to tree replacement that helps sustain and enhance the City's tree canopy cover (i.e., in the City's Tree Technical Manual).
2. Process: To update the approach and processes for administering the private tree by-law (including moving to an online permit application process).
3. Communications: To develop and implement a communications plan to support broader understanding and facilitate implementation of the updated private tree by-law.

These additional key directions are outlined in [Section 3.1](#), [Section 3.2](#), and [Section 3.3](#) respectively.

⁷ This includes \$1.9 million in home energy savings, \$2 million in pollution removal, \$930,000 in avoided stormwater runoff each year, and \$740,000 in carbon sequestration.

⁸ [City of Guelph 2024-2027 Multi-Year Budget: operating budget](#)



Like the recommended scope of the updated tree by-law (described in [Section 2.5](#)), these recommendations build on the findings of the research and engagement undertaken (GS *et al.*, 2023a; GS *et al.*, 2023b; GS *et al.*, 2024a; GS *et al.*, 2024b) and were developed in consultation with City staff.

3.1 Planning recommendations related to the updated private tree by-law

Over the course of the private tree by-law update process, the need for a few related updates to City by-laws and technical guidelines were identified to help implement the updated private tree by-law. The updates outlined in this section are intended to ensure alignment with and support for the confirmed directions for updating the Private Tree Protection By-law from a planning perspective.

Updates to private tree by-law fees

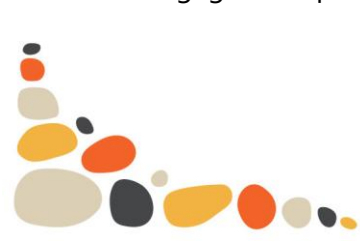
The current Private Tree Protection By-law permit application fee is \$122 per permit, irrespective of the number of trees expected to be damaged and/or removed. It has been agreed through this process that the approach of a single flat fee for each permit irrespective of the numbers of regulated trees (and the amount of tree canopy cover removed) being impacted does not fully align with the City's urban forestry objectives.

In addition, the current Private Tree Protection By-law specifies a fixed fee of \$500 within the by-law to compensate for each regulated tree removed. It has been agreed through this process that (a) the approach of a single flat fee for each regulated tree irrespective of the tree size (and the amount of tree canopy cover removed) does not adequately help advance the City's urban forestry objectives, and that (b) it is inconsistent with known precedents and best practices to specify this fee within the Private Tree Protection By-law.

Many municipalities, including many of Guelph's comparators with private tree by-laws (see Appendix A in GS *et al.*, 2024a), take a somewhat scaled approach to private tree by-law permit fees whereby a higher fee is required for applications seeking to damage and / or remove more than one regulated tree. Permit fees vary widely among comparator municipalities but generally range between about \$50 and \$150 for a first tree, and increase based on the number of trees proposed for removal up to a specified limit.

In addition, most municipalities, including many of Guelph's comparators, do not specify their tree replacement fee(s) in their private tree by-law but instead include them in a municipal by-law that includes all municipal fees and which is updated on a regular basis.

It was also recognized that the City is in a period of fiscal constraint (i.e., with the Mayor seeking to avoid or limit any further increases to property taxes) and that the community has also been subject to the significant cost of living increases over the past few years and, as documented through the engagement process, many residents wish to avoid or limit new costs related to this by-law.



To balance urban forestry objectives and respect Councils' desire to seek some cost recovery while still keeping fees related to this by-law at levels considered reasonable for the average resident, it is recommended that the City

- adopt a scaled approach to permit fees that reflects some increase for applications for multiple trees, but keep the fees aligned with those for other comparable by-laws and set an upset limit on the total permit fee considered reasonable for the average property owner;
- update the approach to calculating tree replacement and related tree replacement fees using a scaled and ratio-based approach;
- establish a per tree replacement fee that is at the lower end of the range among comparators to help keep it reasonable for the average property owner; and
- keep all private tree by-law fees (including the per tree replacement fee) out of the private tree by-law and include them in the City's User Fees By-law.

Key Recommendation 3: The approach to both the permit fee and to the tree replacement fee should be updated to be scaled (e.g., higher fees where more than one regulated tree is to be impacted) within clear and reasonable limits.

Key Recommendation 4: The City should include all fees associated with the Private Tree Protection By-Law in its User Fees By-law.

Updates to the Tree Technical Manual

The City's Tree Technical Manual is a 53-page technical guidance document that was developed over multiple years by City Parks staff with input from various divisions as well as contributions from consultants and approved by Council in December 2019. It currently includes specific guidance for: tree-related reports and plans, tree protection measures, acceptable tree replacement approaches, tree inspection and monitoring post-planting, tree establishment standards, and definitions for key technical terms. It also includes soil volume and species diversity guidelines for different land uses in the city.

As discussed and agreed with the City project team over the fall of 2024, most of the technical details related to specific tree protection, establishment or removal measures, as well as reporting and landscaping requirements should be included in the City's Tree Technical Manual rather than the updated Private Tree Protection By-law. The main reasons for this are to (a) keep the private tree by-law as clear and concise as possible, and (b) allow for periodic updates to technical aspects of tree establishment, protection, maintenance, and replacement without needing to update the private tree by-law once again.

The following technical updates to the Tree Technical Manual have been identified to ensure it is aligned with the updated Private Tree Protection By-law.



1. Update references to include the most current and relevant planning strategies, plans and studies (e.g., the Urban Forest Management Plan Implementation Update and Second Phase Plan Report, 2020; One Canopy Tree Planting Strategy, 2023; City of Guelph Climate Adaptation Plan, 2023), as well as the updated Private Tree Protection By-law (with the new number, once approved)
2. Review and update the technical terms in the Glossary of the Tree Technical Manual, as well as their use throughout the manual, to ensure they are consistent with or support the defined terms in the updated Private Tree Protection By-law.

Key Recommendation 5: The City's Tree Technical Manual should be updated to (a) include references to the most current and relevant City documents and (b) ensure the technical terms align with and support the updated Private Tree Protection By-law.

In addition, simplifying and updating the City's approach to tree replacement calculations has been identified and agreed to as a priority as part of this process, and as a technical detail to be incorporated into the Tree Technical Manual updates.

Under the current Private Tree Protection By-law and Tree Technical Manual, a private property owner who receives a permit must either

- a) replace the regulated tree(s) removed on an aggregate caliper basis (i.e., the number of replacement trees increases based on the diameter of the tree(s) removed), or;
- b) if they cannot accommodate the replacement tree(s) on site, pay a fee of at least \$500 per regulated tree removed.

The aggregate caliper approach was identified as difficult for landowners to understand and also potentially biased in favour of applicants paying the tree replacement fee rather than replanting on their lands where possible. This is not well-aligned with the City's urban forestry objectives, which are to strongly support replanting and to limit collection of cash-in-lieu to cases where alternatives for replanting cannot be accommodated.

Relevant feedback gathered through the engagement for the Private Tree Protection By-law update included

- widespread concern from members of the community about obtaining adequate tree replacement and/or tree replacement fees for regulated trees approved for removal;
- strong support among members of the community and City staff for a simpler tree replacement approach that applicants can calculate independently, or with limited guidance; and
- broad support for limiting any additional fees to the average private property owner in Guelph.



Approaches to tree replacement vary widely among comparator municipalities with private tree by-laws. However, many municipalities with private tree by-laws, including many of Guelph's comparators (e.g., Brampton, Markham) have adopted scaled ratio-based approaches. Even though this approach can be less "biologically" accurate than an aggregate caliper-based approach, it is much simpler to understand and apply. A scaled ratio-based approach also tends to result in a cash-in-lieu fee that favours (i.e., is less cost effective than) replacing trees on site but is still defensible (i.e., comparable to actual tree replacement costs).

The following updates to the Tree Technical Manual's tree replacement approach are recommended to make the process for calculating required replacement trees and / or tree replacement fees simpler to understand and implement while still advancing the City's urban forestry objectives of encouraging on site tree replacement over cash-in-lieu wherever possible.

It is specifically recommended that the City

- implement a scaled, ratio-based approach for tree replacement with clearly defined parameters and limits;
- include one or more alternate and comparable approaches for smaller sized replacement trees and/or shrubs (similar to the current approach); and
- align the tree replacement and cash-in-lieu requirements (i.e., change the cash-in-lieu fee from per regulated tree removed to per required replacement tree).

Notably, given the reliance of the updated Private Tree Protection By-law on the Tree Technical Manual, it will be important to get updates to this manual completed and approved in conjunction with the updated by-law.

Key Recommendation 6: The City's Tree Technical Manual should continue to state that tree replacement is always preferred to cash-in-lieu, but where not possible cash-in-lieu is to be calculated based on per required replacement tree (and not based on per regulated tree removed).

Key Recommendation 7: The City's Tree Technical Manual should be updated to simplify the tree replacement and any related cash-in-lieu calculations using a scaled ratio-based approach.

Also see related Recommendation 9.

Although the final per replacement tree fee is to be determined by City staff, it is suggested that a fee of about \$400 as cash-in-lieu to be paid to the City for every required replacement tree that cannot be accommodated on the subject lots(s) is quite reasonable. A recent review of per replacement tree fees charged among comparators and other municipalities in southern Ontario with private tree by-laws found that 2022 fees generally ranged from \$400 to \$1000.



Updated Private Tree Protection By-law forms

To help administer and implement the updated Private Tree Protection By-law the following forms will need to be updated or created. Notably, these will need to be developed for the online application process (as noted in [Section 3.2](#)) and will also need to be available in other formats to address accessibility requirements.

- Notification form for emergency works requiring injury / destruction of regulated tree(s)
- Tree permit application form

Key Recommendation 8: The City should update the private tree by-law application forms.

3.2 Process recommendations related to the updated private tree by-law

Over the course of the private tree by-law update process, the need for updates to several related City processes were also identified. The updates outlined in this section are primarily intended to facilitate implementation of the updated private tree by-law by making both the application and the permitting process simpler, clearer and more accessible and include:

- shifting to an online permit application process; and
- developing internal standard operating procedures (SOP) to ensure that requirements related to trees regulated under the updated private tree by-law are understood and implemented consistently.

The process updates outlined in this section are expected to be developed and implemented under the direction of Parks staff with support from other City staff (e.g., Communications, Legal and Information Services) as needed.

Shifting to an on-line application process

The current Private Tree Protection By-law permit application process has been largely manual. To date, this has been manageable because the current by-law applies to relatively few landowners and the number of applications has been relatively low (i.e., 10 to 15 per year) and largely associated with the development planning process.

However, with the expanded scope of the updated private tree by-law, both permit inquiries and applications are expected to increase to levels which make shifting the process online both a logical and cost-effective update. This change can also be dovetailed with a communications plan which is expected to include clear information on the City's website about why, how and where this by-law applies.



Notably, the review of Guelph's comparators (see Appendix A in *GS et al., 2024a*) found that about half of the municipalities with private tree by-laws also have online application processes.

To help administer and implement the updated Private Tree Protection the following forms will need to be developed for the online application process (as noted in [Section 3.1](#)) and will also need to be available in other formats to address accessibility requirements.

- Notification form for emergency works requiring injury / destruction of regulated tree(s)
- Tree permit application form

In addition, it is recommended that an online calculator be for tree replacement and cash-in-lieu fee calculations be developed and made available online. This calculator should be aligned with the updated approach for tree replacement in the City's Tree Technical Manual.

Key Recommendation 9: The City should shift the Private Tree Protection By-law application process online in conjunction with clear communications about how, where and when the by-law applies.

Key Recommendation 10: The City should develop and post a tree replacement calculator online, including calculations of tree replacement fees where required (that is aligned with the updated guidance in the City's Tree Technical Manual, as per Key Recommendations 6 and 7).

Updating internal application and review processes

To help administer and implement the updated Private Tree Protection By-law, several internal procedures should be developed or updated to ensure that processes and requirements related to trees regulated under the updated by-law are understood and implemented consistently.

- Process and notification requirements for tree damage or removal for emergency work
- Process exemptions for dead and high risk trees
- Approach for boundary trees
- How and where regulated trees are considered through the building permit process
- How and where regulated trees are considered through the heritage tree review process, and how heritage trees are considered through the private tree by-law review process

Key Recommendation 11: The City should develop or update internal processes related to emergency work, dead and high risk trees, boundary trees, building permits and heritage trees to ensure that they align with the updated Private Tree Protection By-law, are understood, and are implemented consistently.



3.3 Communications recommendations for the updated private tree by-law

One of the key findings through this process was that many residents and property owners in Guelph, and even some City staff, do not have a good understanding of where the Private Tree Protection By-law applies, how it works or what its intent is.

This private tree by-law review and update process provided a good opportunity to start to educate interested parties about private tree by-laws in general, the scope of the current Private Tree Protection By-law, and why the 2010 by-law is being updated. It was also an opportunity to start to develop some key messages and test the effectiveness of some communication tactics for building broader understanding.

Lessons learned related to the engagement completed for this project included

- In both phases, the online surveys received the greatest levels of interest and participation, far exceeding attendance at virtual or in-person open houses.
- Spending a bit of additional funds and effort to increase the profile of social media advertising was very effective at increasing online traffic engagement on this topic. For example, during the Phase 2 engagement this almost doubled the response level for the online survey.
- Some residents seemed to appreciate having in-person and virtual engagement options, and interested persons appreciated having the ability to participate in person, however selecting an appropriate venue is important.
 - For example, levels of engagement were much higher at the Farmer's Market pop-up than at the community recreation centres or public library.

Ideas shared by others and supported by the consulting team to enhance outreach and engagement going forward include

- clearly defining key terms and how the private tree by-law applies in different situations;
- information / visuals to help identify the invasive tree species exempt from the by-law permitting process;
- information / visuals about appropriate native tree replacement species, tree planting and/or tree care;
- incentives for private landowners to encourage and support more tree planting and / or tree care, particularly incentives that support mature tree care;
- incorporating more visual aids into the engagement process, especially to capture a younger demographic (e.g., short videos to help visualize different tree and lot sizes and/or explain exemptions); and
- sharing information on the value and types of services provided by trees in Guelph.



Key Recommendation 12: The updated Private Tree Protection By-law should be implemented with a commitment to develop and implement a Communications Plan intended to support broader understanding of why, where and how this regulation applies to private property owners in Guelph.

This plan should have a launch phase tied to the initial implementation of the updated by-law as well as a sustained outreach component to build and sustain awareness over the long term.



Figure 2: An example of an intensification development in Guelph where tree preservation and tree planting, as well as outreach, were implemented. Credit: M. Ursic



4 Summary of recommendations and concluding remarks

The updated Private Tree Protection By-law, which reflects the recommended directions outlined in this report, is going to Council April 1, 2025 for approval. The specific recommendations from this Key Directions Report being released with this updated by-law are provided for ease of reference below.

1. Guelph's Private Tree Protection By-law should be updated to regulate trees of at least 10 cm diameter on private lots greater than 0.2 hectares (like the current by-law) and, in addition, regulate trees of at least 50 cm diameter on all private lots.
2. The updated Private Tree Protection By-law should be approved with a respectful request that the Mayor include the additional required resourcing identified by City staff to administer and enforce the by-law effectively in the next (i.e., 2026) budget update, recognizing that full implementation of the By-law will not be possible until the required resources are in place.
3. The approach to both the permit fee and to the tree replacement fees should be updated to be scaled (e.g., higher fees where more than one regulated tree is to be impacted) within clear and reasonable limits.
4. The City should include all fees associated with the private tree by-law in its User Fees By-law.
5. The City's Tree Technical Manual should be updated to (a) include references to the most current and relevant City documents and (b) ensure the technical terms align with and support the updated Private Tree Protection By-law.
6. The City's Tree Technical Manual should continue to state that tree replacement is always preferred to cash-in-lieu, but where not possible cash-in-lieu is to be calculated based on per required replacement tree (and not based on per regulated tree removed).
7. The City's Tree Technical Manual should be updated to simplify the tree replacement using a scaled ratio-based approach. For example, three saplings to be planted for every regulated tree of 50 to 65 cm diameter, and \$400 is to be paid to the City for every required replacement tree that cannot be accommodated on the subject lots(s). Also see related Recommendation 9.
8. The City should update its private tree by-law application forms.
9. The City should shift the Private Tree Protection By-law application process online in conjunction with clear communications about how, where and when the by-law applies.
10. The City should develop and post a tree replacement calculator online, including calculations of tree replacement fees where required (that is aligned with the updated guidance in the City's Tree Technical Manual, as per Key Recommendations 6 and 7).
11. The City should develop or update internal processes related to emergency work, dead and high risk trees, boundary trees, building permits and heritage trees to ensure that they align with the updated Private Tree Protection By-law, are understood, and are implemented consistently.



12. The updated Private Tree Protection By-law should be implemented with a commitment to develop and implement a Communications Plan intended to support broader understanding of why, where and how this regulation applies to private property owners in Guelph. This plan should have a launch phase tied to the initial implementation of the updated by-law as well as a sustained outreach component to build and sustain awareness over the long term.

In addition to the specific recommendations above, it is broadly recommended that (a) Guelph's updated Private Tree Protection By-law be implemented with other City policies and regulations, as well as voluntary tree establishment programs, to help achieve the City's tree canopy cover target of 40 per cent by 2065 and help the community adapt to climate change; and (b) the other key directions in this report be implemented in tandem to support the effective implementation of this private tree by-law.

The Guelph Urban Forest Study (2019) estimated there are about 3 million trees across the city that provide more than \$5.6 million in environmental services (e.g., cooling, pollution removal) each year, plus store about 200,000 tonnes of carbon. Effective implementation of the updated Private Tree Protection By-law is estimated to require about \$184,000 in additional resourcing annually. As pointed out by several people engaged through this process, a strong financial case can be made for this investment which represents

- a very small fraction (i.e., less than four (4) per cent) of the services provided by trees in the City;
- a relatively small investment in the broader context of the City's operational budget, which will help the City better sustain and enhance its tree canopy cover; and
- an investment in helping the community plan for and adapt to climate change.



Figure 3: Display at the Farmer's Market for the City's private tree by-law outreach. Credit: M. Ursic



5 Sources cited

Note: The links to the sources below were last verified in January 2025.

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