



# Orange Audubon Society

(A Chapter of National and Florida Audubon Societies)

PO Box 941142, Maitland, FL 32794-1142

[www.orangeaudubonfl.org](http://www.orangeaudubonfl.org)

September 11, 2023

Mayor Jerry Demings  
Orange County Government Administration Center  
201 S Rosalind Ave.  
Orlando, FL 32802-1393

Dear Mayor Demings and Orange County Commissioners:

On behalf of Orange Audubon Society (OAS) and its 2000 member-households, I write to request your support of the County's proposed Tree Preservation and Removal Ordinance. Mr. Alan Marshall has done an excellent job of researching exemplary programs elsewhere and accepting the input of stakeholders. He has familiarized you with the term "ecosystem services" for individual trees species and the tree canopy.

This ordinance is aimed for new development, which, with rare exceptions, removes all trees on a property and replants with readily available fast-growing nursery stock. Trees commonly utilized — like crepe myrtle—look pretty, but do not have the ecosystem services of preserved native trees. Planted trees require water for establishment, which is in shorter and shorter supply. OAS is still concerned about the ordinance allowing relocation of trees, both for success rate and the water required.

- By requiring a tree survey, delineating sizes of trees, identifying specimen and heritage trees, and requiring greater replacement for these trees, Orange County will accomplish greater tree preservation.
- The inclusion of diversity requirements for replacement trees is positive.
- Fines being used to fund planting in heat islands, particularly in low-income areas, is positive.
- OAS would like to see native trees protected and invasive species prohibited on homeowners' lots, most of which are below the 2-acre threshold for permits, but we understand that this would be a different ordinance.
- Mr. Marshall has kindly followed OAS' request to include on the suggested tree list two native species that host caterpillars that songbirds can feed to their young, the sugarberry and wild black cherry. And has included, among the specimen trees that are protected if above 18 inches Diameter Breast Height (DBH), the longleaf pine, a critically important tree of the southern uplands with range drastically reduced. We would like the ordinance to protect all mature longleaf pines, starting at 12 inches DBH. Finding an 18-inch DBH longleaf would be rare.
- We concur with Marge Holt of Sierra Club that existing scrub habitat needs to be protected, and scrub oaks—*Quercus geminata*, *Q. chapmanii*, *Q. myrtifolia* and others—grow slowly in their sandy habitat and never reach the 8-inch DBH threshold that the ordinance protects. We would like to see scrub oaks of 3-4 inches DBH protected, as these are mature, and replacement trees will take excessive water in sandy soils.

In accordance with our mission of "connecting people with nature," OAS will work to assist the county in education on the value of trees. Thanks to Orange County for its work on this Tree Preservation and Removal Ordinance.

Sincerely,

Deborah Green, Ph.D.  
Orange Audubon Society President and Conservation Committee Member  
407-637-2525

Cc: Commissioner Nicole Wilson, Commissioner Christine Moore, Commissioner Mayra Uribe, Commissioner Maribel Gomez Cordero, Commissioner Emily Bonilla, Commissioner Michael Scott

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