



**Tree Permitting Program Feasibility Study
City of Doral
NLE Project No. 57625001**

Background and Scope

New Leaf Environmental, LLC (NLE) is providing this feasibility study to assist the City with determining the costs and benefits of taking over the county tree removal permitting program within the city limits.

Methodology

In order to evaluate the potential costs of administering this program, this study analyzes the likely costs based on the scope (volume) of permit reviews using permit data from the city and county, and typical level of effort information NLE obtained based on correspondence with our contacts in similar municipalities in the county (Miami Gardens, City of Miami, Coral Gables, Miami Beach). In order to evaluate the potential revenue from administering the program, this study analyzes typical costs for staffing provided by the City, the permit and mitigation fees received by the county for projects within the City, and data on comparable tree permit and mitigation fee revenues received within other Miami-Dade municipalities. Beyond the cost analysis, NLE will provide an overview of the non-monetary costs and benefits of administering the program.

Findings

Cost Analysis

Based on information received from the County (Department of Environmental Resources Management), the following permit volume was processed by the County within the city limits:

Year	No. Tree Permits
2023	51
2024	65
2025	57 (based on 33 permits processed as of July 30)
Approximated average: 60 permits per year	

It is common for many applications for construction projects to not claim tree removals in their application, though tree removals (or regulated impacts to trees) are required based on the proposed project. Accordingly, administering the tree permitting program involves a review of many of the applications for building permits to determine if tree impacts are proposed or could potentially result from proposed construction. This process would also likely result in an increase in the typical total number of tree permits issued (by the City) compared to what was issued within the city limits by DERM – in NLE's experience, the number of tree permits issued would likely be approximately 50% higher than what is being processed by DERM, equaling 90 permits.

Based on information received from the City for the period of July 14, 2023 to July 14, 2025, there are approximately 667 permits per year issued by the City which involve ground-disturbing construction and should be reviewed for potential impacts to trees.

In consideration of this data, administering the tree permitting program for the city would be anticipated to involve a review of approximately 670 projects per year which propose ground disturbing activities, and ultimately issuing tree permits for at least 90 projects. As a comparison to help ensure that the estimate is within reason, the City of Miami Gardens (which has a population approximately 25% higher than the City of Doral) conducted 538 plan reviews in the last 12 months. While the population of Miami Gardens is higher, the scale/intensity of development in Doral appears to be higher. Accordingly, the estimation of number of application reviews per year appears to be valid.

Based on NLE's experience in conducting this scope of work for the cities of Dania Beach, Miami, South Miami and Miami Gardens, reviews of building permit applications which do not propose tree removals (but may result in comments for plan modifications to avoid tree impacts), can be anticipated to take approximately one-half of an hour on average to confirm the lack of tree impacts or to submit comments (such as requiring tree protection fencing) to help ensure that inadvertent tree impacts do not occur. Review times for applications proposing tree removal can vary substantially, from two hours for minor projects (i.e. driveways) proposing to remove a small tree, to an average of eight hours for large commercial projects which can include a site visit to verify existing conditions, multiple rounds of plan reviews and comments. Based on the information provided by the City on building permits applied for, approximately 50 applications per year would qualify as major application reviews.

With these assumptions, the following is the planning estimate for the scope required for reviews:

- Building permit applications with minimal tree impacts: 610 applications requiring one-half hour each for review per application = 305 hours
- Building permit applications involving minor reviews: 10 applications requiring two hours per application = 20 hours
- Building permit applications involving major reviews: 50 applications per year requiring eight hours per application = 400 hours

Note that these estimations may be an overestimation for Doral since City staff are already conducting reviews of and providing comments on proposed landscape plans, and the review hours listed above incorporate time spent for reviews both for landscape and tree permitting issues. Since this is a planning document and intended to be on the conservative side, these hours will still be used.

With this information, the estimated grand total planning estimate for hours required is: 725 hours. To help ensure this estimate is valid, the total number of hours spent for conducting reviews for the Miami Gardens tree permitting program in 2024 was obtained, which is 826. This is a close correlation especially considering the larger population of Miami Gardens and that this time also includes hours for landscape plan reviews and technical support for code compliance.

Based on information provided by the City of Doral, the estimated loaded cost (salary plus benefits) for a Planner (position that would likely process the majority of tree permitting) is \$108,474.40. To determine the cost for the City needed to staff the tree permitting program by a planner we can use the following calculations:

- Assuming a 40 hour week
- 725 hours needed divided by 40 hours/week = 18 weeks
- Estimate 46 weeks per year of actual work productivity (52 weeks minus 2 weeks vacation, 2 weeks sick leave, 1 week paid holidays and 1 week training/other in-house activities). Accordingly, each week of work by a planner ($\$108,474 / 46$) would "cost" \$2,358.
- 18 weeks of work required x \$2,358 = \$42,444.

- If there is not sufficient staff time available to allow for assignment of half the time of Planner, a part time (half-time) planner would be hired at an estimated cost of half the total rate: \$54,237.
- The staffing of the program can also be accomplished through consultant staffing, which typically has a higher rate per hour but provides flexibility to increase staffing hours when needed and not pay for it when not, as well as guaranteeing a high level of staff experience. Current consultant staff rate for Miami Gardens is \$80/hour for the majority of the work. As that rate has not changed in a few years, \$90/hour is a more accurate estimate for an hourly rate. For the estimated 725 hours needed, this would result in a cost of \$65,250.

Revenue Analysis

When a tree permitting program is administered by a municipality in Miami-Dade County, the municipality can set permitting fees at their discretion. For analysis, NLE will provide an estimate of permit fees received by the County for applications within Doral, as well as reasonable fees for what the city could charge based on fees in effect in surrounding municipalities.

County Application fee Revenue Estimate:

- Estimated 90 permits issued per year
- Average application fee of \$118
- Average permit fee of \$155 (assumes 10 trees per site to be inspected)
- Total average fee per permit: \$273
- Total revenue from permit fees: \$24,570

Comparative municipal fees: (for permit affecting 10 trees)

- City of Miami Gardens: \$340 (single application fee average)
- City of Miami Beach: \$590 (application fee averaging \$287 and permit fee averaging \$303)
- City of South Miami: \$390
- Average comparative municipal fee: \$440 per permit, estimated total annual revenue of \$39,600 for 90 permits

Mitigation Fee Estimate:

For projects where on-site planting cannot satisfy mitigation requirements, payment must be made to the Tree Trust Fund for the County or the City (when the City administers the permitting program). While these funds can only be used for tree planting (including some planning and maintenance fees), these funds can be held for any length of time and can be used for any planting project on public property including municipal campuses, parks, and rights of way. Accordingly, these funds typically directly offset budgeted funds for planting projects so they result in corresponding cost savings that are similar to revenue.

Based on Information received from the County for 2023-2025, an average of \$30,380 was received annually for Tree Fund payments within the City of Doral. The County's mitigation fees are notably lower than those of most municipalities which administer their own permitting programs (and are allowed to set their own mitigation fees). As a comparison, data from the City of Coral Gables (population 30K less than Doral) shows an average annual revenue to their Tree Trust Fund of \$78,800. Data from the City of Miami Gardens (population 30K higher than Doral) shows an average annual revenue to their Tree Trust Fund of \$98,700. The City of Miami is known for having high mitigation fees. It also has more than five times the population of Doral. If reduced proportionately by population size, their equivalent annual

revenue to their tree trust fund is approximately \$276,480. A conservative estimate for Tree Trust Fund revenue would be \$80,000.

The total program revenue would be \$39,600 (permit fees) plus \$80,00 (mitigation fees) = \$119,600

The total program fees in the highest cost (consultant) scenario = \$65,250

Estimated budget surplus (net revenue) from running municipal tree permitting program in Doral: \$54,350

Non-Monetary Costs and Benefits

Costs

There will be some logistical issues to be considered with administering this program – compliance with tree permitting rules will fall to City of Doral staff and public interest (criticism) for tree permitting decisions will fall on the City as opposed to the County. In addition to the staff that administer the tree permitting program, additional staff will need to be trained on processing tree permits and integrating aspects of the tree permitting program into their work including the staff that perform permit intakes, planners, administrators, and code compliance staff. One logistical consideration is the seasonality of the typical tree permitting cycle – applications often come in “waves” with more applications received after the start of the new year and prior to the end of the year, with fewer than average received during the end of the year holidays. This can make adequate staffing a challenge or alternative could result in variable permit processing times.

Benefits

The primary benefit of a municipality administering their own tree permitting program is the ability to have control over permitting decisions and priority/scheduling of permit reviews. When the County is responsible for tree permitting, they may choose not to approve tree removals on a project that the City would otherwise approve for removal and replacement due to the project being a key priority for the city (such as streetscape projects). In addition when the County administers the program, critical municipal projects and priority development projects within the City can be made to wait in line behind scores of minor projects throughout the county based on the schedule of staff reviewers, whereas the City may elect to prioritize the review of key projects at their discretion. Relatedly, the City can set the fees for applications and mitigation. This would allow the City to conduct actions such as lowering application fees for residents compared to commercial properties or further discounting applications for those with financial challenges, as well as charging market rates (higher than County rates) for mitigation fees for projects that elect to pay instead of plant.

Analysis

With a projected annual net revenue of \$54,350, the tree permitting program in Doral would be considered to be self-sustaining and revenue positive, provided that the revenue from the Tree Trust Fund is counted as revenue (though it could not directly be used to pay for staffing). The anticipated volume of tree permitting is not independently capable of supporting a full-time internal staff position. However, the revenue generated would support either hiring a planner at 20 hours per week or use of an outside consultant. While there would be some challenges from administering the program, especially at the start when staff needs to be trained, forms created, internal processes developed, etc., the added benefits of being able to have control over permit results and revue timelines indefinitely provides another substantial benefit.

Sincerely,

New Leaf Environmental, LLC

A handwritten signature in blue ink, appearing to read 'Michael McCoy', is positioned above the printed name.

Michael McCoy

ISA Certified Arborist MA 4243A, TRAQ, PPQ

LIAF Certified Landscape Inspector