

To: Jeff Caudill, BPS

CC: Mayor and City Commissioners
Meryl Redisch and Urban Forestry Commissioners
Jenn Cairo, PP&R Urban Forestry
UFC Heritage Tree Committee
Laurie Matthews, Oregon chapter of the American Society of Landscape Architects

From: Gregg S. Everhart, ASLA

Date: February 8, 2016

Subject: **Nuisance tree additions to the Portland Plant List**

The Portland Plant List is a valuable tool in my professional work as a landscape architect and I appreciate the proposed improvements to nomenclature and specific plant listings. This will be particularly helpful in my work on the Audubon Native Plant Sale which I helped start over 20 years ago and for which I continue to provide informational signage and plant list handouts.

Unfortunately, I do not support the addition of Horsechestnut (*Aesculus hippocastanum*) and Sycamore Maple (*Acer pseudoplatanus*) to the Nuisance Plants List. Adding the English Oak (*Quercus robur*) is of less concern because there are few existing trees that would be subject to removal and many other great oak species to be planted. Please note that although I am a member of the Sunnyside Street Tree Team and Urban Forestry Commission (UFC) and chair the UFC Heritage Tree Committee, these comments reflect my personal views.

A nuisance listing of the Horsechestnut and Sycamore Maple is undesirable because it:

- makes many existing large trees vulnerable to removal and requires no or only minor mitigation
- could result in significant loss of much-needed tree canopy – large existing trees that are surviving in often challenging urban conditions
- reduces species diversity even though the trees are not invasive in every landscape
- may impact existing Heritage Trees

I hope that the Bureau of Planning and Sustainability can **consider impacts to the urban canopy of the whole city instead of just focusing on potential impacts in natural areas**. There are a substantial number of trees that have the potential to reproduce themselves and the way in which the current Nuisance Plants List is utilized does not allow any flexibility.

Once any tree is listed as a nuisance plant, it is much easier to make a case for its removal. Once these trees are listed, there will be NO preservation or mitigation requirement for existing Horsechestnut or Sycamore Maple street trees in development situations and capital improvement projects. There will also be NO preservation or mitigation requirement for existing publicly owned (non-street tree) Horsechestnut or Sycamore Maple trees in capital improvement projects. Any nuisance tree in a private development situation can be removed without a permit regardless of condition or size. In private non-development situations, removal permits of

nuisance species are granted automatically without inspection and one for one mitigation is required only if the nuisance tree is 20" or greater dbh and healthy.

HORSECHESTNUTS

Dominic Maze (email January 28, 2016) notes that PP&R Natural Resource staff proposed this listing based on the saplings they find in Forest Park, especially near Balch Creek. However, Urban Forestry staff (January 21, 2015) note that Horsechestnut does not develop a persistent seedbank and removed seedlings don't persist or resprout aggressively (like true invasives such as *Ailanthus* and holly). I live in Sunnyside where our 2012 street tree inventory documented 17 Horsechestnuts (among 2995 total street trees). Their average diameter at breast height (dbh) was 23.9 inches. Since our neighborhood has mostly small and medium width tree planting strips, only silver maples (relatively short-lived, weak-wooded) and elm (threatened by Dutch Elm Disease) rival them in quantity and size.

| Large street tree in Sunnyside | Number of trees | Average dbh |
|--------------------------------|-----------------|--------------|
| Big-leaf maple | 2 | 39.4" |
| Tulip poplar | 8 | 38.7" |
| Cedrus | 3 | 36.9" |
| <i>Silver maple</i> | 15 | 30.8" |
| Plane trees | 1 | 28.1" |
| Black locust | 6 | 26.3" |
| <i>Elm</i> | 25 | 25.0" |
| Douglas fir | 3 | 24.3" |
| Horsechestnut | 17 | 23.9" |

Since the two smallest Horsechestnut street trees are 3-6" dbh and three are 6-12" we need to preserve the very largest trees and allow the younger ones time to mature. By contrast, in the whole neighborhood, 36% of ALL our street trees are less than 6" dbh, 29% are 6-12" dbh. In the 49 neighborhoods inventoried so far, there are 974 Horsechestnuts. It is unknown how many additional trees exist outside public rights-of-way, as they are not inventoried, although I featured a Horsechestnut yard tree in last year's Sunnyside Arbor Day spring-flowering tree tour. These would also be vulnerable with a nuisance tree listing. No provision is made to allow the seedless cultivar *A.h.* "Baumannii."

SYCAMORE MAPLES

Dominic Maze proposed listing the Sycamore Maple, noting that "any walk around any eastside neighborhood will reveal many [self-sown] individuals" and that "Jim Schiller of BES Revegetation treats "1000's" of seedlings at Oaks Bottom every year." These are both unscientific assessments with real consequences for the urban forest. It would be preferable to do a study to identify the impacted areas rather than basing city-wide policy on such informal assessments. I do see Norway maple seedlings around mature Norway maples but I have not noticed Sycamore Maple seedlings near our street trees. Although it is possible to check in winter (green buds for Sycamore maples compared to red buds for Norway maples plus bark

differences), this would be much easier in the growing season when leaves aid plant identification.

There is less City-wide data available for the Sycamore Maple, since it was not one of the six maples (bigleaf, Japanese, Norway, paperbark, red, silver) that were keyed out in the street tree inventory. The Urban Forestry memorandum of February 11, 2015 notes that "Urban Forestry Tree Inspectors report that they are quite common." Although PP&R Urban Forestry has removed ALL maples from their approved street tree planting lists (based on over-abundance), Sycamore Maples are estimated to be the fifteenth most common street tree species in Portland with 13" average dbh and 95% in good or fair condition (data from the 2007 *Urban Forest Canopy Assessment and Public Tree Evaluation*). Based on sections of Sunnyside that I helped inventory, I believe they are a substantial number of the 240 "other" maples in Sunnyside rights-of-way, especially the larger trees as they are known to tolerate poor soil, drought, and air pollution. Some of the "other" maples are small form, such as vine, hedge, Amur and Rocky Mountain Glow maples. If the 21 "other" Sunnyside maples over 24" dbh are large form Sycamore and Sugar Maples, Sunnyside needs their canopy. Not to mention the 73 that are over 12" dbh that will continue to provide more benefits as they mature. In the 49 neighborhoods inventoried so far, there are 8766 "other" maples. Although Urban Forestry can still deny removals of healthy trees in non-development situations, I am not yet convinced this tree is an invasive threat in so many neighborhoods that it should be labeled a nuisance throughout the entire City.

NUISANCE PLANT LIST AND NATURAL AREAS

I have worked with the Portland Plant List since it was created to prohibit planting problem species within the Environmental Overlay and Greenway Overlay zones. Since some trees such Norway maples were found to seed into adjacent natural areas, like the street trees along Terwilliger Boulevard into George Himes Park, species on the Nuisance Plant List were not allowed to be planted as street trees or be installed in City required landscaping areas. I believe that trees such as holly and *Ailanthus* deserve their nuisance listing as birds and wind transport their seed great distances and they are able to germinate in nearly every setting. They also are difficult to kill, often re-sprouting until the roots are dug up or poisoned. However, Sunnyside and the many other neighborhoods bounded by Columbia and Powell Boulevards, the Willamette River and I-205 have only two small natural areas: Rosemont Bluff and Rocky Butte. Although there are some "hybrid" developed parks that have portions of natural areas such as Mt Tabor Park and the Willamette Greenway/Springwater on the Willamette, our urban forest and developed parks and residential landscapes are the natural world in these neighborhoods. The non-listed invasive trees in my immediate area are walnut (planted by squirrels) and golden-rain tree (blown downwind from street trees). I value these neighboring trees enough to weed the seedlings rather than promote the removal of the parent trees.

HERITAGE TREES

The most immediate impact of listing Horsechestnut and Sycamore Maple on the Heritage Tree List is that no additional trees could be listed. In time, the four Horsechestnuts and six Sycamore Maples will die and neither tree species will have new Heritage Tree representatives.

All the heritage trees noted below are street trees and are maintained by Urban Forestry rather than the adjacent landowner because of their heritage designation. Although Urban Forestry has to approve removal permits for street and heritage trees, it is harder to defend retaining a tree that has been declared a nuisance species if the adjacent owner requests a removal permit. At the UFC Appeals Committee, landowners already argue that trees no longer on the approved planting lists should be removed. The dimensions below demonstrate the considerable canopy a mature tree of each species can provide!

| Neighborhood, Address, Heritage Tree number | r/w or private | Height | Spread | Circ. |
|--|----------------|--------|--------|--------|
| HORSECHESTNUT | | | | |
| Irvington, 2807 NE 8 th Ave, #121 | r/w | 78' | 90' | 8.8 |
| Irvington, 2807 NE 8 th Ave, #122 | r/w | 85' | 90' | 12.3' |
| Irvington, 2923 NE 8 th , #305 | r/w | 80' | 64' | 11.9' |
| Sullivans Gulch , 2607 NE Wasco St, #308 | r/w | 65' | 77' | 12.7' |
| SYCAMORE MAPLE | | | | |
| Sellwood-Moreland, 1013 SE Lambert, #100 | r/w | 65' | 45' | 12' |
| Sellwood-Moreland, 1013 SE Lambert, #101 | r/w | 65' | 45' | 14.3' |
| King, 1465 NE Going Street, #249 | r/w | 76' | 65' | 13.5' |
| Creston-Kenilworth, 4741 SE 36 th Place, #315 | r/w | 75' | 72' | 14.75' |
| Cathedral Park, 8710 N Willamette Blvd, #322 | r/w | 65' | 61' | 11' |
| BAUMAN (seedless) SYCAMORE MAPLE | | | | |
| Irvington, 1529 NE Thompson, #261 | r/w | 65' | 45' | 12' |

CONCLUSION

To conclude, it is unfortunate that BES and BPS substantially ignored the February 11, 2015 comments from Urban Forestry. At the time, Urban Forestry was within the Natural Resources section where the section manager outranked the City Forester. It also seems to me that all significant issues relating to trees should be presented to the Urban Forestry Commission. Although I raised the issue at our most recent meeting, no staff presentation had been scheduled and the UFC needed most of its limited time for a hearing on amendments to Title 11. I support delaying listing of these and any additional trees until the structure and use of the Nuisance Plants List is modified. It would also be prudent to do some monitoring to scientifically assess if/where species are invasive.