



PORTLAND PARKS & RECREATION

Healthy Parks, Healthy Portland

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Urban Forest management goals of increased tree canopy, species diversity, and equitable environmental benefits must be considered when adding common, large-form trees to the Nuisance Plants List. Until changes to the Nuisance Plants List structure and process are implemented, Urban Forestry recommends that proposed tree additions be postponed unless there is evidence that inclusion will not negatively impact the City's ability to meet these goals.

As stated in Urban Forestry's prior recommendations, presence on the Nuisance Plants List drastically reduces mitigation requirements in non-development situations, and completely exempts nuisance species from preservation or mitigation requirements in all development situations. Below is a short summary:

- *Private trees in non-development situations:* Removal permits of nuisance species are automatically granted with no inspection. Mitigation for removals of healthy nuisance trees 20" or greater in diameter is tree for tree, as opposed to a maximum of inch for inch for non-nuisance species.
- *Private trees in development situations:* Any nuisance tree, regardless of size or condition, can be removed without a permit. Nuisance trees are exempt from preservation standards, which already allow 2/3 of healthy mature trees to be removed with no mitigation or replanting.
- *Street trees in development situations:* Healthy non-nuisance trees 6" or greater are regulated, with removals requiring at least tree for tree replacement. Nuisance trees, regardless of size or health, are exempt from preservation and mitigation requirements.
- *Street and City trees in capital improvement projects:* Healthy non-nuisance trees 6" or greater are regulated (12" during right-of-way improvements). Street trees mitigated at 2:1, on site trees mitigated up to 6:1, depending on the size of the tree removed. Nuisance trees, regardless of size or health, are exempt from preservation and mitigation requirements.

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Sustaining a healthy park and recreation system to make Portland a great place to live, work and play.

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Proposed Species

Inventory data exist for trees in Portland's streets and parks, but not on private lands where more than half of Portland's trees grow. It is therefore difficult to estimate populations of any tree species, or the potential loss of canopy if a species were to be removed. Information below is based on data from the Street Tree Inventory, 2007 Canopy Report, and Urban Forestry's permit database. Due to inventory methods, little species-level data exist for maples and oaks—two of the most common genera in Portland. In the case of horsechestnuts, more specific data do exist, therefore information about this tree presented below is much more detailed.

Common horsechestnut (*Aesculus hippocastanum*)

Horsechestnut is commonly planted across Portland, in rights-of-way and on private lands, and is also on average one of the largest trees in the city. Despite their relatively old age, horsechestnuts in Portland are remarkably healthy. Nuisance listing of this species will result in significant canopy loss with minimal replacement.

- Very common tree on Portland streets (#29 out of 135 genera).
- Largest average diameter (28") of any tree in the street tree inventory.
- Also a very common tree on private lands—40% of permitted horsechestnut removals in 2014 were on private property, with an average diameter of 29".
- 94% are in good or fair condition.
- Nuisance listing would include *A. hippocastanum* "Baumannii"—a seedless variety that poses no threat, and one of relatively few options on Urban Forestry's Approved Street Tree List.
- Horsechestnut ranks in the inventory's top 20 trees in terms of importance value, canopy coverage, and replacement value.
- Citywide, public and private horsechestnuts are estimated to provide \$667,000 in annual benefits and have a replacement value of \$44 million.

Sycamore maple (*Acer pseudoplatanus*)

Sycamore maples are more common than horsechestnuts, and also large trees on average. Data does not exist concerning their presence on private land in Portland, however Urban Forestry Tree Inspectors report that they are quite common. Like horsechestnut, sycamore maples are on average large, healthy, and ubiquitous. Nuisance listing of this species will result in significant canopy loss with minimal replacement.

- 15th most common street tree species in Portland.
- Average DBH 13".
- 95% are in good or fair condition.
- Not on any approved planting list in Portland—no longer commonly planted in the city.

English oak (*Quercus robur*)

English oak is not a common tree in Portland, therefore listing this species as a nuisance would have little negative impact on the city's overall canopy.

- Very little data on this species, not a common tree in Portland.
- Hybrid species are commonly planted in commercial areas (*Q. robur* x *Q. alba* 'Crimschmidt' is on Approved Street Tree List). These trees will not be affected by nuisance listing.

Canopy Implications of Listing

Horsechestnuts and sycamore maples are, on average, large, healthy trees that would often require the maximum replacement requirements under Title 11. In development situations, the significant canopy that these trees represent would be lost with no required replacement. While non-development related removals of nuisance species would require tree for tree replacement, the consequence of reducing mitigation to tree for tree is significant:

- **Drastic canopy loss in the short-term:** In the case of a 20" removal on private land, maximum required replacement is lowered from 10 trees to just one.
- **Net canopy loss in the long-term—fewer trees:** Because not all replacement trees will survive to maturity, tree for tree replacement will result in fewer overall trees in the long-term.
- **Net canopy loss in the long-term—smaller trees:** Replacement trees are most often smaller species than the large-form trees proposed for PPL listing—in 2015, smaller species replaced large-form trees in approximately 2/3 of permitted removals requiring 1:1 replacement. Only 18% of replacement trees in these cases were large-form species.

Additional Concerns

As it is currently implemented, the Nuisance Plants List reduces the number of planting options available in Portland's rights-of-way, where difficult growing conditions allow very few species to thrive. Considering the threats of climate change, pests, and disease, Urban Forestry has worked to increase the species diversity of Portland's street trees. Species exclusion hampers these efforts to build more resiliency into the urban forest, and should only be practiced when there is clear benefit to the entire city and no other management options exist.

Throughout this process, Urban Forestry has suggested alternative methods of managing non-native plants within natural areas that do not compromise citywide urban forest management goals and in 2015 have used flexibility within Title 11 to implement some of these alternatives. Through 2-year programmatic permits issued in 2015 to Portland Parks & Recreation City Nature, the Bureau of Environmental

Services Revegetation Program, and West Multnomah Soil and Water Conservation District—agencies which conduct resource enhancement programs in natural areas—these groups can treat removals and mitigation of agreed upon species of non-native, non-nuisance trees (including sycamore maple and horsechestnut, among others) as nuisance species. Urban Forestry has also suggested that proximity to natural areas be used as a basis for limiting the planting and retention of trees that natural area managers believe to be a nuisance.

The Nuisance Plants List in its current form and use does not discriminate between various levels of threat posed by different species—a species is either “on” or “off” the list. While this may make sense when viewed in the context of planting recommendations, the Nuisance List is also cited as a criterion for removal with reduced replacement requirements. Taken together, the addition of common species such as horsechestnut and sycamore maple will result in significant canopy loss and reduced ability to meet other important urban forest management goals.