

August 8, 2016

Katherine Schultz, Chair  
Planning & Sustainability Commission  
1900 SW 4<sup>th</sup> Ave  
Portland, Oregon  
RE: Central City 2035

Dear Chair Schultz and Members of the Commission,

Thank you for giving the Urban Forestry Commission an opportunity to comment on Volume 5 of the Proposed Draft Implementation Plan. The UFC had two presentations from Bureau staff over the last few months. We are pleased to see that higher canopy targets for practically all of the sub districts are reflected in this draft as a result of new LiDar data and from stakeholder comments, including from the Forestry Commission.

As you note in this draft, the Portland Plan and City's Climate Strategy calls for tree canopy to cover at least one-third of the city, on average by 2035.

The proposed draft includes alternative options that are worth highlighting as a preface to our general recommendations.

- The City must commit financial resources to revise Title 11 in the next budget cycle with Parks and the Planning and Sustainability Bureaus leading this effort in conjunction with community stakeholders. Currently, Title 11 Tree Preservation and Tree Density Standards do not apply to industrial, commercial and employment zones. These zones comprise a majority of the Central City area. Other revisions to the Tree Code are necessary if we are serious about preserving what remains of Portland's large, healthy tree population.
- Another option referenced in the draft includes a greater investment in street tree planting. The UFC firmly believes that the ecosystem and social benefits derived from a healthy and diverse canopy should be a right that everyone is entitled to. Environmental justice concerns compels us to consider the positive impacts that trees have in reducing air pollution and heat stress on vulnerable populations. Intentional planning, planting, and stewardship of street trees will require increased public investment, but it can also generate new jobs and encourage greater community engagement. The City can explore ways to boost public/private partnerships to sponsor maintenance of street trees across the districts. This will help maintain the health of Central City tree infrastructure and help address property owner resistance

to street tree planting.

- Portland’s urban forest canopy is more than just an amenity. It provides critical infrastructure services such as stormwater management, reduction of heat island effects, and air pollution. In the Central City, these services are considerably important than in other areas due to increased impervious surfaces, built infrastructure and traffic.

After reviewing Executive Summary for Tree Canopy and Tree Targets, the UFC offers the following specific recommendations:

### **Tree Canopy Targets**

- Introduction (p 6) – States that the plan has developed tree canopy scenarios but not targets. This section is inaccurate and needs to be corrected.
- We support BPS and bureaus in developing tree canopy targets for the plan, and want to see strong methodology to test the impact of existing and potential future policies, regulations and investments, and to ensure that the targets are aspirational, practical, and attainable. These approaches will serve to inform the next iteration of the Urban Forest Management Plan.
- We recognize and support the policies listed in the Tree Canopy Target section of Volume 5, as the policies acknowledge the many benefits provided by trees in an urban environment, and call for integration of trees, vegetation, and other natural resources Central City-wide.
- We recognize that the targets project a significant increase in tree canopy, based on assumed regulatory changes and significant investment. However, the estimates are based on assumptions that young trees will reach maturity and that existing trees will be replanted with ones of similar form are not well founded. In fact, we have learned that large form trees on private and rights of ways are often replaced with small or medium form trees, resulting in diminished ecosystem and social benefits. To reach the “lift” described in the plan, assumed regulatory changes and investment must occur through Title 11.

## **Regulations**

- We support the river environmental overlay zone that will improve protection and mitigation for potential loss of existing natural resources, generally along the Willamette.
- We support the expanded river setback. Note that 50' from top-of-bank, while an improvement, is not sufficient from a riparian-function perspective. We strongly recommend an increased setback or at a minimum, 50' net the width of the greenway trail. We want to see a clear statement in Central City that states this rule will not set precedent for setbacks in future North and South Reach Plans. We also want to see a requirement for mixed tree sizes with a focus on large form trees.

## **Master Plan Areas**

- We support the new Central City Master Plan as a tool to incorporate tree canopy into development of large sites in the Central City. We want to see detailed tree preservation and planting plan as part of the submittal process and that a mix of large and medium size trees are included. Our recommendations include an increase in open area requirement from 20% to 30%, and establish a graduated tree density requirement depending on tree size. Table 50-2 in Title 11 provides regulatory precedent for this. Large form trees are required at a density of 1 per 1000 sq. ft., medium form trees at 1 per 500 sq. t and small form trees at 1 per 300 sq. ft. This is especially important in the Lloyd District that will be subjected to multi-block development

## **Building Lines and Setbacks**

- Currently, the Proposed Draft allows, in some instances, but does not require or encourage buildings to be setback from the front property line. It is understood that the plan is designed to encourage an active streetscape and transit supportive development. However the lack of required setbacks or open area on development sites creates a significant constraint not only on tree preservation and planting on sites, but also prevents the planting or growth of significant street tree canopy. We recommend that the Required Building Lines section and/or other sections of the plan be revised to require building setbacks that are landscaped or that include trees at least along designated flexible streets and streets within the Green Loop Alignment.

- We support assumed inclusion of trees into new building design, but not at the expense of landscape level trees. Consider creating regulatory incentives to encourage this. We also recommend establishing an FAR bonus for outdoor open space with trees on development sites. Outdoor and open space is needed in the Central City, along with affordable housing and we strongly encourage providing regulatory incentives for trees to be planted in ecoroofs or on building roof areas.
- Policy 6.10 calls for adequate sub-surface soil volume for trees in conjunction with development and infrastructure projects. However, the plan provides no implementing mechanism. We want to see a new code section requiring incorporation of adequate subsurface soil volumes for trees that are required to be planted on sites or in the right-of-way as part of a development or infrastructure project. The City doesn't need to reinvent the wheel and should review regulations from other cities such as Tigard in developing the regulations.

### **Investments**

- Green Loop and Flexible Streets appear to be a very effective route for adding significant canopy by planting large form trees to create a connected canopy. Flexible streets present an excellent way to intentionally design streets with trees in mind. Our recommendation is for every sub district to have an adequate density of flexible streets and sufficient space for large form trees.
- Achieve the Riverbank Enhancement Targets (presented in Volume 5)
- Develop new City parks where large form trees are features and thrive and increase tree canopy on a number of existing City parks.
- We recommend that these investments and potential funding sources be recognized explicitly in fiscal impact assessments for the plan, and these investments also be acknowledged in City Council adopting ordinances or resolutions for the plan.
- We believe its important that language is added in appropriate sections of the plan to ensure that trees are recognized as green infrastructure and incorporated into the capital funding, design and construction of future streetscape improvements in the Central City.

AMANDA FRITZ, COMMISSIONER

MIKE ABBATÉ, DIRECTOR

- We would like to see policies and/or actions recognizing potential new City parks as a source of future large and medium form tree canopy.
- It is clear that existing and future land uses and development pose many constraints to trees and tree planting in the Central City. The Tree Canopy Targets document points out that the installation of subsurface vaults and voids that intersect with the sidewalk corridor create a significant constraint to tree planting. We recommend that the City limit the installation of such vaults and voids in the future. Supporting this recommendation is a mandate for adequate subsurface soil for trees so that grey infrastructure does not compete with space for trees.
- The Tree Canopy Target document assumes that sidewalk corridors wide enough to accommodate new trees will be required in conjunction with new development. This needs to be implemented and not just on the Flexible Streets but throughout the district.

### **Scenic Views**

- The Commission supports retaining historic scenic view sheds such as the ones from the Japanese Garden showcasing iconic Mt. Hood. We do not support expanding views to accommodate the full city skyline or additional mountain views.

Thank you for considering these comments. We look forward to working together to implement this plan and other efforts to advance Portland's urban canopy goals.

Sincerely,

Meryl A. Redisch, Policy Chair, Urban Forestry Commission  
Damon Schrosk, Urban Forestry Commission  
Mark R. Bello, Ph.D., Chair of the Urban Forestry Commission

Cc. Susan Anderson, Director of Planning & Sustainability  
Mike Abbate, Director of Parks