



CITY OF PORTLAND

URBAN FORESTRY COMMISSION

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AMANDA FRITZ, COMMISSIONER

MIKE ABBATÉ, DIRECTOR

August 17, 2017

Planning and Sustainability Commission
1700 SW 4th Ave.
Portland, Oregon

Dear Chair Shultz and Commissioners,

Thank you for giving the Urban Forestry Commission the opportunity to comment on the proposed 2035 Comp Plan Code Reconciliation Draft package. We appreciated being kept informed by staff and sharing our concerns and priorities with them.

We support the Draft Document that eliminates Title 11 exemptions from development standards for tree preservation and tree density (planting) in the CS and CM zones, and does not reinstate the exemptions for the new commercial and mixed-use zones to be established through the Mixed Use Project. Removing the two zone-based exemptions would better support new Comprehensive Plan and Climate Action and Preparation Plans that call for the integration of trees and green infrastructure citywide, including in areas of high density centers and corridors. This change will improve livability, reduce the urban heat island effect and its associated public health impacts. The current Zone-based exemptions from tree preservation and planting standards in development situations were not intended to be part of the original recommendation that the UFC and Planning and Sustainability Commission forwarded to the City Council prior to Title 11 adoption. These exemptions were added due to insufficient data related to industrial and commercial land supply and in response to legal technicalities pertaining to the Comprehensive Plan update process. The City Council stated that they intended to revisit the exemptions and make changes once the Comprehensive Plan was adopted. This Code Reconciliation Project provides an ideal opportunity to take the first step in eliminating these zone exemptions and puts the city on the right track towards achieving its canopy targets, sustainability and livability goals. We are very supportive of this first step to eliminate Title 11 exemptions in Commercial zones and sincerely hope that this sets the stage for removing the Industrial zone-based exemptions during the next Title 11 update.

Thank you again for this work and keeping the Urban Forestry Commission informed.

Sincerely,

Meryl A. Redisch, Chair, Policy Committee
Mark Bellow, Chair Urban Forestry Commission