

November 28, 2017

Director Anderson
Residential Infill Project Staff
Bureau of Planning and Sustainability
1900 SW Fourth Avenue
Portland, OR 97204

Dear Director Anderson and City Staff:

Thank you for this opportunity to comment regarding the Residential Infill Project (RIP). On November 16, the Urban Forestry Commission continued its discussion and voted to authorize this letter with our recommendations. We are reiterating and clarifying the requests we made in a letter dated November 8, 2016. (That letter is attached.)

Specifically, we are asking that BPS interpret Guiding Principle 4, Environmental Health, to mean providing additional space to grow and preserve trees as an aspect of preserving nature in the city, generally:

4. Environmental Health

Weave nature into the city and foster a healthy environment that sustains people, neighborhoods, and fish and wildlife. Recognize the intrinsic value of nature and sustain the ecosystem services of Portland's air, water, and land (RIP Discussion Draft, p. 4).

As it stands, the proposed code amendments do not implement this principle in such a way as to preserve and make room for trees. We recommend that RIP make the following changes:

- Increase minimum setback on one side setback, rear setback, or both setbacks beyond the current 5 feet minimum
- Maintain the current code front setback
- Reduce the overall maximum building footprint in order to meet minimum root and canopy requirements on the lot
- Add code language requiring that garages and ADUs must be configured to accommodate space to meet minimum tree planting requirements
- Require a minimum tree density/canopy where landscaping requirements are in place

Additionally, we propose that the Required Outdoor Area standard, 33.110.235 be reworked to optimize space for trees:

- Require that decks be considered a pervious surface, along with pervious paving on the ground plane, so that trees may be preserved and planted within the deck or paving area
- Restrict impervious driveway paving to the space between the front property line and the front setback
- Restrict outdoor covers when they interfere with canopy and trunk location



CITY OF PORTLAND

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AMANDA FRITZ, COMMISSIONER

MIKE ABBATÉ, DIRECTOR

The Urban Forestry Commission appreciates your attention to and consideration of these recommendations that will properly balance the needs of a growing city and its green infrastructure. Whether it's equity, economic prosperity, human health, environmental health, or resilience, trees are living and growing infrastructure and must have a place in our growing city.

Sincerely,

Mark Bello, Chair, Urban Forestry Commission
Catherine Mushel, Secretary, Urban Forestry Commission
Meryl A Redisch, Chair, Policy Committee, Urban Forestry Commission

Cc. Jenn Cairo, City Forester
Morgan Tracy, BPS