

September 22, 2017

Mayor Wheeler  
City Council  
1221 SW Fourth Ave.  
Portland, Oregon 97204

Dear Mayor Wheeler and City Commissioners,

First off, we wish to express our appreciation to the Bureau of Planning & Sustainability staff who kept the Commission informed throughout the process and has captured our many recommendations in the Central City 2035 draft document. We thank them for their interest and responsiveness to our questions and concerns.

The Central City 2035 Plan is an impressive document with aspirational goals, innovative design, and strategic thinking. We look forward to continuing to work with staff and others to adapt and implement all relevant policies that pertain to trees in development situations, parks, plazas and other spaces identified in the Central City Plan, as well as those related to neighborhood Master Plans.

While the Urban Forestry staff and the Commission anticipates the next version of the Urban Forest Management Plan, and as City Council prepares for a work session related to street tree maintenance and flexible design practices, the Central City Plan offers a unique opportunity to create and implement strong policies that favor environmental and human health benefits for all residents.

The Central City Plan conceives of a healthy and resilient city, where all residents and visitors have equitable and have safe accessibility to nature. According to the plan, there will be 30% more people living, working, and recreating on just 3% of the Central City landscape. Two important factors; (1) human well-being and (2) environmental health, will require intentional planning to ensure that new urban development benefits people and nature.

While there may be tension surrounding new development, with respect to tree planting and preservation, the outcome does not need to be one or the other. We encourage intentional and innovative street design to accommodate trees.

Please consider the following comments as you prepare to advance the next version of the Plan. There are eight (8) points to consider:

1. There is considerable attention devoted to urban forestry, development and trees, as well as canopy targets. The Plan notes that there will likely be code revisions, policy changes, and new investments in tree planting, preservation and maintenance that will affect the two different tree target scenarios. We request that the UFC be informed in a timely manner about new targets, implementation practices, and methodology used to track and evaluate progress.
2. A large and growing body of research links the presence and health of trees and tree canopy to human health in urban areas. Given the priority and extent to which the New Comprehensive Plan calls for green infrastructure (in general) and trees (in particular), for human and public health reasons, City Council should act immediately to remove ALL Title 11 exemptions for commercial and industrial lands.

These exemptions to Title 11 were meant to be temporary. Scientific studies have shown consistently the negative impacts of human health and environmental consequences of tree-deficient cities. Continuing to exempt commercial and industrial lands from Title 11's tree planting and tree preservation standards (which are not requirements), will sentence our residents, especially those in marginalize neighborhoods that have a higher proportion of commercial and industrial lands, to increased yet preventable health risks.

The exemptions are particularly harmful given the density of the human population in the Central City. Removing these exemptions is particularly urgent now to ensure trees and other green infrastructure is an integral part of the built landscape.

3. Whether there is a new project to build a road or add retail storefront in commercial areas, trees are often the last element of consideration during the design and development process. The City has an opportunity to change this pattern by ensuring that green infrastructure is brought into the intentional hierarchy process under the "Flexible Street Design" big idea.
4. The goal for requiring adequate sub-surface soil volumes for trees in conjunction with development and infrastructure projects is very important. However, it is not obvious how this requirement will be implemented. The plan offers guidance but the policy needs strengthening along with code provisions to implement it. We recommend:
  - a. Change to "encourage the provision of increased subsurface soil volumes to improve tree health and increase tree canopy coverage and require adequate subsurface soil volumes in conjunction with development and infrastructure improvement project design and construction".
  - b. Direct staff to develop code provisions for Central City that will guarantee adequate subsurface soil volume for trees in conjunction with new development

- and infrastructure development projects. Look to other municipalities such as the Tigard for cost-effective regulatory options.
- c. Direct staff to develop policies that are specific to the location of underground infrastructure (utilities, cables, etc.), so that sufficient space is given to root zone requirements.
  - d. Direct staff to consider such provisions for areas outside of the Central City.
5. We appreciate that the Plan distinguishes between different street character sites and requires landscaping, if building setbacks are selected by applicants. However, building setbacks, while allowed in some instances, appear to be generally discouraged. Setbacks seem to be required only along the Park Blocks. The Plan should strongly encourage and in more instances, require landscaped building setbacks along sections of the Green Loop and flexible streets.
  6. We support the new Central City Master Plan requirements as it will offer good opportunities to enhance canopy and associated livability benefits on larger Central City sites. Pertaining to this section, we recommend the following:
    - a. Adding an approval criterion that focuses on inclusion of open area and incorporation of green infrastructure, specifically trees. This is needed to meet the big goals defined in the Comprehensive Plan and provide a base for the related code requirements on this section.
    - b. Increase the tree density requirements for medium and large trees from 1 tree per 3,000 sq. feet to 1 tree per 2,000 sq. feet. This is more appropriate for the tree size and area ratio, especially given the limited amount of open area required on these sites.
  7. Existing and new parks, plazas and other open spaces present excellent opportunities to plant a diversity of species and grow the next generation of “Heritage Trees”. The City should take full advantage of spaces below and above ground, and implement innovative designs that offer sufficient space for large trees. The same holds true for the “Green Loop”, a multi-modal path that will serve as the green connector. This is the time for planners, design teams and others to intentionally create sufficient spaces for large trees, especially conifers that will provide environmental and social benefits throughout the year.
  8. We strongly support the expansion of the greenway setback on the Willamette River from 25ft to 50ft in the recommended draft Central City Plan (33.440.210.C.2.b.2). This expansion is critical to improving the ecological function of the greenway while working towards multiple tree goals for the City; including increasing overall tree



CITY OF PORTLAND

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canopy, planting more large form native trees, improving air quality and reducing urban heat island effect in the Central City.

This Central City 2035 Plan sets forth a vision that will impact future generations. Trees planted today will take a generation for human health benefits to be realized.

Thank you for this opportunity, your time and considering these comments.

Sincerely,

Mark R. Bello, Ph.D., Chair of the Urban Forestry Commission