



# URBAN FORESTRY COMMISSION

1120 SW FIFTH AVENUE, PORTLAND, OREGON 97204

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AMANDA FRITZ, COMMISSIONER

MIKE ABBATÉ, DIRECTOR

November 8, 2016

Mayor Hales and Members of Portland City Council  
Portland City Hall  
1221 SW 4<sup>th</sup> Ave.  
Portland, OR 97204

Dear Mayor Hales and City Commissioners,

On behalf of the Urban Forestry Commission, please accept the following comments about the Residential Infill Project that expresses our concerns and recommendations.

When staff from the Bureau of Planning and Sustainability briefed the Urban Forestry Commission last summer about this project, we all noted that the schematics failed to reference trees or represent them at all. Given the overarching goals and aspirations contained in the Comprehensive Plan and other future looking documents developed by the City, we view this as another instance where canopy standards are a secondary consideration and, in this case, are omitted entirely. While we recognize that this document is focused on scale and types of housing, we firmly believe that if trees are not represented at the outset, they will continue to be an afterthought. The work of the Commission is to ensure that Portland meets its forestry targets and that large, healthy trees are preserved. We are counting on this Council to confirm that canopy standards are an investment that all bureaus need to take seriously.

We have concerns about the impacts that the RIF project will have on the preservation and growth of large, healthy trees on private residential land. The City needs to move quickly to develop a site review process for these types of trees to ensure the overall purpose of Title 11 to preserve trees when new development is achieved. We understand that such a site review process cannot be implemented as part of the Residential Infill Project. Therefore, we recommend, at the very least, the City incorporate the following into proposed code changes currently being considered:

1. Allow an additional dwelling unit within allowed building footprint or additional square footage within the allowed building footprint in exchange for extra tree preservation.
2. Instead of simply “retaining current side and rear setback minimums,” allow adjustment of setbacks in exchange for the preservation of one or more large, healthy trees (20” or greater including root protection zones required by Title 11) that would otherwise have to be removed.



CITY OF PORTLAND

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3. Instead of simply “retaining current parking requirements for all houses on standard lots,” allow for parking requirements to be waived in exchange for the preservation of one or more large, healthy trees (20’ or greater including root protection zones required by Title 11) that would otherwise have to be removed.

Points #2 and #3 are direct recommendations from the Title 11 Oversight Advisory Committee Report. Additionally, these recommendations note a 20” diameter threshold as a direct reference to the Tree Code’s large tree classification. We are highlighting this threshold for permitting greater flexibility in site planning and development situations than would be the case if this flexibility were granted only for trees above the larger diameter threshold, i.e. 36” dbh.

The Urban Forestry Commission appreciates your attention to and consideration of these recommendations that will provide more flexibility to developers while capitalizing on opportunities to reach Portland’s canopy and livability goals.

Sincerely,

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

Cc. Jenn Cairo, City Forester  
Susan Anderson, Director, BPS