



URBAN FORESTRY COMMISSION

1120 SW FIFTH AVENUE, PORTLAND, OREGON 97204

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AMANDA FRITZ, COMMISSIONER

MIKE ABBATÉ, DIRECTOR

Director Susan Anderson
Bureau of Planning and Sustainability
City of Portland
1900 SW 4th Ave
Portland, Oregon 97201
Re: Portland's Residential Infill Project

July 21, 2016

Dear Ms. Anderson,

Morgan Tracy recently briefed the Urban Forestry Commission on the current status of the Residential Infill Project. We appreciate the opportunity to submit comments to your Bureau that reflect our concerns and recommendations.

Although Mr. Tracy shared with us the focus and intent of this project as well as the short timeline, we were dismayed that the schematics presented in the documents did not depict trees, and failed to reference existing or new trees at all. Given the overarching goals and aspirations contained in the Comprehensive Plan and other future looking documents produced by the City in the last few years, we see this as another instance where canopy standards are a secondary consideration and in this case, omitted entirely. While we recognize that this document is purely about scale and types of houses, we firmly believe that if trees are not represented, they will continue to be an afterthought. The work of the Commission is to ensure that Portland meets its canopy targets, large healthy trees are protected, and that canopy standards are an investment that all bureaus take seriously.

We are therefore very concerned about the impacts of proposed new allowances for residential infill 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 large healthy trees to ensure the overall purpose of Title 11 to preserve trees that can be preserved with 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 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 - preserving one or more large healthy trees (20" or greater including root protection zones required by Title 11).
2. Instead of simply "retaining current side and rear setback minimums," allow adjustment of setbacks in exchange of 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.



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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 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 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 a larger diameter threshold, i.e., 36" DBH.

We are happy to discuss these recommendations with your staff in greater detail. Thank you for your time and attention to this issue.

Sincerely,

Meryl A. Redisch,
Policy Chair, Urban Forestry Commission

Cc. Members of the Planning and Sustainability Commission, Urban Forestry Commission,
and the City Forester