

March 19, 2018

City of Portland Bureau of Planning and Sustainability
Attn: Better Housing by Design Project
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

VIA EMAIL at betterhousing@portlandoregon.gov

Dear Sir/Madam,

On behalf of the City's Urban Forestry Commission, I'd like to offer comments on the Better Housing By Design discussion draft report.

In general, we are excited by the emphasis on creating green space in the higher density areas, and allowing developers flexibility to achieve greenspace goals according to a range of housing design layouts.

We do have a concern in the greenspace implementation as it relates to trees, especially large-form trees. The health and stormwater benefits of *large form* trees vastly outweigh similar benefits of other greenspace BMPs, such as green roofs and shrubs/herb gardens. The heat island benefits of a large form tree are likewise superior to smaller trees and shrubs.

We want to ensure that the BHBD plan does not allow these other forms of landscaping to substitute for large form trees, where such trees may fit available space.

On a related subject, please ensure that pervious buffer strips and the like have a required geometry capable of supporting large form trees.

We also have specific questions about proposed code changes:

p. 43, 33.120.211 Floor Area Bonus Options, Sec 5c2 Covenants.

This reads that trees must be replaced within the 50-year preservation period. Does this mean that if a tree comes down in the first year, that the developer/owner can wait 49 years before replacing a tree? We prefer language that gives a one-year only grace period to replace dead/diseased/dangerous trees. Language elsewhere in this document discusses a ten-year period. We believe this same approach should be used there, as well.

p. 46, 33.120.210.D Tree Preservation, subpar 2e, "Incentives for preserving large trees."

We understand that developers did not avail themselves of previous incentives. Can you tell us why you think these new incentives will be used?

Finally, as a big picture question: what will be the impact to the City's canopy density as a result of BHBD? Will it decrease? We believe this analysis is important to complete before BHBD is finalized, as increasing tree canopy in underserved neighborhoods is an important City goal, and much of BHBD is focused on East Portland neighborhoods, areas of the City of Portland with the highest concentration of people of color and lower income people.

We look forward to commenting further on future drafts of the BHBD plan. Thank you for your good work.

Sincerely,



Daniel Newberry
Policy Committee Chair
Urban Forestry Commission

Cc: Vivek Shandas, Chair, Urban Forestry Commission; Jenn Cairo, City Forester