



Date: April 25, 2019

To: Michelle Marx, Pedestrian Coordinator

From: Jenn Cairo, City Forester

Subject: Urban Forestry Response to PedPDX

Thank you for the opportunity to provide feedback on the PedPDX public draft. This comprehensive plan is a milestone achievement for the City of Portland and we appreciate the notable inclusion of the role of street trees in supporting an enjoyable pedestrian experience.

Mitigating the impacts of climate change by preserving and expanding the city's urban forest is a top priority for Urban Forestry (UF). Trees improve Portland's air quality, reduce the effects of urban heat islands, and promote overall livability. Likewise, increasing the percentage of Portlanders who walk, bike, or take transit instead of driving is an essential strategy in achieving the region's climate goals. As such, the Bureau of Transportation and Portland Parks & Recreation enjoy common cause in ensuring Portland is a safe and enjoyable place to walk for all community members.

Street trees promote walking by providing shade, creating a physical barrier between pedestrians and cars, reducing vehicle speeds, and beautifying the urban environment. Because of these and many other benefits and services that trees provide, the expansion of the street tree canopy is a critical component of any strategy to make walking enjoyable and safe.

To this end, please accept the following comments responding to several of the action items identified in PedPDX. We look forward to working closely with PBOT to implement these actions to create safe and green streets for all Portlanders.

Action 2.5: Update design guidance to prevent trees and vegetation within 25 feet of marked midblock crosswalks and evaluate the need for vegetation removal at existing marked midblock crosswalks.

- Urban Forestry recommends a more contextual approach where tree maintenance needs necessary to promote pedestrian safety are determined based on the location of the tree relative to the crosswalk, the species of the tree, the specific street light fixture, vehicle speeds, and other factors. We are concerned that a blanket policy de-prioritizes tree preservation over other potentially more effective safety measures such as vehicle speed reduction, road design, reduced visibility from parked vehicles, and improved lighting.

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- Application of the proposed 25-foot rule would likely result in a large number of tree removals and the elimination of the benefits and services those trees provide to the community.
- Follow-Up Questions:
 - Can PBOT provide an estimate of how many existing trees and potential tree planting spaces would be impacted by this policy?
 - Would the proposed 25' rule apply to other assets in the right-of-way?
 - Would the proposed 25' rule also apply to T-intersections?

Action 5.6: Improve unimproved rights-of-way for pedestrian travel

- Unimproved rights-of-way contain a notable percentage of Portland's street trees. Urban Forestry will need to be involved in the design and implementation of street improvements.

Action 6.1: Implement new lighting level guidelines in conjunction with capital projects and private development

- Urban Forestry requests involvement in updating these guidelines in order to ensure minimal impacts to current and potential street tree planting locations.

Action 6.2: Strategically improve street lighting conditions to increase visibility of pedestrians on our streets, focusing investment on High Crash Corridors and locations, Pedestrian Priority Streets, and underserved areas.

- In general, the "underserved areas" identified by in this action are also priority tree planting locations identified in Urban Forestry's citywide tree planting strategy. Urban Forestry and PBOT will need to partner on planned improvements to ensure both street lighting and canopy expansion goals can be mutually achieved.

Action 6.3: Address tree-trimming and removal needs where street lighting is blocked by tree canopy

- We ask that "and removal needs" be deleted from the title of this action. Tree removal is typically unnecessary to accommodate clearance around street lights and should be treated as a last resort.
- The first sentence does not accurately describe current street tree stocking levels. While established and typically affluent neighborhoods in Portland enjoy tree-lined streets, most areas of Portland do not. In fact, the canopy coverage east of the Willamette River is just 21%, roughly equivalent to Los Angeles. City-wide, Portland's canopy coverage falls short of established goals.
- We recommend removing the 11.60.060 citation since other aspects of city code contradict this which can lead to confusion for property owners. We prefer to focus on the need for increased communication and enforcement of pruning standards.
- With regard to streamlining response to resident complaints, UF, PBOT Maintenance, and PBOT Traffic Operations have established an SOP for conducting street tree maintenance requested by PBOT. The procedure has been in place for over a year and is working well.

- Additionally, PBOT has programmatic permits from UF which allow properly trained PBOT staff to make minor pruning cuts to mitigate visibility obstructions and safety issues.

Action 8.4: Update coordination practices with Urban Forestry when trees are uplifting sidewalks and develop joint practices for addressing tree/sidewalk conflicts

- Urban Forestry is concerned that the framing of this action item does not capture the range of causes which lead to conflicts between tree roots and sidewalks. While there are undoubtedly situations where a tree species poorly suited to the planting space was planted years ago, often the primary issue is the sidewalk is not built to modern standards and does not provide enough soil volume for trees to grow in a healthy manner.
- Sidewalks and street trees can co-exist. Other municipalities utilize larger planting spaces, suspended sidewalks, structural soil, and alternative sidewalk materials to create greater soil volume for trees and minimize sidewalk damage. Urban Forestry is eager to work with PBOT to develop a toolkit to prevent and address conflicts between trees and sidewalks.

Action 8.6: Update right-of-way design standards to provide sufficient room for trees

- The title of this action is excellent and gets to the core of existing challenges. We are pleased that PBOT staff has been in communication with UF on the Streets 2035 project and look forward to working on the updated standards.

Action 8.9: Locate utility vaults outside of pedestrian clear zones or require vault lids with materials matching the surrounding sidewalk

- Urban Forestry is concerned that moving utility vaults into the furnishing zone on high-demand pedestrian streets could result in less space for street trees precisely where they are needed most. Utility vaults should be located in a way which minimizes street tree impacts in order to improve public health and the pedestrian experience.
- To this end, UF supports the increased use of vault lid materials which match the surround sidewalk.

Strategy 10: Provide opportunities for an interesting and enjoyable pedestrian experience

- As stated previously, street trees are essential to ensuring an enjoyable pedestrian experience and should be included in this section.

Action 11.1: Update the 1998 pedestrian design guidelines to guide future frontage improvements made in conjunction with private development

- The existing 1998 pedestrian design guidelines contains good information and useful standards, many of which unfortunately remain unimplemented or under-utilized.
- Please include UF and the Urban Forestry Commission in this design guideline update process.

Street Trees (page 309)

- We request the following changes to this section to clarify the Urban Forestry role:

- Second paragraph, second sentence: “Without appropriate frontage design, installation, and species selection tree roots can uplift and crack sidewalks...”
- Proposed new language for final paragraph: “Portland Parks & Recreation’s (PPR) Urban Forestry Program manages Portland’s urban forest infrastructure, including 220,000 street trees. Urban Forestry staff issue permits for planting, pruning, and removal of all trees within the right-of-way, and are on call 24/7 to respond to tree emergencies. It is the responsibility of the adjacent property owner to maintain trees in the public right-of-way.”