



June 4, 2019

Ms. Kathryn Hartinger, DOZA Coordinator
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
Portland, OR 97201

Dear Ms. Hartinger,

My colleagues on the Urban Forestry Commission have authorized me to send you these comments relating to Design Overlay Zoning Amendments (DOZA) as we perceive they relate to Portland's urban forest canopy. Please pardon our timing on sending you this letter, as we only heard about the comment period about the time the deadline passed.

Thank you for agreeing to Portland Parks & Recreation / Urban Forestry's request to brief our commission on DOZA at our July 2019 meeting.

In general, we commend BPS for including consideration of green infrastructure into this DOZA draft. Green infrastructure, and trees in particular, have many health benefits in addition to the reduction in the heat island impacts and livability issues. Along these lines, we encourage BPS to include more consideration of trees in the green infrastructure parts of the document, as the health benefits of trees go far beyond those offered by green roofs, stormwater planters, and other green infrastructure that includes vegetation limited primarily to the shrub and herb layers. We urge you to balance the architectural/structural focus of DOZA with more consideration tree planting and large tree preservation.

Many of the City's commercial districts lack sufficient space in the right-of-way for trees. Because commercial and industrial zones as well as City bureaus are exempt from the Title 11 Tree Code, we currently lack tools to re-green our commercial centers and corridors. The DOZA update could elevate tree preservation and planting as a design tool to remedy this situation. Much of this information is available from reports of the City's Urban Forestry Program (<https://www.portlandoregon.gov/parks/60390>), and we strongly recommend that BPS consider and integrate it with the DOZA analysis and code development effort.

DOZA makes a clear distinction between guidelines and standards. We encourage BPS to ensure that the green infrastructure parts of DOZA are presented in terms of standards rather than guidelines. This is especially true for trees, as tree preservation in Title 11 is at a deficit because of exemptions for commercial and industrial-zoned tax lots.

Many low-income neighborhoods in the east side of the city have tree-deficient canopies compared to the City's higher income neighborhoods. Many of these neighborhoods have commercial corridors that will be impacted by DOZA. We urge you to consider the City's many equity policies, then, in writing the policies and resulting code for DOZA to ensure that equity is a top priority.

Urban Forestry Commission

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We would like to offer comments on the following specific design standards:

- SP11 that deals with Larger Common Outdoor Areas should address trees.
- SP 15 on Tree Preservation should be commended for giving points for preserving up to 4 trees 20" or larger in DBH. Please define "preserving" to avoid ambiguity. Tree survival depends, in part, on an adequate soil volume and quality. Please address this here. Please require adequate tree protection during construction. Required plantings often fail in a few years due to inadequate attention. Please include penalties if a tree planting fails within five years (e.g. required to continue replanting until it survives). Additionally, since other trees will likely be coming down as part of the development, that would likely mean a net loss of canopy in an already low-canopy neighborhood. Please include guidelines that stipulate no net loss of canopy. Or better yet, increase the canopy with the new commercial development.
- SP 16 award points for native landscaping. Although that is important, it is more important that the tree is appropriate for the site (i.e. a mesic tree will probably fail in a xeric site).
- SP 17 Native Trees - To echo the comments from SP15 & SP16, adequate soil volume and quality, as well as planting appropriate species matched to the site, needs to be stated here.
- SP 18 Groups of Trees - Same issues relating to soil volume/quality and to insuring the long term survival of plantings.

Thank you for considering our comments. We look forward to working with you and BPS on this important project.

Sincerely,

Dr. Vivek Shandas, Chair
Urban Forestry Commission

Cc: Kathryn Schultz, Chair, Planning & Sustainability Commission
Jenn Cairo, Portland Parks & Recreation, Urban Forestry