

Monday, June 25, 2018

Catherine Schultz, Chair
Portland Planning & Sustainability Commission
VIA EMAIL at psc@portlandoregon.gov

Dear Commissioner Schultz and the Planning & Sustainability Commission,

On behalf of Portland's Urban Forestry Commission, please accept this letter as public comment on the Better Housing By Design discussion draft. I am authorized by the UFC to submit this letter.

First, we are grateful to Bill Cunningham, Bureau of Planning and Sustainability (BPS) planner, for presenting the changes since the last draft and for answering our many questions, at our monthly meeting last Thursday, June 21, 2018.

We support and recognize the careful work of BPS in adding features to BHBD to preserve greenspace in proposed multifamily housing developments. As affordable housing is a major goal of this plan, it is important that low income residents enjoy the health and heat island reduction benefits trees provide at their place of residence, as do the Portland's wealthier residents, many of whom live in tree-rich neighborhoods. . . Please do not approve additional exemptions from tree planting and preservation requirements for affordable housing, and consider addressing current exemptions in Title 11, Trees. Title 11 exempts affordable housing projects from the tree preservation and planting standards that most other development projects must meet. These exemptions further exacerbate the inequities associated with tree deficient neighborhoods. The more that the City of Portland can do to promote economic and racial equity in this context, the better.

We strongly support the proposed maximum of 30% of the site for parking, and no more than 15% of the site area in asphalt. Any incentive for developers to use materials for paving with a higher reflectivity than asphalt would be desirable, as that will likely reduce the heat island effect.

Limiting impervious area in development situations is important for preserving future space for large form trees and for protecting existing trees. The UFC submitted comments to this effect in the recent Residential Infill Project draft. This concept is just as important for BHBD as for RIP. We urge you to consider further limits on impervious areas beyond those numbers referenced in the previous paragraph, and to urge the City Council to enact impervious surface limitations that would apply to future development in all zones.

Once a space is paved, it is unlikely to be de-paved, so that area is lost to the urban canopy. With the largest buildings—RM4—allowing 85% building coverage, street and street-facing trees become even more critical for our urban canopy. Please consider allowing setback flexibility so that if a developer agrees to an additional front setback, then the rear setback may be reduced by a corresponding width. This will potentially allow either room for new trees on the private land in front of the building or for more space for the canopy of a tree in the street right-of-way.

We are somewhat concerned about the proposed flexible landscaping provisions, with the requirement that at least 50 percent of the landscaping be "in ground". We fear that these provisions will further encourage the payment of fees in lieu of tree preservation and planting, as allowed by Title 11. However, we could support this proposal with an additional requirement that Title 11 Tree Density

Standards are met by planting trees rather than fee in lieu of tree planting. Please elaborate how flexible landscaping will help maintain the urban forest canopy. Please request that BPS staff work with Portland Bureau of Transportation to ensure wider planting strips in the street right-of-way. We understand that separate policies govern PBOT and BPS concerning the ROW, but we ask that wider ROW planting strips need to be a requirement for development, particularly in higher density areas.

We also support the efforts to promote undulating façade design—such as a 100 foot maximum of unbroken building façade—to support space for large street-facing form trees. Please recommend that sidewalk design can also be undulating: periodic narrowing of the sidewalk to allow space for large form trees. Please recommend that PBOT update their procedures to ensure that street trees and innovative sidewalk design are considered early in in ROW design and utility planning in these new developments.

Parking requirements—in addition to planting strip width—determine how much space is available for large form street trees. We support the reduction of parking requirements and urge careful limitations on street cuts in RM1 & RM2 situations for off-street garages, as these also limit space for street trees.

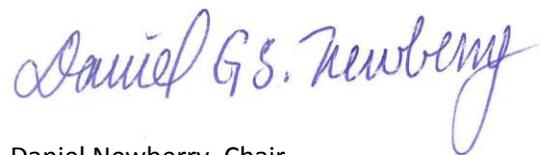
We appreciate that that part of the intent to set aside interior courtyard greenspace is to preserve small groves of large conifers in East Portland. Because Title 11 allows developers to pay fees in lieu of tree preservation, we do not believe that the current BHBD draft can do much to save these conifers. We recognize that saving these trees will be difficult. We believe that using SDCs for City purchase of small groves as “pocket parks” in areas affected by BHBD (or purchase no-cut easements as an alternative to outright land purchase) may be an instrument to protect these groves. We ask your support in helping us advocate with the City Council to develop this idea.

We support the proposal to allow Transfers of Development Rights to protect trees. However, in the past, “Transfer of Development Rights” (TDR) has been underutilized by developers. We understand that a change to allow developers to transfer these rights anywhere in the city (getting rid of the distance limit) is an attempt to make TDRs more attractive. We still have questions about whether or not this will increase the use of TDRs. This mechanism has the potential to save existing large trees, so the UFC supports TDRs as long as they do not otherwise limit space for large form trees.

We understand that tracking these TDRs and a variety of protective covenants (such as heritage trees) is difficult with the City’s current mapping system. We support the creation of a new map layer that would identify public and private trees, groves, and Heritage Trees, so that it may be easily used along with other relevant map layers during the development review and permitting process.

Thank you for this opportunity to comment on BHBD and for adding elements to the plan to promote greenspace in the most urban of our planned housing.

Sincerely,



Daniel Newberry, Chair
Policy Committee of the Urban Forestry Commission
For the Urban Forestry Commission