

**From:** Ted Labbe <ted.labbe@gmail.com>

**Sent:** Tuesday, September 24, 2019 4:27 PM

**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>

**Subject:** Please extend the Title 11 'large tree amendment' and implement additional reforms

Dear PSC:

On behalf of the Urban Greenspaces Institute, I urge you to extend the Title 11 large tree amendment to protect trees from development in Portland over 36 inches in diameter.

This needed extension is a must do for the City of Portland to safeguard large trees, which are under continued threat within the City. In addition, we need more far-reaching reforms to Title 11 to:

1. Lower the residential development exemption on small sites from 5,000 sf to 3,000 or 3,500 sf.
2. Eliminate the current outright exemption from the Title 11 tree code requirements for commercial and industrial sites, as well as for City bureaus.
3. Implement more stringent inch by inch 'fee in lieu of preservation' requirements to protect and mitigate for loss of smaller trees under the code by lowering the size threshold from 36" to 24" or 30".
4. Apply the 'fee in lieu of preservation' to two thirds of trees at a site, instead of the one-third of trees currently required.
5. Drop on-site parking requirements and/or implement more flexible design and setback standards to allow that more trees can be protected during development situations.

Beyond these Title 11 tree reforms, we need to consider how we can align and consolidate the City's urban forestry programs, which are currently split between three bureaus (BDS, Parks, and BES). We need to begin thinking of trees as an essential public health utility, that all Portlanders need and benefit from. Currently we seem to be stuck operating under the notion that trees are an optional amenity, and only protected when it is convenient for developers.

Please act now to renew this Title 11 'large tree amendment'.

Thank you.

Sincerely,

Ted Labbe, Executive Director  
Urban Greenspaces Institute

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