The City of Portland's Changing Urban Forest

Ted Labbe, Kingfisher Ecological Services <u>ted.labbe@gmail.com</u> David Hedburg, Portland State University History Department <u>david.b.hedberg@gmail.com</u> Angie DiSalvo and Jim Gersbach, Urban Forestry, Portland Parks and Recreation

ABSTRACT – City of Portland street tree inventories from 1938, 1976, and 2010-16 reveal shifts in the composition, size structure, and stocking levels of the urban forest over time. In 1938, street trees included 37 families and 71 genera, with maple, walnut, rose, elm, and birch families dominating. In 2016, street trees included 51 families (+38%) and 146 genera (+105%), with maple, rose, and birch families dominating. An incomplete 1976 inventory counted 37 families and 75 genera, indicating that most of the expansion in tree diversity has occurred since 1976. Over the period 1938-present, large-form trees showed marked declines from 52% of street trees in 1938 to 19% in 2016. Average street tree stocking levels increased from 35.7% (range 11.5-71.8%) in 1976 to 66.2% in 2016 (range 48-90%). Comparisons among inventories show changes over the last eighty years, with a greater diversity of tree families and genera at present, and higher stocking levels, but relatively fewer large-form trees as compared to past periods.



Genera with	the greatest	% change, 19	38-present
Juglans	-16.6%	Quercus	+2.7%
Ulmus	-6.8%	Cornus	+3.2%
Aesculus	-5.5%	Acer	+3.3%
Crataegus	-5.5%	Fraxinus	+3.7%
Betula	-4.0%	Malus	+3.9%
Sorbus	-3.8%	Pyrus	+5.0%
Styrax	+2.1%	Prunus	+8.7%

Families with the greatest % change, 1938-present	
Juglandaceae	-16.6%
Ulmaceae	-6.0%
Betulaceae	-2.3%
Styracaceae	+2.1%
Fagaceae	+2.1%
Cornaceae	+4.0%
Oleaceae	+4.4%
Rosaceae	+8.8%

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PORTLAND TREE HISTORY TIMELINE

- 1855 City adopts its first ordinance to regulate and promote the planting of trees.
- 1869 SW Park blocks established with donations dating from 1852-1869.
- 1870 Henry Miller establishes a nursery in Goose Hollow, importing and selling exotic trees that are planted all across Portland.
- 1871 Forty acres of Washington Park acquired, and the Park blocks acquired by City and planted with elms. The planting of street trees begins downtown and gradually expands.
- 1880 City Council amends the tree ordinance to make it illegal to "destroy or injure any growing or living shade or ornamental tree."
- 1897 Washington Park expanded to 145 acres with a land donation by Donald Macleay.
- 1899 Parks Board established and granted authority to manage parks and levy taxes to acquire new parks. Portland has less than 200 acres of parks, concentrated on the westside.
- 1904 The Olmstead Report is published, presenting a conceptual plan for a comprehensive park system in Portland, including potential park sites and connecting tree-lined boulevards or "parkways."
- 1907 The City's first bond measure to acquire and develop parks passes, with vision and inspiration fueled by the Olmstead Report.
- 1910 Portland has 567 acres of parkland, including the newly acquired Sellwood, Peninsula, Laurelhurst, and Mt Tabor parks.
- 1913-4 Three miles of street trees planted in the Peninsula neighborhood. Parks Superintendent Mische presents a plan to plant northeast Portland with North American trees, southeast Portland with trees from Europe, and the westside with Asian trees.
- 1924 Portland Garden Club founded and begins contributing to the conservation of the City's greenspaces, lobbying for the donation of park lands and leading public tree plantings.
- Hoyt Arboretum is established and Macleay Park is expanded. Parks Superintendent Keyser envisions a future Forest
 Park.
- 1929 Portland Garden Club proposes a bill to give the Parks Bureau authority over the planting, trimming, and removal of street trees, which fails to pass City Council.
- 1935 The Planning Commission produces an action report on open spaces, noting 10,000 parcels of vacant, mostly Cityowned property, and recommending that every neighborhood have a 40-acre park within walking distance of all residents. They recommend street trees and parking strips be put under municipal control.
- 1938 Portland approves a parks expansion levy, and by 1939 has 1,804 acres of parks. WPA completes the first-ever street tree inventory and is active across the City planting (and removing) trees.
- 1943 Development of Hoyt Arboretum continues, consisting of 4,301 trees by this time.
- 1946-8 A group of citizens, the Committee of Fifty, convene to plan the acquisition and development of Forest Park. The City Council later unanimously approves a plan for Forest Park, dedicating 4,200 acres of City and transferred Multnomah County lands, and approving the acquisition of up to 6,000 additional acres.
- 1951 A wildfire burns 600 acres of Forest Park, and 600 acres of adjoining private forestland within the proposed park boundary. Volunteers replant burned areas with 30,000 trees during subsequent years.
- 1957 The City completes a land swap with PGE to establish Oaks Bottom.
- 1960 Portland park system consists of over 6,000 acres.
- 1962 Columbus Day Storm devastates Portland's urban forest. The storm fells 75% of trees in Upper Macleay Park and leaves 2 million board feet of fallen timber, blocking roads and trails. In Hoyt Arboretum 53 specimen trees are destroyed and 400,000 board feet fall.
- 1963-6 Renewed community-driven street tree planting efforts by Albina Neighborhood Improvement Project, Campfire Girls and others.
- 1975 Historical Landmarks Commission approves the Burrell Elm (at SW 10th Ave near Main St.) as first historic landmark
- 1974-6 PPR initiates the Park and Street Tree Division, plants 20,000 new street trees and completes a partial inventory.
- 1979 10,000 trees of 77 different varieties are planted across the City by Parks Bureau staff.
- 1980s Budget cuts undermine the Parks Bureau, limiting its tree planting and care activities.
- 1989 Friends of Trees founded, and goes onto to plant 600,000+ trees and native plants across 120+ neighborhoods, in six counties and two states.
- 1993 City Council passes the Heritage Trees code.
- 1997 The Urban Forestry Division plants nearly 2,000 trees in parks and on residential streets, begins efforts to protect trees on undeveloped properties, and initiates the Tree Liaison program that trains community members to care for trees in their neighborhood.
- 2010-6 Parks Bureau staff lead the nation's largest-ever volunteer-powered street tree inventory, identifying, measuring, and mapping over 218,000 trees.

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PICC Portland Youth Climate Council Portland Tree Code Resolution : comments and suggestions Jan 8th 2020. pdx.climate.council@gmail.com

My name is Kaya Grumbles. My name is Tessa Norris. We wrote this with fellow member Tyler Yancey. We are here on behalf of Portland Youth Climate Council, otherwise known as PYCC.

We would like to begin with a quote from one of our colleagues. Lilah MacLowry, a member of PYCC said the following at our last meeting regarding decision-making during this climate crisis:

Quote: "In a climate emergency, the environment must be valued over the economy. We have to act now to slow the earth's climate crisis. That might mean that the economy suffers. But we have no other choice. If the economy has to suffer to save the entire planet then we have to deal with that." End quote.

This is one of the many reasons that PYCC supports removing the exemption status for industrial and commercial land developers in the Portland Tree Code. We have to put the climate crisis first.

We would like to thank you for giving us the opportunity to make comments on the Portland Tree Code's draft resolution. We truly appreciate the changes that have already been made to the resolution and would like to follow up with some additional recommendations. Our recommendations are as follows:

- 1. PYCC would like to address the timeline that city council has given for Tree Code. The city has set March 31st, 2020 to begin looking at removing industrial and commercial exemption from the Portland Tree Code. We will reluctantly accept this date, however it is crucial that a vote on removing the exemption for industrial and commercial land developers should take place no later than June 8th, 2020.
- 2. We also urge the city to provide more outreach to stakeholders directly impacted by the Tree Code. This is directed to the stakeholders whose health and wellbeing is most impacted by the lack of trees in their lives. In the current resolution, it is stated that "The urban tree canopy requires protection and management for the health and safety of all people living in or visiting Portland." We want the city to provide a healthy atmosphere for all the residents, and equal access to tree coverage is a crucial element that is needed in order to reduce heat islands and give equal access to a healthy and comfortable environment.

Thank you

Please see other side for other comments

My name is Teja Graf. My name is Florence Oakley and we are also here on behalf of Portland Youth Climate Council, or PYCC.

We have 3 more recommendations for the draft of the Portland Tree Code resolution to add to our list. They are as follows:

- First, PYCC would like the council to vote on reducing critical tree size to 20" in diameter by September 1st, 2020. We believe this to be crucial. Waiting an entire year to address this is not acceptable or wise. (The city's revised resolution dates for this are January and July of 2021.) Although we don't want these trees cut at all, the higher mitigation fees would help pay for new trees which sequester carbon,-increase cooling effects and help reduce the number of heat islands in the city of Portland.
- For our next recommendation we would like to revisit an issue PYCC brought up before. Until the industrial and commercial exemptions are voted on, PYCC would like a moratorium to ban industrial and commercial developers on cutting down more trees. This is especially relevant considering we are now acting during a climate emergency.

Finally, we felt the need to add another whereas clause into the resolution to highlight the inequity of the Portland tree canopy. It goes as follows:

- Whereas all people living in or visiting Portland do not have equal access to the protection and benefits of the urban tree canopy, which impacts their ability to breathe healthy air, exercise, stay cool, and pursue happiness. These people include children, houseless, elderly, and those living in low income areas.
 - Be it further resolved that the city takes specific steps to meet with the most impacted communities in decisions made regarding tree preservation.

We again would like to thank you for your time and this opportunity.



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Direct BDS, in coordination with PP&R and BPS, to address recommendations made by the PSC and Urban Forestry Commission for Trees in Development Situations

If you wish to speak to Council, please print your name, address and email

	Name (PRINT)	Address and Zip Code (Optional)	Email (Optional)
1	Charles BridgeerAne JOHNE	FON	3:45 p@maxbe?
 ✓ 2 	Edith Gillis		
· 3	Bruce NELSON		
4	Bob Bernstein		
5	Deanna Mueller-Crispin	1221 SWION Are Portland	
6		63195E 34 m	cmushel & comcast.
7	Kaya Grumbles		
V 8	Tessa Norris		
9	Florence Oakley		
10	Tein Graf		

AGENDA ITEMS 23

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Direct BDS, in coordination with PP&R and BPS, to address recommendations made by the PSC and Urban Forestry Commission for Trees in Development Situations

If you wish to speak to Council, please print your name, address and email

	Name (PRINT)	Address and Zip Code (Optional)	Email (Optional)
11	Jan Zuckpunnun	2914 NE 18th DTTd, OR 47212	
12	Riestansper	\sim	
13	BOARTERN	State Bal.	
14	Albert Kantmu	2250 SEYYTH Ave.	
15	BOGSGILARE	AUNON	
16	BOGSGIMAGE DAWN SMALLMAN	1148 SE SOTA DDY 97215	
1 7	Ted Labbe	3011 NE Haytsk PDX	
18			
19			
20			

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Date 1-8-2020

From:

Sent:

To:

3747

Lynn Herring <lynnhe@outlook.com> Wednesday, January 8, 2020 10:50 AM Council Clerk – Testimony City of Portland Tree Code Resolution Subject:

Dear Mayor Wheeler and Commissioners Fritz, Hardesty and Eudaly,

With regard to today's hearing on the Tree Code Resolution, I am writing first to thank you for the big tree protections in residential development situations being extended for another five years and next to ask that you remedy deficiencies in the Tree Code as follows:

- The full process to remove existing exemptions for tree protection and planting on industrial • and commercial lands should not extend beyond March 2020.
- The full process to address the issue of applying inch-for-inch mitigation to trees 20 inches and • larger should not extend beyond July 2020.
- The full process to conduct a comprehensive review of the tree code should be completed by December 2021.
- Address interim measures to prevent preemptive tree cutting on commercial and industrial • lands while the permanent code is being developed.

In support of your stewardship role to protect Portland's trees,

Sincerely,

Lynn Herring lynnhe@outlook.com From: Sent: To: Subject: gwendy reyes-illg <myschen@hotmail.com> Wednesday, January 8, 2020 5:47 AM Carrillo, Yesenia; Crail, Tim; Council Clerk – Testimony Fw: Tree Code Resolution 374731 23

From: gwendy reyes-illg
Sent: Wednesday, January 8, 2020 8:43 AM
To: Amanda@portlandoregon.gov <Amanda@portlandoregon.gov>; joann@portlandoregon.gov <joann@portlandoregon.gov>; MayorWheeler@portlandoregon.gov>; Chloe@portlandoregon.gov>
Subject: Tree Code Resolution

Dear Mayor Wheeler and Commissioners,

I work in Portland and live in Milwaukie, and am very concerned about the trees. They are important for so many reasons, including for wildlife habitat, to mitigate climate change, for human psychological well-being, and in their own right.

I stand with Portland Audobon in bringing the following issues to your attention:

- The process to remove existing exemptions for tree protection and planting on industrial and commercial lands is far too long.
- The process to address the issue of applying inch-for-inch mitigation to trees 20 inches and larger is far too long.
- The process to conduct a comprehensive review of the tree code is far too long, to the point of absurdity.
- The resolution fails to address interim measures to prevent preemptive tree cutting on commercial and industrial lands while the permanent code is being developed.

Please do the right thing and make Portland stand out as a leader in environmental protection!

Sincerely, Dr. Gwendy Reyes-Illg

From:	Christine Colasurdo <c.colasurdo@yahoo.com></c.colasurdo@yahoo.com>
Sent:	Tuesday, January 7, 2020 10:35 PM
То:	Council Clerk – Testimony
Subject:	Fw: Portland's Tree Code

From: Christine Colasurdo <c.colasurdo@yahoo.com> To: "mayorwheeler@portlandoregon.gov" <mayorwheeler@portlandoregon.gov>; "amanda@portlandoregon.gov" <amanda@portlandoregon.gov>; "joann@portlandoregon.gov" <joann@portlandoregon.gov>; "chloe@portlandoregon.gov" <chloe@portlandoregon.gov> Sent: Tuesday, January 7, 2020, 10:33:35 PM PST Subject: Portland's Tree Code

374731

Dear Mayor Ted Wheeler, Commissioner Amanda Fritz, Commissioner Jo Ann Hardesty and Commissioner Chloe Eudaly:

I am unable to attend tomorrow's hearing regarding Portland's Tree Code and am therefore writing my comments to you with the hope that you will consider them.

1) First, I'd like you to open your eyes, ears and heart to the fact that more species besides Homo sapiens live in Portland and need trees for their survival. The tree code does not acknowledge this basic scientific fact. Do you want Portland to be a gray, dull city with no birdsong, no squirrels, no butterflies? Having a tree code that does not recognize the obvious, crucial fact that other species need trees is not just tragically anthropocentric, it's not consistent with Portland's desire to be a green city.

Please amend the language to acknowledge the other residents of Portland besides human beings. Suggested revision for the last sentence:

WHEREAS, Portland's urban forest is a unique community asset and critical infrastructure, providing a broad array of valuable ecological, social, and economic benefits, including cleaner and cooler air and water, reduced urban heat island impacts, reduced stormwater runoff, reduced landslide and flood impacts, carbon sequestration, neighborhood beauty and walkable streets, public health benefits, wildlife habitat, and enhanced property values. The urban tree canopy requires protection and management for the health and safety of all [replace people with] SPECIES living in or visiting Portland.

2) Second, I am concerned and saddened by the fact that in this time of climate crisis, the Portland City Council cannot move faster to protect the city's trees. There are obvious bureaucratic delays in the proposed timeline (January 2021?!). Trees are absolutely critical to the health and wellbeing of ALL of the species in Portland and are significant cooling agents/carbon sequesters to combat global warming. Why is the Council delaying action? What is to be gained by delaying decisions? We are in an emergency situation . . . as Greta Thunberg has said, our house is on fire. We have no time to lose!

Please amend the language to earlier timelines (not 2021 but 2020!)

3) Third, in 2018, Portland suffered its hottest, driest summer on record. As a sad and tragic consequence, we lost a lot of trees. There is nothing in the proposed language that mentions this stark reality. We have lost some of our urban canopy at a time in our city's history when we need it the most. We need to add more trees back into our cityscape.

Please amend the language to acknowledge that Portland's urban canopy has already been damaged and decreased by climate change and that the city needs to supply resources and rules to make up for the losses that have already occurred.

As a native Portlander, I have watched my city change drastically in the last ten years. I have watched many big trees get cut down. I have watched bird populations decline. I have watched civic leaders lose ecological awareness. I have heard each and every one of you—Mayor Wheeler and Commissioners Fritz, Hardesty and Eudaly—speak as though Portland were a city of just one species, Homo sapiens. As though the birds, mammals, amphibians and insects were not a critical, necessary part of the lively community we call home.

Do we really want a city of only one species? That is where we are headed, and it is not ecologically sustainable. That is what I would call a dead city. As the writer Janine Benyus has said, "You can't eat a computer."

We live in a time when nothing can be taken for granted. Please fast-track protections for trees. They are the foundation for life. The native peoples of the Pacific Northwest call the Western Red Cedar the Tree of Life—and this species has been dying due to climate change. We need to act with courage—and speed. What you do now will be your legacy. Inaction is a form of action. Acting too slowly can have tragic consequences.

When you walk outside City Hall, breathe deeply. Then thank a tree, and act on your conscience.

Thank you, Christine Colasurdo

From: Sent: To: Subject: Emily Polanshek <EmilyPolanshek@msn.com> Tuesday, January 7, 2020 10:32 PM Council Clerk – Testimony Title 11

I am a retired teacher, grandmother, and volunteer climate activist.

I write tonight out of concern for the tree code, Title 11. We need to immediately start acting as if our lives depend on taking bold action to bring down carbon emissions of all types, and we need trees to accomplish this.

It does not make sense to me for industrial and commercial lands to ever have been exempt from tree protections or replanting, so why wait another six months to hold hearings on removing them? Please schedule action on this aspect of the tree code as soon as possible.

I also urge you to move up hearings on protecting trees 20-36" in diameter to mid-2020 instead of mid-2021.

Please advocate vigorously for tree protections. As the climate emergency grows, our lives - including the lives of industrial and commercial developers and their families - do indeed depend on bold local action all over the planet.

Sincerely, Emily Polanshek 3841 SW Canby St., Portland 97219 37473j²³

From: Sent: To: Subject: Alan Winter <alanyehudah@gmail.com> Tuesday, January 7, 2020 8:38 PM Council Clerk – Testimony Tree resolution

1

I support the changes requested by Audubon.

Yehudah 503-287-8737 Www.yourpersonalceremony.com

You can "like" Compassionate Listening Oregon on: <u>https://www.facebook.com/compassionatelisteningpdx?ref=aymt_homepage_panel</u>

From:	Greg Snider <gregwsnider@gmail.com></gregwsnider@gmail.com>
Sent:	Tuesday, January 7, 2020 3:32 PM
То:	Council Clerk – Testimony
Subject:	Comments on revised draft resolution 1.7.19

Dear Mayor and Commissioners,

I'm writing to submit official comment about the revised draft resolution tree code that will be heard by Council tomorrow. And I urge you to allow public testimony at the council hearing, since no public testimony has been allowed since the draft resolution has been revised.

1. Addressing the absence of science and equity in the current resolution draft: I'd like to urge you to add language to all aspects of the resolution requiring code reviews and revisions to be based on the best available climate and air pollution science - and to mandate that any/all stakeholder involvement includes representatives of communities on the frontline of climate change and living in areas most affected by air pollution.

2. The revised resolution's plan and timeline for comprehensive review and revision of Title 11 Tree Code is inadequate. Please revise the resolution to require ALL stages - the scoping, budgeting and completion of Title 11 tree code revisions - to be completed no later than April 1, 2021.

3. Council should hold hearings and vote on lifting current exemptions that exist in tree code for commercial and industrial lands (preservation and density standards) no later than March 1, 2020. Very little work needs to be done to move forward to this hearing and vote. In order to protect vulnerable trees on these properties from preemptive cutting before the hearing and vote date, I'm requesting that you also temporarily lift the currently existing exemptions until the vote and add language to the resolution that places a moratorium on cutting trees on commercial and industrial-zoned properties until the revised codes are in place.

4. City Bureaus and the Urban Forestry Commission should complete all internal analysis, stakeholder and public processes concerning the reduction of the inch-for-inch tree mitigation threshold from 36 inches diameter to 20 inches diameter no later than May 1, 2020. And Council should hold a hearing and vote on this issue no later than June 1, 2020.

5. I urge you to consider moving the management of our urban tree canopy from the hands from the Bureau of Development and from Parks and Recreation - into the portfolio of the Bureau of Environmental Services. Trees accomplish the exact mission of BES, so there is no conflict using BES' funding for this purpose. BES currently funds programs (for example: street bioswales) that include funding for tree purchases and management. Let's move the management of our tree canopy out of the hands of BDS (whose work, education and focus primarily serves housing developers) and into the hands of BES - people with environmental educations and scientific understandings of the connectivity between trees, river and water quality, wildlife populations and community health. Our Urban Forester and Urban Forestry Commission should primarily operate from within the Bureau of Environmental Services and advise both Parks and the BDS on tree codes and management issues.

Mature urban canopy is our best, greenest and lowest-cost defense against climate change. We must immediately begin treating it as such. Entire continents roughly the size of the US are literally on fire right now from the drought and temperature increase caused by climate change. There is no time to waste - please move quickly.

Thank you, Greg Snider 1148 SE 50th Ave. Portland, OR 97215 (503) 853-6957

374731 23

McClymont, Keelan

From:	Dawn Smallman <dawnsmallman@gmail.com></dawnsmallman@gmail.com>
Sent:	Tuesday, January 7, 2020 3:12 PM
То:	Wheeler, Mayor; Commissioner Fritz; Commissioner Hardesty; Commissioner Eudaly
Cc:	Council Clerk – Testimony
Subject:	comment on revised draft resolution of tree code before Wed. hearing/vote

Dear Mayor and Commissioners,

I'm writing to submit official comment about the revised draft resolution tree code that will be heard by Council tomorrow. And I urge you to allow public testimony at the council hearing, since no public testimony has been allowed since the draft resolution has been revised.

1. Addressing the absence of science and equity in the current resolution draft: I'd like to urge you to add language to all aspects of the resolution requiring code reviews and revisions to be based on the best available climate and air pollution science - and to mandate that any/all stakeholder involvement includes representatives of communities on the frontline of climate change and living in areas most affected by air pollution.

2. The revised resolution's plan and timeline for comprehensive review and revision of Title 11 Tree Code is inadequate. Please revise the resolution to require ALL stages - the scoping, budgeting and completion of Title 11 tree code revisions - to be completed no later than April 1, 2021.

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Thank you, Dawn Smallman 1148 SE 50th Ave. Portland, OR 97215 From: Sent: To: Subject: 23

374731

Request for City Council to Reduce Title 11 Revision Timelines—written version of oral testimony for 3:30 p.m. 8 January 2020

7 January 2020

Dear Mayor and City Commissioners:

First, please allow us to take a moment to acknowledge our gratitude to Commissioner Fish for his service. We are here at this difficult moment for the city and for you because the city urgently needs your leadership to defend the urban forest.

With political parties at an impasse and the earth rapidly calling in its debts, we are here to ask you as <u>city</u> leaders to revise your draft timeline for addressing revisions to Title 11. We are asking you to follow the lead of the PCEF organizers and see the city itself as the political unit that must address funding and act for the common good in the face of federal inaction and obfuscation. We need you to act now because for so very many people there will be no other, better, greener or cleaner space in which to make a life than the city itself.

We are asking that you shorten your draft timeline in four ways: first, commit to overhauling the tree code by 2021; then, before the end of April 2020, vote on three discrete code changes: vote on reducing inch-for-inch in lieu of fees from 36 inches to 20 inch trees; and vote on rescinding the exemption for mitigation fees and tree density standards in commercial and industrial zones.

We know the federal government is still supporting capital improvements for transportation infrastructure that is somewhat comparable to our central city transit mall with its tree-lined streets. But we are also aware that fostering everyone's health and well-being by growing and maintaining green infrastructure, the urban forest...block-by-block and lot by lot...is up to us—is up

to you as our city leaders. Please make trees central to your decisions going forward. Please Jevise your timelines for addressing Title 11 with the sense of urgency that everyone in the city deserves.

Sincerely,

Catherine Mushel/ 6319 SE 34th Avenue/ Portland, OR 97202

on behalf of Trees for Life Oregon, helping Portland's trees to live up to their full potential

From: Sent: To: Subject: Anthony Antoville and Anne Conrad-Antoville <a2antoville@gmail.com> Tuesday, January 7, 2020 2:30 PM Council Clerk – Testimony Portland Tree Code Resolution 1-8-2020

374731 23

Dear Maoy Wheeler, Commissioner Amanda Fritz, Commissioner Jo Ann Hardesty, Commissioner Chloe Eudaly

The timelines are too long for the tree code resolution.

- The process to remove existing exemptions for tree protection and planting on industrial and commercial lands is far too long. The resolution delays a hearings on removing exemptions for tree protection and planting on industrial and commercial lands for another seven months, until July 7, 2020. The City has been aware of this deficiency for nearly a decade and both the PSC and UFC have recommended its removal. We believe that three months (by March 31, 2020) should be more than sufficient to remedy any process deficiencies that may have occurred at the PSC and UFC and to return the issue to Council.
- 2. The process to address the issue of applying inch-for-inch mitigation to trees 20 inches and larger is far too long. The resolution delays a hearings on addressing deficiencies in mitigation for smaller trees (between 20 and 36 inches in diameter) in residential zones for a full year and a half, until July 30, 2021. We believe it is reasonable to conduct the process on this narrow issue, including internal analysis (much of which is already complete), public outreach, and PSC and UFC hearings and return to Council by July 31, 2020.
- 3. The process to conduct a comprehensive review of the tree code is far too long, to the point of absurdity. The resolution basically delays a comprehensive review of the tree code indefinitely. As proposed the bureaus have a full two years, until January 21, 2022, just to develop a scope of work for the issues they want to consider. That means substantive consideration of these issues will not even begin until 2022. The time it will take to develop a scope of work to review the tree code is actually as long, or longer, than it took to actually develop the entire tree code in the first place. Further, the scoping work has largely already been done by community advisory committees, the UFC, and the city auditor. We believe that a full review, including internal analysis, outreach/ stakeholder engagement, review by the UFC and PSC and substantive recommendations to Council should be completed in less than two years, by December 31, 2021, and that even that timeline is extremely generous given that this is a review of existing code as opposed to creation of new code.
- 4. The resolution fails to address interim measures to prevent preemptive tree cutting on commercial and industrial lands while the permanent code is being developed. Unfortunately we have seen preemptive tree cutting in the past, especially when new code pertaining to trees was delayed for an extended period. It is important that the resolution includes interim measures to prevent preemptive tree cutting on commercial and industrial lands (for example, lifting the exemptions during the interim, applying a moratorium on cutting except in imminent development situations, or requiring reporting of all tree cutting and retroactive application of mitigation requirements that are adopted within 18 months).

Thank you for helping to protect Portland's trees!

Kristin Anne Conrad-Antoville and Anthony Antoville, Portland OR

From:	Marianne Nelson <manelson316@yahoo.com></manelson316@yahoo.com>
Sent:	Tuesday, January 7, 2020 11:45 AM
То:	Council Clerk – Testimony
Subject:	Portland Tree Ordinance

To Mayor and Council Members:

We cannot act fast enough to counter global warming. One of the things we can do here in Portland is to make it harder, MUCH HARDER, to cut down big trees. Trees mitigate climate change by sucking out carbon dioxide from the atmosphere, storing it away in their trunks and soil.

37473] 23

Why is the city stalling with revisions to its tree ordinance?

The current resolution delays a hearings on removing exemptions for tree protection and planting on industrial and commercial lands for another seven months, until July 7, 2020. The City has been aware of this deficiency for nearly a decade and both the PSC and UFC have recommended its removal.

The resolution delays a hearings on **addressing deficiencies in mitigation for smaller trees** (between 20 and 36 inches in diameter) in residential zones for a full year and a half, until July 30, 2021. It is reasonable to conduct the process on this narrow issue, including internal analysis (much of which is already complete), public outreach, and PSC and UFC hearings and return to Council by July 31, 2020.

The resolution basically **delays a comprehensive review of the tree code indefinitely.** As proposed the bureaus have a full two years, until January 21, 2022, just to develop a scope of work for the issues they want to consider. That means substantive consideration of these issues will not even begin until 2022.

Don't tell me that Portland is a 'Green City' and you are trying to do everything you can to the city to mitigate climate change. Unless you quit the delays on the tree ordinance, I will not believe you. And I will not vote for you in the next election.

Marianne Nelson 1644 SE Rex St. Portland OR 97202 503-231-2825

From:

Sent:

Subject:

To:

Kyna Rubin <krubin317@gmail.com> Tuesday, January 7, 2020 10:54 AM Council Clerk – Testimony testimony for Jan. 8, 2020 tree resolution hearing

Dear Mayor Wheeler, and Commissioners Fritz, Eudaly, and Hardesty:

You cannot have it both ways. You cannot proclaim that Portland is a green city, a forward-thinking city with a Climate Action Plan, a city that takes equity seriously while allowing our weak tree code to continue to erode our ability to preserve the large-form trees that play an outsized role in mitigating against climate disaster. It's long past time to reconcile city rhetoric about environmental equity with the sad reality that our Title 11 tree code is way too lame to ensure that people living east of 82nd Ave, where developers are known to clear-cut groves of Douglas-fir, will enjoy the same health and other benefits that trees provide residents living in leafier areas. Sure, Title 11 beats not having a tree code at all, which was the situation before 2011 (and implementation in 2015), but that's not good enough. At a time when national leadership on climate change has deserted us, we look all the more to local government to do the right thing for its citizens.

Here's what the City of Portland can do, if you have the will to do it: First, **do not tolerate the unnecessarily long delays in the Mayor's revised proposed resolution**. The two proposed tree amendments--on quashing the industrial/commercial zone exemptions and on lowering the DBH threshold from 36 inches to 20 inches--are low-lying fruit, no-brainer mechanisms to getting us closer to preserving more trees. You've had plenty of public input on these issues. How much more do you need, really? City Council could expedite the process to get these amendments passed in two to three months, not the Mayor's proposed six months and 18 months, respectively. Second, as Commissioner Fritz has stated in a previous hearing, it's time for a tree code overhaul. The funds to make this happen must be made available ASAP, not two, three years from now. The Mayor's resolution proposes that city agencies "develop a scope to develop additional updates to strengthen Title 11" by January 31, 2022. That timeframe is way too long. I'm proud to call Portland home, but I'm not proud of the Mayor's seeming willingness to relinquish responsibility for protecting us from climate crisis, which isn't in the future. It's now. Please, take leadership on this issue. Thank you. Sincerely, Kyna Rubin 3232 NE 13th Ave Portland 37473]

From:Casey Clapp <treesandbikes@gmail.com>Sent:Monday, January 6, 2020 7:22 PMTo:Council Clerk – Testimony; treesforlifeoregon@gmail.comSubject:Testimony in Favor of Taking Action on Title 11 Trees Now, Not Later.

Good evening,

I wanted to reach out to you all in a personal capacity to urge you not kick the can of tree protection and retention down the road any longer and take action on these issues within six months.

37473 23

I am a Development Tree Inspector for Urban Forestry here in Portland focused previously on North and Northeast Portland and now covering all of the West Side and Sellwood. I grew up just south of town in Milwaukie, and have lived in Portland since arriving back in town after college. This city is my culture, it's my place. However, since beginning my work with Urban Forestry I have had a front row view of our city devouring its urban canopy. In fact, not only have I watched it, my name has been on hundreds of the permits that allow it to happen.

My unique view of the urban forest comes from two main vantages. The first being from the vantage of understanding the impact that trees have on our city. And not just any trees, but large trees that make neighborhoods like Irvington, Piedmont, Ladds, and Sellwood and parks like the Park Blocks, Lauralhurst, and Columbia Park so inviting and special to us all. I won't recite again for you all the services that urban trees provide; it's written in our code, in our master plans, in every report that studies trees and their effects on urban areas and their people. If action is not taken now, then it only allows for more of our large trees to be removed for private development--development that often is not from here and that does not care about what makes a place like Portland so unique, rather just about exploiting whatever that is for the money that comes with it. It takes a firm stance to fight for our values and the unique character of our city. In order to make that stand now, action must be taken now. Our urban forest is what will help protect us from many damaging effects of climate change; it is the only piece of infrastructure in the city that not only appreciates in value over time, but while doing so actively reduces the negative impacts that climate change will have on us.

The second vantage that I see the urban forest from is from my desk. To illustrate this point, takes this example: if a large tree gets removed on any given block, be that a private tree or a street tree, due to development, most people nearby see and notice, but perhaps few others. (As side note, the people on the block notice because a large tree in a neighborhood affects everyone in the neighborhood. Trees are not discreet objects that are owned by and benefit only that one property owner like, say, a garage or a deck. After they reach a certain size, they become a part of the community and have tangible impact on the people nearby, and I mean this in the most literal sense.) This is repeatable for any given block in the city. However, it only goes block by block, property by property, person by person. Few people see this across the whole city. This is what makes my perspective unique: I do not just see the loss of a tree on my block, I see the losses across whole neighborhoods, whole regions of the city. This does not even take into account the areas that my colleagues oversee.

This is all to say that from the perspective of many the loss of canopy is not readily apparent, even perhaps to you all, because locally the impacts appear as one tree here and another there. But when one looks at the larger picture, the losses are overwhelming. And they are tragic when one considers how the world views Portland as a bastion of innovative urban design and an outspoken community when it comes to progressive and impactful policy. Please do not be responsible for failing people across this city and the country who live here and come here for those exact values and ideals.

With respect, I thank you for taking the time to read this through. There is much work that needs to be done to strengthen our policies and re-orient this city and region towards being a true leader in sustainable policy and urban development. These ideas -- urban development and sustainability -- are not mutually exclusive, but it takes strong leaders like you to see through what is directly in front of us and see the future that we are headed towards if we keep kicking the can down the road.

Before the 2019 C40 Mayor's Summit, Mayor Wheeler said, "The City of Portland continues to be among those committed to and leading action for—addressing the climate crisis." Don't let these be words; please continue to be those leaders and take action.

With respect,

J. Casey Clapp, MS ISA Certified Arborist, PN-7475A ISA Qualified Tree Risk Assessor treesandbikes@gmail.com C: 503-816-9345

Moore-Love, Karla

From: Sent: To: Subject: Carole Onasch <leafyoasis@gmail.com> Sunday, January 5, 2020 7:52 PM Council Clerk – Testimony Testimony Title 11

The proposed resolution's lengthy timelines for addressing the nexus of trees, equity and climate change are Not Acceptable and Need Tp Be dramatically Reduced. Thank you, Carole Onasch

Sent from my iPhone

ail.com>	
21 AM	
Council Clerk – Testimony	

It is critical that the City Council vote to preserve trees in development situations without ANY exemptions, which only make a mockery of Portland's professed commitment to keeping its remaining trees.

Thank you, Jynx Houston 7605 SE Lincoln St. Portland 97215

374731

McClymont, Keelan

From:	Suzanne Sherman <suzanne@fatcathatsandsacks.com></suzanne@fatcathatsandsacks.com>
Sent:	Saturday, December 28, 2019 12:37 AM
То:	Wheeler, Mayor; Commissioner Fish; Commissioner Fritz; Commissioner Hardesty; Commissioner Eudaly; Council Clerk – Testimony
Subject:	Submitting comments for the Draft Resolution for Title 11 Tree Code

Good Day Mayor Wheeler and City Council Members,

I am writing in response to the City Council's Draft Resolution for Future Projects on Title 11, the Tree Code. The current deadlines set in the draft resolution are too far in the future and allow our tree canopy to remain in jeopardy.

I ask that you take steps to remove exemptions from Title 11 to ensure that industrial and commercial properties are held to the same tree protection and planting standards as everyone else in the City. Council should hold hearings on removing these exemptions no later than March 1, 2020...there have been too many delays already...and I ask that a moratorium on tree removals be put in place until these exemptions are no longer in place. Commercial development going on in Portland has wiped out way too many of our mature trees due to these exemptions. Please hold developers to the same standards as everyone else.

Please implement an immediate comprehensive review of the Title 11 tree code to start now and be finished by the end of 2020. Those reviewing and making recommendations on the code update should include not just the Bureau of Parks and the Bureau of Development Services but also the Urban Forestry Commission and the Bureau of Environmental Services. This review should include a public process to evaluate reducing the threshold for inch-for-inch tree mitigation from 36 inches diameter to 20 inches diameter with recommendations returned to City Council no later than June 1, 2020.

And finally revising the tree code will be meaningless if City Council doesn't properly fund Urban Forestry. Please find a way to properly fund and staff Urban Forestry so they can properly implement the tree code and protect our trees. Our urban tree canopy is essential to offset climate change impact and it provides food, shelter and beauty for all of us living in the city including our urban wildlife.

Thank you, Suzanne Sherman Mt Tabor Resident

374731

McClymont, Keelan

From:	Dawn Smallman <dawnsmallman@gmail.com></dawnsmallman@gmail.com>
Sent:	Friday, December 27, 2019 2:34 PM
То:	Wheeler, Mayor; Commissioner Fritz; Commissioner Hardesty; Commissioner Eudaly; Commissioner Fish
Cc:	Council Clerk – Testimony
Subject:	Additional public comment on Draft Resolution for Future Projects on Title 11, Trees

Dear Mayor and Commissioners,

I would like to add this additional comment to the comments I already submitted on the Draft Resolution for Future Projects on Title 11, Trees:

5. I understand that stakeholder engagement is important and often requires a process. Because of this, I would like the city to place a moratorium on tree cutting until Title 11 tree code revisions have been made, because otherwise we are just encouraging rapid pre-emptive cutting of trees by industry and commercial land-holders during the evaluation time period.

Thank you, Dawn Smallman 1148 SE 50th Ave. Portland, OR 97215

------ Forwarded message ------From: **Dawn Smallman** <<u>dawnsmallman@gmail.com</u>> Date: Fri, Dec 27, 2019 at 12:56 PM Subject: public comment on Draft Resolution for Future Projects on Title 11, Trees To: <<u>MayorWheeler@portlandoregon.gov</u>>, <<u>chloe@portlandoregon.gov</u>>, Commissioner Hardesty <<u>JoAnn@portlandoregon.gov</u>>, Commissioner Fritz <<u>amanda@portlandoregon.gov</u>>, Nick Fish <<u>nick@portlandoregon.gov</u>> Cc: <cctestimony@portlandoregon.gov>

Dear Mayor and City Commissioners,

I'd like to submit official comment for City Council's Draft Resolution for Future Projects on Title 11, Trees. The current draft of the resolution sets deadlines that are too far in the future and place our tree canopy and community health in harm until those deadline dates. Additionally, the resolution needs to include enacting a decades-long-overdue comprehensive review and update of our Title 11 tree code. It also needs to include a mandate that decisions will be made using the best available science and include equity-based stakeholder engagement that includes communities whose health and well-being are on the frontlines of negative effects of climate change and air pollution.

I would like to see the Resolution revised to accomplish the following actions and results:

1. I would like to see the City specifically mandate that from this date and forward in time, all Title 11 tree codes be reviewed, created and/or revised based on the best available science, and with significant stakeholder participation from community organizations that represent communities whose health and well-being are on the frontlines of negative effects of climate change and air pollution.

2. The Bureau of Planning and Sustainability in coordination with Portland Parks and Recreation and Bureau of Development Services should prepare a budget proposal for the spring 2020 Budget Monitoring Process for a comprehensive review and update of the Portland Tree Code (Title 11) and report back to Council **no later than September 1, 2020**.

The City needs to specifically mandate that the comprehensive review and update to the code should be grounded in the best available environmental science and include significant stakeholder participation by organizations that represent communities in our city who are on the frontlines of the negative effects of climate change and air pollution.

3. Council should hold hearings on lifting exemptions for protecting trees on commercial and industrial lands (preservation and density standards) **no later than March 1, 2020.**

3747 The City needs to specifically mandate that the hearings should be grounded in the best available environmental science and include significant stakeholder participation by organizations that represent communities in our city who are on the frontlines of the negative effects of climate change and air pollution.

3

4. The Bureau of Planning and Sustainability, in coordination with Portland Parks and Recreation, the Urban Forestry Commission and Bureau of Development Services, should conduct a public process to evaluate reducing the threshold for inch-for-inch tree mitigation from 36 inches diameter to 20 inches diameter and return to council with a recommendation no later than June 1, 2020.

The City needs to specifically mandate that the public process should be grounded in the best available environmental science and include significant stakeholder participation by organizations that represent communities in our city who are on the frontlines of the negative effects of climate change and air pollution.

Thank you, Dawn Smallman 1148 SE 50th Ave. Portland, OR 97215

374731

From: Sent:	Greg Snider <gregwsnider@gmail.com> Friday, December 27, 2019 2:38 PM</gregwsnider@gmail.com>
To:	Wheeler, Mayor; Commissioner Eudaly; Commissioner Hardesty; Commissioner Fish;
	Commissioner Fritz; Council Clerk – Testimony
Subject:	Addition to Tree Code comments on Tree Code Draft Resolution

Dear Mayor and Commissioners,

I would like to amend the official comment for City Council's Draft Resolution for Future Projects on Title 11, Trees which I sent earlier today by adding the following.

I understand that stakeholder engagement is important and often requires a process. Because of this, I would like the city to place a moratorium on tree cutting until Title 11 tree code revisions have been made, because otherwise we are just encouraging rapid pre-emptive cutting of trees by industry and commercial land-holders during the evaluation time period.

Thank you.

Greg Snider 1148 SE 50th Ave. Portland, OR 97215 (503) 853-6957

From: Sent:	Greg Snider <gregwsnider@gmail.com> Friday, December 27, 2019 1:43 PM</gregwsnider@gmail.com>
То:	Wheeler, Mayor; Commissioner Hardesty; Commissioner Fish; Commissioner Fritz; Commissioner
	Eudaly; Council Clerk – Testimony
Subject:	Tree Code Draft Resolution

37473

Dear Mayor and City Commissioners,

I'd like to submit official comment for City Council's Draft Resolution for Future Projects on Title 11, Trees. We are in a climate emergency. It is time for our City Council to respond to the need for tree code reform in a manner that takes this emergency into account. The current draft of the resolution sets deadlines that are too far in the future and place our tree canopy and community health in harm until those deadline dates.

Additionally, the resolution needs to include enacting a decades-long-overdue comprehensive review and update of our Title 11 tree code. It also needs to include a mandate that decisions will be made using the best available science and include equity-based stakeholder engagement that includes communities whose health and well-being are on the frontlines of negative effects of climate change and air pollution.

I would like to see the Resolution revised to accomplish the following actions and results:

1. I would like to see the City specifically mandate that from this date and forward in time, all Title 11 tree codes be reviewed, created and/or revised based on the best available science.

2. The Bureau of Planning and Sustainability in coordination with Portland Parks and Recreation and Bureau of Development Services should prepare a budget proposal for the spring 2020 Budget Monitoring Process for a comprehensive review and update of the Portland Tree Code (Title 11) and report back to Council **no later than September 1, 2020**.

3. Council should hold hearings on lifting exemptions for protecting trees on commercial and industrial lands (preservation and density standards) no later than March 1, 2020.

4. The Bureau of Planning and Sustainability, in coordination with Portland Parks and Recreation, the Urban Forestry Commission and Bureau of Development Services, should conduct a public process to evaluate reducing the threshold for inch-for-inch tree mitigation from 36 inches diameter to 20 inches diameter and return to council with a recommendation **no later than June 1**, **2020**.

Portland City Council has kicked the tree code can down the road for far too long. We have reached the end of the road and are now at a "t" in the road. One direction leads to further degradation of our life supporting, carbon sequestering urban canopy. The other direction leads to positive and effective methods to combat climate chaos.

Thank you,

Greg Snider 1148 SE 50th Ave. Portland, OR 97215 (503) 853-6957 Mayor Ted Wheeler and Members of the Portland City Council Portland City Hall 1211 SW Fourth Ave. Portland, OR 97204

26 December 2019

RE: Draft Resolution to Improve Title 11 Trees

Dear Mayor Wheeler and City Commissioners:

I appreciate your intention to continue to address Title 11 Trees, as can be seen in the Draft Resolution due to be considered at Council on 8 January 2020. Though budgetary decisions regarding the urban forest must be translated into the language of finance that regards the urban forest as an asset of great complexity, it is well to remember it is living infrastructure that sustains human and ecosystem health as well as human well being. As such, it requires vigilant protection at all times, not just when City budget plans come due in July.

Please change the schedule proposed in the Draft Resolution to address the code with all deliberate haste. This can be achieved by discretely addressing specific provisions before a whole code overhaul is undertaken and by speeding up the timeline for a complete code overhaul.

First of all, we need not wait until 1 July 2020 to for Council to reconsider the exemption for trees in development in industrial and commercial zones. Instead, please ask the Urban Forestry Commission and the Planning and Sustainability Commission to hold public hearings on these exemptions—thus enabling you to hear from the public and bring the matter before City Council for a vote by March 2020. This earlier vote would honor the support for this code amendment that you have already heard from groups as different as the Portland Business Alliance and the Portland Youth Climate Council, and as numerous as the hundreds of individuals who have been working to support our urban forest in every zone for decades.

Second, we need not address every problem in Title 11 Trees before we address the value of trees 20 inches and greater in development situations by reducing the threshold of inch-for-inch mitigation from 36 to 20 inches. Here again, I ask that public hearings be scheduled with all deliberate haste so that Council may come to a vote on this mitigation question by the third week in December 2020.

Finally, I ask that City Council fund hardworking staff and a citizen advisory group to come to terms with how Title 11 has functioned and where code revisions are necessary by mid December 2021, not 2022. Professionals from the building trades, the public, and arborists have been noting places where the code desperately needs improvement at least since 2015. The longer we wait, the more likely it is that the public will disregard the amazing improvements in service that Title 11 has made possible. The website trees@portlandoregon.gov is but one such improvement. Anyone in the city can use this site to answer all the bedeviling questions the code now raises; it would be even better to have fewer such questions sooner rather than later.

Sincerely, Catherine Mushel 6319 SE 34th Avenue Portland, OR 97202

From:	TERESA MCGRATH <bone1953@msn.com></bone1953@msn.com>
Sent:	Tuesday, December 24, 2019 12:28 PM
То:	Council Clerk – Testimony
Subject:	tree code

- Council should hold hearings on lifting exemptions for protecting trees on commercial and industrial lands (preservation and density standards) no later than April 1, 2020. These protections have already been delayed for a decade since they were first proposed and it is long past time to move forward.
- 2. The Bureau of Planning and Sustainability, in coordination with Portland Parks and Recreation and Bureau of Development Services, should conduct a public process to evaluate reducing the threshold for inch-for-inch tree mitigation from 36 inches diameter to 20 inches diameter and return to council with a recommendation no later than December 31, 2020.
- 3. The Bureau of Planning and Sustainability in coordination with Portland Parks and Recreation and Bureau of Development Services should prepare a budget proposal for the spring 2020 Budget Monitoring Process for a comprehensive review and update of the Portland Tree Code (Title 11) and report back to Council no later than September 1, 2021.

From:	JOHN REILLY <jkr77@comcast.net></jkr77@comcast.net>
Sent:	Friday, December 20, 2019 11:28 AM
То:	Council Clerk – Testimony
Subject:	Tree po;icy extension

As an infill builder and resident of Portland I am both the target and the beneficiary of tree policy. The fees associated with tree removal are absolutely ridiculous. If the homeowner is not aware of the replant program it is an enormous life changing burden.

As a builder the tree protection zone program is so egregious it adds thousands of dollars to the cost of a home when the city claims to want to reduce home prices. Protect some trees if you want but cut the ridiculous fencing program. I spend a thousand dollars permitting and putting up chain link fence for a 6 foot tree so that I can remove the tree anyway. Plus untold hours in on site meetings, permit running and general hassle. How would you like it if someone came to your work and told you that suddenly you have to spend thousands of dollars to protect all the plants in the building. And you can't do any work until you call in for an inspection and wait hours only to find out you missed a minor detail and it's wrong. Call again and wait more days and oops no one is available today. Sorry no one can feed their family until you put the protection sign in the right place and we look at it and sign it off. Oops there went a week of pay. Focus on something important.

And if you try to justify it by playing the climate card, understand this: if you cut all the trees down in the city, that would barely equal the number of trees cut down every day in Oregon. And there is more tree volume today in Oregon than ever in the history of the land, in the entirety of time.

Every time we turn around you burden the builder, Education tax, SDC, fees, CET, trees, permit fees, early assistance fees, 2 or 3 permits per site, year long permit times, environmental erosion fees and inspections and fencing for tiny projects, How can we ever have affordable homes?

From:	Nicola Corl <nicolacorl@mac.com></nicolacorl@mac.com>
Sent:	Thursday, December 19, 2019 8:57 AM
То:	Council Clerk – Testimony
Cc:	treesforlifeoregon@gmail.com
Subject:	Public testimony on trees and developments

A couple of years ago I was personally gutted when close to 8 flowering cherry trees in full bloom were cut down during the redevelopment of a 1920s funeral home on the intersection of Sandy, Burnside and 14th to allow a building to increase its footprint by a few inches. As someone who worked in the neighborhood I know first hand how much that full wide corner of blossoming cherry trees gave to the area. There are no parks in that neighborhood, none until you get to Ladd's Addition or Mount Tabor, or cross beyond Lloyd Center. It's a nature dead zone. The one park that existed down the street is now a building. It made me very sad that the cherry blossoms that I'd loved and looked forward to every year since I moved to Portland in 2004 were gone to make space for concrete. What kind of homes are developers building that eliminate trees? Is there no climate crisis? Why as a homeowner am I required to replace trees I remove but developers are above the law? If we're creating more housing in what was a fairly industrial neighborhood, why are we taking what little nature exists and removing it? So many beautiful and necessary trees are under 36" in diameter. Please stop delaying a change in the law to save smaller beautiful and valuable trees. There will be no small trees left by the time you get to it. They add a lot to our city, they are critical to our survival and you can't get them back once they are gone. Thank you,

Nicola Corl.

Nicola

nicolacorl@mac.com 503-913-7541