

February 14, 2022

Dear Mayor Wheeler and Portland City Council:

Trees for Life Oregon thanks you for the opportunity to express our support for the Ezone Map Correction Project Recommended Draft. Updating the environmental overlay zone maps to reflect current natural resource information is, frankly, overdue. We urge you to adopt the draft promptly.

It is only common sense for the City's environmental overlay zoning maps to reflect current, accurate information on the location and function of significant natural resources. The updated, improved maps will allow the City to apply its strongest natural resource protection program to resources of concern, including extensive areas of tree canopy across large parts of the city.

We appreciate the City's investment in this effort, including several years of technical analysis and on-the-ground fieldwork among multiple bureaus. We also commend City staff for the extensive outreach conducted for this project, including tens of meetings with community groups and more than 600 site visits on individual properties. These corrected maps should help clarify for owners of land in Ezones, and for other community stakeholders, exactly what is intended to be protected during the development process. Having clear maps will reinforce the program while supporting an efficient permitting process--one of the goals of Commissioners Ryan and Mapps' permitting taskforce.

Protecting large-form tree canopy in Ezones is critical to sequester carbon, cool and clean our air and water, and reduce the impacts of climate change including extreme heat and increasingly frequent flooding and landslides. We hope that, having attached ecological value to large-form trees and groves in Ezones, you will also work to attach greater ecological value to and appropriate protections for existing large trees in other parts of the city, particularly in East Portland, which has many fewer Ezones than the westside, and therefore fewer Ezone protections. We are increasingly concerned about outer East Portland's documented loss of large trees and groves, and space for future large trees, including on development sites and in rights-of-way. Much of this area is tree-deficient and much hotter than other parts of the city. These areas are associated with high proportions of low-income Portlanders and BIPOC communities, so the downsides of having fewer large-form trees have a greater impact there.

Thank you for your consideration; we look forward to continued collaboration.

Kyna Rubin  
On behalf of [Trees for Life Oregon](#)

CC: Families for Climate, Portland Audubon, Urban Greenspaces Institute, PDX350, Portland Youth Climate Council