

**From:** [Emily Wahl](#)  
**To:** [Parks - Urban Forestry Commission](#); [Planning Commission](#)  
**Subject:** Title 11 Amendments  
**Date:** Sunday, July 7, 2024 3:53:24 PM

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To Whom it May Concern,

I am writing to testify as strongly in favor of removing the expiration date for the Large Tree Amendment. We need our trees that are 20" DBH or bigger to be protected in perpetuity.

I am also in favor of reducing the 5,000 sq. ft. lot exemption to a 3,000 sq. ft. lot exemption, as was originally planned. The 5,000 sq. lot exemption provides developers with a loophole that allows them through lot confirmation to divide large lots into smaller ones that meet the exemption, letting them cut down more of our large trees.

I would also like to see the exemption for affordable housing projects from the tree code to be ended. People who need affordable housing *also* need large trees. Exempting affordable housing from the tree code only exacerbates the inequity of fewer large trees in neighborhoods where lower income people live.

I also support

- giving Urban Forestry the authority to place liens on property to collect fines owed under the tree code
- increasing the mitigation requirement for removing healthy street trees in development to more than 2 trees for every 1 tree removed
- closing the loophole that allows developers to remove 2/3 of healthy trees and all of less than 12" DBH dead, dying, dangerous, or nuisance trees without replanting any trees if the project cost is less than the non-conforming upgrade valuation
- tightening the by right removal of trees less than 10 feet from a building. Trees should be evaluated by Urban Forestry and determined if they should be required to be saved. The evaluation should also prevent small make-shift buildings being installed just to avoid saving a tree or paying a fee to remove it. The mitigation for removing these trees should also be increased for more than 1 tree-for-tree in the case of large trees.
- Tree size calculations for tree density should no longer favor fast-growing species, as slow growing species are more wind and storm resistant, making them more valuable as we experience more severe weather due to climate change.
- The roots of trees adjacent to development should also be protected by the tree code.
- Mitigation for large nuisance tree removal should be increased. Although they pose their own risk to the environment, they are still a large tree that provides environmental benefits.
- Increase fees for tree removal, or require preservation, removing the fee option.
- Remove exemption for Heavy Industrial zones, on lots less than 5,000 sq. ft., and on lots with existing or proposed building coverage of more than 85%.

We need large trees now, more than ever, to mitigate climate change and other environmental devastation that we've already committed. Yet our tree canopy has *shrunk* since 2015. The city *must* do better to preserve our existing large trees as well as planting more trees for the future.

Thank you for receiving my testimony.

Sincerely,

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