



July 23, 2024

Urban Forestry
1900 SW Fourth Avenue
Portland, Oregon 97201

Re: Title 11 Large Tree Amendment

The East Multnomah Soil and Water Conservation District (EMSWCD) strongly supports the staff's recommendation to remove the sunset clause for the Title 11 Large Tree Amendment.

EMSWCD is committed to the health and wellness of our community through conservation and stewardship of natural resources. Portland's tree canopy is vital to keeping our neighborhoods cool in the face of escalating summer temperatures. Large established trees provide unique habitat and water absorption benefits to our city that are irreplaceable with new trees. Tree preservation is codified within EMSWCD's strategic plan through our dedication to climate resilience. Trees improve quality of life. Trees also provide many quantitative benefits, several of which are near and dear to the City and its citizens; cost-effective stormwater management, traffic calming, energy conservation, soil retention, and improved air quality among numerous others.

We appreciate the City's dedication to its green infrastructure and have two suggestions to further strengthen this policy:

- 1) **We have concerns about the sweeping nature of current exemptions permitted in title 11.** 5,000 sq. ft. is the size of a standard city lot. Exempting these properties results in the potential loss of a significant portion of our urban tree canopy. Building *around* trees adds value to a property. We encourage you to consider revising the City's exemptions.
- 2) **Change the code to include protection for non-invasive trees with a diameter of 12 inches or more.** The current minimum diameter of 20 inches is too large. Large-diameter trees with a diameter of 12 inches or more, provide significant ecosystem services that newly planted trees won't replace for many, many years.

We thank you Commissioners for your efforts to protect and enhance our urban canopy. We appreciate the time to come and speak with you this evening.

Kelley Beamer,
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