



CITY OF PORTLAND

URBAN FORESTRY COMMISSION

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AMANDA FRITZ, COMMISSIONER

MIKE ABBATÉ, DIRECTOR

December 2, 2014

Susan Anderson
Director of Planning and Sustainability
1700 SW 4th Ave
Portland, Oregon

Dear Director Anderson and Members of the Planning and Sustainability Commission:

The Urban Forestry Commission appreciates the opportunity to submit a third round of comments in response to the current draft of the Comprehensive Plan. We are pleased to see many of our previous comments included in the latest edition. However, we found several areas where connections regarding trees, urban canopy, and continued efforts toward designing and retrofitting the city's landscape to provide essential green infrastructure should still be strengthened. We request that the following recommendations be incorporated into the next edition of the Comprehensive Plan.

Green Infrastructure

There are many policies that note "green infrastructure" and we applaud the staff for elevating this concept within the plan. However, we see that connections to other chapters or supporting documents are insufficient. For example, within the **Designing with Nature** chapter, there is no mention of trees as a key strategy for improving the urban landscape and for providing proven environmental, social, and economic benefits to the community. In support of these ends, we recommend that explicit references to the Portland Urban Forest Management and Action Plans, the Portland Watershed Management Plan, and the newly adopted Climate Change Preparation Strategy, are included to underscore the City's commitment to reaching its watershed health, climate resiliency, and canopy goals, and to recognize the immensely valuable contributions that trees make toward achievement of these goals.

We also feel that there are a number of places where the terms "green infrastructure", "nature", and "natural resources" should be further enumerated to identify specifically what is being referenced. For example, **Policy 3.17- Green Infrastructure in Centers**, as currently written, it is not much more than a reiteration of Policy 3.6. It is imperative that defining language be included so that all public and private entities working to design and improve Centers are working in an effective and efficient manner and that trees are included at the beginning of the process, not the end.

Space for Trees on Private Property and Rights of Way

Given the desire to increase density across much of the city, particularly in hubs and along connecting corridors, there is a real need to allocate sufficient space for the planting and stewardship of large canopy and native trees to grow and thrive to maturity. The loss of space for trees in mixed use and other heavily populated zones will be a serious detriment to the environmental quality, the ecological functioning, and the overall livability of a denser Portland. Preserving or creating enough space for trees needs to be included in the design and planning documentation stage of development, whether for new residential, mixed use, or commercial construction, or for rights of way projects. Given all of the benefits derived from trees, it is imperative that the final Comprehensive Plan, which will guide the next 20-25 years of growth and prosperity for all Portlanders, include explicit policies that feature its urban canopy goals.

Toward this end, the Commission requests that a new policy be added under **Chapter 4 – Design and Development**, and that clear supporting language be inserted into the development code revisions that ultimately drive new development behaviors. A possible title and description of such a policy might be, “***Trees are Integral to New and Re-Development. Encourage development and building and site design that preserve trees, as well as adequate space for them.***”

Additionally, we would like to see revisions made to the City’s street standards to accommodate larger planting areas and tree wells. Note that we did not limit this language to “planting strips,” as we believe that alternative means to accommodate large and other trees in neighborhoods and rights of ways may offer robust tree presence outside of traditional street tree patterns. We welcome creative ideas about ways to plan for large canopy trees in preparation for development. In a similar vein, we request that new language be included in **Chapter 9 Transportation** that strongly encourages and offers incentives for preserving and protecting trees during construction.

Natural Areas and Environmentally Sensitive Locations

The Urban Forestry Commission supports the proposed policies and locations regarding the reduction of residential density allowances in environmentally sensitive locations where tree canopy cover is essential to maintaining the integrity of these landscapes, including steep slopes, floodplains, and headwater drainage sites. Not only does limiting development at these locations reduce the risks of landslides and sediment flow into the storm water system, it also serves to safeguard human health, and aids in protecting private property during natural disasters.

Finally, the Commission requests that references to the development of West Hayden Island be completely removed from the Comprehensive Plan and significant project lists. The Island hosts an incredible riparian forest ecosystem, and is home to a number of native hardwood trees of significant size and age. The loss of this contiguous and extensive, bottomland forest to greenfield industrial land use would be counterproductive to Portland’s aspirational goals related to climate resiliency, canopy, and equity. We are convinced that acceptable mitigation is not possible to account for the planned loss (in whole or in part) of this unique and irreplaceable asset to our region. Please remove West Hayden Island from the active list of potential industrial lands for the Comprehensive Plan.

On behalf of the Urban Forestry Commission, thank you for considering these additional comments and recommendations.

Please do not hesitate to contact us with any questions that you may have.

Sincerely,

Meryl A. Redisch, Chair of Urban Forestry Commission
Kris Day, Chair of the Policy Committee

Cc. Mark Bello, David Diaz, Noelle Studer-Spevak, Committee Members.