

From: Karps, Jennifer
Sent: Tuesday, January 12, 2016 12:31 PM
To: Planning and Sustainability Commission <psc@portlandoregon.gov>
Subject: Testimony on Proposed Title 11 Amendments

Hello,

Thank you for the opportunity to provide comments on the proposed amendments to Title 11, Trees, Chapter 11.50, concerning tree replanting requirements for trees on private property in development situations. The Environmental Services bureau provided comments to Emily Sandy on Proposal B in December 2016 (please see attached email). As drafted, the bureau does not have concerns with the proposed language in Proposal B. Requiring additional tree planting when larger trees are removed supports the Bureau's efforts to improve water quality and watershed health with green infrastructure investments and bolsters the effects of our proactive tree planting programs. The comments below reflect the bureau's response to Proposal A.

The Bureau has two concerns with Proposal A as drafted. Imposing additional mitigation for large-diameter trees would place an undue burden on ratepayers. Environmental Services takes all practicable measures to avoid impacts to trees in the course of managing and maintaining Portland's wastewater and stormwater infrastructure, and we plant thousands of trees each year in excess of trees planted to mitigate those tree removals. Occasionally, however, we must remove a large tree to ensure proper functioning of our infrastructure and protection of public health and safety. We propose an exemption from any additional mitigation for the City utilities and PBOT. Should the bureau be obligated to provide additional mitigation for large trees, we request the flexibility to plant trees to satisfy this requirement rather than the sole option of paying an in-lieu fee.

Thanks for your consideration of these comments.

Jennifer Karps for the Environmental Services Bureau

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Follow our work from Grey-to-Green on the [City Green Blog](#) or 

Trees Tame Stormwater! Check out this cool [interactive poster](#).

"To exist as a nation, to prosper as a state, and to live as a people, we must have trees."
-- Theodore Roosevelt

Emily,

Thank you for the opportunity to provide comments on the proposed amendments to Title 11, Trees, Chapter 11.50, concerning tree replanting requirements for trees on private property in development situations. As drafted, the bureau does not have concerns with the proposed language. Requiring additional tree planting when larger trees are removed supports the Bureau's efforts to improve water quality and watershed health with green infrastructure investments and bolsters the effects of our proactive tree planting programs.

The additional notification required to remove very large trees should help address residents' concerns for the loss of these significant community resources. However, since many concerned residents may not be qualified to recognize the distinction between a large, regulated tree and a large, exempt tree, we recommend requiring notification for all large trees. This notification could help increase awareness and understanding of the many reasons for tree removal in the built environment.

Should the proposed tree replanting requirements get expanded to cover City and Street trees, the Bureau has two concerns. Imposing additional mitigation for large-diameter trees would place an undue burden on ratepayers. Environmental Services takes all practicable measures to avoid impacts to trees in the course of managing and maintaining Portland's wastewater and stormwater infrastructure, and we plant thousands of trees each year in excess of trees planted to mitigate those tree removals. Occasionally, however, we must remove a large tree to ensure proper functioning of our infrastructure and protection of public health and safety. We propose an exemption from any additional mitigation for the City utilities and PBOT. In addition, if additional mitigation for large trees were required of the bureau, we request the flexibility to plant trees to satisfy this requirement rather than the sole option of paying an in-lieu fee provided in the private property context.

Thanks for your consideration of these comments.

Jane

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