



Audubon Society of Portland
5151 NW Cornell Road
Portland, OR 97210

October 24, 2017

Dear Portland Planning and Sustainability Commission,

Please accept the following comments from Audubon Society of Portland regarding the 2035 Comprehensive Plan Code Reconciliation Project. Portland Audubon participated in the development of the 2035 Comprehensive Plan along with all of the quadrant plans that helped inform it. We appreciate the opportunity to participate in this process and the tremendous amount of work that has gone into this effort by the Commission and the City.

Our comments are focused on how the Code Reconciliation Project pertains to the tree code (Title 11). **We strongly agree with the staff recommendation to amend the code to eliminate reference to exemptions for CS and CM zones for the tree preservation standards in Title 11. We urge the Planning and Sustainability Commission to retain this recommendation and to go further and consider eliminating Title 11 exemptions from the remaining commercial and industrial zones.**

The City of Portland's Title 11 was developed and adopted in 2009 and 2010 after the collapse of the housing market. At the time of adoption, Title 11 was an improvement over the previous code, but temporary exemptions were put in place for all industrial and commercially zoned lands until a more complete data analysis could be completed which narrowed its application. Now that this data gap has been remedied, it is time to remove these exemptions and implement Title 11 on the entire City.

Since Title 11 was adopted, several long-range planning processes have prioritized the expansion of green infrastructure for both human and public health, including the Comprehensive Plan 2035 and Climate Action Plan. These plans note the deficiency of urban tree canopy in commercial and industrial zones, and how this deficiency has created some of the worst urban heat islands in the city, often times negatively effecting low-income communities that are located nearby. Removing Title 11 exemptions for all commercial and industrial zones provides a great opportunity to improve these deficiencies and work towards a wide range of community health goals. Given all we know about the importance of trees including their ability to mitigate urban heat island effect and improve urban air quality; it is time that commercial and industrial zoned lands play their role in improving the environmental and human health of our communities. Please remove Title 11 exemptions for all commercial and industrial zoned lands in the City so that the tree code can be implemented across the City as it was intended.

Micah Meskel
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Audubon Society of Portland