

**From:** [Chris Peskin](#)  
**To:** [Planning and Sustainability Commission](#)  
**Subject:** Title 11 Amendments  
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I was disappointed to learn that the UFC removed/reversed the Title 11 proposed changes from PF&R to increase pruning distance from structures from 30ft to 100ft to manage defensible space from wildfire. Meanwhile, PP&R has been granted a City Nature Programmatic Permit to allow pruning in Forest Park within 200ft of a structure. This seems lopsided, why does Forest Park management believe 200ft from structures is an appropriate pruning distance, while homeowners adjacent to Forest Park are only provided 30ft of pruning distance?

In addition, the friction Title 11 introduces to homeowners attempting to manage wildfire defensible space must also be reduced. The cost of hiring professionals, arborists or otherwise, to prepare permits, supervise or manage vegetation are not insignificant.

**This cost is not equitable, and it disincentives proactive management for wildfire. Waiting for the next cycle to revisit defensible space changes to Title 11 is irresponsible given the increasing threat of wildfire and climate change happening now.**

Chris Peskin  
13948 NW Country Woods Ln  
Portland, OR 97231