



**City of Portland, Oregon**  
**Bureau of Development Services**  
**Land Use Services**  
FROM CONCEPT TO CONSTRUCTION

Carmen Rubio, Commissioner  
David Kuhnhausen, Interim Director  
Phone: (503) 823-7300  
TTY: 711  
[www.portland.gov/bds](http://www.portland.gov/bds)

## Briefing

# DISCUSSION MEMO

**Date:** April 1, 2024  
**To:** Historic Landmarks Commission  
**From:** Tanya Paglia, Design & Historic Review Team  
(503) 865-6518, [tanya.paglia@portlandoregon.gov](mailto:tanya.paglia@portlandoregon.gov)  
**Re:** Portland Urban Forest Plan  
Briefing Cover Memo – April 8, 2024

This memo is regarding the upcoming Briefing on April 8, 2024, for the Portland Urban Forest plan by Urban Forestry. A copy of Urban Forestry's briefing memo is available for review online:

- <https://efiles.portlandoregon.gov/Record/16618748/>

More information can also be found on the public website for the plan at the following URL

- <https://www.portland.gov/trees/portland-urban-forest-plan>

## PROGRAM OVERVIEW

Portland Parks & Recreation Urban Forestry staff have been working on an update to the city's Urban Forest Plan. The plan should be completed by spring 2025. Portland's Urban Forest Plan was previously updated in 1995 and 2004 and is now due for an update to address current needs and priorities. It is important to note that Portland's urban canopy is declining.

An Urban Forest Plan is a 10-year roadmap of goals, policies, actions, and priorities to guide City urban forestry management activities and decisions. It is meant to:

- Protect, preserve, restore, and expand Portland's urban forest.
- Develop and maintain support for the urban forest.
- Manage the urban forest to maximize benefits to all residents.

The Portland Urban Forest Plan will be created in three phases. The project is currently in the Listen and Learn phase. Therefore, the Historic Landmarks Commission is invited to provide advice to the project team. The Design Commission also provided advice to the project team on March 21<sup>st</sup>.

## SOME THOUGHTS FOR DISCUSSION

- Are the tools in our regulatory toolbox aligning with the goals of this plan? Is the commission missing resources and direction for how to advocate for trees and other urban forest goals?
- Tools related to Historic Resource Review include:
  - **Historic Review Guidelines.** Some Historic Resource Review guidelines involve trees and landscape, while others have a nexus to trees and landscape via guidelines focused on compatibility and area character. In particular, the Ladd's Addition guidelines have guidance pertaining to specific tree species which is discussed below.....
  - **Portland Zoning Code (Title 33).** Includes regulations pertaining to landscape and trees.
  - **Tree Code (Title 11).** Regulates all city and street trees, and private property trees above 12" DBH.
  - **Building Code.** Relevant to resilience to wildfire hazard increasing with climate change)
- The Ladd's Addition Guidelines are from 1988 and have some problematic guidance. This was discussed at a briefing to the Historic Landmarks Commission done by Jenn Cairo from Urban Forestry in May of 2018. The following are take-aways from that briefing:
  - They require certain tree species to be planted on particular streets such as:
    - Norway Maple, a nuisance species;
    - American Elm, subject to Dutch Elm disease; and
    - European White Birch, subject to Bronze birch borer.
  - However, we don't currently review alterations to street trees via Historic Review, so there are no occasions where we would apply these guidelines related to street trees because they are in the right-of-way.
  - Street tree planting is regulated and implemented by Urban Forestry. Urban Forestry does try to adhere to the recommendations from the Ladd's guidelines when a person comes in for a tree planting permit, however, they cannot sign off on a nuisance species, etc.
  - If the guidelines were updated, it would help Urban Forestry in their guidance. However, it might make more sense to take the street tree guidance out of the historic guidelines document and have it live elsewhere, such as a street tree plan. The historic review guidelines might not be the proper place for guidance related to street trees.
  - After the meeting, Hillary Adam met with Urban Forestry and BPS staff to discuss next steps and they determined that despite being noted in the guidelines, the trees were UF's purview (not BDS's) and if the Ladd's Guidelines were to be updated that would be BPS's purview and they didn't have the budget for that at the time.
- Work on the plan thus far has identified the following urban forest management needs & challenges – input from the commission on these would be useful:
  - How do we manage our urban forest?
  - What is working well? What's not working well?

- How are we preparing for climate change?
- How are we incorporating diversity, equity, and inclusion into our work?
- How can we do better?

## **ADDENDUM**

- Many of the National Register Nominations for the city's historic and conservation districts reference trees and landscape, and it is a particular focus for certain districts such as the Halprin Open Space Sequence, Mount Tabor Park Historic District, and Washington Park Historic District.
  - City's Historic Districts.
    - Alphabet Historic District
    - Chinatown/Skidmore Oldtown overlap
    - East Portland/Grand Ave. Historic District
    - Halprin Open Space Sequence
    - Irvington Historic District
    - Kenton Commercial Historic District
    - King's Hill Historic District
    - Ladd's Addition Historic District
    - Mount Tabor Park Historic District
    - New Chinatown/Japantown Historic District
    - NW 13th Ave. Historic District
    - Peacock Lane Historic District
    - Skidmore/Old Town Historic District
    - South Portland Historic District
    - Washington Park Reservoirs Historic District
    - Willamette National Cemetery
    - Yamhill Historic District
  - City's Conservation Districts:
    - Eliot Conservation District
    - Kenton Conservation District
    - Mississippi Conservation District
    - Piedmont Conservation District
    - Russell Street Conservation District
    - Woodlawn Conservation District

- List of Historic Resource Review guidelines – As previously noted, some involve trees and landscape, while others have a nexus to trees and landscape via guidelines focused on compatibility and area character.
  - Ladd’s Addition Conservation District Design Guidelines
  - King’s Hill Historic District Guidelines
  - Historic Alphabet District - Community Design Guidelines Addendum
  - South Portland Historic District Design Guidelines
  - 33.846.060.G (1-10) Other historic approval criteria – used by:
    - Sites on the National Register
    - Irvington Historic District
    - South Portland Historic District east of SW Naito Parkway
    - Kenton Historic District
  - 33.846.060.H (1-10) Other historic approval criteria – used by:
    - Conservation Landmarks
  - Community Design Guidelines – used by:
    - Alphabet Historic District
    - Kenton Conservation District
    - Eliot Conservation District
    - Mississippi Conservation District
    - Piedmont Conservation District
    - Woodlawn Conservation District
  - Central City Fundamental Design Guidelines – used by:
    - Historic Districts inside CCPD
    - Sites on the National Register
  - 33.846.060.I (1-10) Other historic approval criteria – used by:
    - Relocation projects