

Portland City Council Agenda Written Testimony  
Document Number 2025-123

	Name or Organization	Position	Comments	Attachment	Created
1	Kyna Rubin, Trees for Life Oregon			Yes	03/27/25 5:44 PM
2	kelly lanspa	Oppose	<p>I am a resident of Portland and a volunteer for Eastmoreland Neighborhood Assc Tree Committee as well as Friedns of Trees Volunteer. The article in the Willamette Week was poorly researched, inflammatory and did not reflect the experiences Ive had with Urband Forestry.</p> <p>—The tree code is imperfect. But we urge the Finance Committee to hold off on considering any code changes until the formal tree code revision process, which is scheduled to start at the end of this year. The tree code is complex and its elements are linked to one another and to other City codes. Title 11 was created with broad input from many different interest groups and with strong community support in response to public outrage about the loss of trees from arbitrary tree removals.</p> <p>—In some instances, Title 11 provides City staff with discretion in evaluating specific tree removal requests. In considering any changes to the tree code related to tree removal concerns, it's important that policymakers first define the problem carefully, then determine whether it could or should be addressed by amending code language, modifying how the code is interpreted or administered, addressing costs or fees, or some combination of the above.</p> <p>—In applying the discretion afforded by the code in some places, City staff must be careful in applying it. Even as the code directs staff to evaluate many tree removal requests on a case-by-case basis, staff must also strive for consistency and fairness, such as treating similar situations in similar ways. It is important that staff develop clear protocols to avoid making decisions that could be viewed as arbitrary, capricious, or discriminatory.</p> <p>Kelly Lanspa 7710 se 35th ave Portland 97202 408 605 6846</p>	No	03/31/25 2:24 PM
3	Anonymous	Support with changes	<p>1. Portland should have kept its tree program with Friends of Trees.</p> <p>2. The City waives enforcement fees for tree violations way too much.</p> <p>3. Fees should absorb the full cost of providing the services.</p>	No	05/05/25 5:10 PM



To: Portland City Council Finance Committee Members

Fr: Trees for Life Oregon

Date: March 27, 2025

Re: Finance Committee's April 1, 2025, meeting, re: tree code fees/practices

We acknowledge the issues recently raised by the media about Urban Forestry's fees and enforcement. When City leaders address such concerns, the best outcomes are likely to result from adopting a measured approach to revisiting regulations and how they are implemented. Many would agree that revisions and improvements to Title 11, Portland's tree code, are needed. Fortunately, a project to update Title 11 is scheduled to begin at the end of this year. Those changes will be informed by the updated Urban Forest Plan, which is now in draft form and will be heading to City Council this spring.

Portland's tree code is comprehensive and comprises many inter-related elements and connections to other codes. Precipitous, piecemeal code changes should be put on hold. Ideas for amendments should be channeled into the Title 11 update. Changes made quickly and outside a more holistic review, even if small, can have undesirable consequences for the whole.

Writing empathy into a code might be achieved through provisions for hardship, but such provisions require the consideration of many values that might be in conflict with one another.

[Our tree code](#) is imperfect, for sure, and elements of it need changing. But Title 11 also contains important features that help protect the trees that, in turn, protect the health and well-being of the broader public.

The tree code matters because Portland's urban forest, among its diverse benefits, has an outsized role in preparing current and future generations for climate resilience. We are in a climate crisis and are experiencing severe weather events, especially scorching heat, that have already taken the lives of Portlanders. [Studies](#) indicate that during heat events, neighborhoods with abundant tree canopy are far cooler than those with sparse canopy. Studies also show that our urban forest canopy has been declining for several years, especially in disadvantaged neighborhoods, where most of the 2021 heat dome deaths occurred. [Further research](#), on Portland and other cities, has shown that residents who live near trees are physically and mentally healthier than those who don't. Canopy is therefore a question of equity, livability, and saving public health dollars. Trees are not an amenity but a necessity that are no less important than our other infrastructure.

Title 11 was originally adopted unanimously by the City Council in 2011 with strong community support in response to public outrage about the loss of trees from arbitrary tree removals and the lack of coherent tree rules across agencies. (Budget constraints delayed its implementation until 2015.) The code is complex. Over several years [a great deal of thought, public investment, and community engagement went into its creation and the integration of its parts](#). A great deal of thought must also go into improving the tree code when it is formally revisited this year. A deliberate, thoughtful process with feedback from a wide swath of the public will ensure that the code update will benefit all Portlanders.

In the meantime, we support options to reduce the cost burdens of trees in Portland. We are pleased that the City intends to devote PCEF funds toward a widespread street tree maintenance program, removing from adjacent property owners the cost burden of caring for our valuable street tree assets. We also support the proposal to fund maintenance of trees on private property based on financial need. And we support PCEF-funded efforts, described in agenda #4, exhibit A, that, if approved by City Council, would reduce or eliminate fees related to trees in non-development situations. These steps will help improve equity and remove barriers to planting and caring for trees across our city.

To learn more about the tree code, our suggested design and policy changes to improve it, and the studies that document the impacts of tree canopy on the health and well-being of urban residents, visit [our website](#).

[Watch here](#) a five-minute video about Portland's urban forest challenges and some proposed solutions.

Portland City Council  
Wednesday, May 7, 2025 - 9:30 a.m.  
Testimony List

Name	Document Number
Edith Gillis	2025-123