



PORTLAND PARKS & RECREATION

Healthy Parks, Healthy Portland

Date: November 18, 2014

To: Portland Planning and Sustainability Commission

From: Mike Abbate, Director, Portland Parks & Recreation 

cc: Eric Engstrom, Emily Roth, Brett Horner, Sarah Huggins, Jenn Cairo

RE: Comprehensive Plan Proposed Draft Comments

Portland Parks & Recreation appreciates the treatment of parks, open spaces, natural areas, urban canopy, trails, and green infrastructure in the Comprehensive Plan. Portland Parks & Recreation also appreciates the close collaboration with Bureaus in the development of this Plan.

PP&R has a few requested changes:

1. We have a requested change to policy 6.50, Public Facilities and Land Acquisition. As written, it seems redundant with the intent of policy 6.36. We suggest deleting policy 6.50. If it does remain, we suggest re-wording it as indicated below. The suggested additional text from Portland Parks & Recreation is in red.

Policy 6.50 Public Facilities and Land Acquisition. Limit the use of prime industrial land for parks or other non-industrial public facilities, **unless the land has been identified as having significant natural resource value or is needed to provide recreation service in accord with established PP&R service levels.**

2. PP&R supports a change of zoning on the 'Green Thumb' site (R992190070), which is co-owned by PP&R and Portland Public Schools and used as a community garden and educational site – from R2 (current) to OS (proposed) consistent with use at the site.
3. Policy 8.74 Acquisition of Surplus Properties. Suggest deleting this policy. Policies 8.72 and 8.73 provide guidance on where PP&R needs to acquire additional properties to meet service level goals and address equity.
4. PP&R requests that the protection, enhancement and maintenance of the urban forest be stronger throughout the plan by adding policies in multiple chapters.

The following are PP&R's recommendations for adding urban forest policies in existing policies and suggestions for new policies:

- a) Chapter 1: The Plan and Guiding Principles – page 10 in the Supporting Documents graphic include a bullet for Urban Forest after Natural Areas.

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Amanda Fritz, Commissioner

Mike Abbate, Director



- b) Chapter 3: Urban Form
- Page 1 – What is this chapter about? Add urban canopy into the third bullet.
 - Page 13 Policy 3.39 Design to be Great Places. – add **street trees**.
 - Page 15 City Greenways: In the first sentence, change green streets to streets with green infrastructure including large form trees. BES' program is called Greenstreets so it may be confusing to the public if green streets is used in the plan in a different context.
 - Page 15 #1. – Add **"including wider parking stripes for large form trees"** after extensive tree canopy.
- c) Chapter 4: Design and Development
- Policies, General Development Principles – add a policy for green infrastructure and the need to incorporate in all designs, including street trees.
 - Page 13, Policy 4.59 – add to the end of the policy **... "and retain healthy trees."**
- d) Chapter 5: Housing
- Policies 5.41, 5.43 and 5.44 – add **trees as essential elements of quality housing, healthy living and walkable surroundings, including open spaces to plant large form trees.**
- e) Chapter 7: Environment and Watershed Health
- Page 10, Policy 7.19 Urban Forest. Add **7.10h** Limit public and private tree removal and support planting of trees on steep slope and slopes with unstable soils. Tree roots significantly increase stability of slopes and unstable soils, reducing the potential for landslides and associated property damage, injuries and loss of life.
 - Add **7.10i: Design rights-of-way and property zoning to provide sufficient space for tree infrastructure, including large form trees.**
- f) Chapter 8: Public Facilities and Services
- Page 7, Goal 8.D: Public rights-of-ways. Add **"street tree infrastructure"** after private utilities.
 - Page 9, Policy 8.2 Service Delivery. Add a bullet that states **"Urban Forest including street trees and trees on public and private property."**
 - Page 9, Policy 8.4 Interagency coordination – Add a bullet that states **"Urban forest management coordination with regional municipalities and ODOT."**
 - Page 15 – add a new Policy specifically for Urban Forest, similar to Stormwater. Improve **rights-of-ways to integrate tree infrastructure to meet City canopy goals and economic, social and environmental objectives.**
 - Page 15, Policy 8.43 Right-of-way Vacations: Add a bullet that the code should consider **appropriateness for urban canopy, including existing or potential future trees.**
 - Parks and Recreation Page 19, Policy 8.72, modify to read **...parkland, urban forest and recreational facilities...**
 - Policy 8.76 modify to read **...Improve parks, natural areas, recreational facilities, and the urban forest...**

Thank you for your work on developing this Comprehensive Plan.