

September 21, 2020

Mr. Ted Wheeler, Mayor
Portland City Council
1221 SW 4th Avenue, Room 130
Portland, OR 97204

Dear Mayor Wheeler and members of the City Council,

Last Thursday, September 17, 2020, the Urban Forestry Commission (UFC) completed its public hearing on proposed changes to Title 11, Trees, that began during our two commissions' joint hearing on September 8.

After closing the public comment period at our September 17 hearing, the UFC (joined by several PSC members and City staff), had a discussion that weighed city goals, centering social justice and the long-term environmental health of the City. We then voted to approve City staff's proposal with one exception as noted below. The City staff proposal was delineated in a letter from Emily Sandy, Bureau of Development Services, to the PSC and UFC on August 14.

Specifically, the UFC voted on September 17 to make the following recommendations to the Portland City Council.

"1. Remove the exemptions from tree preservation and tree density in IG1 (General Industrial 1), EX (Central Employment), CX (Central Commercial) and IH (Heavy Industrial) zone, on private or City-owned/managed property, during development situations, and

2) Reduce the threshold for required preservation of trees on private property, in development situations, from 36 inches to 20 inches in dbh¹, wherever tree preservation is required, and

3) Reduce the threshold for inch-per-inch fee in lieu of preservation for trees on private property, in development situations, from 36 inches dbh to 20 inches dbh."

The UFC's vote differs only from the City staff proposal in the treatment of exemptions for IH-zoned lands: The staff proposal is to retain this exemption. The UFC voted to remove this exemption.

We understand staff's rationale for retaining the IH exemption, including consideration of the City's 2016 Economic Opportunity Analysis (EOA) -- a required component of the City's compliance with statewide Goal 9 -- that claims that retaining large trees on IH land will increase development costs on this land. However, the UFC respectfully disagrees with the City staff conclusion. The analysis concludes that such costs would limit development, which would

¹ 'dbh' refers to Diameter at Breast Height, and reflects a standard measure used in the field of forestry science to describe the physical size of a tree.

in turn shrink the future supply of developable industrial land (and thus limit the number of industrial jobs).

However, the UFC believes this analysis is far too narrow upon which to base this important decision. In fact, the staff report itself states that the economic analysis did not take into account the potential benefits of improvements to public and ecological health that would likely offset the projected negative impacts.

Absent in the EOA methodology is consideration of many other City goals and policies, including those calling for aggressive action to mitigate and prepare for climate change and its inequitable impacts on low-income, mainly BIPOC, communities. In particular, a City policy that facilitates the removal of large trees in areas such as the IH zone will amplify ambient temperatures, exacerbating the already disproportionate heat island effects on employees working within those areas, and on adjacent communities. The extensive amounts of impervious surfaces in all these land use categories, though especially in the heavy industrial zone, retains the heat and increases temperatures on nearby communities by upwards of 15-degrees Fahrenheit, which could be the difference between life and death for many in historically marginalized communities.

Cities around the country are actively addressing these urban heat islands, and Portland should be no exception. Removing these exemptions on all the zones under consideration will provide a stronger incentive to both preserve valuable shade from existing trees and to plant new trees which over time will reduce temperatures as future heat waves increase in frequency and intensity.

Our recommendation also aligns with the City's climate emergency declared earlier this year and that describes the importance of advancing climate equity and environmental justice. Allowing the exemption for IH-zoned land to remain is a step backwards on both fronts. We believe that the City Council must take bold action to ensure that the responsibility to preserve and enhance tree canopy infrastructure is borne equitably. **The UFC also recommends that the City evaluate these climate and equity considerations in the next Economic Opportunity Analysis, which is scheduled for 2021.** Following our recommendations would be an important step in that direction.

Thank you for the opportunity to collaborate on this issue and for consideration of our recommendations.



Vivek Shandas, Chair
Urban Forestry Commission

cc: Planning and Sustainability Commission, Bureau of Development Services