



June 17, 2022

Portland City Council
1221 SW Fourth Ave.
Portland, OR 97204

Dear Mayor Wheeler and Portland City Commissioners:

The Urban Forestry Commission (UFC) supports and recommends adoption of the recommended technical and minor policy amendments to Title 11, Trees. While the proposed amendments are narrow, they are important and will individually and collectively make Title 11 more effective in supporting the existing policies it was adopted to meet, namely, to help sustain a healthy and equitably distributed urban forest across the city, while also meeting other city goals. The UFC commends the Urban Forestry Program staff for their efforts and their responsiveness during the project.

On May 19, 2022, the Urban Forestry Commission held a public hearing on the proposed Title 11 technical amendments. We heard thoughtful testimony from multiple parties. Those testifying supported the amendments, expressing appreciation for specific aspects including the explicit recognition of trees as critical infrastructure, clearer enforcement options, the broadening of criteria to be reviewed in conjunction with tree removal permits to prevent public health and safety risks, and more. We did not hear opposition to specific amendments, but several individuals stated that they do not go far enough to address aspects of Title 11 that are resulting in the loss of trees. They asked that the City embark on a comprehensive, substantive Title 11 update soon, rather than in 2024 as proposed by the Urban Forestry staff. We also heard concerns about wildfire risks and the need to ensure that trees in high wildfire risk areas can be pruned without undue cost or timer requirements.

The Urban Forestry Commission shares these concerns. We ask that the City Council support the Urban Forestry program in completing an expeditious update of the 2004 Urban Forest Management Plan (UFMP) which is scheduled to begin this year. The UFMP and tree canopy targets need to reflect current city plans, policies, and resolutions, including Comprehensive Plan 2035, the Climate Action Plan and Climate Preparation Strategy, and the recent Climate Crisis Declaration. (Note: Title 11 requires a UFMP update at least every 10 years (11.20.050.C), so it is woefully out of date.) We also ask the City Council to direct the Urban Forestry program staff to work with other bureaus and community stakeholders to identify key Title 11 provisions

Urban Forestry Commission

1900 SW 4th Avenue, Suite 5000

Portland, Oregon 97201

503-823-TREE (8733) | Fax 503-823-4493

PORTLANDPARKS.ORG

Commissioner Carmen Rubio

Director Adena Long



Sustaining a healthy park and recreation system to make Portland a great place to live, work, and play.

that warrant potential revision as part of the Urban Forest Management Plan update project. This is a practical approach that will save time and cost.

There is an urgency in updating City tree policies and codes. Increasingly we know that tree canopy provides critical health benefits and resilience to climate change. During recent heat events Portland neighborhoods with sparse tree canopy were in some instances found to be more than 20 degrees hotter than neighborhoods with abundant tree canopy. And we know that these are often areas where tree canopy is currently declining and with relatively high proportions of lower income people and people who are black, indigenous, and other persons of color. In addition to keeping the city cooler, trees will help temper the impacts of flooding and landslides associated with climate-induced higher-intensity weather events.

We recognize that a number of critical issues will need to be addressed along the way, including integrated, creative approaches meet to City goals for tree canopy, affordable housing, public health and safety, and climate resiliency. We look forward to those collaborations with you and others.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Vivek Shandas', with a stylized, flowing script.

Vivek Shandas, PhD
Portland Urban Forestry Commission Chair

CC: Urban Forestry Commission
Planning and Sustainability Commission
Adena Long, Portland Parks and Recreation Director
Jenn Cairo, City Forester
Brian Landoe, Urban Forestry Staff
Nik Desai, Urban Forestry Staff