



**Portland Parks & Recreation Urban Forestry Programmatic Permit
Portland Parks & Recreation
Land Stewardship, City Nature**

1.0 GOALS:

- 1.1 Protect, preserve, and restore the urban forest (Urban Forest Management Plan (UFMP), 2004).
- 1.2 Promote stewardship of the urban forest (UFMP, 2004).
- 1.3 Prevent cumulative adverse impacts to the urban forest and ensure that there is no reduction in tree canopy coverage over time (Title 11.45).
- 1.4 Maintain public safety and tree canopy health.
- 1.5 Maintain a health, diverse tree canopy

2.0 TERMS AND TIMELINE OF PERMIT:

- 2.1 Permit duration is from the date of final signature through December 31, 2025.**
The permit must be signed and in effect before tree work is conducted.
- 2.2 Portland Parks & Recreation (PP&R) Land Stewardship is the responsible party for all activities in this permit and shall ensure all staff, contractors, and volunteers comply with the terms and conditions of this permit.
- 2.3 This permit applies only to tree management activities not related to site development or development projects. Separate permits are required for tree activities related to development.
- 2.4 This permit is issued under the authority of the City Forester in compliance with the requirements of City of Portland [Title 11 Trees](#).

Urban Forestry

1900 SW 4th Ave, Suite 5000
Portland, OR 97201
Tel: (503) 823-TREE (8733) Fax: (503) 823-4493

Administration

1120 S.W. 5th Ave., Suite 1302
Portland, OR 97204
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Portland Trees – www.Portlandoregon.gov/trees - permits, tree removal, report a downed tree.

Sustaining a healthy park and recreation system to make Portland a great place to live, work and play.
PortlandParks.org • Carmen Rubio, Commissioner • Adena Long, Director



2.5 Definitions

- a. City trees: Trees located on City-owned property
- b. Street trees: Trees located in the City right-of-way
- c. Private trees: Trees located on property not owned by the City of Portland or another government entity (e.g. ODOT) and not located in the City right-of-way
- d. DBH: diameter at breast height; the diameter of a tree trunk measured at 4.5 feet above the ground
- e. Dangerous tree: the condition of the tree presents a foreseeable danger of inflicting damage that cannot be alleviated by treatment or pruning
- f. Native tree: a tree listed on the [Portland Plant List](#) as [native to the Willamette Valley](#).
- g. Nuisance tree: a tree of a species listed on the [Portland Plant List's Nuisance Plant List](#).
- h. Topping: means the inappropriate pruning practice used to reduce tree height by cutting to a predetermined crown limit without regard to tree health or structural integrity. Topping is considered "removal."

3.0 SCOPE OF WORK

- 3.1 Activities shall prevent cumulative adverse impacts to the urban forest and ensure no net reduction in tree canopy coverage over time.
- 3.2 Activities shall support the [2004 Urban Forest Management Plan](#), the [2010 Natural Areas Restoration Plan](#), the [2005 Portland Watershed Management Plan](#), and the [2008 Invasive Plant Strategy](#).
- 3.3 This permit applies to properties that are owned by Portland Parks & Recreation and managed as natural areas. It also applies to trees growing in the City right-of-way adjacent to natural areas if the right-of-way is being managed as an extension of the natural area. A list of sites is included in the 2010 Natural Areas Restoration Plan, updated March 2015 (Appendix G).

3.4 Definitions

- i. City trees: Trees located on City-owned property
- j. Street trees: Trees located in the City right-of-way
- k. Private trees: Trees located on property not owned by the City of Portland or another government entity (e.g. ODOT) and not located in the City right-of-way
- l. Dangerous tree: the condition of the tree presents a foreseeable danger of inflicting damage that cannot be alleviated by treatment or pruning
- m. DBH: diameter at breast height; the diameter of a tree trunk measured at 4.5 feet above the ground

- n. Native tree: a tree listed on the [Portland Plant List](#) as [native to the Willamette Valley](#).
- o. Nuisance tree: a tree of a species listed on the [Portland Plant List's Nuisance Plant List](#).

3.5 Pruning

- a. Land Stewardship staff, contractors, and volunteers may prune trees for the following reasons:
 - to improve their health and form;
 - to remove dead, damaged, and diseased portions of trees;
 - to maintain proper clearance from adjacent structures or buildings;
 - to accommodate the growth of other trees;
 - to increase security and discourage camping; and
 - to allow passage along trails, walkways, driveways, and service roads.
- b. Within 200 feet of a structure, Land Stewardship supervised staff, contractors, and volunteers may prune the lower limbs of trees, up to a maximum of 15' from the ground, for the purpose of breaking the continuity of ladder fuels that would allow fire to move from the ground to the crown of trees. All pruning shall be in accordance with ISA best practices, ANSI standards and 4.5.d (state elm pruning moratorium).
- c. Pruning shall be made with proper pruning cuts and sharp tools. Pruning activities shall adhere to American National Standards Institute (ANSI) *A300 Pruning Standard – Part 1*, and International Society of Arboriculture *Best Management Practices: Tree Pruning*, including any amendments or revisions.
 - i. All persons conducting this work shall have the training, experience, and equipment necessary to conduct the pruning work in a controlled and safe manner.
 - ii. Pruning shall remove no more than 25% of the crown within an annual growing season.
 - iii. When pruning from the ground, the trunk shall not be cut above the pruning site.
 - iv. Trees shall not be topped.
- d. Elm pruning requirements
In order to limit the spread of Dutch elm disease and comply with Oregon's state quarantine of elm wood, the following rules apply to the pruning of elm trees (*Ulmus spp.*):
 - i. Elm trees shall not be pruned from April 15 through October 15 annually, unless pruning is necessary for public safety.
 - a. Pruning of elm trees during the state quarantine period requires prior approval from the City Forester. Land Stewardship shall submit an Inspection Request Form (Appendix H) at least 4-weeks in advance of planned pruning activity.
 - ii. Pruning tools shall be treated with disinfectant before and after pruning individual elm trees.
 - iii. All elm wood waste shall be chipped or taken to an approved commercial disposal site within 24 hours of cutting.

- iv. Land Stewardship management will communicate these requirements to all involved staff prior to April 15 of each year. Documentation of this communication will be provided to the City Forester by April 15 of each year.

3.6 Removal

a. Unregulated trees

- i. Trees in the City right-of-way (i.e. street trees) that are sucker shoots or self-sown trees less than 1/2 inch DBH (diameter at breast height, the diameter of the trunk measured at 4.5 feet above the ground) are not regulated and therefore may be removed without prior notice to Urban Forestry, reporting, or mitigation.
- ii. Trees on City property (i.e. City trees) that are less than 3 inches DBH may be removed without notice, reporting, or mitigation, unless the tree was required to be planted as a condition of a permit.
- iii. Trees on private property that are less than 12 inches DBH are not regulated and therefore may be removed with property owner permission but without notice, reporting, or mitigation to Urban Forestry, unless the tree was required to be planted as a condition of a permit or otherwise specified in 3.6.a.iii.a below.

- a. The regulatory threshold for tree removal on private property decreases to 6 inches DBH for trees located in the following plan districts and/or overlay zones:

- Plan districts: Cascade Station/Portland International Center Plan District; Columbia South Shore Plan District; Johnson Creek Basin Plan District; Portland International Airport Plan District; Rocky Butte Plan District; South Auditorium Plan District
- Overlay zones: Environmental (c, p); Greenway (n, q, g, i, r); Pleasant Valley Natural Resources (v); Scenic Resource (s)

- b. The property owner's permission should be obtained via signature before removing any tree on private property.

b. Non-dangerous trees

- a. Dead or dying trees of any size or species may be removed without prior notification. Mitigation (3.6.c) and reporting (3.6.d) requirements apply.

c. Dangerous Trees

- i. As per Title 11.80.020, a dangerous tree presents a foreseeable danger of inflicting damage that cannot be alleviated by treatment or pruning. A tree may be dangerous because it is likely to injure people or damage vehicles, structures, or development, such as sidewalks or utilities.
- ii. Dangerous trees of any size may be removed without prior notification. Mitigation (3.6.c) and reporting (3.6.d) requirements apply.
 - a. Emergency removal of a dangerous tree shall be conducted as follows, as per Title 11.40.020.D: Within seven days of an emergency tree removal, Land Stewardship shall provide notification and documentation to the City Forester on the Inspection Request

Form (Appendix H). Upon submittal to the City Forester, the Inspection Request Form shall accompany photographs or other documentation that prove an emergency existed. The City Forester will evaluate the information to determine whether the tree was dangerous. Failure to provide information documenting the emergency nature of the event may be pursued as a violation per Title 11.70.

d. Nuisance trees

- i. Nuisance trees less than 20 inches DBH may be removed without notifying the City Forester or the public. Mitigation (3.6.h) and reporting (3.6.i) requirements apply to regulated trees.
- ii. Nuisance trees 20 inches DBH or greater may be removed with at least 4 weeks prior notice to the City Forester. The Forester may set conditions on the timing of removal. Mitigation (3.6.h) and reporting (3.6.i) requirements apply.
- iii. The following species may be treated as nuisance trees under this permit:
 - Excelsior ash (*Fraxinus excelsior*)

e. Non-nuisance trees

- i. Non-nuisance trees less than 12 inches DBH may be removed for the purposes of trail maintenance, thinning, habitat creation, or fire safety without notifying the City Forester or the public. Mitigation (3.6.h) and reporting (3.6.i) requirements apply to regulated trees.
- ii. Non-nuisance trees 12 inches DBH or greater may be removed for the purposes of trail maintenance, thinning, habitat creation, or fire safety with at least 4 weeks prior notice to the City Forester. The City Forester may set conditions on the timing of removal. Mitigation (3.6.h) and reporting (3.6.i) requirements apply.

f. Other tree removal activities

- i. The City Forester may approve the removal of non-nuisance trees for purposes other than trail maintenance, thinning, habitat creation, or fire safety on a case-by-case basis. Removal shall be requested at least 4 weeks in advance of the anticipated removal timeframe. The City Forester may approve or deny the removal request or approve the request with conditions.

g. Zoning code exemption requirements

- i. The zoning of the property shall be checked before any non-dangerous, non-nuisance tree is removed. Zoning information can be found on Portland Maps at www.portlandmaps.com -> maps -> zoning.
- ii. Trees located in the following plan districts and overlay zones shall meet zoning exemptions for removal, or else a zoning code review from the Bureau of Development Services (503-823-7526) shall be obtained prior to removal.
 - Plan districts: Cascade Station/Portland International Center Plan district; Columbia South Shore Plan District; Johnson Creek Basin Plan District; Portland International Airport Plan District; Rocky Butte Plan District; South Auditorium Plan District

- Overlay zones: Environmental (c, p); Greenway (n, q, g, i, r); Pleasant Valley Natural Resources (v); Scenic Resource (s)
- iii. Zoning code exemption requirements are detailed in Title 11 Table 40-1 (Appendix D). Generally, a zoning code review is required for the removal of healthy native trees. However, some plan districts and overlay zones require a zoning code review for certain non-native, non-nuisance tree removals. The City Forester can help determine whether exemption requirements are met or whether a zoning code review is necessary.
- h. Public notice
 - i. The public shall be notified at least two weeks in advance of the impending removal of healthy (i.e. not dead, dying, or dangerous), non-nuisance trees that are 20 inches DBH or greater by posting a sign on or near the tree. If the tree is not in a publicly visible area, a copy of the sign and a map to the tree shall also be posted in a high-traffic, publicly visible area relevant to the site.
 - ii. The sign shall state when and why the tree is being removed, it is a permitted tree removal, how the removal is being mitigated, and contact information for a person the public can contact regarding the removal.
 - i. Mitigation
 - i. Regulated trees that are removed under this permit shall be compensated by replanting trees within the timeframe of the permit. Mitigation trees need not be planted at the same site where tree removal occurred.
 - ii. Whenever the exact number of trees removed is known, trees shall be replaced one-for-one. Trees planted for mitigation shall be monitored for at least two years and replaced in kind if they die within that timeframe.
 - iii. When removal numbers are solely tracked by estimated density of trees removed over a treatment area, the number of acres planted for mitigation shall be at least as much as the number of acres where trees were removed. Replanting density in these cases shall be at least twice the estimated density of trees removed. Trees planted for mitigation shall be monitored for at least two years, and mortality shall not exceed 30%. If mortality exceeds 30%, trees shall be replaced in kind. Replaced trees shall also be monitored and guaranteed for at least two years.
 - i. Mitigation unable to be met by tree planting shall be paid into the Tree Planting and Preservation Fund. Payment for each tree to be mitigated shall be the Fee in Lieu of Planting and Establishment for two inches per [Title 11 Trees Permit Fee Schedule](#). Mitigation payment shall be completed by the expiration of the permit.
 - j. Reporting
 - i. The number of trees removed, species removed, DBH, general condition, and reason for the trees' removal shall be reported for each site. For projects tracked by acre, the number of acres of trees removed, an estimated density of trees removed, an estimated number of

trees removed that were over 20 inches DBH, and the target species removed shall be reported for each site.

- ii. The amount of money paid to the Tree Planting and Preservation Fund shall be reported.

3.7 Planting

- a. Planting activities shall adhere to American National Standards Institute (ANSI) A300 *Planting and Transplanting Standards* and International Society of Arboriculture *Best Management Practices: Tree Planting*.
- b. Trees should be planted in accordance with the site's Desired Future Condition (DFC) as stated in the 2010 Natural Areas Restoration Plan (Appendix G). Trees may be planted in areas devoid of trees, with declining tree canopy, with low tree canopy density, or where non-native trees have been removed.
- c. Trees species selected for planting shall be chosen from the [Portland Plant List's Native Plants List](#).
- d. Trees selected for planting may be bareroot seedlings.
- e. Trees should be planted after adequate site preparation, such as invasive plant removal and control.
- f. Tree planting efforts need not employ supplemental irrigation for establishment.
- g. Establishment success shall be monitored and planting strategies shall be re-evaluated if establishment success is low.
- h. The number of acres planted, planting density, total number of trees planted, stock type, and species planted shall be reported per site.

3.8 Girdling

- a. Girdling a tree is considered removal of the tree, and all of the conditions in 4.6 Removal apply.
- b. Herbicide may be applied to girdled trees. Herbicide application shall be conducted in accordance with PP&R Integrated Pest Management policies.
- c. Girdled trees shall not have a target nearby and shall not create a public hazard.
- d. The number, DBH, and site of trees girdled shall be reported.

4.0 COMMUNICATION:

- 4.1 Land Stewardship shall maintain accurate permit contact information with Urban Forestry.

4.2 City Nature Contact

Rachel Felice, Natural Areas Manager
503-823-4376
Rachel.Felice@portlandoregon.gov

5.0 QUALITY CONTROL AND REPORTING:

5.1 **Reporting**

Qualitative and quantitative activities reports shall be sent to Urban Forestry once per year for the duration of the permit. Completed forms shall be received no later than one month after the reporting period.

a. Reporting periods:

Jan 1, 2022 – Dec. 31, 2022, report due by February 1, 2023

Jan 1, 2023 – Dec. 31, 2023, report due by February 1, 2024

Jan 1, 2024 – Dec. 31, 2024, report due by February 1, 2025

Jan 1, 2025 – Dec. 31, 2025, report due by February 1, 2026

5.2 **Inspections**

Urban Forestry may inspect the property to determine compliance with the conditions of the permit.

5.3 **Compliance**

It is the permit holder's responsibility to adhere to the terms of the permit. If the terms of the permit are not met, the permit holder shall be notified of the violation in writing and informed of the actions necessary to correct the violation(s). If the corrective actions are not undertaken within the specified timeframe, Urban Forestry may impose any or all of the following actions until the violation is corrected:

- Temporary stop work order
- Revocation of the Programmatic Permit
- Denial of future Programmatic Permits
- Additional conditions imposed upon the activities permitted by the Programmatic Permit
- Enforcement penalties
- Civil penalties up to \$1000 per tree per day of violation
- Restoration fees imposed for trees found in violation.

a. Fees shall follow the adopted Title 11 fee schedule at www.portlandoregon.gov/trees/fees.

5.4 **Revisions**

Urban Forestry may modify the specifications of the permit in order to respond to concerns, changes in regulations, or previously unforeseen issues. The permittee shall be notified at least 3 weeks in advance in writing of the intent to modify the permit and shall be provided an opportunity to comment on the proposed changes. The permittee shall also have an opportunity to appeal the permit if changes are made. Changes shall not go into effect until the permit is updated in writing.

6.0 RESOURCES:

ANSI A300 (Part 1)-2008 Pruning: Tree Care Operations: Tree, Shrub, and Other Woody Plant Management: Standard Practices (Pruning). Revision of ANSI A300 (Part 1)-2001. 2008. American National Standards Institute, Washington, DC.

ANSI A300 (Part 6)-2012: Tree Care Operations: Tree, Shrub, and Other Woody Plant Management: Standard Practices (Planting and Transplanting). Revision of ANSI A300 (Part 6)-2005. 2012. American National Standards Institute, Washington, DC.

Gilman, Edward and Sharon Lilly. *Best Management Practices: Tree Pruning, Second Edition*. 2008. International Society of Arboriculture, Champaign, Il.

Portland Plant List. 2011. City of Portland, Bureau of Planning and Sustainability, Portland, OR. < <http://www.portlandoregon.gov/auditor/34460?a=322280>>

Portland Urban Forestry Management Plan. 2004. City of Portland, Parks & Recreation Urban Forestry, Portland, OR. < <http://www.portlandoregon.gov/trees/ufmp>>

Street Tree Pruning Standards. 2014. City of Portland, Portland Parks & Recreation Urban Forestry, Portland, OR.

Watson, Gary. *Best Management Practices: Tree Planting, Second Edition*. 2014. International Society of Arboriculture, Champaign, Il.

7.0 APPENDICES:

Appendix A – City of Portland Street Tree Pruning Standards


Appendix B – Title 11 Table 40-1

Appendix C – Natural Areas Qualitative reporting template

Appendix D – Natural Areas Quantitative reporting template

Appendix E – 2010 Natural Areas Restoration Plan

8.0 SIGNATURE:

By: 
City Forester

Date: 1/18/22