



August 18, 2022

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

Dear Mayor Wheeler and Portland City Commissioners:

Thank you for the opportunity to comment on the draft Climate Emergency Resolution and Work Plan 2022-2025. The Urban Forestry Commission (UFC) agrees that the City must move swiftly and boldly to curb carbon emissions, improve Portland's resilience to climate change impacts, and address disparities in how those impacts are experienced. We support the general direction of the Resolution and actions in the Work Plan. Yet, we have significant concerns and do not believe that this package is ready for adoption as the City's Climate Action Plan. The UFC believes it is our responsibility to recommend sound, science-based, best practices to ensure that tree preservation, planting, preservation and maintenance, and related, critical actions such as reducing impervious area, are an integral part of the City's Climate Emergency Work Plan. We appreciate the City Council's full consideration of our comments.

**General Comments:**

- 1. The Work Plan lacks the specificity in terms of metrics, resource requirements and gaps, timelines, and a tracking/reporting process needed for it to serve as the City's Climate Action Plan. More is needed to provide accountability, specifically to confirm who will oversee this work and be responsible for ensuring it happens, and how progress will be reported to the public.**

Given that this work plan has a three-year timeline, we are concerned about the general lack of specificity associated with the proposed actions. For example, the resource gaps for many proposed actions are shown as "TBD," even for actions that are to begin this fiscal year (22-23) or next fiscal year (23-24), such as the Urban Forest Management Plan and Title 11 updates. Without knowing the necessary resource requirements and gaps, or if/how those gaps will be addressed, we are not confident that the City is ready to budget for these actions and make them happen.

Further, a number of actions (that are not "Ongoing") have start dates but no end dates, or the end dates are not clear. And when an action timeline is shown as "TBD," are readers to assume the action will start within 3 years (or not)?

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Many of the proposed actions do not include or refer to metrics, milestones, or measures of success. And it is unclear how progress will be tracked, who is responsible to do so, and how and to whom progress will be reported. Will this be done through staff and bureau directors, city commissioners or the mayor? Will this citywide effort require additional staff to coordinate, track, and/or report on its progress? How will the public be kept informed about the progress?

**To ensure that it is feasible to conduct this work plan successfully within the 3-year timeframe, and to provide transparency and accountability, the work plan should be revised to provide more specific metrics/milestones, timelines, resource requirements, and a coordinated, transparent process for tracking and reporting progress to the City Council, city commissions, key stakeholders, and the community at large. The work plan should also list strategies for addressing resource gaps, including coordination with other agencies (county, Metro, state agencies) and potential funding sources from within and outside the city.**

- 2. Climate Emergency Resolution and Work Plan package does not recognize or incorporate guidance from Portland/Multnomah County Climate Change Preparation Strategy” (2014) with its strong direction for climate adaptation and resilience.**

The draft Climate Emergency Resolution states that the draft Work Plan is intended to update and replace the City’s existing Climate Action Plan (2015), and that the intent is to address climate mitigation and climate resilience. Notably however, neither the Resolution nor the Work Plan refers to Portland’s “Climate Change Adaptation Strategy” and associated “Risks and Vulnerabilities Assessment,” which were adopted by the City and Multnomah County in 2014. These documents reflect extensive effort on the parts of City bureaus, the county, and the community. The “Risks and Vulnerabilities Assessment” provides a wealth of information about climate-related risks to human, ecological, and infrastructure health and function, and illuminates the disproportionate impacts of those risks among Portlanders. The “Climate Preparation Strategy” establishes a rich suite of objectives and actions to improve Portland’s resilience and adaptation to climate change, and to address disparities relating to the impacts of climate change. The direction provided in the Climate Change Preparation Strategy overlaps with the draft Work Plan. However, on some topics the Climate Change Preparation Strategy is broader and deeper than the resilience-related actions in the draft Work Plan. For example, the strategy calls for actions to reduce impervious area that are not reflected in the work plan. This direction remains critical and must not be lost.

**The draft Resolution and Work Plan should be updated to recognize the Climate Change Preparation Strategy, and either incorporate guidance from this document or establish the clear intent to utilize guidance from these documents in implementing the Work Plan.**

**Work Plan Specific comments:**

### **3. Carbon Sequestration**

Page 3 – For carbon sequestration the work plan calls for **“planting nearly 100,000 acres by 2050”**. **Please clarify what is intended here.** This goal is vague. Where does this number come from and what is the intended carbon capture? One must assume that much of the planting would be outside the city since Portland is about 92,800 acres in size. Please indicate where/how goal will be met, and who is responsible for the planting and long-term stewardship of planted areas.

In addition, the 2015 Climate Action Plan - Urban Forest, Natural Resources, and Carbon Sequestration Objective includes a 2030 goal to reduce impervious surfaces by 600 acres. The City must re-state a clear intent to reduce impervious surfaces in the Climate Emergency Work Plan, consistent with the existing Climate Action Plan, Climate Change Preparation Strategy, and Comprehensive Plan 2035 policy direction, and to support both existing and expanded City depaving/tree planting programs and projects. This is needed not only to complement tree-related goals and actions for carbon sequestration, but also to address the combination of low canopy and impervious surface that is **the** main driver of urban heat island and associated human and ecological health impacts. **Please revise the Work Plan to include an updated impervious surface reduction goal in this section. Related recommendations are provided in comments on other Work Plan sections below.**

### **4. Land Use (page 9)**

- 1.** We support action LU-1 to increase capacity to establish centers and corridors, and the proposed greening of those corridors. Although these actions are listed under the heading “Decarbonization Priorities,” improving resilience must be addressed here as well. **Under “Why This Matters,” please insert this new sentence after the first sentence: “Centers and Corridors must also be designed to improve resilience including to reduce heat and associated health impacts.”** For example, there is a huge opportunity in the 82<sup>nd</sup> Avenue improvement project

to reduce pavement and increase canopy from large- form trees, but this will require direction, leadership, creativity, collaboration, and investment.

2. We support Action LU-2 – to prevent displacement. **Under “Council Request,” please call for proactive planning and development of tools to prevent gentrification, including real and perceived gentrification impacts associated with neighborhood greening.**

## 5. Trees (Canopy) and Natural Resources/Green Infrastructure

- a) On pages 12 & 13, please combine the headings "Trees (Canopy)" and "Natural Resources/Green Infrastructure" to create a single heading that reads "Green Infrastructure/Trees (Canopy)/Natural Resources. Consolidate the associated “T” and “NR” actions under this one new heading.

The Purpose section of Title 11, Trees states: ***“Trees are a fundamental component of the City’s urban infrastructure.” (11.05.010.B).*** However, the heading “Green Infrastructure” is applied to a different section of this Work Plan, specifically the section focusing on natural resources in Portland’s environmentally sensitive areas. Natural resources, trees, and bioswales are all part of Portland’s green infrastructure system. However, the section headings currently imply that trees/canopy are not part of that system. It is important that the Climate Emergency Work Plan reinforce the paradigm of trees as a key component of Portland’s infrastructure.

- b) **Please specify Resource Gaps in T1, T2, and T3.** Each action in this section shows “TBD” under Resource Gaps, which is not acceptable. The Urban Forest Management Plan long overdue update is slated to begin this year and the Title 11 update within two years. The tree planting program is underway and ongoing. This Work Plan must provide meaningful and transparent resource-related information that supports the City and bureau budgeting for these actions.
- c) We support Action T-1 – to update the City’s Urban Forest Management Plan. However, this action wording lacks the direction provided in other proposed actions. **Under Action, please add the underlined language: “Update and implement the Urban Forest Management Plan and tree canopy targets, to address climate change, potential canopy changes due to development and**

**other impacts, equity, public health, infrastructure asset management, and the need to preserve large-form trees and space for large-form trees.**

- d) We support Action T-2 – to update Title 11, however the intent stated is too narrow. **Under Action, please add the following underlined language: “... to improve preservation of trees and space for trees (especially large-form trees), provide more equitable distribution of tree canopy, and achieve canopy goals. Please remove “increase resources for tree planting in high priority communities” from this action, as this does not relate to Title 11, and integrate it with Action T-3.**
- e) We support Action T-3 to expand tree planting in East Portland and other priority neighborhoods. **Please provide or refer to metrics or measures of success, and to guiding plans such as “Growing a More Equitable Urban Forest.”**
- f) For the T1, T2, and T3 “Why This Matters”, please update the third sentence to read: Trees improve air quality by actively removing particulate matter and other pollutants, provide for safer streets by reducing vehicle speeds, reduce urban flooding through stormwater capture, improve habitat connectivity for wildlife by connecting urban greenspaces, and lower summer temperatures through shade and evapotranspiration.
- g) **Please add a new action directing Portland Parks and Recreation to “Evaluate and recommend street tree maintenance program and funding options to improve tree canopy and community resilience, and to reduce the disproportionate financial burden and tree canopy-related disparities (e.g., urban heat island) experienced by Portlanders, many of whom are low-income, and/or who are Black, indigenous, and other people of color. Bureaus would include at least PPR, PBOT, BES. Council request would be consideration of options and direction for action.**

Historically, the City of Portland has assigned responsibility for street tree maintenance with adjacent property owners. As a result, street trees are less healthy and resilient, and Portlanders often choose not to plant street trees due to the financial burden. This exacerbates the disproportionate impacts of climate change on people with low incomes, and/or who are Black, indigenous, or other persons of color, many of whom live in tree-deficient neighborhoods.

In 2017, the Urban Forestry Commission and City staff presented the City Council with a proposal to explore potential City street tree maintenance program options. After hearing the presentation and strong public testimony in support, the City Council, directed the establishment of a task force to examine street tree maintenance program and funding options, and to make recommendations. This effort has since been subsumed by Portland Parks and Recreation's Sustainable Futures project, where it is unlikely to receive the attention warranted. **In this Climate Emergency Work Plan, it is critical that the City establish an intent to manage street trees as a fundamental infrastructure asset, and address the barriers and inequities associated with the lack of street tree maintenance.**

- h) We support Action NR-1, to complete the E-zone correction process in Industrial Areas including the Columbia Corridor. The existing maps are outdated, and the new maps will more accurately apply to existing tree canopy.
- i) We support NR-2, to continue support for community-based organizations doing watershed stewardship, community engagement, and education. **Please add "tree planting" to the list of functions attributed to these organizations. Also, please clarify what is meant by "continue to support".** Does this mean at current, previous, or expanded levels? This is confusing given that some city contracts, such as those for tree planting, are currently in flux. Further, this is the only action in the Work Plan that has "None" under Resource Gaps. It is unclear what "None" means. **If the action is to continue supporting organizations the city has supported in the past, and the action is ongoing, the action should be shown either as funded during the work plan timeframe, or should identify any additional funds needed, or as TBD.**
- j) We support Action NR-3 – to include climate resilience in the EOA. This action is scheduled to start this fiscal year (22-23). A Resource Gaps assessment of "TBD" is not acceptable. **Please update Resource Gaps to provide meaningful information.**

Also, the NR-3 language "to allow space for trees" is weak and does not reflect previous City Council direction. Ordinance 190200 As Amended (Nov 2020) states: "The Bureau of Planning and Sustainability will evaluate the Title 11 tree preservation and density exemptions for IH as part of the Economic Opportunities Analysis (EOA) update, consistent with City goals including those related to tree canopy, environmental health, climate change, and urban heat islands. The EOA

shall also analyze equitable public health and environmental justice, especially for those who are essential workers, those who are Black, Indigenous, and People of Color, and community members working in or living adjacent to the IH zone. The Bureau of Planning and Sustainability, Bureau of Development Services, and Portland Parks & Recreation shall also bring to Council viable strategies to reduce the urban heat island effect and create and maintain a healthy urban tree canopy within the IH zone concurrent with completion of the updated EOA.”

**Please reword the NR-3 Action by deleting “allowing space for trees” and rewording with the underlined: “... This includes address equitable public health and environmental justice, bring viable strategies to reduce urban heat island effect, create and maintain and healthy urban tree canopy within the IH zone, and protect wetlands, riparian corridors, and other natural areas.”**

- k) We support Action NR-4 – to create a comprehensive green infrastructure systems plan. Under Action - **Please elaborate on this action, providing intent and a citation for the work completed in 2019-2020 referred to in this section.**
  
- 6. **Wildfire** (page 14) - We support ambitious and expeditious action to address wildfire risks, for people and wildlife, and to sustain a healthy urban forest. **Please consider including a City-sponsored, proactive tree-pruning program at the Wildland Urban Interface near City natural areas (such as Forest Park) to reduce risks to nearby residents and to the natural areas.**
  
- 7. **Health Impacts – Heat and Smoke** – We support the actions in this section; however, it is missing key actions needed to reduce the heat-related impacts of climate change – specifically to reduce existing and future impervious surfaces and improve shade-equity. In our climate crisis, where excessive heat is already causing serious health impacts and deaths, this omission from the Climate Emergency Work Plan is not acceptable.

As noted above, the Climate Action Plan called for reducing impervious area. The 2014 Climate Change Preparation Strategy addressed impervious area specifically in ***Objective 1 Decrease the urban heat island effect, especially in areas with populations most vulnerable to heat.*** This objective is followed by 12 actions including the following:

- *Decrease impervious areas and increase the total ecoroof acreage in the city and identify additional complementary heat-mitigation alternatives such as reflective roofs in public and private development.*
- *Implement and expand the City's Urban Forestry Management Plan, revegetation, restoration and land acquisition programs, and continue and expand programs that incent removal of impervious areas.*
- *Adopt a site development performance standard to achieve high quality green infrastructure similar to Seattle's Green Factor for new development and redevelopment sites.*
- *Update environmental codes, regulations, plans, zoning and permit reviews to support strategies that reduce the urban heat island effect.*
- *Research, evaluate and pilot porous paving, de-paving, vegetation and/or more reflective surfaces in parking areas to reduce and cool impervious surfaces, particularly in urban heat island areas with populations most vulnerable to heat.*

Comprehensive Plan 2035 (2016) policy also calls for reducing impervious area and tree canopy to reduce urban heat island effects:

**Policy 4.76 Impervious surfaces.** Limit use of and strive to reduce impervious surfaces and associated impacts on hydrologic function, air and water quality, habitat connectivity, tree canopy, and urban heat island effects.

Although Portland's zoning code regulates building coverage, it does not (unlike some other U.S. cities and counties) regulate impervious surface coverage which can include patios and balconies, driveways, pathways, parking areas, etc. Combined with planned higher density development and recent housing-related code changes, Portland will continue seeing significant increases in impervious surfaces, including in our hottest neighborhoods, unless action is taken.

The Climate Emergency Workplan should include or incorporate by reference guidance from the Climate Change Preparation Strategy and the Comprehensive Plan to reduce impervious area and increase tree canopy to reduce urban heat and associated health impacts. The Bureau of Environmental Services is already collaborating with community partners to remove impervious areas and plant trees and vegetation. These programs should be expanded, and the City should create a multi-faceted and ambitious plan to



reduce heat across the city, including reducing existing and future impervious surface, strategic tree preservation and planting, and use of appropriate materials for roofing and paved surfaces.

- a) **Please add an action(s) to this section calling for 1) expansion of existing programs focused on depaving and tree planting in heat-prone areas, 2) a plan to reduce urban heat across the city, and especially in areas that are most vulnerable to heat. The plan should establish geographically specific temperature reduction targets, and regulatory and non-regulatory strategies to meet them, including programs to reduce existing impervious surfaces (depaving) and reduce future impervious surfaces associated with development, preserving, planting, and maintaining space for trees, development design approaches and materials (e.g., lighter colored roofs and streets), and 3) evaluation of regulatory options to limit impervious areas and such approaches in other cities.**
  - b) **Please add an action establishing the approach that PBOT will use to track the effectiveness of the recently adopted Pedestrian Guidelines in achieving its stated intent to encourage planting of street trees, especially large-form trees.**
8. **Infrastructure Planning and Construction (page 17) This section is currently lacking in that it does not, but should, establish a clear intent to leverage City infrastructure investments to improve community resilience.**
- a) We support Action IP-1 – To incorporate climate change information into capital project planning and design. However, simply incorporating such information into planning and design is insufficient. We want our infrastructure facilities to be resilient to climate change. But we also want to incorporate design approaches during infrastructure planning that will improve community resilience, equity, and environmental justice.

**Under Action, please reword as follows: “Incorporate climate change information (i.e., flood risk, extreme heat, drought) and opportunities to improve community resilience, equity, public and ecological health, and environmental justice, into capital planning and infrastructure design. Also, please update the “Why This Matters” section accordingly and complete the Council request section.**

- b) **Please add a new action to: Complete the Streets 2035 planning project, with a priority to include measures that improve community health and resilience to climate change, such as the inclusion of large form street trees and shade equity.**

We submit these comments to support Portland's efforts to make real progress toward meeting climate mitigation goals and creating an equitable climate-resilient city.

Sincerely,

A handwritten signature in black ink, appearing to read "Vivek Shandas". The signature is fluid and cursive, with a large initial "V" and a distinct "S" at the end.

Vivek Shandas, PhD  
Chair, Urban Forestry Commission

cc: Urban Forestry Commission members  
Andria Jacob, Bureau of Planning and Sustainability