



The League of Women Voters of Oregon, established in 1920, is a grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.

September 8, 2023

To: **Co-Chairs Damien Hall and J.D. Tovey**
[Members of the Housing Production Advisory Council](#)

Re: **Council Recommendations - Gutting Tree Codes - Opposed**

The League of Women Voters of Oregon has engaged in both housing and land use policies for many years. The League supports our statewide land use planning program with its 19 Goals. We also have strong positions on addressing our Climate Emergency.

We provided earlier comments in our [August 25th letter](#) on this issue of tree removal:

We are equally concerned by the potential recommendation related to tree removal. Many Portland neighborhoods with the least tree canopy cover and fewest parks also have the most impermeable surfaces, compounding the heat island effect. See a [KPTV map](#) of the Portland Metro area from 2023. Trees and other greenspaces are valuable assets to absorb carbon (think diesel fumes in urban areas) and to help with our increasingly hot summers.

There are multiple calculations to determine the age of a certain species of tree by its diameter. In any case, one can assume that a 48-inch diameter tree of any species has lived a long time—much longer than any new “street tree” that might be substituted for such a large tree. And a “fee in-lieu” doesn’t get you the purpose for required trees.

Are there circumstances when a tree should be removed? Yes. But **allowing for a blanket rule to remove all 48-inch diameter trees on small lots and clearcutting on larger parcels should be rejected.** Local jurisdictions have created tree ordinances with the public’s input. In prior input to this Work Group, it was noted that **there are different species of trees with varying degrees of local importance. That is why this issue should be left to the local jurisdiction.**

Any changes in those ordinances should be done locally after public discussion around both the need for affordable housing and the need to preserve valuable trees, and not by statewide legislation.

Not considered in the recommendation is the role trees play in addressing our climate emergency. Do we need more housing? Yes. But if we don’t provide mitigating strategies, our warming climate will make our planet unlivable. Without trees, that will certainly be true of our cities. **The 2023 legislature recognized the value of trees and other natural areas when they passed [HB 3409](#), Sections 24-26.**

We hope you will consider these comments as you develop your final recommendation.

Thank you for the opportunity to discuss this proposal.



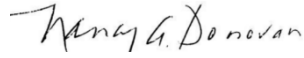
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Cc: [Geoff Huntington](#), Governor's Senior Natural Resources Advisor
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