



# PORTLAND PARKS & RECREATION

Healthy Parks, Healthy Portland

May 22, 2006

Oregon Public Utility Commission  
Attn: Filing Center  
PO Box 2148  
Salem, OR 97308-2148

RE: OPUC Docket No. AR 506-Public Comment in the Matter of a Rulemaking to Amend and Adopt Permanent Rules in OAR 860 Division 24 Regarding Vegetation Clearance Requirements

First, I want to state that I fully support all reasonable means to assure protection of human safety as it pertains to the above issue. But, as Portland's City Forester, I am concerned with the proposed new language and its potential negative consequences to the urban forest. From my understanding of the situation, I am not convinced of the necessity for the changes, as proposed. I ask that the OPUC consider delaying the adoption of these vegetation clearance requirements until a thorough analysis on the impacts to Portland's urban forest can be done.

What most concerns me is the change in the language from 'infrequent interference' to '18 inches of clearance at all times'. Not knowing how the utility companies may choose to comply with this language is what is most troubling. In Portland, we have worked hard with neighborhoods and utility companies to derive an appropriate pruning cycle that best suites the interests of the utilities and trees, while maintaining public safety.

I share the concerns outlined in a letter to you from the Oregon Department of Forestry that, "aggressive and poor pruning can severely impact the growth rate and the canopy health, causing trees to decline and become liabilities instead of assets to a community." As greater numbers of trees decline, we can expect an increasing number of tree failures and, thereby, of emergency call outs. Aggressive pruning will also have other consequences, such as increases in citizen complaints, which could place additional burdens on staff.

Respectfully,

David McAllister  
City Forester

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

[www.PortlandParks.org](http://www.PortlandParks.org)  
Dan Saltzman, Commissioner  
Zari Santner, Director