



Sam
Adams
Commissioner

May 24, 2006

Susan D.
Keil
Director

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

Eileen
Argentina
System
Management

RE: AR 506 Division 24 Administrative Rules

Don
Gardner
Engineering &
Development

I want to restate the position taken by the City at the May 11 and May 18 workshops. We believe that the rules proposed by OPUC staff will have a detrimental impact on the urban forest. Portland is known as a beautiful city in part because of its high quality environment and trees are an essential part of that. Urban trees contribute in at least three ways:

- **Aesthetic quality.** Trees make the City a more pleasant place.
- **Air Quality.** Trees help clean the air.
- **Property Values.** It is well documented that the presence of trees increases the values of individual properties and, thus, the community at large.

Sam M.
Irving, Jr.
Maintenance

John
Rist
Business
Services

Our concerns are similar to those of the Oregon Department of Forestry: "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." ODF further says: "...the long term cost to the urban forests of the cities we serve could potentially outweigh the benefits of this proposal. It would be incorrect to characterize this as a concern for beauty at the expense of safety." The City has been an active participant in the Oregon Joint Use Association (OJUA) since it was an OPUC task force, and we have yet to see any evidence of a compelling need to change the status quo. The proposed rules go too far.

Paul
Smith
Planning

In the absence of any credible evidence of need, and because of the likely impact to our investment in the urban forest, I urge the Commission to reject these proposed rules.

Sincerely,

Richard Gray
Contract Administrator
OJUA Treasurer

c: Rob Crouch, David McAllister, Portland Parks
Andrea Fogue, LOC