

To: Coalition of Gresham Neighborhood Associations.
From: Terra Wilcoxson, Planning Manager
Gabby Sinagra, Planner II
Tabitha Boschetti, Planner II
Memo Date: September 1, 2026
Meeting Date: September 8, 2026
Re: Presentation on the Tree Code Update Project

Purpose

At the September 8, 2026 Coalition of Gresham Neighborhood Associations meeting, staff will brief the Coalition on the Tree Code Update Project focusing on the key provisions in the draft code update. The purpose of this meeting is to share information about the draft amendments and garner input from the coalition members. The aim is also to prepare members to review the draft code updates, which will be available for public review by October 5, 2026.

Background

The Tree Code Update Project is a comprehensive review of Gresham's tree goals, policies, procedures, and development regulations. Residents, developers, and staff have identified concerns about complex processes, enforcement challenges, and the appropriateness and effectiveness of existing standards. The project is intended to support a more robust and equitably distributed tree canopy that advances climate resilience and healthy living. Earlier work included community engagement, application of an equity lens and data analysis, and review of peer-city approaches to tree preservation, planting, mitigation, and administration.

The project also builds on recent development code updates: a new site tree requirement for single detached and middle housing development was instituted (2022), the street trees standards and some planter strip widths were updated (2025), and new large parking-lot shading standards per the State of Oregon's Climate Friendly and Equitable Communities rules were added (2025). The current project is threefold; it includes Development Code amendments, updated approved tree lists based on a "right place, right tree" approach, and a user-friendly Tree Guidebook for the public.

Amendment Highlights

The amendments are intended to make tree regulations easier to find, understand, and administer. The draft code update consolidates most tree regulations into one section. Additionally, the draft includes:

- Clear criteria for large-scale tree removals,
- Spacing requirements based on tree size,
- Reduction and clarification of tree categories,
- Establishing uniform tree planting standards that are consistent with best practices in Urban Forestry,
- Draft Approved Tree List organized by tree size (small, medium, and large) with corresponding planter-strip width ranges for street trees,
- Allowance for up to 25 percent encroachment into a tree protection zone to aid tree protection and flexibility for small projects, and align standards with practices in other Cities,
- Fewer opportunities for discretionary changes to site trees requirements in design districts, and
- Updated terminology and definitions; consistent use of terms throughout.

Tree Removal

The draft code establishes new tree removal permit categories of A, B, and C. The new category system replaces the current system of Tree Removal Exemption applications, Tree Removal I, and Tree Removal II for the purpose of being clearer, more intuitive and better aligned with review time and effort. For the updated permit categories, any category may require tree replacement.

- **Tree Removal “A”** applications apply to the simplest situations, such as removing one or two trees in a backyard. This application includes all tree removals that would currently qualify for a “Tree Removal Exemption,” as well as residential street tree removals, and is therefore anticipated to be the application most frequently used by homeowners. Replacement of removed trees under a Tree Removal A may be required based on site tree planting standards for a given lot or where street tree replacement is needed to meet standards.
- **Tree Removal “B”** applications apply to situations that require more staff review to confirm that specific standards are met, including evaluating the need for an arborist report. This includes requests to remove hazard trees beyond the thresholds allowed under a Type “A” application, limited removal of hazard trees within environmental overlays, and removal of Significant Trees that area dead or determined to be hazardous. Tree Removal “B” applications also apply to requests to remove 10 or fewer trees under certain circumstances, including conflicts with existing or proposed development. Replacement of removed trees is typically required based on site tree and other planting standards.
- **Tree Removal “C”** applications apply to the most impactful situations that require a greater level of staff review and judgement. This includes situations where more than 10 trees are being removed due to development or other conflicts. Replacement of removed trees is typically required based on site tree and other planting standards.

New Industrial and Commercial Site Trees Standard

Currently in Gresham, industrial and commercial areas have substantially lower canopy than residential areas, creating an opportunity to increase tree canopy through planting and preservation. Existing standards rely on buffer trees, parking-lot trees, Climate Friendly and Equitable Communities shading requirements, and general landscape-area provisions. The draft includes a new requirement of one tree per 5,000 square feet of required landscaped area outside parking areas. A fee in lieu is available for demonstrated conflicts such as underground utilities.

Support for Preservation of Site Trees

Current standards generally count all site trees equally. The draft code allows preserved trees to count more toward planting requirements than newly planted trees, with greater credit given to larger, mature trees. Credit for preserved trees is based on diameter at breast height (DBH):

- 8–18 inches DBH equals one newly planted site tree,
- 18–24 inches DBH equals two newly planted site trees, and
- Greater than 24 inches DBH equals three newly planted site trees.

Retroactive Tree Removal Permit Fees

Current violations proceed through the City’s standard code enforcement process, which includes the responsible party obtaining the required tree removal permit. The proposal would add a retroactive permit fee for unpermitted removal, construction damage, and topping, responding to community requests for greater penalties. The draft includes an updated Violations section that includes allowance for application of additional penalty fees for greater levels of tree removal. For limited violations corresponding to the “Type A” removal threshold, fees are only proposed where more than one violation has occurred within a given timespan.

Anticipated Next Steps

As mentioned, Planning staff will review the above subjects and other key project topics with the Coalition on September 8, 2026. A full draft of the code amendments will be available for public review by October 5, 2026. A Planning Commission hearing is tentatively scheduled for November 2026 and a City Council hearing is tentatively scheduled for December 2026.