

To: Planning Commission
From: Terra Wilcoxson, Comprehensive Planning Manager
Gabby Sinagra, Planner II
Tabitha Boschetti, Planner II
Memo Date: April 17, 2026
Meeting Date: April 27, 2026
Re: Tree Code Update Project Work Session

Purpose

At the Planning Commission's meeting on April 27, 2026, City staff will provide a presentation on the Tree Code Update Project. The purpose of this meeting is to share updates on the project and garner input on potential code amendments.

Background

The Tree Code Update Project is a broad evaluation of the tree regulations in Gresham's Development Code. Staff last held a Planning Commission work session on this topic on August 18, 2025. Staff requested input from City Council during work sessions on September 2, and November 4th, 2025. At that time, staff solicited direction on options for the City's tree planting, preservation, and permit requirements, as well as fees. City Council supported strengthening the Development Code's existing tree requirements without overhauling the current regulations. There have been significant increases in tree planting requirements (and associated standards) in 2022 and 2025. Requirements were increased with various code update projects including Gresham's Middle Housing Code Update, Climate Friendly and Equitable Communities amendments, and a street tree standards update. Due to the incremental nature of development, the cumulative effect of these changes on the City's tree canopy is not yet clear.

Overview: Code Amendments

At the Planning Commission's meeting on April 27, 2026, staff will present options for strengthening the existing code standards. Staff have been working closely with a consulting arborist, Todd Prager, on these options. Below is a brief overview.

Ease of Use Amendments

Currently, Gresham's tree regulations are spread throughout the Development Code and can be difficult to understand and apply. The code is challenging to navigate and interpret for residents, developers, and staff.

The following edits can address this:

- Consolidate tree regulations into one section, to the extent feasible: Section 9.1000 Tree Regulations.
- Rewrite and reformat Section 9.1000 Tree Regulations.
- Make language clear and objective where required and where possible.
- Update requirements that are confusing; for example, tree removal permit criteria, and site tree removal/replacement.
- Increase uniformity of standards, where this is best urban forestry practice, for example, tree planting sizes.

Minimum Site Tree Requirements

Since 2022, the Development Code generally requires 1 site tree per 3,000 square feet of gross lot area for single family detached and middle housing developments. There is a similar requirement for developments in the

City's Design Districts, which most frequently see commercial and multifamily development. However, in Design Districts an applicant may apply to deviate from the requirement to plant less trees. Potential refinements for consideration include the following.

- Adding a minimum size requirement for site trees.
- Removing the ability to apply for fewer site trees in design districts, unless the development is in a town center.
- New minimum site tree requirements for commercial and industrial development outside of Design Districts, where no such standards currently exist.
- Allowing additional site tree planting (beyond the minimum requirement) to count toward meeting sustainability standards in Design Districts.

Tree Preservation

The project team has identified options to incentivize tree preservation including:

- Allowing preserved trees to count more heavily towards meeting the minimum site tree requirements, for example preserving 3 site trees equals planting 1 site tree. Larger trees could be weighed more heavily.
- As of June 2026, tree preservation can be used to meet neighborhood amenities requirements for residential subdivision development over 2.5 acres.

The project team has also identified options to improve tree protection practices, such as updating tree protection fencing requirements and clarifying requirements for off-site tree protection.

Revisions to Tree Removal Permit Thresholds and Processes

The tree removal permitting process can be simplified and clarified. Options include:

- Eliminating the current Tree Removal Exemption (TRES) and incorporating it into a Type I permit to streamline review. A TRES already requires paperwork for tracking purposes, which causes confusion for property owners. More situations that would otherwise be "TRES" also now require replanting to stay consistent with site planting standards.
- Refining the various permit thresholds so they align with the time and intensity of review needed.
- Developing clear and objective standards for Type II Tree Removal permit to make the criteria easier to understand and consistently apply. Particular clarity is needed for tree removal in development situations.
- Incorporating elements applicable only with the existing "clearcutting" threshold, such as financial guarantees for replanting, into a clear and objective set of criteria for Type II Tree Removal.

Tree Removal Permit Fees

Currently, there is no cost for a Tree Removal Permit Exemption or a Tree Removal Permit Type I. A Tree Removal Permit Type II has a flat fee of \$1,506. Amendment options include:

- Updating tree removal permit fees to align with intensity of staff resources needed for the type of review.
- Instituting fee amounts based on the quantity of trees removed (with or without a fee cap).
- Instituting a retroactive tree removal fee; this could be scaled by the magnitude of the unauthorized removal.

Approved Tree Lists and Street Trees

The project team is working to update the City's approved tree lists. The draft lists organize trees by size and align those sizes with planter strip widths to maximize street tree canopy.