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STAFF REPORT
TYPE IV HEARING: COMPREHENSIVE PLAN AMENDMENT
Tree Code Update Project

TO:	Gresham Planning Commission
FROM:	Gabby Sinagra, Planner II Tabitha Boschetti Planner II Terra Wilcoxson, Comprehensive Planning Manager
HEARING DATE:	November 9, 2026
REPORT DATE:	October 30, 2026
FILE NUMBER:	CPA-25-00461
PROPOSAL:	To adopt Comprehensive Plan text amendments to Volume 3 (Development Code) of the Gresham Community Development Plan (GCDP). The amendments consolidate tree-related standards currently dispersed throughout the Development Code for ease of use, clarity, and consistency; update the tree removal permit framework to ensure clear and objective standards for tree removal; update thresholds for tree removal; update site tree planting requirements to include a new site tree requirement for commercial and industrial development; update tree protection standards to be more clear and objective; align tree planting standards and technical requirements with current arboricultural best practices; and update definitions and code language throughout the Development Code for consistency and to remove repetitive or out-of-date language and standards.

EXHIBITS:

- Council Bill: Proposed Comprehensive Plan Text Amendments
- Exhibit A of the Council Bill: Draft Section 9.1000 Tree Regulations
- Exhibit B Public Comment – Dyk – October 28, 2026

RECOMMENDATION: Staff recommends **adoption** of the proposed Comprehensive Plan text amendments, CPA-25-00461, as contained in the attached exhibits, based on the findings, conclusions, and recommendations in the October 30, 2026, staff report.

SECTION I. Executive Summary

The Tree Code Update project is a comprehensive review of Gresham's tree goals, policies, procedures, and development regulations. This package of code amendments is designed to modernize the City of Gresham's tree regulations, establish a clearer and more predictable tree removal permitting framework, strengthen tree protection and urban canopy objectives, and align technical requirements with current arboricultural best practices. By updating outdated or inconsistent and confusing language and consolidating tree-related standards, the proposed code amendments aim to make the tree regulations more user-friendly for applicants, staff, and the public.

Primary Changes

The amendments are to Volume 3 of the City's Community Development Plan. The update includes a repeal and replace of Section 9.1000 Tree Regulations, provides new language, language clarifications, reformatting, and removes outdated or irrelevant information. The primary proposed changes include:

- Establishing new tree removal permit thresholds that better reflect the scope, impact, and review time associated with the removal request;
- Requirement of a financial guarantee for mass grading;
- Clear requirements for tree protection during development and flexibility for encroachments when spatial constraints exist;
- New site tree planting requirements in required landscaping area for commercial and industrial development outside of Design Districts with flexibility for fee-in-lieu;
- Removing the discretionary path for site tree requirements in Design Districts, with exemptions for Town Centers where development is most intense;
- Uniform planting standards and technical updates to align with best practices in urban forestry;
- New tree size standards and new spacing requirements, which provide minimum distances between trees, buildings, and other infrastructure based on the size of the tree to reduce conflicts;
- Enhanced tree retention standards that allow preserved trees to count towards development planting requirements; and
- Enhanced tree replacement requirements that are coordinated across new standards for tree type, size, and required spacing.

Community Engagement and Involvement

Community engagement took place throughout the project with outreach strategies tailored to different stages of the process. Outreach occurred in two phases, each with a different focus to

support the project goals. Staff have incorporated input from community members, the Gresham Coalition of Neighborhood Associations, Urban Forestry Subcommittee, local development professionals, Planning Commission, and City Council into the code updates.

- The initial phases of outreach introduced the project goals and were primarily opportunities to hear about the community's priorities for tree regulations in the City. The use of an Equity Lens tool helped identify community members and places that may be more impacted by tree policies and informed place-based community engagement activities. Outreach activities included two online surveys, community events, and cross-cultural outreach in partnership with Latino Network and Arise and Shine.
- The second phase of outreach involved discussion of specific changes to tree regulations in the Development Code as well as additional work revolving around updates to the Approved Tree Lists and Tree Guidebook through multiple work sessions with the Neighborhood Coalition, Urban Forestry Subcommittee, Developer Advisory Group, Planning Commission, and City Council. Larger policy discussions, including a focus on site tree requirements, tree removal permits, and tree preservation were held with the Planning Commission and City Council at work sessions during the Summer and Fall of 2026.
- Engagement activities included the following:
    - Urban Forestry Subcommittee – May 20, 2024
    - Neighborhood Coalition – June, 11, 2024
    - Planning Commission – June 24, 2024
    - Movies in the park – July 20, 2024, August 9, 2024, & August 16, 2024
    - Downtown Farmer's Market – August 3, 2024
    - Rock the Block – August, 24 2024
    - Cross-Cultural Engagement Sessions (hosted in partnership with Latino Network and ARISE and Shine) – October 15 and November 12, 2024
    - Urban Forestry Subcommittee – November 18, 2024
    - Urban Forestry Subcommittee – January 27, 2025
    - Planning Commission – January 27, 2025
    - City Council – February 4, 2025
    - Neighborhood Coalition – March 11, 2025
    - Urban Forestry Subcommittee – May 19, 2025
    - Developer Advisory Group – July 31, 2025
    - Urban Forestry Subcommittee – August 18, 2025
    - Planning Commission – August 18, 2025
    - City Council – September 2, 2025
    - City Council – November 4, 2025
    - Neighborhood Coalition – April 15, 2026
    - Urban Forestry Subcommittee – April 20, 2026
    - Planning Commission – April 27, 2026

- City Council – June 2, 2026
- Neighborhood Coalition – September 8, 2026
- Planning Commission – September 28, 2026
- Urban Forestry Subcommittee – October 15, 2026

The following required notices were sent for the project:

- Notice of the Development Code changes were sent to the Department of Land Conservation and Development (DLCD) and Metro on October 5, 2026, complying with the requirement to provide such notice at least 35 days before the first evidentiary hearing. Notice of the November 9, 2026, Planning Commission hearing was published in the *Gresham Outlook* on October 28, 2026. Notice of the December 8, 2026, City Council hearing will be published in the *Gresham Outlook* no later than November 25, 2026. A Measure 56 notice is not required for this comprehensive plan amendment.

Public Comment

As of the date of this report one written public comment was received on October 28, 2026 from Dave Dyk which is attached as Exhibit B. The main focus of Mr. Dyk's comments included the need to prioritize housing production and affordability in regard to adopting new tree regulations such as tree preservation, spacing, replacement, and permitting requirements that could constrain residential density, increase development costs, and delay housing construction.

Proposed Comprehensive Plan Amendments Overview

The overview provided below summarizes the changes proposed to the Gresham Community Development Plan (GCDP). The plan consists of three volumes—Volume 1 "Findings", Volume 2 "Policies", and Volume 3 "Development Code". Updates are proposed to Volume 3. The full text of the proposed updates is provided in the draft Council Bill (formatted in ~~strikeout~~/underline) and Exhibit 'A' - Draft Section 9.1000 Tree Regulations.

The following code amendments are proposed:

3.0100 Definitions

The proposed amendments in this section primarily replace outdated and inconsistently applied terminology with standardized classifications. Updated definitions will support updates in other areas of the Development Code. For example, rather than relying on "Regulated" and "Required" tree definitions to illustrate what requirements are applicable to different trees in different development contexts, the language refers to trees in specific situations and defines trees that are "Exempt" from permit requirements. A definition for "Gross Lot Area" was created to help clarify the requirements for site trees in residential developments and this term will now appear in the site tree planting requirements table in Section 9.1000. Other edits were made to align technical requirements with current arboricultural best practices, support consistent

terminology throughout the code, or to provide clarification. Additionally, some terminology was removed either because it was no longer used in code or because there was no need to define it in the context of this document.

4.0300 Industrial Land Use Districts
Corrected references to new code sections are proposed in this section.

4.1100 Downtown Plan District
The proposed amendments in this section update references to the consolidated tree standards in Section 9.1000 and remove planting requirements in locations that conflict with the revised tree spacing and dimensional standards, including parking area building buffers, driveway landscaping, and setback landscaping. The amendments also revise parking lot landscaping requirements to improve consistency between the design district sections and the general parking standards, incorporating the updated tree terminology and aligning the requirements across these sections.

4.1200 Civic Neighborhood Plan District
The proposed amendments remove tree planting standards from the design district, by consolidating them into Section 9.1000 and adding references to the new consolidated tree standards. Species-specific street tree requirements along Wallula Avenue are retained due to the street's unique cross section. The amendments remove tree planting requirements in locations that conflict with the revised tree spacing and dimensional standards, including setback landscaping and parking area building buffers. Within the Civic Neighborhood Design District, the existing discretionary pathway for site tree requirements is retained to allow flexibility in areas expected to accommodate the densest development. Parking lot landscaping requirements are updated to align the design district standards with the general parking standards and to incorporate the revised tree terminology.

4.1500 Springwater Plan District
The proposed amendments include a minor clarification to landscaping requirements to address revisions to definitions and to update a section reference.

5.0200 Hillside and Geologic Risk Overlay (HGRO)
Updates include corrections to terminology and section references.

6.0300 Planned Developments
The proposed amendments include an update to terminology for consistency.

7.0100 Corridor Design District
The proposed amendments update section references and terminology for consistency. Planting standards that conflict with the revised tree spacing and dimensional requirements, including those applicable to parking structures, are removed. The amendments eliminate a discretionary pathway for meeting site tree requirements and revise parking lot landscaping standards to improve consistency across the design district sections.

7.0300 Commercial, Institutional, and Industrial Design Standards
The proposed amendments update section references and establish new site tree planting requirements of 1 site tree per 5,000 square feet within existing landscaping areas (excluding parking lot landscape area) exclusively for industrial development. The amendments also revise planting requirements to reference the updated tree spacing and dimensional standards in Section 9.1000 and clarify that preserved trees are subject to the site tree retention standards.

7.0400 Residential Design Standards
The proposed amendments update section references to reflect the removal of site tree planting requirements from this section and their consolidation in Section 9.1000, including the updated dimensional and spacing standards and site tree retention standards for preserved trees. Site tree requirements have been updated so that planting may occur anywhere on the site rather than solely within private open spaces. The amendments do not propose any changes to the amount of site trees required per site i.e. 1 tree per 3,000 square feet of gross lot area.

7.0500 Rockwood Design Guidelines and Standards
The proposed amendments update section references and revise planting requirements to align with the consolidated tree standards in Section 9.1000, including the updated dimensional and spacing standards and site tree retention standards for preserved trees. Street tree standards are revised to reference Section 9.1000. The amendments remove the distinction between areas inside and outside the Rockwood Triangle to simplify the standards and remove outdated and inconsistent terminology. Within the Rockwood Design District, the existing discretionary pathway for meeting site tree standards is retained to allow flexibility for areas expected to accommodate the densest development. Parking lot landscaping requirements are updated to improve consistency across the design district sections and provide greater clarity and ease of use.

9.0100 Buffering and Screening
The proposed amendments update section references to the consolidated tree standards in Section 9.1000 and add minor clarifications to align with new terminology.

9.0800 Parking
The proposed amendments update section references to the consolidated tree standards in Section 9.1000 and coordinate parking lot standards with design district sections.

9.1000 Tree Regulations
The existing 9.1000 Tree Regulations section is proposed to be repealed and replaced because the proposed text and formatting updates are extensive. Notably, this section has been reorganized to replace the Tree Removal for Existing Development and Tree Removal During Development framework with a new tree removal permit framework consisting of Categories A, B, and C, each with corresponding removal allowances and standards. This approach is intended to improve the clarity, consistency, and usability of this code.

Specific updates include: an update to standards for tree removal that provide clear and objective criteria for evaluating tree health, hazardous conditions, and conflicts with development; the addition of a financial guarantee to ensure required tree replacement is secured when trees are proposed to be removed to accommodate early grading before a

development application is submitted; site tree requirements for residential, commercial, and industrial development are consolidated into a single table, and the circumstances under which a fee-in-lieu may be used to satisfy the requirements are clarified; new site tree retention standards that allow healthy preserved trees, as determined by a certified arborist, to count toward site tree planting requirements based on the size of the retained tree; new uniform planting standards recommended by the project consulting arborist to align with urban forestry best practices, along with corresponding spacing standards establishing minimum distances between trees, buildings, and other infrastructure; revised tree protection standards that more strongly protect the critical root zone of trees while allowing minor encroachments to provide flexibility for smaller or constrained development sites; clarification of the process for Significant Tree removal; and updates to the violations provisions to align with the new tree removal permit framework.

11.0200 Initiation and Classification of Applications
The proposed amendments include updates to reflect the new permit threshold framework and minor terminology updates.

II. APPLICABLE COMMUNITY DEVELOPMENT CODE PROCEDURES

Section 11.0200 Initiation and Classification of Applications
Section 11.0600 Type IV Legislative Procedures
Section 11.1000 Public Hearings

Section 11.0200 – Initiation and Classification of Applications

11.0201 – Initiation of an Application

This section provides that City Council may initiate a Type IV legislative application to amend the Community Development Plan.

Findings:

This project was initiated by City Council on July 18, 2023. City Council will review these amendments at a hearing on December 8, 2026.

11.0203 and 11.0204 – Classification of Applications and Review Authorities

These sections provide that Type IV procedures are legislative and typically involve the adoption, implementation, or amendment of policy by ordinance. They also provide that the Planning Commission provide a recommendation on Community Development Plan Amendments and the City Council be the decision-making authority.

Findings:

This project meets those conditions and is being processed under the Type IV procedures and will be heard by both the Planning Commission and the City Council.

Section 11.0600 – Type IV Legislative Procedures

11.0602(A)&(B) – Pre-application and Neighborhood Meetings

These meetings are not required of Type IV legislative applications.

Findings:

Although a pre-application meeting and neighborhood meetings are not required, public meetings were held and provisions for public involvement were included in the project.

11.0602(C) – Application Initiation

This section provides that the City Council may initiate a Type IV legislative application to amend the text of the Community Development Plan.

Findings:

As noted above, this project was initiated by City Council on July 18, 2023.

11.0602(D)(1) – Type IV Public Notice for Comprehensive Plan Amendments

(a) For a Type IV Comprehensive Plan Amendment this section requires a submittal to the DLCD and Metro at least 35 days prior to the Planning Commission hearing.

(c) This section requires that at least 10 days before the initial hearing, a notice be published in a newspaper of general circulation in the city and copies of the hearing notice made available in City Hall.

Findings:

Submittal to DLCD and Metro was made on October 5, 2026, which is 35 days prior to the Planning Commission hearing date of November 9, 2026. Required notice of the public hearing for these proposed amendments were published in the *Gresham Outlook* before October 28, 2026 (12 days in advance of the November 9, 2026, Planning Commission Hearing) and was made available through City Hall as required by this section.

11.0602(E) – Type IV Decision Authority and 11.0602(F) Type IV Notice of Decision

This section requires that the Planning Commission hold a public hearing and make a recommendation to the Council for an amendment to the Community Development Plan. The Council considers that recommendation at their hearing and makes a final decision. Interested persons may present evidence and testimony relevant to the proposal at either or both hearings.

Findings:

The Council will make a decision that will be based on findings contained in this report and in the hearings record, and the decision, findings, and order will be sent to those who participated in the hearings.

This standard will be met with issuance of a decision.

11.1000 – Public Hearings

This section provides for a hearing process consistent with Section 11.1000.

Findings:

The Council will make a decision that will be based on findings contained in this report and in the hearings record, and the decision, findings, and order will be sent to those who participated in the hearings.

This standard will be met with issuance of a decision.

Conclusion: The proposed amendments meet all applicable Development Code standards and procedures.

III. APPLICABLE COMMUNITY DEVELOPMENT PLAN (GCDP) GOALS & POLICIES

This section identifies the applicable Community Development Plan goals, policies, and action measures. The text (*italicized*) of the goals, policies, and action measures is followed by corresponding findings and conclusions.

Section 10.014 Land Use Policies and Regulations
Section 10.100 Citizen Involvement

Section 10.014 – Land Use Policies and Regulations

Section 1, Land Use Policies and Regulations

Goal: *Maintain an up-to-date Comprehensive Plan and implementing regulations as the legislative foundation of Gresham's land use program.*

Policy 1 *The City's land use program will be consistent with state and regional requirements but also shall serve the best interests of Gresham.*

Policy 2: *The City's land use regulations, actions, and related plans shall be consistent with and implement the Comprehensive Plan.*

Policy 15: *Applicants shall bear the burden of proof when proposing to amend the Community Development Plan Map or the Comprehensive Plan text to show compliance with approval criteria. This includes applicable Comprehensive Plan goals and policies.*

Policy 19 *Applicants shall bear the burden of proof to demonstrate that proposed land use actions are consistent with applicable Community Development Code regulations and standards, Comprehensive Plan criteria, and when necessary, the requirements of the state and other agencies.*

Policy 20: *The City shall periodically review and update the Comprehensive Plan text and the Community Development Plan Map(s) to ensure they remain current and responsive to community needs; provide reliable information and dependable factually-based policy direction; and conform to the applicable state law, administrative rules, and regional requirements.*

Policy 21: *Council may, upon finding it is in the overall public interest, initiate legislative processes to change the Comprehensive Plan text and Community Development Plan Map(s) and Development Code.*

Action Measure 11 :	Revise the Comprehensive Plan Text, Map, and related findings as needed to maintain its reliability and timeline to ensure consistency among goals, policies, implementing measures; accuracy of findings and compliance with regional, state, and federal laws and rules. This includes review by the Planning Commission every two years…
Action Measure 12:	*Monitor and evaluate whether City actions and resulting community conditions and circumstances are consistent with the goal and policy directions of the Comprehensive Plan…*
Action Measure 13:	*Monitor actions, programs and policies of federal, state and regional governments and when appropriate amend the Comprehensive Plan to be consistent with new laws and administrative rules.*
Action Measure 15:	*Allow mixed-use commercial, employment, and residential development to support transit use, enhance neighborhood economic and social vitality, and provide for a range of housing opportunities/options.*

Section 2, Community Design, Trees and Other Vegetation

Goal:	*Protect and enhance the environmental, public health and safety, and aesthetic contribution of trees and other vegetation.*
Policy 1:	*The City shall establish regulations to protect and, when necessary, restore trees and other vegetation to support community aesthetics, maintenance and/or improvement of water quality, erosion control and stability of slopes and unstable soils.*
Policy 2:	*The City shall condition development approval to require preservation of existing trees and mitigation of the consequences of tree/vegetation removal.*
Policy 4:	*The city shall require:* a. Installation of trees and other landscaping with all development, including… b. Tree types and other plant materials installed as conditions of development approval are appropriate for site conditions….
Policy 7:	*The City shall require compliance with its tree regulations and conditions of development approval and shall establish and enforce regulations whenever necessary to preserve trees, ensure development occurs per city standards and to deter vandalism and unauthorized removal of city trees.*

Policy 9:	*The City shall ensure its various codes, regulations and standards relating to landscaping, site development, tree protection and removal are consistent with and supportive of one another.*
Action Measure 2:	*Maintain and periodically update approved tree lists for specific applications and site conditions such as street trees, parking lot trees and trees for wetland and riparian areas. These lists should allow flexibility to choose a wide variety of species that are proven suitable for local climate conditions and for specific uses and locations.*
Action Measure 7:	*Ensure development actions comply with the City's landscape standards and tree protection ordinances.*
Action Measure 15:	*Develop information and provide education for the general public regarding tree maintenance and protection, tree planting and the use of drought tolerant, low maintenance landscaping.*
Action Measure 16:	*Provide incentives to encourage developers to preserve trees and other significant vegetation.*
Action Measure 20:	*Emphasize, where conditions allow, the planting of trees that will grow large, including long lived evergreens and broad spreading deciduous varieties. Large trees are particularly important for their aesthetic and environmental contributions.*
Action Measure 21:	*Develop tree-mitigation regulations / standards to guide the City in assessing fees or compelling compensatory action resulting from violation of its tree protection standards and / or conditions of development approval.*

Section 3, Urban Forestry Management Plan

Goals:	1. *Create a High-Quality Urban Forest in Gresham* 2. Establish Proactive Public Tree Maintenance and Management Practices 3. Promote Community Partnership and Education Opportunities for Urban Forestry
Policy 1:	*Protect, preserve, and enhance Gresham's urban forest*
Policy 2:	*Maximize tree-canopy cover to expand Gresham's urban forest*
Policy 6:	*Adopt best management practices and resource management tools to improve tree maintenance citywide*
Action Measure 1:	*Simplify and consolidate tree codes, making them clearer to the public and implementable by City staff*

Action Measure 2:	*Update the City's Street Tree List to reflect "Right Tree, Right Place" strategies for planter-strip widths, medians, parking lots and utility corridors. The list should not include invasive species and should reflect species diversity.*
Action Measure 20:	*Emphasize, where conditions allow, the planting of trees that will grow large, including long lived evergreens and broad spreading deciduous varieties. Large trees are particularly important for their aesthetic and environmental contributions.*
Action Measure 21:	*Develop tree-mitigation regulations / standards to guide the City in assessing fees or compelling compensatory action resulting from violation of its tree protection standards and / or conditions of development approval.*

Findings:

City Council initiated this update to the Tree Code in Summer 2023 as an opportunity to look holistically at the City's tree management priorities and policies and to respond to the concerns from residents, staff, and developers regarding the complexity of tree processes, enforcement challenges, and the effectiveness of existing standards.

The proposal consolidates tree regulations, clarifies tree removal permit categories and approval criteria, and coordinates landscaping and tree planting standards across the Development Code to improve the consistency, clarity, and usability of the tree code. The amendments establish new tree retention standards to allow retained trees to count toward planting requirements and refines tree protection standards to align with arboricultural practices to support the Comprehensive Plan's goals for protecting and enhancing Gresham's urban forest. Updated planting and spacing standards, informed by the project consulting arborist, promote appropriate tree selection based on site conditions and urban forestry best practices. The proposed amendments include new site tree planting standards for industrial and commercial development to support maximizing tree cover and expanding Gresham's urban forest while responding to community concerns related to urban heat islands and the desire for a variety of canopy coverage throughout the City. The project is a review and update to the Development Code to ensure tree regulations remain current and responsive to community needs; provide clear and objective standards; and conform to the applicable state law, administrative rules, and regional requirements.

Gresham's Community Development Plan has been found to be in compliance with State and regional requirements. The proposed amendments have been found to be in compliance with

Gresham's Community Development Plan and State and regional requirements as described in this staff report.

As required by State and Metro regulations, a draft of the proposed amendments were sent to the Oregon Department of Land Conservation and Development (DLCD) and to Metro at least 35 days prior to the scheduled November 9, 2026, Planning Commission Hearing. As of the date of this report, neither agency has contacted the City regarding this notice.

Conclusion: The proposed amendments to the Gresham Community Development Plan meet the applicable goals, policies, and action measures in Section 10.014 Land Use Policies and Regulations.

Section 10.100 – Citizen Involvement

Goal:	*The City shall provide opportunities for citizens to participate in all phases of the planning process by coordinating citizen involvement functions; effectively communicating information; and facilitating opportunities for input.*
Policy 1:	*The City shall ensure the opportunity for citizen participation and input when preparing and revising policies, plans, and implementing regulations.*
Policy 2:	*The City shall consider the interests of the entire community and the goals and policies of the Comprehensive Plan when making decisions.*
Policy 6:	*The City shall ensure that technical information necessary to make policy decisions is readily available.*
Policy 7:	*The City shall facilitate involvement of citizens in the planning process, including data collection, plan preparation, adoption, implementation, evaluation, and revision.*
Policy 8:	*The City shall ensure that citizen concerns are considered in land use decisions and shall provide feedback to the public regarding how these concerns have impacted decisions.*
Policy 9:	*The City shall ensure that citizen involvement plans and activities incorporate Gresham's diverse constituencies regardless of age, sex, religion, social, or business affiliation.*
Policy 10:	*The City shall ensure the opportunity for the public to be involved in all phases of planning projects and issues.*

Policy 11:	*The City shall ensure that the public has complete and timely access to all public information concerning land use projects and issues. This includes private proposals once they are in the formal application process.*
Action Measure 2:	*Ensure that the input, information, factual contributions, and expertise provided by citizens is considered…*
Action Measure 4:	*Keep the public informed of opportunities for involvement in all phases of land use planning issues…*
Action Measure 5:	*Provide citizens timely access to all public information related to land use matters…*
Action Measure 6	*Communicate information clearly and effectively*
Action Measure 7:	*Engage in outreach activities to inform and encourage public involvement…*
Action Measure 8:	*Facilitate citizen input in the process for revising local land use plans and ordinances…*
Action Measure 9:	*Make public participation processes user-friendly…*
Action Measure 10:	*Encourage broadly based public participation including all geographic areas and diverse interests…*
Action Measure 11:	*When appropriate, provide culturally-sensitive participation opportunities, which may include language translation and interpretation.*

Findings:

The public involvement goals and policies establish the City's intent that its citizens have meaningful opportunities throughout a planning project to be informed and to affect proposals. This project's community engagement opportunities included outreach at multiple stages of the project, including at inception to the point that draft code was available for review. Feedback was gathered from various stakeholders, including several workshops with the Neighborhood Coalition, Urban Forestry Subcommittee, and the Developer Advisory Group; community outreach events to get feedback from underrepresented communities; and multiple work sessions with the Planning Commission and City Council to discuss and receive direction on specific Development Code sections and standards.

The comments and suggested code updates were thoughtfully considered and, in most instances, incorporated into the project. For example, in response to guidance from the Neighborhood Coalition regarding the importance of preserving large, mature trees, staff incorporated amendments establishing a higher level of permit review for the removal of trees greater than 36 inches in diameter at breast height (DBH), requiring applicants to demonstrate an approved reason for removal. Feedback from City Council and the Developer Advisory Group informed the development of new tree retention standards to allow preserved trees to count toward site tree planting requirements, with larger trees contributing more toward meeting those requirements. Additionally, the Planning Commission and City Council informed amendments to the new site tree requirements for commercial and industrial developments outside Design Districts to include the allowance of a fee-in-lieu for when the standards are unable to be met.

A webpage on the EngageGresham.org web site was updated with information about the project goals and status, with an opportunity to provide comments on the project or to contact staff for more information. The project included a variety of outreach and engagement opportunities which respond to Policies 1, 2, 6, 7, 8, 9, 10, and 11 and Action Measures 2, 4, 5, 6, 7, 8, 9, 10, and 11.

Draft Planning Commission minutes will be forwarded to City Council prior to the final Hearing for their consideration while making a decision in response to Action Measure 2. The recording of the Planning Commission Hearing will also be available to Council and the public prior to the final hearing.

Conclusion: The proposed amendments meet the applicable goals, policies and action measures in Section 10.100 – Citizen Involvement.

IV. APPLICABLE METRO URBAN GROWTH MANAGEMENT FUNCTIONAL PLAN TITLES

Title 1 Housing Capacity
Title 3 Water Quality and Flood Management
Title 8 Compliance Procedures
Title 13 Nature in Neighborhoods

Title 1 – Housing Capacity

Title 1 of Metro's Urban Growth Management Functional Plan (UGMFP) is intended to promote efficient land use within the Metro UGB by increasing housing capacity. Section 3.07.110 states that, "*the Regional Framework Plan calls for a compact urban form and a 'fair-share' approach to meeting regional housing needs. It is the purpose of Title 1 to accomplish these policies by requiring each city and county to maintain or increase its housing capacity."*

Findings
The amendments support the objectives of Metro's Title 1 by maintaining flexibility in how development sites accommodate tree requirements, thereby supporting the efficient use of land and maintaining Gresham's housing capacity. Site tree requirements for residential uses have

not been increased; rather, existing requirements have been reorganized and clarified to ensure standards are clear and objective. Discretionary pathways are retained in designated Centers to accommodate the greater intensity of development anticipated in these areas. The new tree retention standards offer a voluntary pathway for tree preservation rather than imposing a rigid requirement that could create conflicts with development. No amendments are proposed to reduce housing capacity. The proposal is consistent with Title 1.

Title 3 – Water Quality and Flood Management

Title 3 of Metro's Urban Growth Management Functional Plan (UGMFP) calls for maintaining watershed health to benefit people, fish, and wildlife. It is the purpose and intent of this title to protect beneficial water uses, and functions and values of water resources, within the Water Quality and Flood Management Areas by limiting or mitigating the impact on these areas from development activities and protecting life and property from dangers associated with flooding.

Findings:
The City protects Title 3 water resources through the provisions of Section 5.0100 Floodplain Overlay District and Section 5.0700 Natural Resource Overlay. These provisions will not be reduced, therefore Title 3 is not applicable.

Title 8 – Compliance Procedure

Findings:
Section 3.07.820 of this title requires that at least 35 days prior to the first evidentiary hearing on an amendment to a comprehensive plan or land use regulation that the City submit the proposed amendments to Metro. Metro may review the amendments and can request that the City provide an analysis of compliance with the Functional Plan.

The City submitted the proposed amendments to Metro on October 5, 2025, which was at least 35 days prior to the first evidentiary hearing of November 9, 2026. As of the date of this report, METRO has not contacted the City regarding this proposal.

Title 13 – Nature in Neighborhoods

The purpose of Title 13 is to protect riparian areas and wildlife habitat, and to prevent water pollution and improve water quality.

Findings:
The City protects riparian areas and wildlife habitat through the provisions of Section 5.0100 Floodplain Overlay District and Section 5.0700 Natural Resource Overlay. These provisions will not be reduced, therefore Title 13 is not applicable.

Conclusion: The proposed amendments comply with the applicable Metro Urban Growth Management Functional Plan Titles 1 (Housing Capacity), Title 3 (Water Quality and Flood Management), Title 8 (Compliance Procedures), and Title 13 (Nature in Neighborhoods). As of the date of this report, Metro has not contacted the City regarding the notice for these amendments.

V. APPLICABLE OREGON STATEWIDE PLANNING GOALS

Goal 1 Citizen Involvement
Goal 2 Land Use Planning
Goal 6 Air, Water, and Land Resources Quality
Goal 10 Housing

Goal 1 – Citizen Involvement

Statewide Planning Goal 1 for Citizen Involvement requires that cities "*ensure the opportunity for citizens to be involved in all phases of the planning process.*"

Findings:
Gresham's Planning Commission acts as the Committee for Citizen Involvement (CCI) and has been involved in the project from the beginning of the project in 2023.

The public process included various outreach efforts including but not limited to web updates, cross-cultural engagement sessions, neighborhood association workshops, Urban Forestry Committee workshops, and work sessions with the Developer Advisory Group, Planning Commission, and City Council. The public was notified of the Planning Commission, and City Council Hearings through the City's webpage, interested parties email update, and published in the *Gresham Outlook*.

Public comment may be submitted before or during the forthcoming Planning Commission hearing and City Council hearing. All those who submit comment on the proposed amendment receive a notice of decision.

Additional findings regarding Citizen Involvement can be found in Section III, Section 10.100 of this report.

Goal 2 – Land Use Planning

Statewide Planning Goal 2 for Land Use Planning requires cities, "*to establish a land use planning process and policy framework as a basis for all decision and actions related to use of land and to assure an adequate factual base for such decisions and actions. This shall result in land use plans and implementation measures that are consistent with the land use plans."*

Findings:
The City has a state-acknowledged Comprehensive Plan. Section III of this report describes findings and conclusions that all actions related to land use (i.e., the proposed code amendments) are consistent with applicable procedures and applicable goals and policies of the City's Comprehensive Plan. In compliance with Goal 2, the proposed code amendments will be considered at a public hearing with opportunities for review and comment by residents and affected governmental units, including DLCD and Metro.

Goal 6 – Air, Water, and Land Resources Quality

Statewide Planning Goal 6 for Air, Water, and Land Resources Quality instructs local governments to consider protection of air, water, and land resources from pollution and pollutants when developing Comprehensive plans.

Findings:
The City's acknowledged regulations for implementing Goal 6 remain in effect with no change in applicability. The amendments do not affect the City's ability to maintain and improve air, water, or land resources. The proposed tree retention standards provide a clear and objective pathway for preserving trees related to land development and the proposed replacement standards provide mitigation for lost canopy to support air quality. Trees improve air quality by absorbing carbon dioxide and particulates, storing carbon, and releasing oxygen – a process that purifies the air we breathe. The amendments do not alter these requirements.

Goal 10 – Housing

Statewide Planning Goal 10 for Housing requires cities to "*provide for the housing needs of citizens of the state*." Goal 10 specifies that each city must plan for and accommodate needed housing.

Findings:
The amendments to site tree requirements, including maintaining a discretionary pathway for site trees in designated Town Centers and adding a site tree requirement for industrial development with the allowance for fee-in-lieu, continue to balance the goals of enhancing Gresham's urban forest and housing development by providing clear and objective standards as well as several discretionary options to comply with regulations, and do not impede the development of housing, which remains a critical need across Oregon.

Conclusion: The proposed amendments comply with the applicable Statewide Planning Goals 1 (Citizen Engagement), Goal 2 (Land Use), Goal 6 (Air, Water, and Land Resources Quality), and Goal 10 (Housing). As of the date of this report, DLCD has not contacted the City regarding the notice for these amendments.

VI. CONCLUSION

The proposed Community Development Plan text amendments included in the Council Bill and Exhibit A are consistent with all applicable procedures, goals and policies of the Community Development Plan, applicable Titles of the Metro Urban Growth Management Functional Plan, and applicable Statewide Planning Goals as indicated by findings contained or referenced in Section V of this report.

VII. RECOMMENDATION

Staff recommends **adoption** of the proposed Comprehensive Plan text amendments, CPA-25-00461, as contained in the attached exhibits, based on the findings, conclusions, and recommendations in the October 30, 2026, staff report.

End of staff report