

To: Urban Forestry Subcommittee  
From: Terra Wilcoxson, Comprehensive Planning Manager  
Gabby Sinagra, Planner II  
Memo Date: April 13, 2026  
Meeting Date: April 20, 2026  
Re: Tree Code Project Update Work Session

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## Purpose

At the Urban Forestry Subcommittee's meeting on April 20, 2025, City staff will provide a presentation on the Tree Code Update Project. The purpose of this meeting is to share the updates on the project and garner input on potential code amendments to be reviewed by the Planning Commission and City Council in May and June of 2026.

## Background

The Tree Code Update Project is a broad evaluation of the tree regulations in Gresham's development code. On November 4<sup>th</sup>, 2025, staff solicited direction from City Council on options to update the City's tree planting, preservation, and permit requirements during a Council Work Session. Staff were advised to strengthen the development code's existing tree requirements, without overhauling the current regulations. There have been significant increases in the development code's 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 Urban Forestry Subcommittee's meeting on April 20, 2025, 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

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 developments. However, in design districts an applicant may apply to deviate from the requirement and plant less trees. Potential refinements for Planning Commission and City Council's consideration include the following.

- Adding a minimum site tree size requirement (i.e. requiring a minimum of small or medium trees, per the City's revised tree lists) to prevent ornamental and undersized trees from being planted.
- 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.

### Tree Preservation Incentives

Incentivizing 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. Established trees provide greater near-term community benefits.
- Increasing tree preservation as a way to meet the design requirements in the City's design standards.
- As of June 2026, tree preservation can be used to meet neighborhood amenities requirements for residential subdivisions over 2.5 acres.

### Tree Fees

Updating tree-related fees to consider the scale of tree removal. This includes:

- Evaluating fee structures that differentiate between small and large scale removals (i.e. removal of 2 vs 100 trees),
- Analyzing research on peer jurisdictions to inform the development of a potential fee framework for further discussion with Council.

Increasing the tree removal permit fee for retroactive tree removal permits.

### Revisions to Tree Removal Permit Thresholds and Processes

Simplify and clarify the tree removal permitting process, with a focus on increasing confidence in the process and scaling it to the tree removal impact. Options include:

- Eliminating the current Tree Removal Exemption (TREX) and incorporating it into a Type I permit to streamline review. A TREX already requires paper work for tracking purposes, which causes confusion for property owners,
- Refining Type II permit thresholds to better scale review requirements based on the level of impact,
- Developing clear and objective standards for Type II tree removal permit to make the criteria easier to understand and consistently apply.

### Approved Tree Lists

Staff have been working with the project's consulting arborist to update the City's approved tree lists. Staff have a draft of the tree lists to discuss with the Urban Forestry Subcommittee at the upcoming meeting. The draft lists organize trees by size and align those sizes with planter strip widths to maximize street tree canopy.