

Executive Summary: Proposed Updates to the City of Gresham Tree Regulations in the Gresham Community Development Code

The proposed amendments to the Gresham Community Development Code represent a modernization of the City of Gresham's tree regulations. The updates consolidate tree-related standards currently dispersed throughout the Development Code, establish a clearer and more predictable permitting framework, strengthen tree protection and urban canopy objectives, and align technical requirements with current arboricultural best practices and American National Standards Institute (ANSI) standards and International Society of Arboriculture (ISA) Best Management Practices standards.

The proposal shifts the City's tree program from an older system based on terms such as "regulated," "required," "major," and "shade" trees to a more straightforward framework focused on tree size, location, function, and development context. The amendments create a centralized tree regulations chapter (Section 9.1000) that serves as the primary location for tree removal, replacement, planting, retention, protection, and significant tree standards.

Modernized Tree Definitions and Terminology

A major component of the update is the revision of tree-related definitions throughout the Development Code. The proposal replaces outdated, counterintuitive, or inconsistently applied terminology with standardized classifications. For example, rather than a singular reference to "Major Trees," which requires the reader to flip back to the Definitions to see this refers to a specific size of tree, specific size thresholds are called out in the code language. Additionally, rather than relying on "Regulated" and "Required" tree definitions which often confuse applicants, the language refers to trees in specific situations and defines trees that are "Exempt" from permit requirements, such as volunteer trees under 8" DBH. Other terms are updated to reflect current arboricultural norms. Definitions for hazard and imminent hazard trees are clarified and tied directly to current ANSI standards and ISA Best Management Practices.

Numerous amendments throughout the Development Code are intended to reference the new consolidated tree standards. Downtown, Civic Neighborhood, Corridor, Rockwood, residential, commercial, industrial, parking, buffering, and overlay district standards are revised to remove redundant tree requirements and instead refer applicants to Section 9.1000.

The changes create consistency across development types while reducing conflicting standards and simplifying administration. At the same time, district-specific urban design objectives such as street tree placement, parking lot landscaping, and publicly accessible open spaces are maintained.

Consolidated Tree Removal Framework

The updated Section 9.1000 establishes a simplified three-tier tree removal permit system:

- **Tree Removal A (Type I review):** Limited removal of site trees and residential street trees.
- **Tree Removal B (Type I review):** Hazard trees (including limited, medium-scale tree removals up to 10 trees, street tree removals, and certain overlay district removals).



- **Tree Removal C (Type II review):** Larger-scale removals, removals involving significant trees, and removals exceeding established thresholds.

The proposal replaces the current regulatory structure with clear thresholds tied to the number, location, and significance of trees being removed. It also requires cumulative review when multiple applications occur on the same property within a 12-month period, preventing incremental tree removal from circumventing permit thresholds.

Tree removal criteria are reorganized around two primary concepts:

- Tree health and safety (hazardous, dead, diseased, invasive, or proactively managed species).
- Development conflicts where trees impede approved development, public safety, infrastructure, or building placement.

Updated Site Tree Planting Requirements

One of the most significant policy changes is the consolidation of site tree planting requirements into a new citywide standard located in Section 9.1020, Site Tree Planting Requirements. Under the current code, tree planting ratios, sizing requirements, retention credits, and counting methods are scattered across multiple zoning districts, design districts, parking standards, and residential development standards. The proposal centralizes these requirements into a single set of standards while preserving limited flexibility in urban centers and special design districts.

The proposed site tree planting ratios vary by development type:

- The site tree requirements for single unit detached, middle housing, multifamily, mixed-use, commercial, and most other development types is unchanged. Existing buffer trees and parking lot trees may count toward meeting this requirement, reducing duplication while maintaining overall canopy objectives.
- Industrial development requirements include a new to a landscape-based standard requiring one site tree per 5,000 square feet of required landscaped area, excluding the parking lot area. The proposal includes a fee-in-lieu option where site constraints make tree planting infeasible.
- The proposal limits the ability to deviate from site tree requirements in Design Districts. Only permitting a discretionary request outside of established town and regional centers, where greater building coverage is most appropriate.

Enhanced Replacement and Retention Standards

The amendments strengthen replacement requirements while also creating incentives to preserve existing healthy trees. Replacement obligations vary by tree type and location, including street trees, buffer trees, parking lot trees, and other site trees. Tree replacement standards are consolidated and linked to approved planting lists and spacing requirements.

A new Site Tree Retention program allows preserved trees to count toward development planting requirements:

- Trees 8-12 inches Diameter at Breast Height (DBH) equal one required site tree.



- Trees 12-36 inches DBH receive count as two required site trees.
- Trees 36 inches DBH and larger count as for three required site trees.

This approach encourages preservation of established trees while still allowing flexibility in site design and development. Updated mitigation standards are also included for floodplain removals and sensitive resource areas.

Unified Tree Planting Standards

A significant objective of the code update is the creation of uniform planting standards applicable citywide. Rather than repeating and varying tree requirements throughout numerous code sections, most development types will rely on centralized standards addressing:

- Approved tree lists.
- Tree size requirements.
- Tree planting standards.
- Minimum spacing standards.

The code establishes minimum planting sizes of 1.5-inch caliper for broadleaf trees and five-foot height for conifer trees. It also introduces objective spacing standards based on tree maturity class (small, medium, or large) and requires root barriers where trees are planted near pavement.

Tree Protection During Development

Development activity near non-exempt trees continues to require a Tree Protection Plan identifying trees to remain, tree protection zones, fencing, and protection measures. However, several specific standards are updated. The standards include clear requirements for protecting critical root zones and, within reason, allow greater encroachment into the zone without an arborist's report. The amendments also replace older references to driplines with a more technically defensible Critical Root Zone methodology and align protection standards with ANSI and ISA best practices.

Overall Impact

Collectively, the amendments are targeted at creating a more transparent, enforceable, and user-friendly tree code. The proposal centralizes tree standards, clarifies permitting pathways, promotes retention of healthy mature trees, improves consistency across development review processes, and supports a more robust and equitably distributed tree canopy, while mitigating for potential impacts on development. The updates are expected to improve predictability for applicants, simplify administration for staff, and enhance Gresham's ability to balance growth, infrastructure investment, environmental stewardship, and community livability.

