Oregon
Theodore R. Kulongoski, Governor

Department of Land Conservation and Development
635 Capitol Street, Suite 150
Salem, OR 97301-2540
(503) 373-0050
Fax (503) 378-5518
www.lcd.state.or.us

NOTICE OF ADOPTED AMENDMENT

03/06/2012

TO: Subscribers to Notice of Adopted Plan or Land Use Regulation Amendments

FROM: Plan Amendment Program Specialist

SUBJECT: City of Gresham Plan Amendment
DLCD File Number 005-11

The Department of Land Conservation and Development (DLCD) received the attached notice of adoption. Due to the size of amended material submitted, a complete copy has not been attached. A Copy of the adopted plan amendment is available for review at the DLCD office in Salem and the local government office.

Appeal Procedures*

DLCD ACKNOWLEDGMENT or DEADLINE TO APPEAL: Monday, March 19, 2012

This amendment was submitted to DLCD for review prior to adoption pursuant to ORS 197.830(2)(b) only persons who participated in the local government proceedings leading to adoption of the amendment are eligible to appeal this decision to the Land Use Board of Appeals (LUBA).

If you wish to appeal, you must file a notice of intent to appeal with the Land Use Board of Appeals (LUBA) no later than 21 days from the date the decision was mailed to you by the local government. If you have questions, check with the local government to determine the appeal deadline. Copies of the notice of intent to appeal must be served upon the local government and others who received written notice of the final decision from the local government. The notice of intent to appeal must be served and filed in the form and manner prescribed by LUBA, (OAR Chapter 661, Division 10). Please call LUBA at 503-373-1265, if you have questions about appeal procedures.

*NOTE: The Acknowledgment or Appeal Deadline is based upon the date the decision was mailed by local government. A decision may have been mailed to you on a different date than it was mailed to DLCD. As a result, your appeal deadline may be earlier than the above date specified. NO LUBA Notification to the jurisdiction of an appeal by the deadline, this Plan Amendment is acknowledged.

Cc: Tina Osterink, City of Gresham
Angela Lazarean, DLCD Urban Planner
Jennifer Donnelly, DLCD Regional Representative

<paa> YA

FORM 2 DLCD Notice of Adoption

This Form 2 must be mailed to DLCD within **5-Working Days after the Final Ordinance is signed** by the public Official Designated by the jurisdiction and all other requirements of ORS 197.615 and OAR 660-018-000

☐ In person ☐ electronic ☐ mailed

DATE STAMP

DEPT OF

FEB 28 2012

LAND CONSERVATION AND DEVELOPMENT

For Office Use Only

Jurisdiction: **City of Gresham**

Local file number: **CPA 11-212**

Date of Adoption: **2/21/2012**

Date Mailed: **2/27/2012**

Was a Notice of Proposed Amendment (Form 1) mailed to DLCD? ☒ Yes ☐ No Date: 9/29/2011

☒ Comprehensive Plan Text Amendment

☐ Comprehensive Plan Map Amendment

☐ Land Use Regulation Amendment

☐ Zoning Map Amendment

☐ New Land Use Regulation

☐ Other:

Summarize the adopted amendment. Do not use technical terms. Do not write "See Attached".

Provides new and revised findings, goals, policies and action measures regarding trees and urban forestry management.

Does the Adoption differ from proposal? No

N/A

Plan Map Changed from: **NA** to:

Zone Map Changed from: to:

Location: Acres Involved:

Specify Density: Previous: New:

Applicable statewide planning goals:

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
☒	☒	☐	☐	☐	☒	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐

Was an Exception Adopted? ☐ YES ☒ NO

Did DLCD receive a Notice of Proposed Amendment...

35-days prior to first evidentiary hearing?	☒ **Yes**	☐ **No**
If no, do the statewide planning goals apply?	☐ **Yes**	☐ **No**
If no, did Emergency Circumstances require immediate adoption?	☐ **Yes**	☐ **No**

DLCD file No. 005-11 (18992) [16949]

Please list all affected State or Federal Agencies, Local Governments or Special Districts:

Metro

Local Contact: **Tina Osterink** Phone: **(503) 618-2392** Extension:

Address: **1333 NW Eastman Parkway** Fax Number: - -

City: **Gresham** Zip: **97080-** E-mail Address:

tina.osterink@greshamoregon.gov

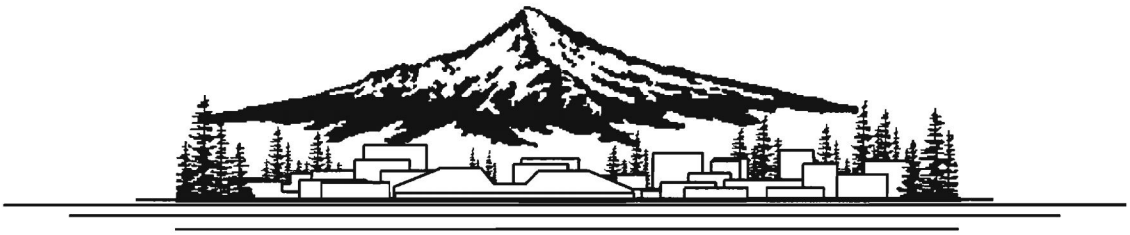
ADOPTION SUBMITTAL REQUIREMENTS

This Form 2 must be received by DLCD no later than 5 working days after the ordinance has been signed by the public official designated by the jurisdiction to sign the approved ordinance(s)
per ORS 197.615 and OAR Chapter 660, Division 18

1. This Form 2 must be submitted by local jurisdictions only (not by applicant).
2. When submitting the adopted amendment, please print a completed copy of Form 2 on light **green paper if available**.
3. Send this Form 2 and **one complete paper copy** (documents and maps) of the adopted amendment to the address below.
4. Submittal of this Notice of Adoption must include the final signed ordinance(s), all supporting finding(s), exhibit(s) and any other supplementary information (ORS 197.615).
5. Deadline to appeals to LUBA is calculated **twenty-one (21) days** from the receipt (postmark date) by DLCD of the adoption (ORS 197.830 to 197.845).
6. In addition to sending the Form 2 - Notice of Adoption to DLCD, please also remember to notify persons who participated in the local hearing and requested notice of the final decision. (ORS 197.615).
7. Submit **one complete paper copy** via United States Postal Service, Common Carrier or Hand Carried to the DLCD Salem Office and stamped with the incoming date stamp.
8. Please mail the adopted amendment packet to:

ATTENTION: PLAN AMENDMENT SPECIALIST
DEPARTMENT OF LAND CONSERVATION AND DEVELOPMENT
635 CAPITOL STREET NE, SUITE 150
SALEM, OREGON 97301-2540

9. **Need More Copies?** Please print forms on **8½ -1/2x11 green paper only if available**. If you have any questions or would like assistance, please contact your DLCD regional representative or contact the DLCD Salem Office at (503) 373-0050 x238 or e-mail **plan.amendments@state.or.us**.



CITY OF GRESHAM
Urban Design & Planning Office
1333 NW Eastman Parkway
Gresham, Oregon 97030

NOTICE OF FINAL DECISION

February 27, 2012

On February 21, 2012, the Gresham City Council Approved the application of **City of Gresham (Council Order No. 635)** amending the Gresham Community Development Plan regarding the **Urban Forestry Management Plan**.

The record for this project is maintained at Gresham City Hall, City of Gresham **File No. CPA 11-212**, and may be reviewed at the City's Urban Design & Planning office Monday through Friday, 8:00 AM to 5:00 PM.

An appeal of this decision may be filed with the Land Use Board of Appeals (LUBA) within 21 days of this Notice of Decision. LUBA has the jurisdiction to review all governmental land use decisions. An appeal of a land use decision must conform to the procedures and requirements of LUBA. They may be contacted in Salem at:

LUBA
550 Capitol Street, NE – Suite #235
Salem, Oregon 97301-2552
(503) 373-1265

Proposed new language is double-underlined;
Proposed deleted language is ~~stricken~~.

CB 01-12

ORDINANCE NO. 1713

AMENDMENTS TO VOLUME 1 (FINDINGS) AND VOLUME 2 (POLICIES) OF THE GRESHAM COMMUNITY DEVELOPMENT PLAN, PERTAINING TO THE URBAN FORESTRY MANAGEMENT PLAN

THE CITY OF GRESHAM DOES ORDAIN AS FOLLOWS:

Section 1. Volume 1, Findings Document, is amended to add new Appendix 48 as follows:

VOLUME 1 - APPENDIX 48
URBAN FORESTRY MANAGEMENT PLAN
SUMMARY REPORT

Introduction

The purpose of this Report is to summarize urban forestry principles, benefits, existing conditions, issues and the public outreach results from Gresham's Urban Forestry Management Plan (UFMP). The Gresham City Council adopted the UFMP on July 19, 2011. This Report summarizes the factual information that is the basis for the Urban Forestry Management Plan Goals and Policies found in Section 10.014.3 of Volume 2 of the Community Development Plan.

In 2009, City Council directed staff to help carry out Gresham Community Development Plan goal 10.014.2 to "Protect and enhance the environmental and aesthetic contribution of trees and other vegetation" and action measure 19 of this goal to "Develop an Urban Forestry Management Plan and ultimately implement a citywide urban forestry management program." This goal and action measure was adopted by the Council in September 2004.

The Urban Forestry Management Plan (UFMP) was developed by the City of Gresham through a two year planning process. Public involvement included outreach to residents and property owners, stakeholders, elected officials, multiple City departments and monthly collaboration with the Urban Forestry Subcommittee (UFS). Over the two year planning effort staff conducted the following major tasks:

- Researched and analyzed issues related to urban forestry
- Conducted public outreach, including an online survey
- Identified solutions and approaches to address identified issues/concerns
- Drafted the UFMP document

The UFMP provides a comprehensive, sustainable and integrated approach to the management of trees in Gresham as well as guidance for future decisions related to trees in Gresham's urban forest. The UFS with input from the public and City staff offers the following vision for Gresham's urban forest:

Gresham's trees are recognized as integral to the quality of the City's urban character and natural environments. A healthy urban forest remains a longstanding community priority and will be thoughtfully managed in a way to maximize a range of public benefits including a thriving ecosystem, a vibrant economy and a livable community.

Urban Forestry Guiding Principles

The following principles were developed in collaboration with City Council, the Urban Forestry Subcommittee, Natural Resources and Sustainability Committee, the public and City staff. They were used as guidelines for the process and structure of the Urban Forestry Management Plan, and can also be used for future implementation of the UFMP.

Principle 1. Tree regulations should be easily understood by the public and implementable by City Staff, and should be consistent with other City codes and practices.

Principle 2. The City should seek out and collaborate with tree partners throughout the community to complete action items. These partners could include: residents, business owners, the nursery and tree industry, watershed councils, neighborhood associations, developers, schools, nonprofits (Friends of Trees), adjacent municipalities and other stakeholders.

Principle 3. An adaptive management approach, where resource managers can incorporate new findings into best practices, should be taken with regard to the urban forest.

Principle 4. A long-term approach should be taken to planning and maintaining Gresham's trees.

Principle 5. The benefits of the urban forest should be used to inform and support other City planning goals, and the urban forest should be a recognized asset in Gresham's Community Development Plan. Other City planning goals may include:

- Defining a sense of place
- Promoting aesthetics
- Creating walkable neighborhoods
- Improving community health
- Improving traffic safety
- Advancing air, water and conservation goals

Principle 6. Healthy trees make neighborhoods more livable by creating quality streetscapes, neighborhoods and parks; by softening the built environment; and fostering safer and more sociable neighborhoods.

Principle 7. Design standards should incorporate the philosophy "Make the place right for trees and pick the right trees for the place."

Together, the vision and guiding principles provide the policy framework for the Urban Forestry Management Plan.

What is the Urban Forest?

Urban Forestry is the study and management of a city's trees, consisting of those along streets and trails, within parks and natural areas, and on other public and private property. An American Planning Association report defines urban forestry as *"a planned and programmatic approach to the development and maintenance of the urban forest, including all elements of green infrastructure within the community, in an effort to optimize the resulting benefits in social, environmental, public health, economic and aesthetic terms."* [1]

Gresham's urban forest consists of both public and private trees. These trees are located within specific urban environments that have particular physical characteristics, provide various benefits and serve different needs. The health and quality of trees on both public and private land depends on the knowledge, skills and involvement of the owners and managers.

Public trees can be highly visible and valuable components of the urban forest. Public tree owners include the City, School Districts, Metro, and Multnomah County. Public trees are located in following areas of the city:

- Parks, public plazas and trails
- Natural areas and stream corridors in publicly owned open space
- Street medians
- Civic institutions such as schools, City Hall, and fire stations
- Vegetated public stormwater facilities such as ponds and wetlands

Although generally located within public street rights-of-way, like sidewalks, private property owners are the caretakers of trees located along the sides of streets. About 70 percent of the Gresham urban forest is located on private property. Private property owners are the chief stewards of trees located on private lands in a variety of environments:

- Residential areas including both single-family and multifamily landscapes
- Commercial and industrial areas
- Parking lots
- Golf courses
- Along stream corridors on private property
- Privately owned undeveloped land

Why is it Important?

Trees affect the community and local economy in many ways. According to Dr. Robert Young, a nationally renowned urban forestry expert from the University of Oregon, trees provide a range of public benefits; can make a considerable contribution to public service cost reductions; and are a sound investment in the delivery of municipal goods and services such as clean air and water, parks, recreation, tourism, energy conservation, stormwater retention and walkable streets.

The City of Gresham covers a land area of about 23 square miles and includes natural features that are important to the local community and to the region, such as Johnson Creek, Fairview Creek and the buttes.

---

[1] Planning Advisory Service Report Number 555: Planning the Urban Forest: Ecology, Economy, and Community Development, James C. Schwab (American Planning Association, 2009), p. 3

A resource of this size and scale requires careful management to ensure its preservation, restoration and enhancement. While Gresham has a long history of protecting the natural environment, the development of an Urban Forestry Management Plan is the City's most comprehensive approach to establishing long-term, proactive management of the entire urban forest.

Trees in urban and natural settings require different types of management. Urban forest management goals such as increasing tree canopy, adopting best management practices and providing educational opportunities must be balanced with other community priorities. For the sake of efficiency and cost-effectiveness, the Urban Forestry Management Plan attempts to integrate management of the many issues and opportunities presented by Gresham's natural systems, tree resources, public infrastructure and urban development.

Benefits of the Urban Forest

Trees, especially as part of a regional and urban "green infrastructure" system, help create a better quality of life. Specifically, the retention of trees in historically wooded areas and the establishment of trees along street corridors help to soften urban development, screen unattractive areas, block wind, cool streets and buildings, reduce stormwater run-off, filter noise and air pollution, and promote soil stability. This "green infrastructure" provides important ecological and social functions that translate into direct cost-savings to local governments and indirect stimulation of the local economy.[2]

Urban forests require comprehensive management to ensure healthy vegetation over time, and community-wide support is essential to supplement public management efforts. The goal of a sustainable urban forest is to maintain a maximum level of net economic, community and environmental benefits over time. In other words, long-term management of natural assets brings a higher return than their short-term elimination.[3]

Economic Benefits

Healthy mature trees are a major economic asset for attracting and retaining residents, businesses and visitors. Money spent on trees is a good investment and adds to the overall value of the community.[4]

Many Pacific Northwest communities are quantifying the benefits of trees so they can evaluate how growing their tree canopy can stimulate the local economy. For instance, the City of Vancouver, Washington, calculates that for every dollar spent on tree planting and maintenance, the City receives a 250 percent return on investment in terms of total services provided by those trees at maturity. In other words, for every $1 spent on a community's urban forestry program, the City receives about $2.50 in tree benefits.[5]

Specific economic benefits of the urban forest include:

---

[2] Vancouver Urban Forestry Management Plan, 2007. p.7.
[3] Renton Urban and Community Forestry Development Plan, 2009, p. 13.
[4] According to a national urban forestry expert in an excerpt from "Planting the Living City", Dr. Robert Young and Dr. Greg McPherson, 2010. (in review)
[5] International Society of Arboriculture, Pacific Northwest Chapter 76. Western Washington and Oregon community tree guide: benefits, costs, and strategic planting, Silverton, OR. McPherson, E.G., S.E. Maco, J.R. Simpson, P.J. Peper, Q. Xiao, A.M. VanDerZanden, and N. Bell, 2002.

- **Increased Property Values**
  - Trees add to property values and have been shown to increase the resale value of a home 3 to 7 percent.[6]
  - Studies report that landscaping speeds the sale of a home by four to six weeks.[7]
  - Street trees positively influence the price of neighboring houses within a 100-foot radius.[8]

- **Maintenance of Economic Stability Citywide**
  - Trees also enhance commercial and retail district appeal, offering higher occupancy and rental/lease rates and contributing to community economic stability.
  - Tree-lined streets create more enjoyable shopping experiences, bringing more dollars into the community.

    > A study conducted by the University of Washington showed that consumers were willing to pay 9 percent more in small cities and 12 percent more in large cities for equivalent goods and services in business districts having trees.[9]

  - Trees reduce the necessary size and costs of conventional infrastructure, such as stormwater pipes and ponds, by soaking up and storing water run-off in their leaves, trunks and root systems.
  - Trees contribute to reduced air pollution by absorbing gaseous pollutants such as ozone, nitrogen oxides and sulfur dioxide, leading to reduced healthcare-related costs.
  - Trees increase the life of pavement along our public rights-of-way. Tree shade increases pavement life by 40 to 60 percent based on reduced daily heating and cooling (expansion/contraction).[10]
  - Trees contribute to regional tourism that involves outdoor recreation.
  - Urban forests help moderate global climate change and can be a cost-effective method of greenhouse gas reduction. Trees remove carbon dioxide from the atmosphere and then store it in the tree structure (roots, trunk, branches and leaves), in a process called carbon sequestration.
  - The cost of planting and maintaining trees to remove a metric ton of carbon can be as low as $5.[11]

---

[6] Alliance for Community Trees: The Value of Trees Fact Sheet located at www.actrees.org/files/resources/ValueofTrees_ FactSheet.pdf

[7] Ibid.

[8] Landscape and Urban Planning. Trees in the city: valuing street trees in Portland. p. 77-83. Geoffrey H. Donnovan and D.T. Butry, 2010.

[9] Main Street News, The Monthly Journal of the National Trust Main Street Center, Trees Mean Business: City Trees and the Retail Streetscape, Kathleen Wolf, Ph.D., University of Washington, No. 263 August 2009.

[10] Ibid.

[11] City of Gresham Inventory of Greenhouse Gas Emissions and Recommended Reduction Strategies Report, 2010.

Community Benefits

Trees are place-makers that are vital to livability and give a community visual character, unity and identity. Trees preserve and enhance quality of life by offering a sense of place and the opportunity to embrace nature.

In 1990, the Gresham City Council recognized the importance of trees to community well-being by passing an ordinance to protect "significant trees." Since then, more than 50 trees have been adopted as trees of significance to the City. The Urban Forestry Management Plan is an opportunity to strengthen the community's past efforts to protect significant trees and Gresham's forested buttes, and to maintain Tree City USA status.

Specific community benefits of the urban forest include:

- **Improve Safety, Personal Health and Enjoyment**
  Trees enhance public health and safety by providing a natural physical barrier along transportation corridors, reducing traffic speeds by narrowing drivers' field of vision, and creating walkable neighborhoods.
  - Trees and landscaping lower crime primarily by bringing people together outdoors, increasing surveillance and discouraging criminals.[12]
  - Trees placed at the street bring speeds down 7 to 8 mph.[13]
  - Trees provide a sense of enclosure, allowing pedestrians to feel fully separated from traffic.
  - Trees stabilize hillsides by supporting the soil with their root systems and breaking the fall of raindrops with their leaves.
  - Street trees create pedestrian-friendly streets, increasing the attractiveness of walking and active living.

  Trees are important to human health and help purify air by absorbing pollutants.
  - 100 trees remove 5 tons of carbon dioxide and up to 1,000 pounds of pollutants (including 400 pounds of ozone and 300 pounds of particulates) per year.[14]
  - Trees can provide edible fruit, supporting the local food movement.
  - Trees cool air by giving shade and releasing moisture.

- **Enhance the Aesthetics of the Community and its Neighborhoods**
  - Healthy mature trees establish the community's character and identity, which strengthen ties among neighbors.
  - Trees increase the attractiveness of neighborhoods and build neighborhood pride. Regional neighborhood examples include: Irvington, Ladd's Addition, Laurelhurst, Eastmoreland, Lake Oswego's First Addition and the Villebois Community in Wilsonville.
  - Trees soften severe building lines and large expanses of pavement, making urban environments more pleasant.
  - Trees improve community appeal, attracting businesses, shoppers and homeowners.

---

[12] Environment and Crime in the Inner City: Does Vegetation Reduce Crime? Environment and Behavior, 33(3), 343-367, Kuo, F.E., and Sullivan, W.C. (2001)
[13] Glatting, Jackson, Walkable Communities, Inc.: Urban Street Trees: 22 Benefits and Specific Applications, Dan Burden, 2006.
[14] McPherson et. al. 1999.

Environmental Benefits

A healthy urban forest contributes valuable ecosystem services for watershed protection, reducing flood potential and stream erosion while improving water quality. More trees are capable of removing a greater percentage of toxins from the air, thereby decreasing air pollution.

Specific environmental benefits of the urban forest include:

- **Protect Air and Water Quality, Reduce Flooding and Enhance Wildlife Habitat**
  - Trees improve ecological and watershed health.
  - Trees reduce air pollution by absorbing gaseous pollutants such as ozone, nitrogen oxide and sulfur dioxide; they also filter particulate matter such as dust, ash, pollen and smoke – which contributes to improved public health.
  - Trees reduce the amount of water-borne pollutants that reach streams and rivers.
  - 100 mature trees intercept about 250,000 gallons of rainwater per year, reducing stormwater run-off and providing clean water.
  - Street trees 32 feet tall can reduce stormwater run-off by 327 gallons per year.
  - Trees provide habitat for birds and other wildlife, even in urban areas.

- **Energy Conservation**

  Trees conserve resources by reducing energy costs, both in summer and winter.
  - Trees provide cooling shade in the summer and buffer the wind in the winter. For example, trees cool cities by reducing heat generated by buildings and paved surfaces
  - Trees planted within 20 feet of any side of a home provide insulation benefits in the winter.
  - Trees within 60 feet of the west side of a home can reduce electricity used for air conditioning in the summer.
  - If properly placed, a tree with a 25-foot diameter crown reduces annual heating and cooling costs of a typical residence by 8 to 12 percent.[15]
  - Temperature differentials of 5 to 15 degrees are felt when walking along tree-canopied streets.[16]

Existing Conditions

The urban forest is one reflection of the city's health, well-being and livability. Many residents and business owners who live and work in Gresham enjoy the iconic backdrop of forested buttes. However, some neighborhoods are more treed than others; residents complain when neighbors remove trees on or near their properties; property owners, including the City, struggle with the consequences of not planting the right tree in the right place; and the street corridors that connect business districts and neighborhoods often lack trees.

Without ongoing maintenance, Gresham's publicly owned trees are not as healthy and vigorous as they could be. Consequently, trees grow slower, die faster and are much more susceptible to injuries and diseases that require premature removal. Urban forests support a dynamic mix of people, wildlife and trees. The current state of Gresham's forest is described in the following sections:

---

[15] Center for Urban Horticulture, University of Washington, Kathleen Wolf, Ph.D., November 1998.
[16] Glatting Jackson, Walkable Communities, Inc.: Urban Street Trees: 22 Benefits and Specific Applications, Dan Burden, 2006.

- Trees in the Urban Environment
- Tree Canopy
- Assessment Needs

Trees in the Urban Environment

The urban forest lives and grows in the built and natural environment where both are constantly evolving over time due to changing demographic, development, climatic and technological circumstances.[17] About 55 percent of Gresham's land base is privately owned and includes land-use types that range from residential to commercial and industrial. About 10 percent of Gresham's land base includes street right-of-way.

While some of the city enjoys proximity to nearby forested buttes, parks and green corridors, there are other neighborhoods that are defined by scattered stands of tall Douglas-fir trees. Some neighborhoods to the north have little mature tree canopy. Regardless of location, there are opportunities throughout the city to plant new trees and enhance tree canopy.

Gresham requires trees in new multifamily, commercial and industrial developments. However, specific tree provisions vary for industrial, Downtown, Civic Neighborhood, Rockwood, Station Centers, residential multifamily, single-family attached, commercial and parking lot landscapes in the City.

Tree Canopy

Tree canopy cover is defined as the amount of land that falls under the shade of a tree. It is one of the most-common metrics that communities use, as shown in Table 1, to evaluate the health of urban forests and their associated benefits.

Many communities set aspirational tree canopy goals, such as those shown below, to prioritize City investments that will create the greatest tree canopy gain. Tree canopy goals assist in understanding:

- Current canopy cover and canopy gain and loss
- Impacts of development and redevelopment
- Planting potential
- Baseline data to monitor progress against canopy-cover goals

Table 1 shows some Portland Metropolitan and Northwest regional communities that have established aspirational tree canopy goals.

A 2006 study managed by the Johnson Creek Watershed Council recommended that Gresham develop a preferred level of canopy coverage to ensure higher protection of tree canopy and to better meet local water quality and natural resource goals.[18]

[17] Planning Advisory Service Report Number 555: Planning the Urban Forest: Ecology, Economy, and Community Development, James C. Schwab (American Planning Association, 2009), p. 43.
[18] Gresham Code Review Project prepared by the Johnson Creek Watershed Council, Lori Faha, P.E. Water Resources Engineer, 2006.

Gresham's tree canopy has three major landscape features: One is the urban landscape – the areas of the City where living, working, shopping and playing take place. The second is the natural area landscape – the areas of the City where streams and wetlands provide clean water, flood mitigation and wildlife and plant habitat. The third is the street right-of-way landscape – the medians and planter areas lining the City's streets. A description of the canopy associated with these three major landscapes follows.

Table 1. Regional Canopy Coverage and Targets

	Portland, OR	Tigard, OR	Vancouver, WA	Bellevue, WA	Seattle, WA
Current Canopy	26.3%	24.5%	19.7%	36%	18%
Target Canopy	33%	40% by 2047	28%	40%	30%

Source: Regional Urban Forestry Goals compiled by Gresham City staff

Urban Canopy

Maps 1 and 2 illustrate the City's tree canopy. Both maps show the City limits, neighborhood boundaries and the new communities of Pleasant Valley, Springwater and Kelley Creek Headwaters. Map 1 shows the areas of the City that are shaded by trees (and large shrubs) based on aerial orthophotographs taken in 2007. Map 2 converts the shading to a percentage of each neighborhood's total area, with darker shading indicating a higher percentage of canopy.

The City's canopy, when measured in 2007, was 28.1 percent. Map 1 illustrates that the heaviest canopy coverage is concentrated on the butte areas, such as Gresham Butte, and along stream corridors. This map also shows that the canopy is more dispersed in the developed parts of the city (the white areas of the map). Additionally, this map can help determine where there may be gaps or deficiencies in the canopy.

Table 2 shows canopy cover throughout the City and for seven land-use categories within the urban forest that include: single-family residential, commercial/multifamily, industrial, mixed-use centers, developed parks, natural areas and rights-of-way.

Table 2. Current Canopy Cover Citywide and by Land-Use Category

Land Use Category	Total Acres	Current Canopy
Residential/SFR	6,247	26%
Commercial/MF	1,895	17%
Industrial	2,516	14%
Mixed-Use Centers	896	16%
Developed Parks	352	36%
Right-of-Way	*2,332*	*10%*
Subtotal		**22%**
Natural Areas	*2,753*	*72%*
Total Citywide	**16,991**	**28%**

Source: City of Gresham, 2011. Note: SFR= Single-Family; MF = Multifamily; Mixed-Use Centers includes regional and town centers; Developed Parks includes currently developed parks and park areas owned by the City to be developed as neighborhood or community parks in the future.

It is important to note how Gresham's forested buttes and dense riparian corridors heavily influence the citywide canopy coverage figure of 28 percent. For example, Map 1 illustrates how the Gresham Butte and Kelley Creek Headwaters neighborhoods both contain approximately 70 percent canopy cover within their boundaries. By removing the natural areas within these two neighborhoods, as well as other publicly designated natural areas citywide (i.e. Habitat Conservation Areas), the 28 percent citywide canopy coverage figure is reduced to approximately 22 percent, as shown in Table 2.

///

///

///

///

///

///

///

///

///

///

///

///

///

///

///

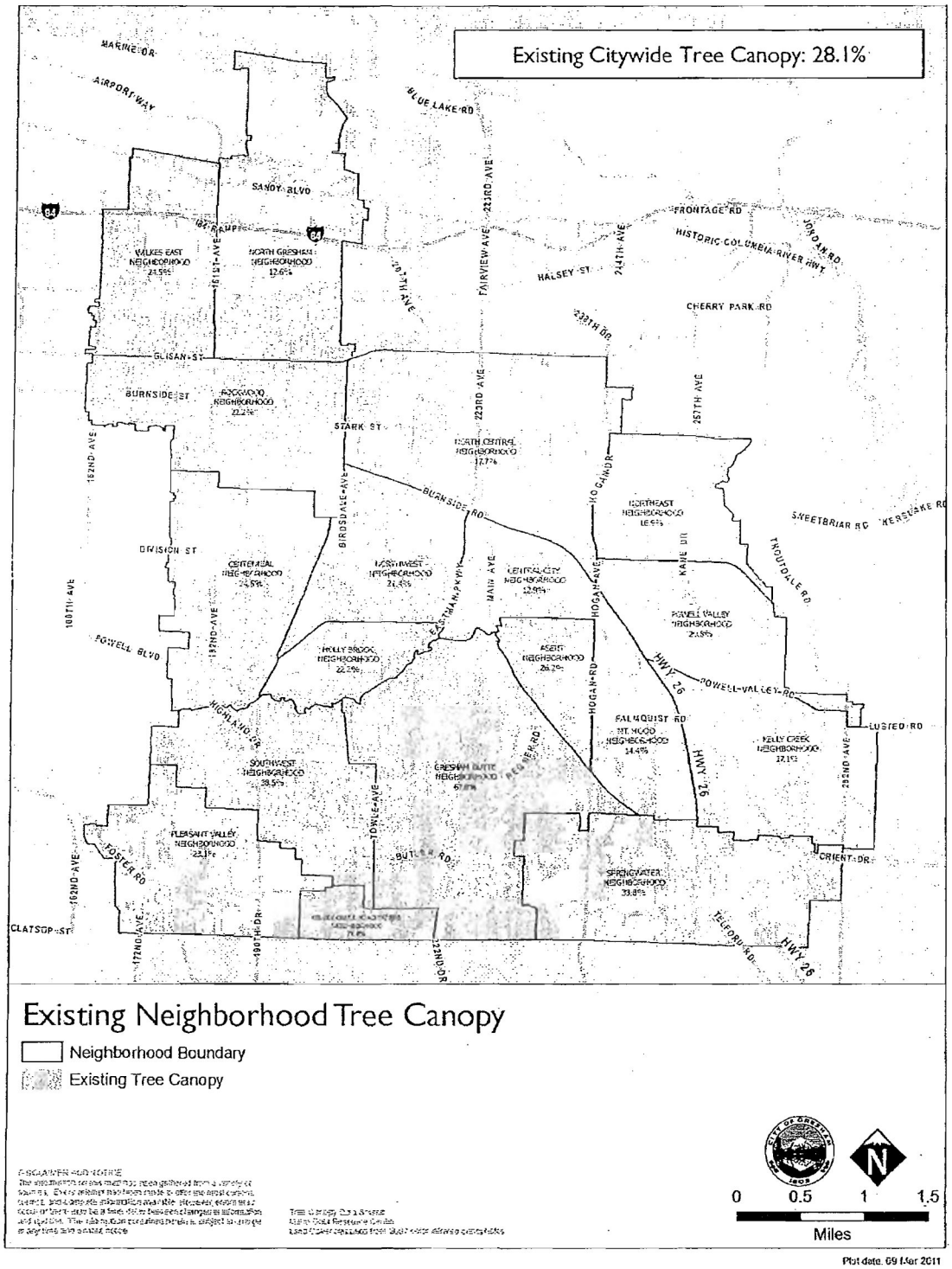
///

///

///

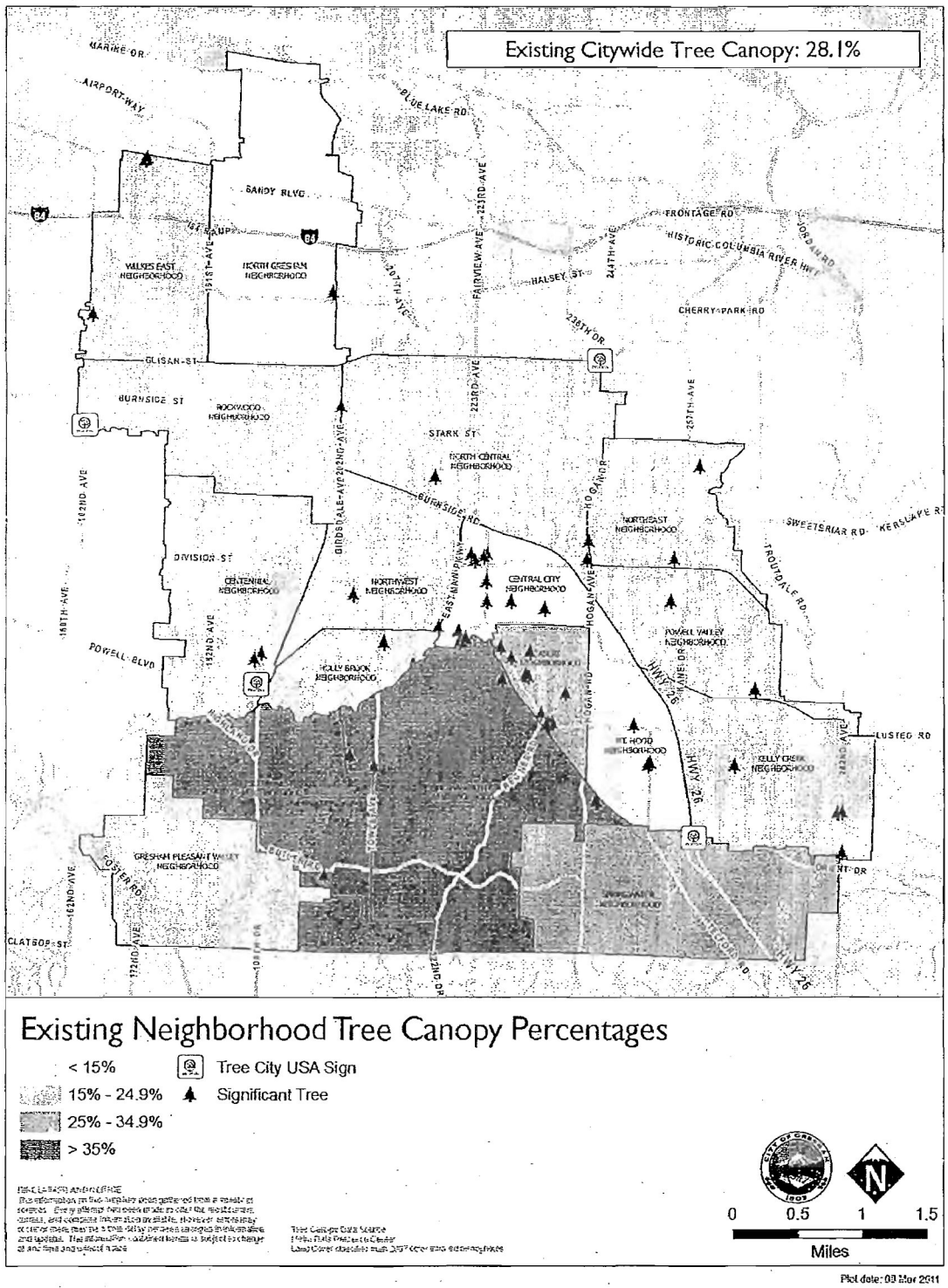
///

Map 1. Gresham's Existing Tree Canopy by Neighborhood



Source: City of Gresham GIS, 2009, based on 2007 data and aerial photographs from Metro.

Map 2. Gresham's Existing Tree Canopy by Neighborhood



Source: City of Gresham GIS, 2009, based on 2007 data and aerial photographs from Metro.

Natural Area Canopy

Gresham is one of many communities now working to regain "ecosystem services" historically provided by healthy urban forests and streams, an effort that involves protecting and expanding the tree canopy – particularly in riparian areas where dense thickets of trees once stood. Metro-area communities are starting to understand that augmenting a City's flood-control infrastructure with robust riparian forests and natural areas is a cost-efficient way of handling run-off, as some mature, native trees can take up as much as 400 gallons of water per day.

Equally important, the City of Gresham is obligated to respond to regional, state and federal water quality and habitat protection laws. A significant portion of the City's reforestation efforts are directly tied to its obligations under the federal Clean Water Act, which includes reporting on how Gresham meets the tree canopy shade targets established in its 2008 Temperature TMDL 3 Implementation Plan. That plan aims to increase shading over streams to reduce stream temperature.

The Oregon Department of Environmental Quality (DEQ) currently requires annual reporting from Gresham, and beginning in 2013 it will provide data at five- and ten-year intervals.

- **Annual reporting intervals:** The City is required to submit annual reports detailing how it has worked toward addressing all the TMDL pollutant parameters, including the number of riparian restoration sites planted.

- **Five-year reporting intervals**: Vegetation in active restoration sites will be monitored to assess the impact of City planting plans and maintenance strategies on tree canopy densities and growth rates.

- **Ten-year reporting intervals:** The City will collect field data to confirm shade estimates derived from aerial-image analysis, and will then use that information to monitor and quantify tree canopy development, health and progress towards meeting tree canopy goals in riparian areas.

In 2008, the City's Temperature TMDL [19]Implementation Plan identified three important categories of riparian areas, which include:

- Where the City should not plant trees due to physical constraints
- Where there is a reasonable chance that the City will be able to plant trees
- Where other plant communities would be more appropriate than trees, such as wetlands, water quality facilities, power-line easements and developed park areas

The Temperature TMDL Implementation Plan includes figures that illustrate areas within riparian zones where no tree planting can occur, such as:

- Transportation infrastructure such as paved right-of way with required visual sight distances
- Hardscapes such as buildings, parking lots and large recreational trails
- Utility and gas line corridors
- Access easements

[19] TMDL stands for Total Maximum Daily Load and is a measurement of pollutant load into a water body.

The Temperature TMDL Implementation Plan also shows constrained planting sites within riparian zones where planting may be limited to small, shorter tree species. These include the following areas:

- Wetlands
- Water quality facilities
- Power line corridors with height restrictions
- Developed parks

Because Gresham needs riparian shade to keep streams cool for salmonids, City staff worked with the Oregon Department of Environmental Quality to identify appropriate native tree and shrub communities to be planted streamside. These tree and shrub communities also improve water quality and aquatic habitat conditions. Tree and shrub lists are provided in the Gresham Community Development Code (Section 5.0411 – Table 5.0411 (D)), which also identifies appropriate plant species for specific moisture and soil types.

Public and City-owned land restoration efforts adhere to these tree species lists unless site constraints suggest tall shade trees would be inappropriate. Private streamside landowners are also given these recommended tree and shrub species lists when they express an interest in restoring their riparian lands.

Right-of-Way Canopy

There are more than 300 miles of public streets in Gresham. Right-of-way locations with trees and other vegetation include:

- 0.23 acres of hardscaped medians (29 total)
- 6.24 acres of vegetated medians (112 total, three of which are irrigated)
- 0.05 acres of vegetated mini circles (7 total)
- 52.7 acres of maintenance areas, including roadside mowing, weed abatement and planter strip areas
- 493 tree wells

Tree canopy located within the right-of-way is described further in this section and primarily includes trees within or along:

- Medians
- Streets
- Green Streets

Medians

Median trees are considered any tree located in the center median of a Gresham street. Landscaped medians on Eastman Parkway, Division Street and Powell Boulevard are the only irrigated medians. The Eastman Parkway medians were installed in the 1980s and, as of 2006, 33 trees and more than 1,000 shrubs were installed at a cost of $26,500. In 2002, trees and shrubs were installed in the Division Street medians as an innovative approach for traffic-calming. Total cost: $126,000.

In 2007, about $700,000 was spent to install a variety of tree and shrub species within the Powell Boulevard medians and planter strips. The City is required to show how it is reducing

pollution in its creeks over time and the 2,500 linear feet of median swales along Powell Boulevard help to achieve this by:

- Managing run-off from five acres of pavement; and
- Reducing run-off to Johnson Creek by more than 4 million gallons per year.

Streets

Street trees are those planted in or immediately adjacent to the public right of way. These often grow in a planter strip between the curb and sidewalk, but in cases where there is no planter strip, street trees may be planted on the private land side of a sidewalk. In Gresham, as in most Oregon municipalities, responsibility to care for and maintain all street trees located in the public right-of-way belongs to adjacent property owners. Street trees that are not properly maintained can become a hazard to property owners, pedestrians and neighbors. Routine maintenance helps keep neighborhoods clean, accessible and safe.

An inventory of street trees by tree type, quantity, size and condition has not been completed. Because street trees are located in the right-of-way, tree removal or planting activities within these areas are regulated by the City. For new development, City Code typically requires one tree to be planted every 30 feet, of the type specified in the City's Recommended Street Tree List found online at GreshamOregon.gov/UrbanForestryPlan.

Green Streets

Over the last few years, Gresham has applied Green Street elements to a number of large arterials, transforming impervious street surface into landscaped green spaces that:

- Capture stormwater run-off;
- Allow water to soak into the ground; and
- Let plants and soil filter pollutants.

These landscaped areas include trees, shrubs and other plant materials.

Green streets convert stormwater into a resource that replenishes groundwater supplies. They also create attractive streetscapes and urban green spaces, provide natural habitat and help connect neighborhoods, schools, parks and business districts. Green streets are an innovative, effective way to restore watershed health, protecting water quality in rivers and streams, and managing stormwater from impervious surfaces. They can also be more cost-efficient than new storm sewer pipes or large regional treatment facilities.

Green streets are one technique for developing in a green and sustainable manner. The planting and preserving of trees is another cost-effective green and sustainable development technique.

Need for Assessment

Assessing the health of public trees is a best practice for protecting and enhancing the public's investment in trees. Assessments can provide information about maintenance needs, tree replacement strategies and new planting opportunities. Assessments can reveal planting locations and methods that result in the healthiest trees and successful planting outcomes. Many communities have developed a Public Property Tree Inventory and Assessment Report.

This report does not assess trees on private property, focusing instead on trees on City-owned lands.

A tree inventory is the first step in a tree-health assessment and fundamental to a long-term maintenance program for public trees. Public trees are catalogued for location, species, stem diameter, health and appraised value. Data from a public tree inventory addresses the following:

- Quantification, composition and location
- Quality, health and condition
- Effect on property values
- Calculation of environmental benefits
- Maintenance needs and management plan
- Risk-management goals
- New tree planting opportunities

Over time, municipal tree inventories change as trees grow, new trees are planted, others are pruned and some removed. A tree inventory should be considered a dynamic process – one that managers can use to increase the value of Gresham's urban forest resource. Many communities often start by conducting a street tree inventory with the help of local neighborhood associations.

Inventories provide important information about the current level of species diversity and encourage greater tree diversity. Reliance on too many of one species or genus has proven costly in the past when an insect or disease epidemic has sickened an entire city's tree population consisting of one species or genus of a tree. Researchers recommend the 30:20:10 rule: no more than 30 percent from any family; no more than 20 percent from any genus; and no more than 10 percent of any species.

Public Participation

Community outreach was a key component in the development of this plan. Feedback from residents, along with urban forestry and business stakeholders, shaped the direction of Goals and Actions. Five primary methods of public participation were employed in the development of this plan from 2009 to 2011. These methods included a survey, community forums, focus groups, interviews and Urban Forestry Subcommittee and Natural Resources and Sustainability Committee meetings.

Urban Forestry Survey

In collaboration with staff, the Urban Forestry Subcommittee, Natural Resources and Sustainability Committee and Planning Commission, an online survey was developed to gauge residents' opinions and insights about urban forestry in Gresham.

It was available online from February to May 2010. A paper copy of the survey was also available during this time. There were 162 respondents from 16 Gresham neighborhoods. About 80 percent of the respondents were Gresham residents and 40 percent were Gresham business owners.

Appendix G of the Urban Forestry Management Plan includes a complete summary of the online survey findings. Key findings include:

- Fifty percent of respondents observed a citywide tree decline by neighborhood
- Air quality, wildlife habitat and livable neighborhoods ranked highest among tree benefits
- Requirements for retention and replanting in new developments ranked highest among desired future urban forestry programs and services
- Incentive and sidewalk repair programs were strongly suggested by respondents
- Respondents noted the following challenges to Gresham's urban forest:
    - Tree removal during development
    - Tree removal by residents and/or property owners without a tree removal permit
    - Spread of invasive plant species
    - Lack of knowledge
    - Enforcement
    - Poor tree choice

The survey helped the City formulate solutions to a range of recognized tree issues and to develop new urban forestry goals, policies and action measures.

Community Forums

Six community forums were held during the planning process:

- September 29, 2009 – Urban Forestry Issues
- March 13, 2010 – Tree Forum on the Benefits of Trees
- May 26, 2010 – Urban Forestry Goals and Policies
- August 2, 2010 – Urban Forestry Actions
- February 22, 2011 – Existing Tree Code Regulations
- April 19, 2011 – Draft Urban Forestry Management Plan Open House

All forums were hosted at City Hall and designed to elicit important feedback from the community about urban forestry issues, benefits, Goals, Action Items and existing tree regulations. Publicity in advance of the forums included public notices to interested parties, website postings, social media and newspaper articles. Participants were given an opportunity to provide direct feedback on this Urban Forestry Management Plan's executive summary, seven chapters and the appendices.

Summary responses from all six meetings are provided in Appendix H of the UFMP.

Focus Groups and Interviews

Four focus groups were also held during the planning process. These included:

- May 27, 2010 – Developer Focus Group
- June 23, 2010 – Community Focus Group
- July 27, 2010 – Johnson Creek Watershed Council Focus Group
- February 23, 2011 – Business Focus Group

Three focus group interviews were conducted with members of the business community including a retail shopping center developer, a Downtown restaurant owner and a West Gresham retail garden center owner.

Summary responses from all focus group sessions are provided in Appendix H of the UFMP.

Summary of Issues

Like Gresham, many cities in the Pacific Northwest are growing and have experienced a significant decline in their urban forests over the past two decades. Cities are faced with the challenge of balancing development pressures while trying to improve their urban forests. This section describes a wide range of community concerns about current tree management on public and private property.

Generally, the Gresham community values and enjoys trees. However, there have been situations where trees have been either removed or topped (an improper maintenance practice) for blocking views and sunlight or dropping leaves or fruit. While shoppers appreciate tree-lined business districts, business owners often have maintenance and sign-visibility concerns. Issues identified during the Research and Analysis phase of the project are detailed in the November 2009 Urban Forestry Issues and Opportunities White Paper, included in Appendix J of the UFMP.

A number of issues were identified as part of the public involvement program using feedback from several stakeholders and community members. The following is a list of current challenges to Gresham's urban forest. These collective challenges are organized within the following eight topic areas and not necessarily listed in order of importance.

Effects of Urbanization

Large-scale removal of trees as the city develops can have negative impacts on the city's environment, public operations and livability. Trees make cities livable, and urbanization without tree protection can negatively affect community livability or sense of place, and cause:

- Tree canopy loss
- Loss of wildlife habitat
- Increases in air and water pollutants
- Increases in atmospheric greenhouse gas
- Increases in stormwater management costs and other infrastructure costs

A key issue from past development is the replacement of existing urban tree canopy cover with impervious surfaces such as paved roads, parking lots and rooftops. The expansion of impervious surfaces from housing and transportation causes additional heat build-up in urban areas, which can increase tree mortality and negatively impact wildlife. The lack of trees in these areas also can increase the cost of maintaining roads, cooling buildings and managing stormwater, and lessen a community's overall appeal.

Tree Canopy

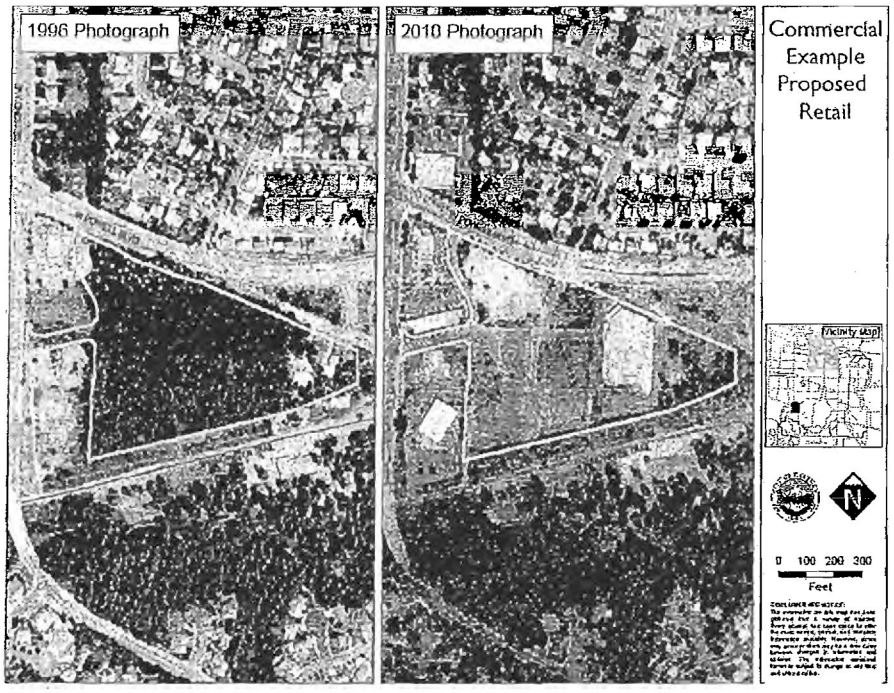
A significant challenge is maintaining and expanding tree canopy, which is the area of ground that is directly underneath a tree. Tree canopy is one of the most common metrics communities use to evaluate the health of their urban forests. Current tree cover in Gresham is estimated at 28 percent.

In 2001, American Forests, a nonprofit partner of the U.S. Forest Service, conducted a regional ecosystem analysis and discovered that between 1972 and 2000, the Portland Metro Area lost

22 percent of its heavy canopy cover.[20] Additional data confirms that over the last 15 years, naturally forested areas of the Pacific Northwest have lost 25 percent of their tree canopy cover while impervious surfaces increased about 20 percent.[21] Figures 1 through 2 show aerial examples of tree canopy that has been replaced, in some cases almost entirely, by impervious surfaces in commercial and residential projects located in Gresham.

These changes in land cover, coupled with the City's desire to transition into a more sustainable future, are important reasons why the City should examine how to best preserve the existing natural canopy and manage newly planted trees.

Figure 1. Commercial tree canopy change in Gresham from 1996 to 2010

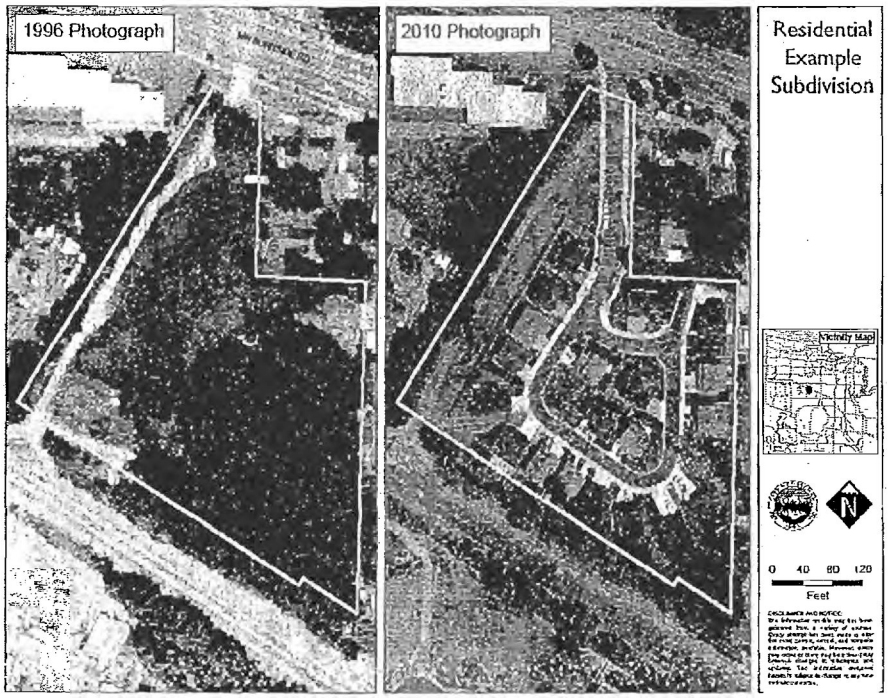


Source: City of Gresham GIS staff

20 Regional Ecosystem Analysis for the Willamette/Lower Columbia Region of Northwest Oregon and Southwestern Washington State: Calculating the Value of Nature. (American Forests and USDA Forest Service, 2001) p. 10 and City of Vancouver Urban Forestry Management Plan, 2007.

21 www.planning.org/research/forestry/index.htm

Figure 2. Residential tree canopy change in Gresham from 1996 to 2010



Source: City of Gresham GIS staff

Lack of a Shared Community Vision for Trees

Trees benefit many users of the urban forest, each with his or her personally developed sense of the right balance between development and tree preservation. The lack of a community-based visioning process for the urban forest has resulted in an uncoordinated system of tree regulations and management practices, or inconsistent enforcement of regulations and missed opportunities for community involvement in the protection, improvement and expansion of the city's tree canopy.

For instance, other than the riparian shade-management program, the City does not have a program or management practices in place to identify what areas are deficient in tree canopy. Additionally, no tracking mechanisms currently exist to identify where public trees are removed or could be planted. Without a centralized municipal urban forestry program it is difficult to have a focused mission to achieve a shared vision for urban forestry.

A shared vision for the urban forest, for example, could use tree canopy as a measure of tree health. Over the past few decades, increasing commercial and residential development has lead to a reduction in canopy cover, which has contributed to an increase in the costs of water quality infrastructure, street maintenance and building cooling.

Lack of Stewardship Opportunities and Outreach on the Value of Trees

Trees in the urban environment are a valuable resource that benefits visitors, landowners, business owners and residents. Education, stewardship opportunities and outreach efforts are ways to increase awareness within the business community and among residents. While the AmeriCorps stewardship outreach program has engaged a number of streamside landowners over the last 10 years, the City does not have a concerted outreach effort in place specifically to preserve, protect and improve the City's urban tree resources.

Gaps exist in education, stewardship and outreach, which include a lack of knowledge about sustainable landscape practices and limited partnerships to build on the City's outreach efforts.

With better outreach and stewardship opportunities, the community can better realize the benefits of the urban forest.

Infrastructure and Resource Conflicts

Tree placement and type can conflict with infrastructure and other valued resources. Conflicts identified include:

- **Sidewalks**. Tree roots may buckle infrastructure when planted in constrained sidewalk areas.
- **Power lines/light poles**. Trees may interfere with overhead power lines and light poles.
- **Solar panels**. Trees can potentially block sunlight needed for solar-panel operation.
- **Shading gardens**. Depending on placement, mature trees can limit the amount of sun received by neighboring gardens.
- **Streets and commercial signs**. Trees can obstruct drivers' or customers' view of road or business signs.
- **Roof gutters and downspouts**. Leaf litter may clog downspout pipes.
- **City storm sewers and drains**. Storm sewers and drains often clog with leaves or pine needles, requiring maintenance crews to clean them to prevent flooding.
- **Views**. Trees on residential and commercial properties may interfere with adjacent property owners' desired views.

The City does not have a program in place to address conflicts such as tree roots lifting sidewalks in the right-of-way or on residential property. Better coordination of infrastructure layers and tree placement may be one way that City staff and developers can avoid these potential conflicts during the pre-construction phase.

Maintenance

Routine maintenance of trees can greatly increase the health and longevity of the tree canopy and help minimize conflicts. The City's codes do not address maintenance, and the City's management practices on maintenance are not well coordinated.

Barriers to implementing both ongoing and periodic preventative maintenance programs for public and private property include:

- Lack of clearly defined roles for citizens and City staff
- Lack of requirements and incentives for maintenance on private property
- Lack of knowledge about sustainable landscaping practices
- Lack of central oversight for vegetation management of public trees

With the exception of the Streamside Property Outreach and Fee for Service programs, private property owners receive little guidance about how to maintain healthy trees or which practices to avoid. (Tree-topping, for example, renders a tree vulnerable to disease.) Lack of adequate funding and resources for tree maintenance, irrigation and inspection also prevent the City and property owners from implementing a more proactive approach to tree maintenance on public and private property.

Tree Selection and Placement (Right Tree in the Right Place)

Selecting and planting the right tree species and providing for variety is critical for the health and survivability of tree canopy. An urban forest diverse in both tree age and tree species is more resilient and ensures that no single event, pest or disease wipes out a significant portion of the city's trees at any one time.

Similarly, many trees were or continue to be planted in constrained right-of-way planting strips diminishing tree health and survivability. When trees are required, such as trees in commercial parking lots, the right trees should be chosen to provide shade, and to avoid negative consequences such as fruit falling on cars.

Like many cities across the Portland Metropolitan Area, Gresham is growing and continually faces the challenge of balancing urban growth with environmental protection. Trees in urban areas are less resilient than trees in natural areas because they lack sufficient space and irrigation.

Tree-placement issues include sidewalk and power line conflicts. Because of the narrowness of many street planting strips in Gresham, property owners are occasionally forced to remove a maturing tree or replace a sidewalk damaged by tree roots, at significant expense. Similarly, planting trees underneath power lines can result in tree-topping. Planting the "wrong tree in the wrong place," creates potential public safety hazards: trees weakened by topping, fires and power outages resulting from branch interference with high-voltage transmission lines.

Development Code

The City has a number of tree regulations establishing a framework for tree preservation, planting and care. Gresham's existing tree code is located in Section 9.1000 of the Gresham Community Development Code (CDC). These Code sections are designed to retain existing trees along public rights-of-way, on public lands and on multifamily, commercial and industrial property.

However, many residents and developers agree that these regulations are ineffective and difficult to interpret, and that they produce inconsistent delivery of urban forestry programs and services.

The following is a documented list of concerns with the Development Code's tree regulations:

- *Lack of clarity in tree-protection standards.* For instance, while some provisions require landscaping plans in parking lots, others do not. There is also not a clear Code protocol to follow to coordinate street tree placement with the placement of other infrastructure such as driveways and streetlights.

- *Outdated tree provisions are scattered throughout the Code, parts of which are more than 20 years old.* The Code has had minimal updates over the years and is considered user-unfriendly by many within the development community. This has resulted in interpretation inconsistencies that have affected public and private projects.
- *Limited Code compliance measures.* Currently, Gresham's Code Compliance Division does not have a clearly defined Code enforcement process for tree issues and lacks resources to properly administer and translate Code requirements on the ground.
- *Inconsistent tree removal and replacement process.* The tree Code provides limited language to specify replacement and mitigation requirements, resulting in concerns that the benefits offered by trees – and especially by mature trees – may be permanently lost with removal. Limited code language exists to support the City's tree fund mitigation tool.
- *Limited protections for large-canopy trees with high community value.* Studies show that large trees have significantly more value than smaller trees. In Gresham, that has raised questions about whether the City's current minimum size for regulated trees is too small.

Several of the Development Code issues discussed in this section are expanded upon in the November 2009 Urban Forestry Issues and Opportunities White Paper, included in Appendix J of the UFMP. The Development Code issues described in the White Paper are organized under three headings: 1) standards related to tree regulations; 2) Code compliance; and 3) public tree management.

Section 2. Volume 2, Section 10.014 is amended to as follows:

VOLUME 2 - P O L I C I E S

10.014 GOAL 2 – LAND USE PLANNING LAND USE POLICIES AND REGULATIONS, AND COMMUNITY DESIGN

BACKGROUND

Statewide Planning Goal 2: Community Design – Trees and Other Vegetation

*****

Efforts to Protect and Enhance Trees and Vegetation

Gresham has taken a proactive position towards protecting and enhancing the City's trees and vegetation. For example, the City's Community Development Code requirements for site design review (Article 7, Site Design Review) requires landscaping and tree protection measures for new multi-family, single-family attached, industrial, commercial, mixed-use, community service and manufactured park development. The City's code also requires vegetation as part of buffering and screening between dissimilar land uses (Article IX, Section 9.0100 – ~~9.0110~~ 9.0111). Furthermore, parking lots are required to have special landscape treatment pursuant to Community Development Code, Section 9.0824.

The City also requires the protection and sometimes restoration of vegetation when development occurs in the following overlay districts - Floodplain District; Hillside Physical Constraint District; ~~Natural Resource District, and Water Quality Resource Area~~ Habitat Conservation Area (HCA) District. Also, the Downtown, ~~and~~ Civic Neighborhood, Pleasant Valley and Springwater Plan Districts require new development to provide special landscape treatments. The purpose is to enhance the unique design quality and character of the ~~two~~ four districts.

The City of Gresham seeks to provide a level of protection for existing trees per Community Development Code Section 9.1000. This section seeks to preserve significant trees; control cutting of trees and retain trees and wooded areas. Tree removal permits are required if a certain size and number of trees are proposed to be removed. Also, the standards require permits for removal of a significant tree(s). A significant tree(s) is defined by the Development Code as a tree or group of trees that have been designated by the City as having unique importance. Removal of a significant tree or trees requires mitigation in the form of planting new trees. This section of the Code also regulates removal of trees in several of the City's Overlay Districts.

Gresham's citizens are involved in protection and management of the City's trees. Gresham Revised Code provides for the establishment of a ~~Tree Preservation Council Advisory Committee~~ Urban Forestry Subcommittee consisting of seven members, five of which must have expertise with trees such as arborists, nursery operators, landscape architects or foresters.

The purpose of the ~~committee~~ subcommittee is to advise the City Council and make recommendations to Council and the Planning Commission regarding preservation and protection of trees. The ~~committee~~ subcommittee is also responsible for recommending designation of significant trees and maintaining and updating the significant tree list. Also, the ~~committee~~ subcommittee engages in public education regarding topics such as tree protection, pruning and other maintenance activities.

On July 19, 2011 Council adopted the Urban Forestry Management Plan. Based on the adopted Plan a new section, 10.014.3, has been established.

GOAL, POLICIES AND ACTION MEASURES

GOAL

Protect and enhance the environmental and aesthetic contribution of trees and other vegetation.

POLICIES

*****

3. The City shall protect environmental quality and public safety by:

   a. Regulating removal of trees and other vegetation on steep slopes, within floodplains, natural resource (Goal 5) overlay areas, ~~water quality resource overlay~~ habitat conservation areas and in tree groves and other forested areas.

   b. Instituting regulations and practices to prevent and immediately resolve hazards such as falling limbs and trunks and dangerous conditions caused by tree removal such as blow-down, landslides, soil erosion, and altered hydrology.

*****

ACTION MEASURES

*****

19. ~~Develop an~~ Maintain the Urban Forestry Management ~~Master~~ Plan and ultimately implement a citywide urban forestry management program.

Section 3. Volume 2, Section 10.014 is amended to add Section 3, Urban Forestry Management Plan Goals, Policies and Action Measures, as follows:

10.014 Section 3, Urban Forestry Management Plan Goals, Policies and Action Measures

INTRODUCTION

The Urban Forestry Management Plan (UFMP) provides a comprehensive, sustainable and integrated approach to the management of trees in Gresham and provides guidance for future decisions related to trees in Gresham's urban forest.

City Council directed staff to help carry out Gresham Community Development Plan goal 10.014.2 to "Protect and enhance the environmental and aesthetic contribution of trees and other vegetation" and action measure 19 of this goal to "Develop an Urban Forestry Management Plan and ultimately implement a citywide urban forestry management program."

BACKGROUND

The purpose of the UFMP is to improve and coordinate management and administration of the urban forest by developing a comprehensive, sustainable and integrated approach to tree management. It integrates management of the many issues and opportunities presented by Gresham's natural systems, tree resources, public infrastructure and urban development.

Development of the UFMP included an extensive public involvement process that also included outreach to multiple City departments and collaboration with the UFS, staff and the public as well as an online survey. The Gresham City Council adopted the UFMP on July 19, 2011. The UFMP is intended to be implemented over a period of 20 years, and therefore must respond to the needs of both today and tomorrow.

Benefits of the Urban Forest

Trees, especially as part of a regional and urban "green infrastructure" system, help create a better quality of life. Specifically, the retention of trees in historically wooded areas and the establishment of trees along street corridors help to soften urban development, screen unattractive areas, block wind, cool streets and buildings, reduce stormwater run-off, filter noise and air pollution, and promote soil stability. This "green infrastructure" provides important ecological and social functions that translate into direct cost-savings to local governments and indirect stimulation of the local economy.[22]

Urban forests require comprehensive management to ensure healthy vegetation over time, and community-wide support is essential to supplement public management efforts. The goal of a sustainable urban forest is to maintain a maximum level of net economic, community and

[22] Vancouver Urban Forestry Management Plan, 2007. p.7.

environmental benefits over time. In other words, long-term management of natural assets brings a higher return than their short-term elimination.[23]

Economic Benefits
Healthy mature trees are a major economic asset for attracting and retaining residents, businesses and visitors. Money spent on trees is a good investment and adds to the overall value of the community.[24] Economic benefits of the urban forest include:

- Increased Property Values
- Maintenance of Economic Stability Citywide

Community Benefits
Trees are place-makers that are vital to livability and give a community visual character, unity and identity. Trees preserve and enhance quality of life by offering a sense of place and the opportunity to embrace nature. Community benefits of the urban forest include:

- Improve Safety, Personal Health and Enjoyment
- Enhance the Aesthetics of the Community and its Neighborhoods

Environmental Benefits
A healthy urban forest contributes valuable ecosystem services for watershed protection, reducing flood potential and stream erosion while improving water quality. More trees are capable of removing a greater percentage of toxins from the air, thereby decreasing air pollution. Environmental benefits of the urban forest include:

- Protection of Air and Water Quality, Reduction in Flooding and Enhancement of Wildlife Habitat
- Energy Conservation

SUMMARY OF MAJOR ISSUES

The following is a list of current challenges to Gresham's urban forest, which were considered in the update of this Comprehensive Plan section.

- **Effects of urbanization on livability**. A key issue from past development is the replacement of existing urban tree canopy cover with impervious surfaces such as paved roads, parking lots and rooftops.

- **Declining tree canopy**. A significant challenge is maintaining and expanding tree canopy, which is one of the most common metrics communities use to evaluate the health of their urban forests. Current tree cover in Gresham is estimated at 28 percent.

- **Lack of a shared community vision for trees**. The City does not have a program or management practices in place to identify what areas are deficient in tree canopy. Additionally, no tracking mechanisms currently exist to identify where public trees are removed or could be planted.

- **Lack of stewardship opportunities and outreach on the value of trees.** The City does not have a concerted outreach effort in place specifically to preserve, protect and improve the City's urban tree resources. Gaps exist in education, stewardship and

[23] Renton Urban and Community Forestry Development Plan, 2009. p.13.
[24] According to a nationally renowned urban forestry expert in an excerpt from "Planting the Living City", Dr. Robert Young and Dr. Greg McPherson, 2010. (in review)

outreach, include a lack of knowledge about sustainable landscape practices and limited partnerships to build on the City's outreach efforts.

- **Infrastructure and resource conflicts.** Tree placement and type can conflict with infrastructure and other valued resources. The City does not have a program in place to address conflicts such as tree roots lifting sidewalks in the right-of-way.

- **Lack of maintenance.** Routine maintenance of trees can greatly increase the health and longevity of the tree canopy and help minimize conflicts. The City's codes do not address maintenance, and the City's management practices on maintenance are not well coordinated.

- **Incorrect tree selection and placement (right tree in the right place).** Selecting and planting the right tree species and providing for variety is critical for the health and survivability of tree canopy. Tree-placement issues, include sidewalk and power line conflicts requiring costly sidewalk repair or potential public safety hazards; trees weakened by topping; and fires and power outages resulting from branch interference with high-voltage transmission lines.

- **Unclear and outdated development Code.** The City has a number of tree regulations establishing a framework for tree preservation, planting and care. However, many residents and developers agree that these regulations are ineffective, unclear, difficult to interpret, and that they produce inconsistent delivery of urban forestry programs and services.

The UFMP process included analysis of the above issues along with the needs and desires of Gresham residents, and review of best management practices related to urban forestry, which informed development of the following: Guiding Principles, Vision, Goals, Policies and Actions.

GUIDING PRINCIPLES

Principle 1. Tree regulations should be easily understood by the public and implementable by City Staff, and should be consistent with other City codes and practices.

Principle 2. The City should seek out and collaborate with tree partners throughout the community to complete action items. These partners could include: residents, business owners, the nursery and tree industry, watershed councils, neighborhood associations, developers, schools, nonprofits (Friends of Trees), adjacent municipalities and other stakeholders.

Principle 3. An adaptive management approach, where resource managers can incorporate new findings into best practices, should be taken with regard to the urban forest.

Principle 4. A long-term approach should be taken to planning and maintaining Gresham's trees.

Principle 5. The benefits of the urban forest should be used to inform and support other City planning goals, and the urban forest should be a recognized asset in Gresham's Community Development Plan. Other City planning goals may include:

- Defining a sense of place
- Promoting aesthetics
- Creating walkable neighborhoods

- Improving community health
- Improving traffic safety
- Advancing air, water and conservation goals

Principle 6. Healthy trees make neighborhoods more livable by creating quality streetscapes, neighborhoods and parks; by softening the built environment; and fostering safer and more sociable neighborhoods.

Principle 7. Design standards should incorporate the philosophy "Make the place right for trees and pick the right trees for the place."

VISION

Gresham's trees are recognized as integral to the quality of the City's urban character and natural environments. A healthy urban forest remains a longstanding community priority and will be thoughtfully managed in a way to maximize a range of public benefits including a thriving ecosystem, a vibrant economy and a livable community.

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

POLICIES

1. Protect, preserve and enhance Gresham's urban forest.
2. Maximize tree-canopy cover to expand Gresham's urban forest.
3. Maximize the ecological, environmental and economic benefits of the urban forest.
4. Manage the urban forest to maximize community benefits for all.
5. Improve interdepartmental communication and coordination regarding trees.
6. Adopt best management practices and resource management tools to improve tree maintenance citywide.
7. Improve the health and care of Gresham's street trees.
8. Promote partnerships between residents, neighborhood associations, government, nonprofits and businesses.
9. Increase public awareness and engage the community in active stewardship of the urban forest.

ACTION MEASURES

Short-Term Action Measures

1. Simplify and consolidate tree codes, making them clearer to the public and implementable by City staff.

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.
3. Promote educational offerings and informational materials, such as:
    - Tree planting promotion and workshops.
    - Tree Maintenance Best Management Practices, Technical Tree Manual and Stewardship Guide.
    - Value of trees to residents, business owners, Realtors, industries, schools and community groups.
4. Develop a process to establish meaningful tree-canopy coverage goals throughout the City, taking into account community desires, tree function, and habitat needs/forest diversity. As one measure of performance over time, periodically compare GIS measurements of canopy with goals for various land uses.
5. Hold quarterly meetings between City department representatives and the Urban Forestry Subcommittee at City Hall. Connect with residents by hosting a citywide celebration of Gresham's urban forest every two years in addition to the annual Tree City USA celebration.

Longer-Term Action Measures

6. Develop incentives to promote tree retention and planting.
7. Promote and incentivize the use of large-canopy trees in appropriate areas to provide maximum benefits.
8. Promote the use of native tree species on public and private lands to enhance wildlife habitat in the city.
9. Develop a Tree Mitigation Plan Manual providing replacement and other options for public and private development applicants. Other options include paying into a tree fund in lieu of on-site planting.
10. Work with the Urban Forestry Council Advisory Subcommittee to develop a prioritized list of urban forest enhancement opportunities and projects citywide.
11. Partner with service organizations such as Friends of Trees to plant street and open space trees.
12. Partner with tree/landscape contractors to distribute informational materials.
13. Help neighborhoods achieve distinct identities by listing specific trees for planting in public rights of way.
14. Enhance public awareness of trees by providing interpretive species labels at prominent public places such as the Gradin Sports Park arboretum, Center for the Arts Plaza, and along key pedestrian streets. This would include botanical name, common name and date planted.
15. Perform a tree inventory of publicly owned street and developed park trees. Use volunteers as available.
16. Conduct a tree health assessment and identify specific varieties that will survive Gresham's urban environment, east winds and occasional winter ice storms.
17. Develop a methodology to assess the carbon offset from Gresham's trees.
18. Calculate the economic benefits of trees in Gresham.

19. Prepare and distribute a "State of Gresham's Urban Forest" report, to be updated every five years.
20. Establish new maintenance funding sources for public trees (i.e. partnerships, grants, Gresham Tree Fund, sustainable harvesting, etc.)
21. Provide technical arborist expertise to assist in development review, respond to citizen inquiries and assess individual tree-health issues. This could include contracting for arborist services.
22. Establish a Tree Hotline, similar to the City's Planner on Duty, for residents to ask tree-related questions.
23. Work with City departments to make tree preservation and tree planting a priority in their plans and operations.
24. Review the Public Works Standards and City Operations policies for public tree maintenance and modify as necessary to reflect best management practices.
25. Develop design phase and preconstruction coordination protocols to ensure the "Right tree is installed in the right place."
26. Develop and implement an invasive species control strategy citywide to safeguard tree canopy.
27. Create prominent tree amenities such as the Gradin Sports Park arboretum, and work with schools, nurseries or other landowners to construct tree species test plots.
28. Develop an Arterial Street Tree Plan to enhance the visual appeal of the City's shopping, employment and civic districts.

First Reading: January 17, 2012

Second Reading: February 21, 2012

Yes: Widmark, Fuhrer, Kilian, Warr-King, Stegmann

No: None

Absent: Bemis, Echols

Abstain: None

Erik Kvarsten
City Manager

Shane T. Bemis
Mayor

Approved as to Form:

Richard D. Faus
Senior Assistant City Attorney

BEFORE THE CITY COUNCIL OF THE

CITY OF GRESHAM

IN THE MATTER OF AMENDMENTS TO VOLUME 1 (FINDINGS) AND VOLUME 2 (POLICIES) OF THE GRESHAM COMMUNITY DEVELOPMENT PLAN, PERTAINING TO THE URBAN FORESTRY MANAGEMENT PLAN	)))))	Order No. 635 CPA 11-212

On January 17, 2012, the City Council held a public hearing to take testimony on amendments to Volume 1 (Findings) and Volume 2 (Policies) of the Gresham Community Development Plan as it relates to the Urban Forestry Management Plan.

The hearing was conducted under Type IV procedures. Council President Karylinn Echols presided at the hearing.

The Council closed the public hearing at the January 17, 2012 meeting, and a final decision was made at the February 21, 2012 meeting.

A permanent record of this proceeding is to be kept on file in the Gresham City Hall, along with the original of the Order.

The Council orders that these amendments are approved, adopts the standards, findings and conclusions as stated in the attached Planning Commission Recommendation Order and staff reports.

Dated: 2/21/2012

Erik Kvarsten
City Manager

Shane T. Bemis
Mayor

BEFORE THE PLANNING COMMISSION OF THE

CITY OF GRESHAM

TYPE IV RECOMMENDATION ORDER CPA 11-212

A Type IV Legislative Public Hearing was held on November 14, 2011 to consider proposed amendments to Volume 1 (Findings) and Volume 2 (Policies) of the Gresham Community Development Plan regarding the **Urban Forestry Management Plan**.

The Planning Commission closed the public hearing at the November 14, 2011 meeting, and a final recommendation was made at the November 14, 2011 meeting.

William Bailey, Chair, presided at the hearing.

A permanent record of this proceeding is to be kept on file at the Gresham City Hall, along with the original of this Type IV Recommendation Order.

The Planning Commission recommends **ADOPTION** of the proposed amendments to the Gresham Community Development Plan regarding the Urban Forestry Management Plan with the following changes:

No changes

William J. Bailey

Chairperson

11/14/2011

Date

MEMORANDUM

URBAN DESIGN & PLANNING

STAFF REPORT

TYPE IV HEARING—COMPREHENSIVE PLAN AMENDMENT

URBAN FORESTRY AMENDMENTS

To:	Gresham Planning Commission
From:	Jonathan Harker, AICP, Long Range Planning Manager Tina Osterink, Associate Natural Resources Planner
Hearing Date:	November 14, 2011
Report Date:	November 3, 2011
File:	CPA 11-212
Proposal:	To adopt comprehensive plan amendments to Volume 1 (Findings) and Volume 2 (Policies) of the Gresham Community Development Plan with text amendments creating new or revised findings, goals, policies and action measures pertaining to the Urban Forestry Management Plan.
Exhibits:	'A' – Draft amendments to Volumes 1 and 2 of the Gresham Community Development Plan
Recommendation:	Staff recommends **adoption** of the proposed Comprehensive Plan amendments to the City Council.

SECTION I
EXECUTIVE SUMMARY

Purpose

The purpose of the Urban Forestry Management Plan (UFMP) is to improve and coordinate management and administration of the urban forest by developing a comprehensive, sustainable and integrated approach to tree management. It integrates management of the many issues and opportunities presented by Gresham's natural systems, tree resources, public infrastructure and urban development.

Further, the development of the UFMP was guided by the following principles:

Principle 1. Tree regulations should be easily understood by the public and implementable by City staff, and should be consistent with other City codes and practices.

Principle 2. The City should seek out and collaborate with tree partners throughout the community to complete action items.

Principle 3. An adaptive management approach, where resource managers can incorporate new findings into best practices, should be taken with regard to the urban forest.

Principle 4. A long-term approach should be taken to planning and maintaining Gresham's trees.

Principle 5. The benefits of the urban forest should be used to inform and support other City planning goals, and the urban forest should be a recognized asset in Gresham's Community Development Plan. Other City planning goals may include defining sense of place; promoting aesthetics; creating walkable neighborhoods; improving community health; improving traffic safety and advancing air, water and conservation goals.

Principle 6. Healthy trees make neighborhoods more livable by creating quality streetscapes, neighborhoods and parks; by softening the built environment; and fostering safer and more sociable neighborhoods.

Principle 7. Design standards should incorporate the philosophy "Make the place right for trees and pick the right trees for the place."

Background

In 2004, City Council enacted new goals, policies and action measures regarding trees and other vegetation as part of a larger project to update Volume 2 Policies of the Gresham Community Development Plan. The adopted goal was: "Protect and enhance the environmental and aesthetic contribution of trees and other vegetation." This goal included Action Measure 19: "Develop an Urban Forestry Management Master Plan and ultimately implement a citywide urban forestry management program."

The UFMP project addresses Action Measure 19 and is part of the 2011 Council Work Plan.

The UFMP was developed through a two year planning process. Public Involvement included outreach to residents and property owners, stakeholders, elected officials, multiple City departments and monthly collaboration with the Urban Forestry Subcommittee (UFS). The planning process included conducting research and analysis of issues and opportunities related to urban forestry; administering public outreach, including an online survey; identifying solutions and approaches to address identified issues/concerns; and drafting the UFMP document. Multiple community forums and open houses, stakeholder meetings and work sessions with the Urban Forestry Subcommittee were held.

The UFMP identified challenges to Gresham's urban forest which include:

- Effects of urbanization on livability
- Declining tree canopy
- Lack of a shared community vision for trees
- Lack of stewardship opportunities and outreach on the value of trees
- Infrastructure and resource conflicts
- Lack of maintenance
- Incorrect tree selection and placement (right tree in the right place)
- Unclear and outdated development code

The benefits of trees in the urban environment are documented in the UFMP, ranging from reduced energy consumption and lower crime to increased property values, flood mitigation and improved health and wellness. Trees also provide a connection to nature that can be hard to find in urban centers. They are shown to considerably reduce the cost of delivering clean air and water, stormwater retention and other municipal services.

The UFMP has created a series of goals, policies and action items which taken together attempt to address the challenges to and benefits of a healthy and well managed urban forest. City Council unanimously adopted the UFMP on July 19, 2011. The proposed UFMP Goals, Policies and Action Measures amendments are intended to provide the policy direction and implementation steps related to urban forestry management based on the adopted UFMP.

Proposed Comprehensive Plan Amendments Overview
Text changes to Community Development Plan are proposed. The format of the attached Exhibit 'A' ~~strikeout~~ /double-underline version. Proposed deleted language is ~~stricken~~ and proposed new language is double-underlined. The overview provided below summarizes the changes:

1. Volume 1 (Findings)
Findings are written statements that provide the factual basis for goals, policies and action measures. The proposal creates a new section (Appendix 48) to establish findings for a new Urban Forestry Management Goal section. This new section includes the following vision statement:

> *Gresham's trees are recognized as integral to the quality of the City's urban character and natural environments. A healthy urban forest remains a longstanding community priority and will be thoughtfully managed in a way to maximize a range of public benefits including a thriving ecosystem, a vibrant economy and a livable community.*

Appendix 48 is a summary of UFMP and also includes a description of the urban forestry guiding principles; an explanation of what is an urban forest and why it is important; benefits of the urban forest; existing urban forestry conditions; a public participation summary; and a summary of issues.

2. Volume 2 (Policies)
A new Section 10.014.3 -- Urban Forestry Management Plan is proposed. It includes three goals, nine policies and twenty-eight action measures. The action measures are categorized as either short-term or longer-term actions.

Goals are general statements of a desired end or the direction that will follow to achieve that end. The three goals are:

- Create a High-Quality Urban Forest in Gresham
- Establish Proactive Public Tree Maintenance and Management Practices
- Promote Community Partnership and Education Opportunities for Urban Forestry

Policies are statement's identifying Gresham's position and a definitive course of action. Policies are more specific than goals. The nine policies are:

1. Protect, preserve and enhance Gresham's urban forest.
2. Maximize tree-canopy cover to expand Gresham's urban forest.
3. Maximize the ecological, environmental and economic benefits of the urban forest.
4. Manage the urban forest to maximize community benefits for all.
5. Improve interdepartmental communication and coordination regarding trees.
6. Adopt best management practices and resource management tools to improve tree maintenance citywide.
7. Improve the health and care of Gresham's street trees.
8. Promote partnerships between residents, neighborhood associations, government, nonprofits and businesses.
9. Increase public awareness and engage the community in active stewardship of the urban forest.

Action measures are statements identifying a specific City project or standard that would implement the goals or policies. Action measures are implemented based on priorities and resource availability. There are twenty eight action measures divided into short-term and longer-term action measures. Short-term action measures are ones that likely can be implemented, if prioritized, in the next five years using current resources. Examples of short-term action items are:

- Simplify and consolidate tree codes, making them clearer to the public and implementable by City staff.
- 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.

Examples of longer-term action items are:

- Develop incentives to promote tree retention and planting.
- Work with the Urban Forestry Council Advisory Subcommittee to develop a prioritized list of urban forest enhancement opportunities and projects citywide.
- Perform a tree inventory of publicly owned street and developed park trees. Use volunteers as available.

Additionally, amendments are proposed to the existing Section 10.014.2 Community Design, Trees and Other Vegetation to reflect updated information and the adopted Urban Forestry Management Plan with minor changes such as:

- References to the term Natural Resource District and Water Quality Resource Area, is replaced with the revised term Habitat Conservation Area (HCA) District.
- References to the term Tree Preservation Committee, is replaced with the revised term Urban Forestry Subcommittee (UFS).
- Reference to a new buffering and screening Code section, 9.0111, is added.

- Language in Action Measure 19 has been modified to reflect development of the Urban Forestry Management Plan.

Staff Report Organization

- Section II and Section III identify those current Community Development Plan procedures and policies that apply to the proposal.
- Section IV identifies the applicable Metro Urban Growth Management Functional Plan Titles that apply to the proposal.
- Section V identifies the applicable Statewide Planning Goals that apply to the proposal.
- Section VI contains findings of fact that indicate how the proposal is consistent with Sections II through V:
    - Subsection A is findings of fact for the Community Development Code Procedures.
    - Subsection B is findings of fact for the Community Development Plan Goals and Policies.
    - Subsection C is findings of fact for the Metro Urban Growth Management Plan.
    - Subsection D is findings of fact for the Statewide Planning goals.
- Sections VII and VIII summarize staff conclusions and recommendations.

Exhibit 'A' includes proposed amendments to Volumes 1 and 2 of the Gresham Community Development Plan.

SECTION II
APPLICABLE COMMUNITY DEVELOPMENT CODE PROCEDURES

Section 11.0200	Classification of Applications
Section 11.0600	Type IV Procedure – Legislative
Section 11.1100	Public Hearings

SECTION III
APPLICABLE COMMUNITY DEVELOPMENT PLAN GOALS & POLICIES

Section 10.014.1	Land Use Policies and Regulations
Section 10.014.2	Community Design, Trees and Other Vegetation
Section 10.100	Citizen Involvement
Section 10.211	Steep Slopes and Landslides
Section 10.221	Natural Resources, Fish and Wildlife Habitat, Water Resources and Ecologically and Scientifically Significant Areas
Section 10.231	Air Quality
Section 10.232	Water Quality
Section 10.320	Transportation System
Section 10.333	Stormwater Management System

SECTION IV
APPLICABLE METRO URBAN GROWTH FUNCTIONAL PLAN TITLES

Title 8	Compliance Procedures

SECTION V
STATEWIDE PLANNING GOALS

Goal 1	Citizen Involvement
Goal 2	Land Use Planning
Goal 6	Air, Water and Land Resources Quality
Goal 7	Areas Subject to Natural Hazards

SECTION VI
FINDINGS OF FACT

The proposed Community Development Plan amendments attached as Exhibit 'A' are consistent with all applicable Procedures, Goals and Policies of the Gresham Community Development Plan, applicable titles of the Metro Urban Growth Management Functional Plan and the applicable Statewide Planning Goals as indicated in the following findings.

A. COMMUNITY DEVELOPMENT CODE PROCEDURES

1. ***Section 11.0200 – Initiation and Classification of Applications.*** This section requires that an amendment to the Community Development Code and the Community Development Plan be a legislative action under the Type IV Procedure pursuant to this section. This section applies to this proposal, as it is an amendment to the Community Development Plan.

2. ***Section 11.0600 - Type IV Legislative Procedures***. This section requires the Planning Commission to hold a public hearing and make a recommendation to the Council. The Council holds another public hearing and makes a final decision. Interested persons may present evidence and testimony relevant to the proposal. The Planning Commission and Council make findings for each of the applicable criteria. The section also provides for a hearing process consistent with Section 11.1000. Both the Planning Commission and the City Council, at public hearings in conformance with provisions of this section, will consider this proposal. Findings are made for the applicable criteria in this report or as revised in the record.

3. ***Section 11.1000 – Public Hearings***. For a Type IV Comprehensive Plan Amendment this section requires that hearings be scheduled, a notice published in a newspaper of general circulation in the City and a copy of the decision be mailed to those required to receive such notice. Required notice of public hearing for these proposed text amendments has been published in the Gresham Outlook, as required by this section. The Planning Commission will make a recommendation and the Council will make a decision that will be based on findings of fact contained in this report and in the hearings record and a decision will be sent to those who participated in the hearings. A decision shall be made accompanied by findings and an order.

B. COMMUNITY DEVELOPMENT PLAN GOALS AND POLICIES (VOLUME II)

This section identifies the applicable Community Development Plan Goals and Policies. The text (*italicized*) of the Policy is followed by corresponding findings and conclusions. The applicable Policies are grouped by general categories.

1. General Goals & Policies

Section 10.014 Section 1: Land Use Policies and Regulation

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 the 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 11: The City's land use regulations shall identify and protect designated significant natural resources. These regulations shall have sufficient flexibility to allow development to adapt to unique and difficult conditions.

Policy 26: The City shall, where practical, protect views that contribute to Gresham's identity such as Mt. Hood, the Columbia River Gorge, streams and riparian corridors and the wooded character of buttes and hillsides.

Findings:
These general Goals and Policies establish the City's intent to use its Comprehensive Plan (Gresham Community Development Plan [GCDP]) as the basis for appropriate planning processes and resulting land use plans.

The proposed amendments are part of the Urban Forestry Management Plan, which was requested by the City Council in its 2011 Council Work Plan to complete an UFMP and to draft goal, policy and action measure amendments based on the adopted UFMP to Volume 2 of the GCDP. The proposed amendments address tree management and maintenance issues identified through an extensive public participation process including many public meetings with the Urban Forestry Subcommittee, the Planning Commission, City Council, residents, property owners, business owners and other interested parties.

Policies 1 and 2 are addressed because the proposed amendments are consistent with state and regional natural resource requirements, are intended to meet the interests of the citizens of Gresham and implement the applicable goals and policies of the Comprehensive Plan, as described in Section III.B of this staff report. The proposed amendments will serve the interests of the City by implementing new best practices for Urban Forestry that will create a high-quality urban forest citywide.

Policies 11 and 26 are addressed because the proposed amendments provide recommendations to preserve and protect all functional and visual aspects of the urban forest, including Significant Trees adopted by City Council, the forested buttes and streamside riparian corridors.

Conclusion:
The proposed amendments address the Goal and applicable Policies because they are part of the Urban Forestry Management Plan (UFMP) project, which was requested by the Gresham City Council in 2009 to address urban forestry issues citywide. The City Council endorsed the project by adopting it in its 2009, 2010, and 2011 Council Work Plans. They conform to State law and Gresham's Community Development Plan, as described in Sections II, III and IV of this staff report.

The proposal is consistent with the applicable general Goals and Policies listed in this section.

Section 10.014 Section 2: Community Design, Trees and Other Vegetation

Goal: Protect and enhance the environmental 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 3: The city shall protect environmental quality and public safety by:

a. *Regulating removal of trees and other vegetation on steep slopes, within floodplains, natural resource (Goal 5) overlay areas, water quality resource overlay areas and in tree groves and other forested areas.*

b. *Instituting regulations and practices to prevent and immediately resolve hazards such as falling limbs and trunks and dangerous conditions caused by tree removal such as blow-down, landslides, soil erosion, and altered hydrology.*

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 vandalisms 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 19: Develop an Urban Forestry Management Master Plan and ultimately implement a citywide urban forestry management program.

Findings:
This general Goal is addressed through the creation of the UFMP, which is intended to improve and coordinate the management of the urban forest to protect the environmental and aesthetic contribution of trees and other vegetation throughout the city.

Policies 1, 2 and 3 are addressed as the UFMP includes new urban forestry policies to protect, preserve and enhance environmental quality, public safety and trees during site development.

Policies 7 and 9 are addressed with a specific recommendation in the UFMP to ensure that various codes, regulations and standards relating to landscaping, site development and tree removal are made more effective by making them clear to the public and implementable by City staff.

Action Measure 19 is partly completed with the development of the Urban Forestry Management Plan and is modified to reflect maintaining the Plan and ultimately implement a citywide urban forestry management program.

Conclusion:
The urban forestry goals and policies have been addressed through new goals and policies adopted in the UFMP. Therefore, the proposal is consistent with the applicable goals and policies listed in this section.

2. Citizen Involvement Goals & Policies

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 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 development proposals once they are in the formal application process.

Findings

The public involvement goals and policies establish the City's intent that its citizens have opportunities throughout a planning project to be informed and to affect proposals.

The key part of involving citizens in this project is coordination with the Urban Forestry Subcommittee (UFS). The UFS is a group of citizens that advises City Council on urban forestry issues. It has been a strong advocate of the City developing the City's first comprehensive, sustainable and integrated approach to management of trees in Gresham. The subcommittee has been involved throughout this project including during the identification of issues, developing solutions for dealing with them and reviewing both the draft plan and text amendments. Their suggestions have been incorporated as described in the vision section and throughout Appendix 48 and the new Goals, Policies and Action Measures section of attached Exhibit A.

Public outreach began on the UFMP in the fall of 2009 and included a City web page and an askGresham interested parties list. The following measures were taken to inform citizens and involve them in this project:

2009

- UFS work sessions: 8/17, 9/21, 11/16, 12/21
- Natural Resources and Sustainability Committee meeting: 11/10
- Neighborhood Coalition meeting: 12/8
- Johnson Creek Watershed Council meeting: 11/24
- Community Forum: 9/29
- City Council work sessions: 12/8

2010

- UFS work sessions: 1/25, 2/22, 3/15, 4/19, 5/17, 6/21, 8/16, 10/18
- Natural Resources and Sustainability Committee meetings: 3/9, 6/8, 8/10, 12/14
- An Urban Forestry Survey available online from February to May on the City's website and shared at community forums, with advisory committees and outreach events
- Planning Commission meeting: 2/8
- Rockwood Kiwanis Club: 2/17
- Transportation Subcommittee: 3/4
- Community events: 3/1 to 3/12 Significant Tree Hunt; 4/17 Center for the Arts 'Green Grows Your Garden and Gresham' event; 4/24 Earth Day; 5/8 Farmer's Market; 5/19 East Gresham Neighborhood Information Fair; and 7/15 SW Information Fair

- Community Forums: 3/13; 5/26, 8/2
- Developer Focus Group: 5/27
- Community Focus Group: 6/23
- Johnson Creek Watershed Council Focus Group: 7/27
- City Council work sessions: 7/13, 9/14

2011

- UFS work sessions: 2/7, 3/21, 4/18, 5/16, 6/7
- Natural Resources and Sustainability Committee meetings: 3/8, 5/10, 6/14
- Planning Commission meetings: 8/8, 9/12
- Neighborhood Coalition meetings: 2/8, 6/14
- Community Forums: 2/22, 4/19
- Business Focus Group: 2/23
- City Council work sessions: 2/8, 3/8, 7/19

Conclusion
The Citizen Involvement Goal and its policies are met by the combination of UFS meetings, Natural Resources and Sustainability meetings, Planning Commission meetings, City Council work sessions, presentations to neighborhood groups and community forums for the interested public as well as providing information on the proposal on the City's Web site.

The proposal is consistent with the applicable citizen involvement goals and policies listed in this section.

3. Natural Hazard Goals and Policies

Section 10.211 – Steep Slopes and Landslides

Goal: Protect life and property from hazards associated with landslides and unstable soils

Findings
This general Goal is supported through goals and policies in the UFMP that involve protecting and expanding the tree canopy, particularly through reforestation efforts that include erosion control along steep slopes.

Conclusion
The Natural Hazard Goal has been addressed through the proposed UFMP policies to maximize tree canopy cover to expand Gresham's urban forest, use large canopy trees in appropriate areas and implement an invasive species control strategy citywide to safeguard tree canopy, life and property.

The proposal is consistent with the applicable natural hazard goal listed in this section.

4. Natural Resources Policies

Section 10.221 – Natural Resources, Fish and Wildlife Habitat, Water Resources and Ecologically and Scientifically Significant Areas

Natural Resources Policy: It is the policy of the City to assist in protecting the quality and quantity of the following resources:

1. *Fish and wildlife habitats*

2. *Visual resources (scenic views and sites)*

3. *Water resources*

4. *Ecologically and scientifically significant areas.*

6. *Energy sources.*

7. *Significant and unique natural features, such as a major stand of trees*

The City will assess the impacts on these resources when a development project is proposed. The project developer and city staff shall outline measures to preserve or mitigate negative impacts on these natural resources.

Findings
The Natural Resources Policies establish the City's priority to protect the quality and quantity of its natural systems that provide drinking water, scenic landscapes and important fish and wildlife habitat.

The Urban Forestry Management Plan project is a continuation of the City's effort to expand tree canopy in both the built and natural environment. Tree canopy is one of the most common metrics that communities use to evaluate the health of urban and natural area forests and their associated benefits.

Policies 1, 3 and 4 are addressed by creating an action in the UFMP to establish a preferred level of canopy coverage to ensure a higher protection of tree canopy and to better meet local natural resource and water quality goals. Additional actions in the UFMP provide language to promote the use of native tree species in public and private lands to enhance wildlife habitat in the City and to revise the City's street tree list to reflect species diversity and prohibit installation of invasive plants in City right-of-way planter strips.

Policy 2 and 7 are addressed by a combination of short and long-term actions in the UFMP that aim to preserve Gresham's visual resources that include trees on forested buttes, along streams and within groves and park land. These actions include developing tree canopy coverage goals that takes into account community desires, tree function, habitat needs and forest diversity. Other actions recommend incentives to promote the use of large canopy trees in appropriate areas, which would enhance both the function and visual appeal of natural resource areas throughout the City.

Policy 6 is addressed by implementing actions in the UFMP that promote energy savings as a result of proper tree placement around buildings, along public right-of-way and within parking lots. The UFMP includes a number of goals, policies and actions that support planting the right tree in the right place and includes applicable implementation strategies to site trees for optimal shade and energy benefits.

Conclusion
The natural resource policies have been addressed through proposed goals, policies and actions in the UFMP that outline measures to preserve and mitigate any potential negative impacts on Gresham's natural resources from development projects.

The proposal is consistent with the applicable natural resource policies listed in this section.

5. Environmental Quality Goals and Policies

Section 10.231- Air Quality

Goal: Improve air quality and reduce air pollution.

Findings
A healthy urban forest provides trees that remove toxins from the air and decrease air pollution. The proposed amendments support this Goal by providing a policy framework to implement tree retention and

expansion provisions that aim to reduce air pollution by absorbing gaseous pollutants such as ozone, nitrogen oxide and sulfur dioxide. Additionally, an expanded tree inventory in Gresham will help filter particulate matter citywide such as dust, ash, pollen and smoke all of which contribute to improved public health.

Conclusion
The Air Quality Goal is met because the UFMP provides a policy framework to maximize tree canopy cover and the air quality benefits of Gresham's urban forest.

The proposal is consistent with the applicable air quality goal listed in this section.

6. Water Resources Quality Goals and Policies

Section 10.232 - Water Quality

Goal: Prevent surface and ground water pollution and improve water quality.

Policy 3: The City shall establish and maintain water quality plans, regulations and standards consistent with federal, state and Metro laws and rules necessary to protect surface and groundwater quality.

Policy 4: The City shall protect the water quality, conveyance, storage functions and associated environmental values of streams, wetlands, 100-year floodplains and other natural drainage-ways and water bodies.

Findings
A healthy urban forest provides trees that reduce the amount of water-borne pollutants. Trees have the capacity to intercept rainwater, which both reduces stormwater run-off and provides clean water.

The general Water Quality Goal and Policies 3 and 4 are addressed through the development of the UFMP because actions to improve tree canopy cover throughout the city will result in a healthy and expanded urban forest that will help meet federal, state and regional water quality requirements. These requirements are intended to eliminate pollution discharge into local streams and to install and protect riparian buffer trees, ensuring the growth of tall trees, and the provisions of adequate stream shading. For instance, the Oregon Department of Environmental Quality currently requires the City to maintain a Temperature Total Maximum Daily Load (TMDL) plan and to evaluate urban canopy best management practices during preparation of the annual National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer (MS4) Discharge Permit (Number 101315) Report. Annual stream temperature and pollutant parameter reporting from Gresham occurs with the following reporting intervals supported by tree-canopy related objectives in the UFMP and Development Code provisions:

- Annual reporting intervals: The City is required to submit annual reports detailing how it has worked toward addressing all the TMDL pollutant parameters, including the number of riparian restoration sites planted.

- Five-year reporting intervals: Vegetation in active restoration sites will be monitored in order to assess tree canopy densities and growth rates attributable to the planting plans and maintenance strategies being employed by the City.

- Ten-year reporting intervals: The City will collect field data to confirm shade estimates derived through aerial image analysis, which the City will use to monitor and quantify tree canopy development, health and progress towards meeting tree canopy goals in riparian areas.

Conclusion
The Water Quality Goal and polices are met because the UFMP provides a policy framework to maximize tree canopy cover and the water quality benefits of Gresham's urban forest.

The proposal is consistent with the applicable water resources quality goals and policies listed in this section.

7. Transportation Goals and Policies

Section 10.320- Transportation System

Goal: Plan, implement and maintain an efficient transportation system.

Policy 2: The City shall coordinate transportation projects, programs and investment strategies with land use planning, economic development, noise reduction, air quality, water quality, land resource quality, and wetlands and stream corridor preservation to implement other Comprehensive Plan goals and policies.

Findings
Street trees and landscaping within the right-of-way are highly visible and important elements of the street system. Properly placed and spaced trees and landscaping can enhance the appearance and safety of the street by softening the urban environment with green infrastructure and providing a sense of enclosure.

A thoughtful street tree and landscape design can establish a distinct visual character and sense of place for a community. Roadside vegetation can also create user-friendly environments and contribute to an efficient transportation system. Street trees and green landscaping offer many visual, social, economic and environmental benefits to the public and private realm, which help implement other Comprehensive Plan goals and policies. A summary of these benefits follows:

- **Visual Benefits**. The visual impact of street trees contribute to a lower stress response for drivers as well as provide safety corridors and active living opportunities for pedestrians and cyclists.

- **Social Benefits**. Trees also help create a more pleasant and healthy environment for people by calming traffic where needed, providing shade, blocking winds, cooling streets and buildings, and filtering noise and air pollution.

- **Economic Benefits**. Properties with street trees typically have more visual appeal and thus can have higher property values. Trees are important vertical elements that frame the City's business district streetscape and influence consumer perceptions of product value, product quality and merchant responsiveness.

- **Environmental Benefits**. Trees and landscaping help protect the natural environment by providing wildlife habitat, absorbing stormwater run-off, controlling erosion, and cooling the water that enters streams. Trees are important to human health and help purify air by absorbing pollutants along busy streets with high levels of vehicle exhaust.

The general Transportation Goal and Policy 2 are addressed through the development of the UFMP because it contains specific actions to improve the health and care of Gresham's street trees throughout the city, which directly affect the visual appeal and efficiency of the city's transportation system.

Conclusion
The general Transportation Goal and Policy 2 have been met because the UFMP provides a policy framework to improve the health and care of Gresham's street trees and subsequently the efficiency of the city's transportation system.

The proposal is consistent with the applicable transportation goals and policies listed in this section.

8. Stormwater Management Goals and Policies

Section 10.333- Stormwater Management System Public Facilities and Services Background

Goal: Improve flood protection and water quality through the construction and maintenance of the public stormwater system and preservation of natural resources, including area waterways, in compliance with applicable federal and state environmental regulations.

Policy 1: Provide, maintain, preserve and restore the stormwater infrastructure in order to control both the quantity and quality of stormwater flows, and to provide for the safe passage of storm flood flows. The stormwater infrastructure includes the structural (piped) conveyance system as well as natural stream channels and wetlands, constructed wetlands/swales, regional and on-site stormwater detention systems.

Action 7: The City will continue its NPDES Program and modify the program as necessary to continue meeting the program's permit requirements.

Findings
The City is required by the Department of Environmental Quality (DEQ) and the Federal Clean Water Act to reduce stormwater pollution to local rivers and streams. To meet pollution reduction mandates and prevent flooding, the City has created a Stormwater Management Program, which consists of a variety of elements such as engineering, operation and maintenance, state and federal permit reporting, stormwater monitoring, erosion control, inspections, and education and outreach. The Streamside Property Outreach Program/Healthy Streams Program offers free resources, such as tree giveaways, to residents to help reduce pollution to local watersheds, creeks and wetlands.

Under the federal Clean Water Act and Oregon Revised Statute 468B.050, DEQ has issued the City of Gresham a National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Discharge Permit. The City of Gresham is required to develop a Stormwater Management Plan (SWMP) as described in the Clean Water Act (CWA) of the 2010 NPDES MS4 Permit Number 101315. The Stormwater Management Plan (SWMP) was put into place in 2006 to address the need for water quality protection, enhancements and flood control in Gresham. This requirement is from the Oregon Department of Environmental Quality. Enhancing riparian areas in each major watershed is one of the SWMP's best management practices and includes but is not limited to: removal of invasive species, restoring and expanding riparian buffers, and planting multi-story native plant populations.

The general Stormwater Management Goal and Policies 1 and 7 are addressed through the creation of goals and policies in the UFMP that promote tree retention and planting as part of the City's stormwater management plan; and through the City's NPDES Permit that requires urban canopy program commitments by the creation and implementation of an Urban Forestry Management Plan.

Conclusion
The Stormwater Management Goal and Policies are met because the UFMP provides a policy framework to promote tree retention and planting that supports the City's stormwater management program and urban canopy objectives by complying with NPDES program permit requirements that meet compliance standards for applicable federal and state environmental regulations.

The proposal is consistent with the applicable stormwater management goals and policies listed in this section.

C. METRO URBAN GROWTH MANAGEMENT FUNCTIONAL PLAN

Title 8: Compliance Procedures

Findings
Section 3.07.820 of this title requires that at least 45 days prior to the first evidentiary hearing on an amendment to a Comprehensive Plan or land use regulation that the City submits the proposed

amendments to Metro. Metro may review the amendments and can request that the City provide an analysis of the compliance of the amendment with the Functional Plan.

The City submitted the proposed amendments to Metro on September 29, 2011, which was at least 45 day prior to the first evidentiary hearing of November 14, 2011. No comments or request for an analysis have been received.

Conclusion
The City has submitted the proposed amendments to Metro at least 45 days prior to the first evidentiary hearing as required by Title 8.

D. STATEWIDE PLANNING GOALS

1. Goal 1 – Citizen Involvement

Goal 1: To develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process.

Findings:
Goal 1 requires municipalities adopt and publicize a program for citizen involvement that clearly defines the procedures by which the general public will be involved in the ongoing land-use planning process.

The Urban Forestry Management Plan project has followed the City of Gresham Public Participation Guide and City goals and policies regarding citizen involvement as detailed in Section V.B.2 of this staff report. The project provided significant opportunity for the public to comment on and shape the recommendations throughout the process. Three community forums were held with the express purpose of educating the public about the project and to gain input. Forty public meetings were held.

Conclusion:
Goal 1 is met by utilizing a public participation plan consistent with the City's Public Participation Guidelines and Citizen Involvement Goals and Polices.

2. Goal 2 – Land Use Planning

Goal 2: Land Use Planning. To establish a land use planning process and policy framework as a basis for all decisions and actions related to use of land and to assure an adequate factual base for such decisions and actions. The goal also specifies components of a citizen involvement program.

Findings:
Goal 2 requires the actions of jurisdictions and government agencies (in regards to land use) to be consistent with Comprehensive Plans adopted by cities, counties and regional governments. The Goal also describes considerations to be made as part of the development and adoption of Comprehensive Plans.

Gresham already has a State acknowledged Comprehensive Plan. The proposal here is a modification of that Plan and its Implementation Policies. The proposed amendments include a new set of findings regarding urban forestry management (Appendix 48) and a new set of goals, policies and action measures consistent with those new findings. The prior findings and conclusions of this Section of the staff report illustrate how the proposed modifications comply with the City's Comprehensive Plan.

Conclusion:
Goal 2 is met by showing conformance of the proposed amendments with the City's acknowledged comprehensive plan.

3. Goal 6 – Air, Water and Land Resources Quality

Goal 6: To maintain and improve the quality of the air, water and land resources of the state.

Findings:
Statewide Planning Goal 6 requires that cities maintain and improve the quality of its air, water and land resources. The prior findings and conclusion of this Section of the staff report have illustrated how the proposed amendments address City goals and policies related to air, water and land resources quality.

Conclusion:
Goal 6 is met by showing that the proposed amendments address City's goals and policies related to this goal because the UFMP provides a policy framework to implement tree retention and viability of the City's urban forestry canopy that aim to reduce air and water pollution and to protect significant natural land resources.

4. Goal 7 – Areas Subject to Natural Hazards
Goal 7: To protect people and property from natural hazards.

Findings:
Statewide Planning Goal 7 requires jurisdictions to implement measures that will protect people and property from natural hazards. The prior findings and conclusion of this Section of the staff report have illustrated how the proposed amendments address City goals and policies related to Goal 7 such as hillside protection and stormwater/flooding management.

Conclusion:
Goal 7 is met by showing that the proposed amendments address the City's goals and polices related to this goal because proposed policies include maximizing tree canopy cover, protecting the forest canopy with an invasive species control strategy, using large canopy trees in appropriate areas and utilizing forestry management practices to minimize potential hazards on hillsides and for flood control.

SECTION VII
CONCLUSION

The proposed Comprehensive Plan amendments attached as Exhibit 'A' are consistent with applicable Goals and Policies of the Community Development Plan; the applicable Development Code procedures of the Community Development Plan; applicable Metro UGMFP Code and the applicable Statewide Planning Goals as indicated by findings contained or referenced in Section VI of this report.

SECTION VIII
RECOMMENDATION

Staff recommends **adoption** of the proposed Comprehensive Plan amendments as contained in the attached Exhibit 'A'.

End of Staff Report

Urban Design & Planning Services
City of Gresham

CERTIFICATION OF MAILING

FILE NO.: **CPA 11-212** PROJECT: **Urban Forestry Mgmt. Plan**

I, TAMMY J. RICHARDSON, CERTIFY THAT I HAVE MAILED THE ATTACHED NOTICE OF DECISION TO THE FOLLOWING PARTIES:

DLCD
Plan Amendment Specialist
635 Capitol Street, NE #150
Salem, OR 97301-2540

Metro
Growth Management
600 NE Grand
Portland OR 97232-2736

Carol Rulla
5162 SE 28th Drive
Gresham, OR 97080

Michael Heilman
1320 SW Nancy Ct.
Gresham, OR 97080

Lee Dayfield
16820 NE Hassalo
Portland, OR 97230

Sue Ruonala
4619 SE 5th
Gresham, OR 97080

DEPT OF
FEB 28 2012
LAND CONSERVATION
AND DEVELOPMENT

SIGNATURE: Tammy J. Richardson

DATE OF MAILING: Feb. 27, 2012

CITY OF GRESHAM
DEVELOPMENT SERVICES
PLANNING SERVICES
1333 NW EASTMAN PARKWAY
GRESHAM, OR 97030

PRESORTED
FIRST CLASS

neopost

049J82046171
$01.90
02/27/2012
Mailed From 97030
US POSTAGE

DEPT OF
FEB 28 2012
LAND CONSERVATION
AND DEVELOPMENT

DLCD
Plan Amendment Specialist
635 Capitol Street, NE #150
Salem, OR 97301-2540