

To: City of Gresham Planning Commission

From: Terra Wilcoxson, Comprehensive Planning Manager  
Justin Douglas, Economic Development Director  
Josh Williams, Senior Planner  
Austin Ross, Planner 2  
Erika Fitzgerald, Senior Economic Development Specialist

Memo Date: May 1, 2026

Meeting Date: May 11, 2026

Re: Economic Opportunity Analysis Work Session

Attachment: Attachment A: Summary of Gresham's Economic Opportunity Analysis by ECONorthwest  
Attachment B: Technical Memo: City of Gresham Employment Lands Buildable Lands Inventory

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## Purpose

A work session on the City's Economic Opportunity Analysis and Economic Development Comprehensive Plan Update is scheduled for the Planning Commission's meeting on May 11, 2026. The purpose of this meeting is for Planning Commission to learn about the project and provide direction on key project topics.

## Background

On September 6, 2026, Gresham City Council initiated a Type IV Comprehensive Plan Amendment for the purpose of updating the City of Gresham's Economic Opportunity Analysis (EOA) and the economic development findings, goals, and policies in Volumes 1 and 2 of the City's Comprehensive Plan. The Comprehensive Plan addresses all applicable Oregon Statewide Land Use Goals, including Economic Development (Goal 9). Goal 9 ensures cities and counties have enough land available to realize economic growth and development opportunities. As required by Goal 9, local governments perform EOAs based on a 20-year forecast of population and job growth.

The City's most recent EOA was completed in 2003. It planned for the Springwater Plan Area to be employment-generating land with a target of approximately 15,000 jobs. Future industrial development was anticipated to locate into one of two unique Springwater-specific land use districts: Research and Technology Industrial-Springwater and Industrial-Springwater. However, there has been no industrial development in the Springwater Plan Area since its addition to the Urban Growth Boundary in 2002.

## Overview

Gresham's EOA is over 20 years old and some of its development predictions were unrealistic. Therefore, the City's Urban Design and Planning and Economic Development staff partnered with two consulting firms, ECONorthwest and Mackenzie, to complete a new EOA and update the Economic Development component of the Comprehensive Plan. The initiative is important for State of Oregon compliance and local planning efforts. ECONorthwest provided the attachment for the Planning Commission in advance of its May 11, 2026, work session. The attachment summarizes the EOA, as the basis for the City's commercial and industrial land use planning and explains critical context for the three work session topics of discussion. These topics are introduced below to prepare the Commission.

### Work Session Topic 1

The City must decide between three different employment forecasts to use in the EOA. The employment

forecast is used to estimate future land needs. Staff recommend using the historic employment growth rate in Gresham. This option is based on the rate of growth of employment in Gresham from 2007- 2024, which is 0.56 percent growth per year. Please refer to Attachment A for more detailed information. On May 11, members of the Planning Commission will be asked whether they concur with staff's recommendation.

#### Work Session Topic 2

The EOA contains an industrial land supply and demand reconciliation. In evaluating land supply, 'vacant', 'partially vacant', and 'redevelopment' parcels were identified. The City has a significant quantity of land that is underutilized and staff believe it is likely to redevelop in the next 20 years. Considering this, Gresham has a sufficient supply of industrial land regardless of whether the current Springwater Plan Area zoning persists or is amended (see Attachment B – Technical Memo: City of Gresham Employment Lands Buildable Lands Inventory). Staff will introduce the topic of emphasizing industrial land redevelopment over the development the highly constrained industrial land in Springwater.

#### Work Session Topic 3

The Economic Development goals and policies in the Comprehensive Plan currently emphasize ensuring an adequate supply of land for employment that is served by public facilities, increasing the ratio of jobs to households in Gresham, and attracting a diverse set of industries to the city. Many of these goals and policies are outdated and unclear. This initiative will repeal and replace the Economic Development portion of the Comprehensive Plan, including the goals and policies. The new content will be aligned with the draft EOA and the anticipated work of the Economic Development and Planning Departments, including the current Economic Development Strategy, which emphasizes business attraction and growth, workforce development, and ensuring a friendly business climate in Gresham. Staff and the Planning Commission will discuss the existing goals and policies and the proposed themes for new goals and policies.

**DATE:** May 1, 2026  
**TO:** City of Gresham  
**FROM:** ECOnorthwest  
**SUBJECT:** Attachment A: Summary of Gresham’s Economic Opportunity Analysis

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This memorandum summarizes the key findings of Gresham’s Economic Opportunities Analysis (EOA) for the Planning Commission work session on May 11, 2026. The EOA evaluates whether the City has an adequate supply of land to accommodate expected employment growth between 2026 and 2046 and will inform updates to the City’s Comprehensive Plan policies and related planning efforts.

This summary focuses on the information most relevant to the Planning Commission’s review and recommendations. It describes Gresham’s economic context, including its employment base and historic growth trends; broader trends affecting economic development; and the city’s advantages and disadvantages. It also summarizes the employment forecast, land demand, and land sufficiency to accommodate forecasted employment growth. Detailed results from the Buildable Lands Inventory (BLI) are provided in a separate memorandum and are summarized here only as needed to support conclusions about land capacity.

## Gresham’s Employment Base and Historic Trends

Gresham has a diverse employment base that reflects both its role as an industrial center and as a service hub for eastern Multnomah County. In 2024, the largest employment sectors were health care and social assistance, manufacturing, government, retail trade, accommodation and food services, and construction. Together, these six sectors accounted for 76% of covered employment in the city (**Exhibit 1**).<sup>1</sup>

Gresham’s wage levels vary by industry and are generally lower than the Portland region. The average annual wage across all employees was \$63,365 in 2024, about 25% lower than the regional average. Among the city’s largest sectors, manufacturing, government, and construction had higher average wages, though only manufacturing exceeded the regional average. In contrast, wages in health care and social assistance were slightly below the citywide average, while wages in retail and accommodation and food services were substantially lower.

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<sup>1</sup> Covered employment includes employment covered by unemployment insurance.



## Exhibit 1. Covered Employment and Average Pay for Six Largest Sectors, Gresham, 2024



Source: Oregon Employment Department, Quarterly Census of Employment and Wages, 2024.

Between 2007 and 2024, covered employment in Gresham increased by 3,412 jobs, or about 10%, at an average annual growth rate of 0.6% (**Exhibit 2**). This is slower than the Portland region, which grew at about 0.8% annually over the same period.

## Exhibit 2. Change in Covered Employment, Gresham, 2007–2024

Sector	Employees		Change in Employment 2007-2024		
	2007	2024	Number	%	AAGR*
Agriculture, Forestry, & Mining	160	100	(60)	(38%)	(2.7%)
Construction	1,628	2,053	425	26%	1.4%
Manufacturing	5,584	5,639	55	1%	0.1%
Wholesale Trade	1,306	1,662	356	27%	1.4%
Retail Trade	3,809	4,419	610	16%	0.9%
Transportation, Warehousing, and Utilities	1,074	1,445	371	35%	1.8%
Information	278	178	(100)	(36%)	(2.6%)
Finance and Insurance	2,174	1,027	(1147)	(53%)	(4.3%)
Real Estate and Rental and Leasing	553	451	(102)	(18%)	(1.2%)
Professional, Scientific, and Technical Services	534	624	90	17%	0.9%
Management of Companies and Enterprises	158	130	(28)	(18%)	(1.1%)
Administrative, Support, Waste Management and Remediation	2,214	1,201	(1013)	(46%)	(3.5%)
Private Education	233	449	216	93%	3.9%
Health Care and Social Assistance	4,083	7,857	3774	92%	3.9%
Arts, Entertainment, and Recreation	378	414	36	10%	0.5%
Accommodation and Food Services	3,640	4,009	369	10%	0.6%
Other Services and Unclassified	1,675	1,254	(421)	(25%)	(1.7%)
Government	4,937	4,918	(19)	(0%)	(0.0%)
<b>Total</b>	<b>34,418</b>	<b>37,830</b>	<b>3,412</b>	<b>10%</b>	<b>0.6%</b>

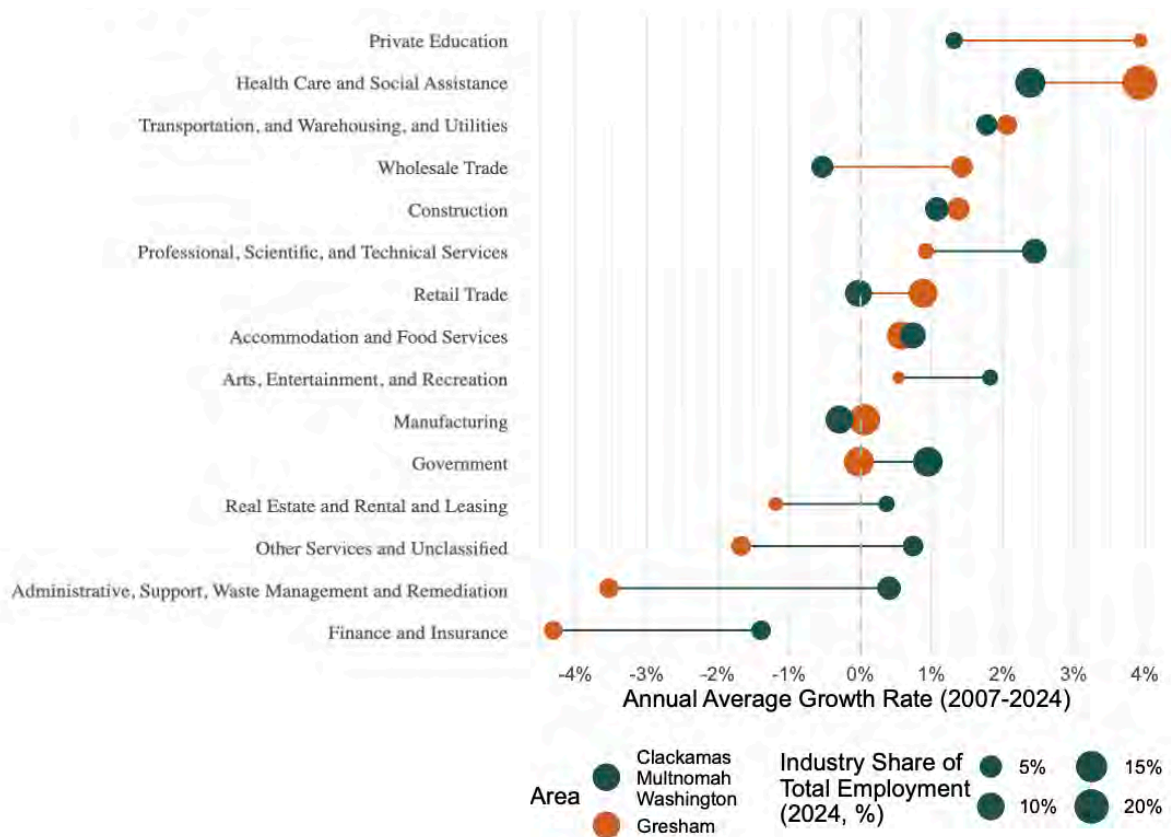
Sectors highlighted in blue have wages higher than the City average. \*Average Annual Growth Rate

Source: Oregon Employment Department, Quarterly Census of Employment and Wages, 2007 and 2024



Since 2007, employment in Gresham has grown more slowly than in the Portland region. **Exhibit 3** shows how employment growth by industry in Gresham compares to the region. A few industries grew faster in Gresham than in the broader Portland region, with the largest differences in private education, health care and social assistance, and wholesale trade (which declined slightly across the region). Manufacturing employment also increased slightly in Gresham, even as it declined regionally. In contrast, several sectors that grew across the Portland region, including real estate and rental and leasing, administrative services, and other services, declined in Gresham.

**Exhibit 3. Change in Covered Employment, Gresham compared to the Portland Region, 2007 – 2024\***



Source: Oregon Employment Department, Quarterly Census of Employment and Wages, 2007 to 2024.  
 \*Exhibit only shows industries with greater than 200 employees in Gresham



## National, State, and Regional and Trends

Gresham's future economic growth will be shaped by a combination of national, state, and regional trends, as well as local conditions. The following trends are expected to influence the pace, location, and type of employment growth over the 20-year planning period.

- ◆ **Slower employment growth.** Employment growth in Oregon and the Portland region is expected to continue but at a slower pace than in the past decade due to lower birth rates and moderating migration. Looking ahead, Gresham's growth will likely reflect the region's slowing trajectory.
- ◆ **Labor availability constraints.** An aging workforce will increase demand for replacement workers, while stricter immigration policies may reduce labor availability in sectors that rely heavily on foreign-born workers, including construction, agriculture, food processing, and hospitality. These trends are particularly relevant to Gresham, where construction and manufacturing account for relatively large shares of employment.
- ◆ **Rising costs and inflation.** Although inflation has eased since 2021, prices remain elevated compared to pre-pandemic levels, reducing household discretionary spending. This may slow growth in key local sectors such as retail and accommodation and food services. At the same time, higher costs and interest rates make business expansion and new development less feasible, potentially delaying investment and constraining overall economic growth.
- ◆ **Trade exposure and tariff vulnerability.** Gresham's concentration in manufacturing and traded sectors increases its exposure to changes in trade policy and global economic conditions.
- ◆ **Shifting manufacturing trends.** Manufacturing is expected to remain a core sector in Gresham, but employment growth may be modest relative to output growth. Firms are increasingly investing in automation and advanced technologies, which increase productivity but reduce the number of workers needed.
- ◆ **Shifts in retail, office, and commercial development patterns.** Retail demand is shifting toward service-oriented and experiential uses, while demand for traditional retail space is more limited. This is particularly relevant in Gresham, where retail accounts for a larger share of employment than in the region. At the same time, remote and hybrid work have reduced demand for office space. Because Gresham has a relatively small office market, it is less affected by these changes.



- ◆ **Aging population and service demand.** Growth in the older population will increase demand for health care and related services, reinforcing one of Gresham’s largest employment sectors.
- ◆ **Entrepreneurship and small business dynamics.** Business formation has slowed in the near term due to economic conditions, but demographic trends and access to a diverse workforce in Gresham support continued long-term potential for small business growth.
- ◆ **Energy demand and infrastructure needs.** Demand for electricity is expected to increase, particularly for industrial users. Energy capacity and infrastructure investment may influence the city’s ability to accommodate future growth.
- ◆ **Automation and changing skill needs.** Automation is reducing demand for routine and repetitive tasks while increasing demand for higher-skilled roles, particularly in manufacturing and retail. These shifts may reduce some entry-level and middle-skill jobs while increasing the need for technical and operational skills.
- ◆ **Emerging impacts of AI and robotics.** AI and robotics are expanding across administrative, service, and production roles, especially in manufacturing, health care, and retail. These technologies are expected to change the types of jobs and skills required more than total employment, increasing demand for digital, technical, and interpersonal skills while creating a greater need for workforce training to support upskilling.
- ◆ **Climate-related impacts.** Increased frequency of extreme heat and wildfire smoke may affect worker productivity, business operations, and infrastructure systems. Over time, this may increase costs and influence development patterns.

## Gresham’s Economic Advantages and Constraints

Gresham’s ability to capture future employment growth will depend not only on regional economic conditions but also on local factors that influence business location decisions. These factors shape how much of the region’s growth occurs in Gresham versus elsewhere.

### Key Advantages

- ◆ **Regional location, market access, and quality of life.** Gresham’s location within the Portland metro provides access to a large labor pool and consumer market. Its position on the east side of the region, with proximity to the Columbia River Gorge and Mount Hood, supports quality of life and helps attract and retain businesses and workers.



- ◆ **Transportation access and freight connectivity.** Gresham benefits from strong regional and interstate connections, including I-84, U.S. 26, and nearby I-205, as well as rail access and proximity to the Port of Portland and Portland International Airport. These assets support efficient movement of goods and workforce access.
- ◆ **Established manufacturing base and industrial specialization.** Manufacturing is a core strength, accounting for about 15% of employment, with a diverse base that includes transportation equipment, machinery, and electronics. The presence of semiconductor firms such as Onsemi and Microchip supports a local cluster and related suppliers. Manufacturing also provides stable middle-wage jobs aligned with the local workforce.
- ◆ **Workforce access, training, and relative affordability.** Gresham draws from a large regional labor pool and has access to workforce training providers such as Mt. Hood Community College, which offers industry-aligned programs including semiconductor training. Relatively lower housing costs compared to other parts of the region support workforce attraction and retention, particularly for middle-income households.
- ◆ **Economic development tools and incentives.** The City has several programs that support business investment and redevelopment, including the Enterprise Zone, Strategic Investment Zone, Urban Renewal Areas, and the Garage to Storefront Program. The city is also located within Foreign Trade Zone 45, managed by the Port of Portland. Together, these tools support business growth, redevelopment, and job creation and are increasingly important as future development depends more on redevelopment and site preparation.
- ◆ **Business environment and City support.** Stakeholders described Gresham as generally responsive and supportive, particularly for industrial and traded-sector development. Programs such as the *Rapid Response Team* and expedited review processes for industrial development help streamline permitting and reduce uncertainty, although experiences vary across project types.
- ◆ **Large-site opportunity within the Heavy Industrial land use district.** While Gresham has limited vacant, unconstrained industrial land overall, the Heavy Industrial land use district includes one large site exceeding 100 acres that may be positioned for redevelopment during the planning period. Large, contiguous industrial sites of this scale are increasingly limited in the Portland region.



## Key Disadvantages

- ◆ **Limited supply of development-ready industrial land.** Gresham has a limited inventory of vacant, unconstrained industrial land that can accommodate future growth. While the BLI identifies approximately 388 acres of vacant industrial land, much of it is constrained, fragmented, or not well suited for development. Most available sites are small, with about 90% under 10 acres.
  - **Springwater constraints and planning uncertainty.** About 272 acres (70%) of remaining undeveloped industrial land is located in the Springwater Plan Area, where natural constraints, limited infrastructure, fragmented ownership, and poor site configuration have limited development. The City is currently evaluating whether this area should remain designated for industrial use.
  - **Reliance on redevelopment for industrial growth.** With limited vacant, unconstrained land, much of Gresham’s future industrial growth will depend on redevelopment and intensification of existing sites. While the city has identified about 150 acres of redevelopment opportunity, including a large site in the Heavy Industrial district, these opportunities can be difficult to realize. Redevelopment typically involves higher costs, longer timelines, site preparation challenges, and dependence on property owner decisions, all of which may slow the pace of industrial growth.
- ◆ **Limited and fragmented commercial land supply.** Gresham has a limited supply of vacant commercial land, much of which consists of smaller, dispersed sites that may not support larger or coordinated development. As a result, future commercial growth will rely on a mix of redevelopment, infill, and reuse of existing buildings, in addition to development on vacant land. While the city has successfully supported redevelopment in areas such as Rockwood, these projects are often more complex and less predictable than development on vacant land.
- ◆ **Lower wage levels relative to the region.** Average wages in Gresham are lower than in the Portland region, including in several major sectors. While lower wages may reduce labor costs for some employers, they may also make it more difficult to attract and retain workers in a competitive regional labor market.
- ◆ **Regional tax and cost competitiveness.** Gresham operates within a multi-state region where nearby jurisdictions, particularly in Clark County, Washington, offer lower overall tax burdens. Oregon’s state income tax and additional local taxes in Multnomah County may affect business costs and household income, which can influence business location and workforce decisions.



# Forecast of Employment Growth and Land Demand

Statewide Planning Goal 9 requires cities to estimate the amount of land needed to accommodate employment growth over a 20-year planning period. This involves estimating future job growth and translating that growth into demand for industrial and commercial land.

## Employment Forecast

Gresham had approximately 45,882 total jobs in 2024, including both covered and non-covered employment.<sup>2</sup> This serves as the baseline for forecasting future employment growth and associated land needs.

The EOA evaluated three employment growth scenarios based on regional forecasts and local historical trends (**Exhibit 4**).

- ◆ **Metro Urban Growth Report’s regional employment forecast rate:** 0.42% annual growth
- ◆ **Gresham’s historic employment growth rate (2007–2024):** 0.56% annual growth
- ◆ **Oregon Employment Department’s regional employment forecast rate:** 0.71% annual growth

City staff recommended the historic growth rate of 0.56% annually as the preferred forecast. Under this forecast, Gresham is expected to add 5,457 jobs between 2026 and 2046, resulting in total employment of approximately 51,852 jobs by 2046.

**Exhibit 4. Forecast Rate Options for Employment Growth in Gresham, 2026-2046**

Year	Jobs grow at the rate of ...		
	Metro Urban Growth Report (0.42%)	Gresham Historic Growth Rate (2007-2024) (0.56%)	OED Regional Growth Rate (0.71%)
2026	46,269	46,395	46,533
2046	50,319	51,852	53,569
Change 2026 to 2046			
Employees	4,050	5,457	7,036
Percent	9%	12%	15%
Growth Rate	0.42%	0.56%	0.71%

Source: ECONorthwest

<sup>2</sup> Covered employment does not include all workers in the economy, most notably sole proprietors. To estimate total employment, ECONorthwest started with covered employment (which was 37,830 jobs in 2024) and applied sector-specific ratios using data from IMPLAN for Multnomah County to estimate the number of noncovered workers in Gresham by employment sector.



This forecast assumes that future employment growth will generally follow Gresham's historical pattern. The selected rate is higher than the regional growth rate in Metro's Urban Growth Report but lower than the Oregon Employment Department's forecast for the Portland region. As a result, it reflects a moderate and realistic pace of growth that is consistent with broader state and national expectations for slower employment growth over time.

The forecast also reflects Gresham's development context. As a regional employment center, Gresham is well positioned to support future job growth. However, the city is already largely built out and has a limited supply of vacant employment land. As a result, much of this growth will need to occur through redevelopment, which is typically more costly, complex, and less predictable than development on vacant sites. In addition, some areas planned for future industrial use, such as Springwater, face significant development challenges, including steep slopes, natural resource constraints, fragmented ownership, and limited infrastructure. Together, these local conditions, combined with broader regional conditions point toward a moderate pace of employment growth in Gresham.

**The Commission will be asked whether it concurs with staff's recommendation to use the historic growth rate (0.56% annually) as the basis for the EOA.**

## Allocate Employment by Industry Category

The next step in forecasting employment was to allocate future employment across broad industry categories. ECONorthwest grouped employment into broad categories based on the North American Industrial Classification System (NAICS): industrial, retail commercial, office and commercial services, and government.<sup>3</sup>

**Exhibit 5** shows the expected share of employment across the categories in 2026 and the forecast of employment growth by category in 2046 in Gresham. The results assume that the share of employment in each category will remain the same.

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<sup>3</sup> Industrial employment includes agriculture, forestry, and mining; construction; manufacturing; wholesale trade; and transportation and warehousing and utilities. Retail commercial is retail trade. Office and commercial includes information; finance and insurance; real estate; professional services; management of companies; administrative support and waste management; private education; healthcare and social assistance; arts, entertainment, and recreation; accommodation and food services; and other services. Government includes all employment at federal, state, local, and other governmental agencies.



### Exhibit 5. Forecast of Employment Growth by Industry Category, Gresham City Limits and Urban Growth Area, 2026–2046

Industry Category	2026		2046		Change 2026 to 2046
	Employment	% of Total	Employment	% of Total	
Industrial	13,060	28%	14,596	28%	1,536
Retail Commercial	5,490	12%	6,135	12%	645
Office & Commercial Services	22,872	49%	25,563	49%	2,691
Government	4,973	11%	5,558	11%	585
<b>Total</b>	<b>46,395</b>	<b>100%</b>	<b>51,852</b>	<b>100%</b>	<b>5,457</b>

Source: ECONorthwest Note: The shaded percentages denote an assumption about the future share of employment (as a percent of total) by land use type.

### Estimate of Demand for Commercial and Industrial Land

The analysis then translated forecasted employment growth by industry category into demand for commercial and industrial land over the 20-year planning period. ECONorthwest applied employment density assumptions based on observed development patterns in Gresham, using average densities of 8.1 employees per acre for industrial uses and 19.0 employees per acre for commercial uses. These assumptions reflect existing employment densities in the city.

The analysis also converts these net densities to gross land demand by accounting for land needed for streets and other infrastructure. ECONorthwest assumes that rights-of-way will account for 5% of gross industrial land and 10% of gross commercial land. These assumptions reflect that most future development will occur in areas with existing infrastructure and will require limited new right-of-way.

Using these assumptions, the forecasted growth of 5,457 new employees results in demand for approximately:

- ◆ 200 gross acres of industrial land
- ◆ 194 gross acres of commercial land

Government employment is not included in this estimate. Public-sector uses, such as schools and public facilities, follow separate planning and siting processes and do not rely on industrial or commercial land in the same way as private sector uses.

### Exhibit 6. Demand for Land for Employment Growth, Gresham, 2026–2046

Land Use Category	New Employment	Employees per Net Acre	Land Demand (Net Acres)	Land Demand (Gross Acres)
Industrial	1,536	8.1	190	200
Commercial	3,336	19.0	176	194
<b>Total</b>	<b>4,872</b>	<b>-</b>	<b>366</b>	<b>394</b>

Source: ECONorthwest



## Preliminary Land Sufficiency

This section evaluates Gresham’s employment land sufficiency for the 2026–2046 period. Comparing land supply and demand shows that Gresham has sufficient industrial land capacity over the 20-year planning period and a modest shortfall in commercial land. This analysis includes both vacant land and redevelopment capacity identified in the BLI, which is summarized here and described in detail in the separate BLI memorandum.

**Exhibit 7** compares land supply from the BLI with forecasted land demand. The analysis shows:

- ◆ **Buildable industrial land.** Gresham’s Industrial Districts have approximately 537 acres of buildable land. About 72% (388 acres) is vacant or partially vacant and 28% (149 acres) is identified as redevelopable.
- ◆ **Buildable commercial land.** Commercial and Mixed-Use Districts have approximately 174 acres of buildable land (adjusted for mixed use assumptions).<sup>4</sup> About 74% (129 acres) is vacant or partially vacant, and 26% (45 acres) is identified as redevelopable.
- ◆ **Land demand.** Gresham will need approximately 200 acres for industrial uses and 194 acres for commercial uses over the 2026-2046 period.
- ◆ **Land sufficiency.** Based on this analysis, Gresham has a 337-acre surplus of industrial land, and a 20-acre deficit of commercial land

The 20-acre commercial land deficit is relatively small in the context of the overall land supply. Under Statewide Planning Goal 9, the City is not required to take additional action to address this deficit in order to adopt the EOA. This finding highlights the importance of supporting redevelopment, infill, and efficient use of existing commercial areas to accommodate future growth.

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<sup>4</sup> Because Mixed Use Districts can accommodate either commercial or residential development, the analysis assumes that approximately 50% of this land will develop as commercial, based on development patterns observed over the past 10 years.



**Exhibit 7. Comparison of the Capacity of Unconstrained Land with Land Demand by Designation, Gresham, 2026-2046**

Comprehensive Plan Designation	Land Supply (Gross Acres)	Land Demand (Gross Acres)	Land Sufficiency (Gross Acres)
Industrial	537	200	337
without Springwater	265	200	65
Commercial	174	194	(20)

Source: ECONorthwest

While the analysis shows a surplus of industrial land, a large share of this land (approximately 272 acres) is located in the Springwater area, where development is limited by natural constraints, limited infrastructure, and fragmented ownership patterns. As a result, the availability of suitable sites for industrial users is more limited than total acreage suggests.

Excluding the Springwater area, the remaining industrial land supply is approximately 265 acres, which still exceeds the estimated demand of 200 acres. This indicates that Gresham can accommodate forecasted industrial growth within other areas of the city, although site characteristics and redevelopment feasibility will influence how that capacity is realized.

Gresham will need to rely on redevelopment and site readiness to accommodate future industrial growth, rather than on vacant land alone. Commercial development will similarly depend on redevelopment and infill to meet future demand.



# MACKENZIE.

## **Attachment B**

### **TECHNICAL MEMO: CITY OF GRESHAM – EMPLOYMENT LANDS BUILDABLE LANDS INVENTORY**

#### **To**

City of Gresham

#### **For**

City of Gresham Economic  
Opportunities Analysis (EOA)

#### **Dated**

April 20, 2026

#### **Project Number**

2240411.01



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**APPENDIX**

Appendix A – Manual Adjustment Log

## **I. INTRODUCTION AND PURPOSE**

This technical memo describes Mackenzie's findings related to the employment areas Buildable Lands Inventory (BLI) for the City of Gresham. Information from this document will be incorporated into the Economic Opportunity Analysis (EOA) reconciliation of employment land supply and demand in the main report by ECONorthwest.

## II. EMPLOYMENT LANDS BUILDABLE LANDS INVENTORY

As part of the 2026 Economic Opportunity Analysis, the City of Gresham requested a buildable lands inventory (BLI) for employment lands to identify those parcels available for and buildable for development by commercial and industrial users within the Urban Service Boundary (USB). Mackenzie has compiled information on buildable lands to further the City's economic development objectives and to satisfy provisions of Oregon Statewide Land Use Planning Goal 9, Economic Development, as codified at Oregon Administrative Rules (OAR) 660, Division 9 to implement Oregon Revised Statutes (ORS) 197.712(2).

To determine the City's buildable lands, Mackenzie utilized geographic information systems (GIS) data from the City, Metro, and Federal Emergency Management Agency (FEMA) to review information on parcels, Gresham Community Plan Map District, development status, natural resources, and topographic conditions to:

1. Categorize land designated or planned for employment.
2. Screen out properties which are already built out and not anticipated to redevelop.
3. Determine which sites are vacant, partially vacant, exempt, and developed.<sup>1</sup>
4. Deduct areas with site constraints that preclude development on vacant, partially vacant, and developed parcels.
5. Identify the remaining buildable area of vacant, partially vacant, and redevelopable parcels after deducting for constraints.

### Study Area

The study area includes the area within the City of Gresham Urban Service Boundary as shown in Figure 1.




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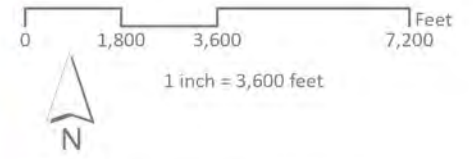
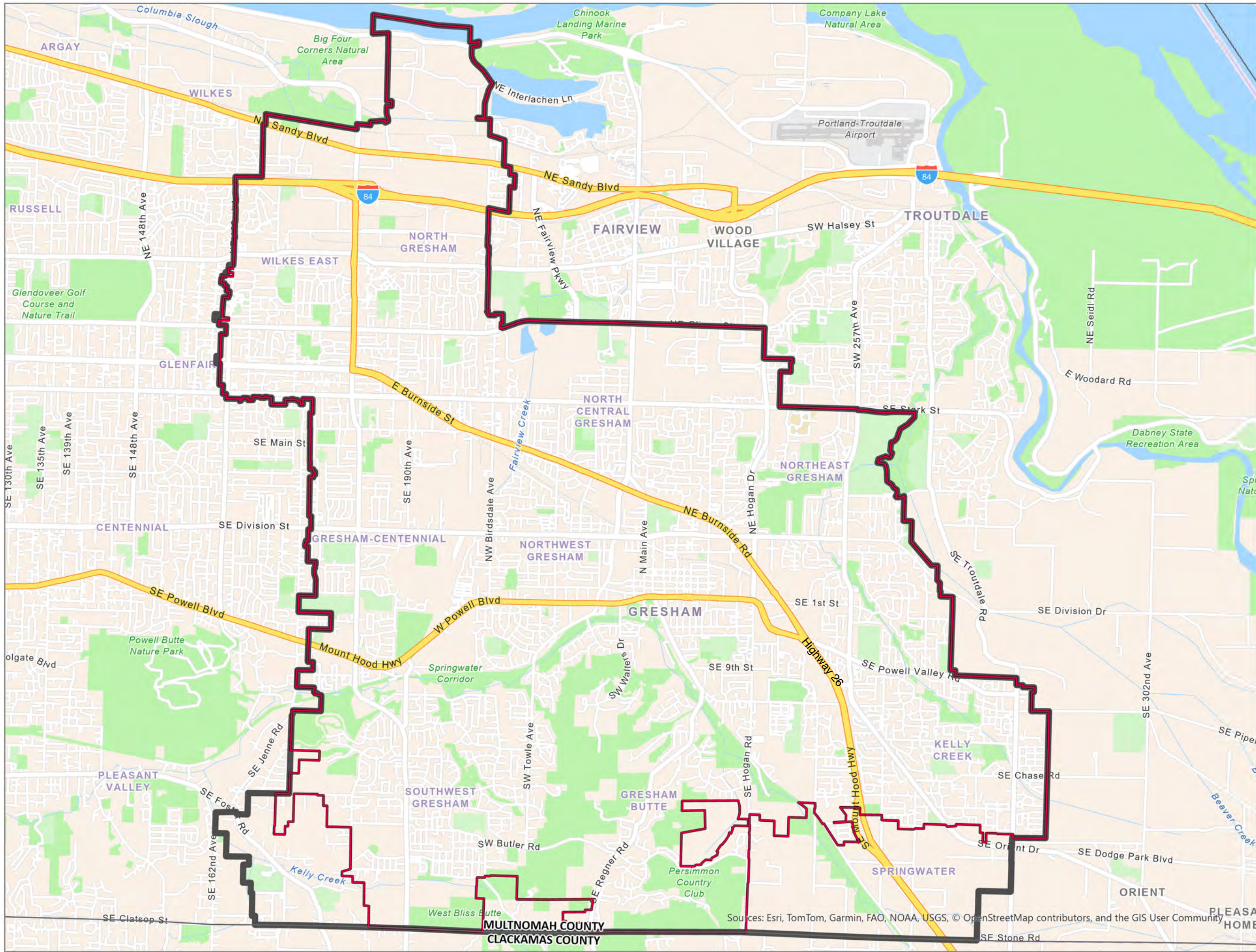
<sup>1</sup> As defined in OAR 660-009-0005, "Developed Land" means non-vacant land that is likely to be redeveloped during the planning period.

**Figure 1: City Limits and Urban Service Boundary, Gresham Buildable Employment Lands Inventory**

**Gresham, Oregon**

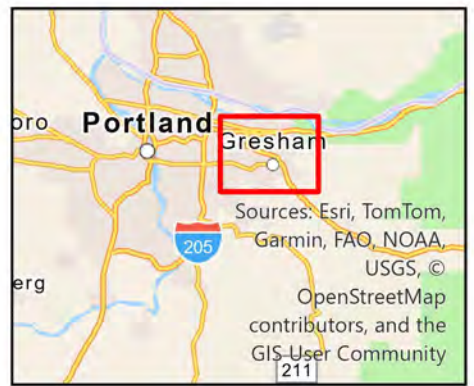
**LEGEND**

-  City Limits
-  Urban Service Boundary
-  County Boundary



SOURCE DATA: Metro RLS Lite Base Data, Dec 2025  
 GEOGRAPHIC PROJECTION: NAD 83 HARN, Oregon North Lambert Conformal Conic

Date: 3/11/2026 Map Created By: SH  
 File: Basemap Project No: 2240411.01



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The land use districts noted in Table 1 were analyzed as part of this employment land BLI.

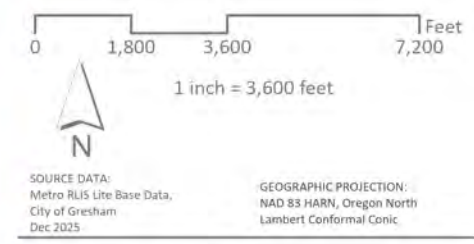
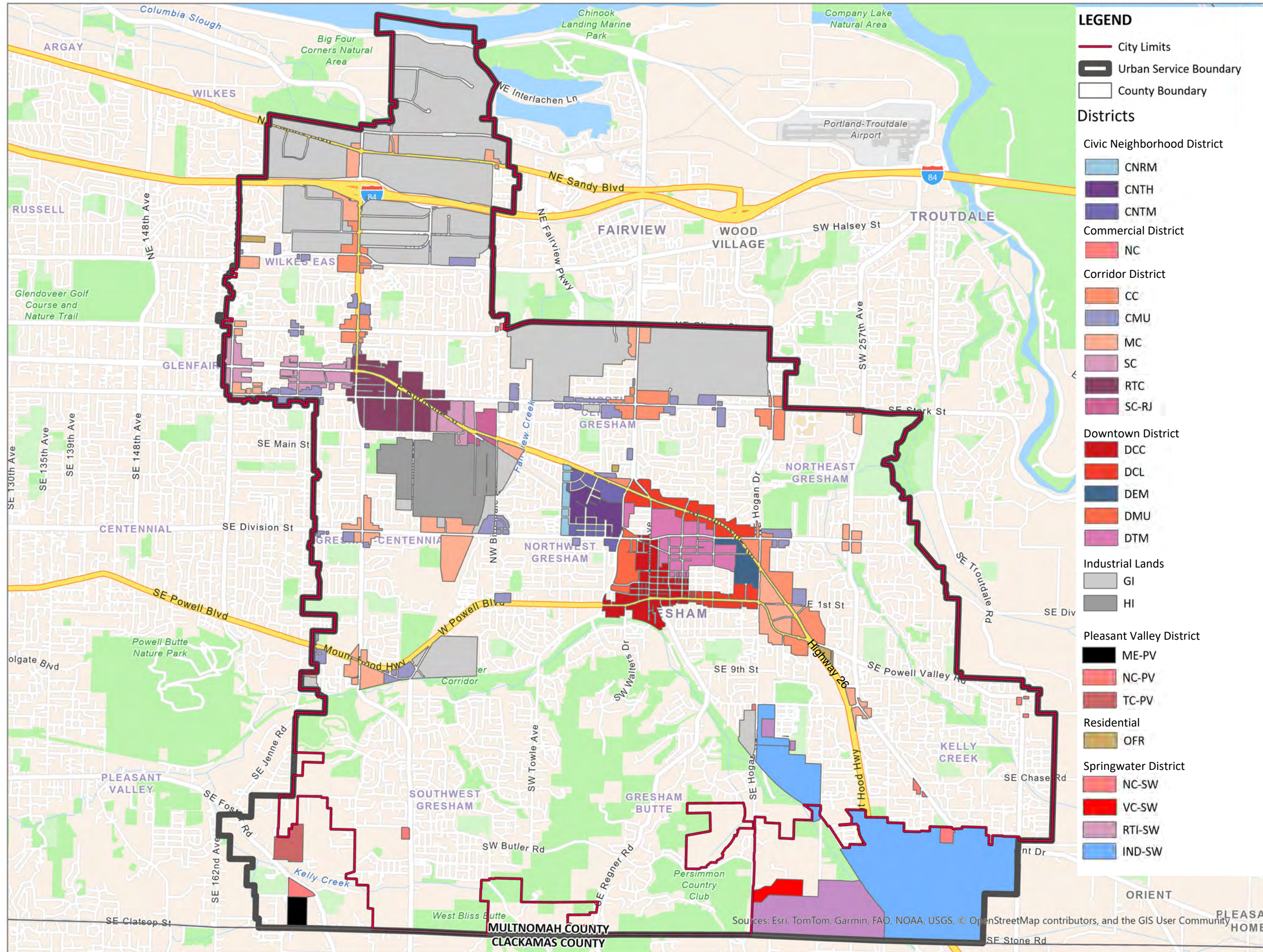
TABLE 1: GRESHAM BUILDABLE LANDS INVENTORY EMPLOYMENT LAND USE DISTRICTS	
<b>Commercial Districts</b>	
▪	Community Commercial (CC)
▪	Moderate Commercial (MC)
▪	Neighborhood Commercial (NC)
<b>Mixed Use Districts</b>	
▪	Office/Residential (OFR)
▪	Rockwood Town Center (RTC)
▪	Station Centers (SC)
▪	Corridor Mixed Use (CMU)
▪	Station Center Ruby Junction (SC-RJ)
▪	Downtown Commercial Core (DCC)
▪	Downtown Mixed Use (DMU)
▪	Downtown Transit Mid-Rise (DTM)
▪	Downtown Employment Mid-Rise (DEM)
▪	Downtown Commercial Low-Rise (DCL)
▪	Civic Neighborhood Residential Mid-Rise (CNRM)
▪	Civic Neighborhood Transit Moderate Density (CNTM)
▪	Civic Neighborhood Transit High Density (CNTH)
▪	Town Center – Pleasant Valley (TC-PV)
▪	Neighborhood Commercial – Pleasant Valley (NC-PV)
▪	Mixed Employment – Pleasant Valley (ME-PV)
▪	Village Center – Springwater (VC-SW)
▪	Neighborhood Commercial (NC-SW)
<b>Residential</b>	
▪	Office/Residential (OFR)
<b>Industrial Districts</b>	
▪	Heavy Industrial (HI)
▪	General Industrial (GI)
▪	Research/Technology Industrial – Springwater (RTI-SW)
▪	Industrial – Springwater (IND-SW)

Those employment land use districts listed in Table 1 are graphically depicted in Figure 2.

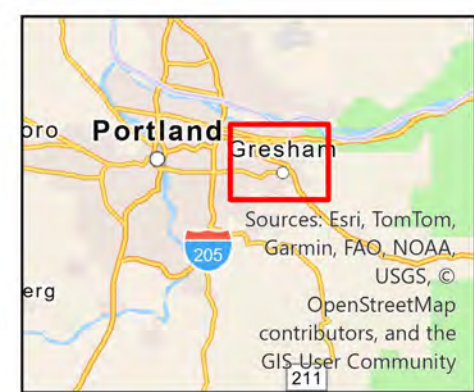
Since Mixed Use Districts can accommodate either commercial or residential development, Mackenzie used Metro Regional Land Information System (RLIS) data to calculate the percentage of commercial development in Gresham Mixed Use Districts over the last 10 years. This rate (approximately 50%) has been applied to the identified Mixed Use Districts’ supply of buildable land.

**Figure 2: Employment Districts, Gresham Buildable Employment Lands Inventory**

**Gresham, Oregon**



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## Development Status

To identify tax lots which may be available for economic development, Mackenzie utilized GIS software to determine which sites in the Commercial, Mixed Use, or Industrial districts were vacant, partially vacant, exempt, or developed, designated as follows:

### Vacant Land (Using Metro 2024 Buildable Land Inventory as the starting point):

1. Vacant tax lots are those that have no building, improvements, or identifiable land use. This includes tax lots that are 95% or more vacant from the GIS vacant land inventory per the 2024 Metro BLI.
2. Tax lots with less than 2,000 square feet (SF) developed AND where the developed portion is under 10% of the entire tax lot area.

*Vacant Land approach is intended to comply with OAR 660-009-0005(15).*

### Partially Vacant Land:

1. Tax lots between one and five acres occupied by a use with a minimum quarter-acre vacant portion that could still be further developed based on zoning; or
2. Tax lots equal to or larger than five acres occupied by a use with a minimum one-acre vacant portion that could still be further developed based on zoning.

*Partially Vacant Land approach is based on project experience and is not defined in Statute or Oregon Administrative Rules.*

### Exempt Land:

1. Tax exempt with property codes for city, state, federal and Native American designations.
2. Schools.
3. Private streets.
4. Rail Properties.
5. Tax lots under 1,000 SF.
6. Parks, Open spaces, and private common areas.

*Exempt Land approach is based on project experience and is not defined in Statute or Oregon Administrative Rules.*

### Developed Land (Using Metro BLI as the starting point):

Developed Land approach is intended to comply with OAR 660-009-0005(1), which defines developed land as “non-vacant land that is likely to be redeveloped during the planning period.”

1. Lands not classified as vacant, partially vacant, or exempt are considered developed. A subset of the developed land includes potentially redevelopable land. City staff has provided input on redevelopable sites, including some publicly owned sites that would otherwise be classified as Exempt Land, as provided in Appendix A.

Following GIS analysis to identify sites in each of the categories, Mackenzie refined the results as follows:

- To incorporate direction provided by the City staff for specific tax lots where staff had institutional knowledge of the employment land inventory and redevelopable sites, as explained in the Manual Adjustment Log included as Appendix A.<sup>2</sup>
- To remove GIS irregularities such as small slivers of land that are likely a result of misaligned data sets provided by multiple sources.
- To manually update tax lots identified as vacant in the Metro 2024 BLI, but which have since been developed.

A map of the Development Status is presented as Figure 3.






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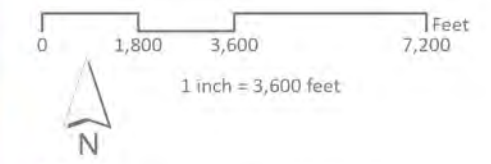
<sup>2</sup> Please note, at the request of City staff, some redevelopable sites have not been mapped due to confidentiality, but the potential redevelopment acreage is included in Table 2 and Table 3.

**Figure 3: Development Status, Gresham Buildable Employment Lands Inventory**

**Gresham, Oregon**

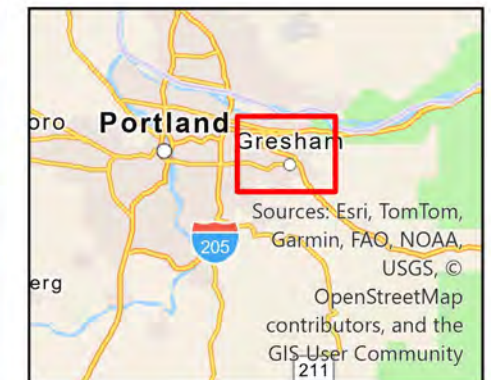
**LEGEND**

-  City Limits
-  Urban Service Boundary
-  County Boundary
- Development Status**
-  Vacant
-  Partially Vacant
-  Developed



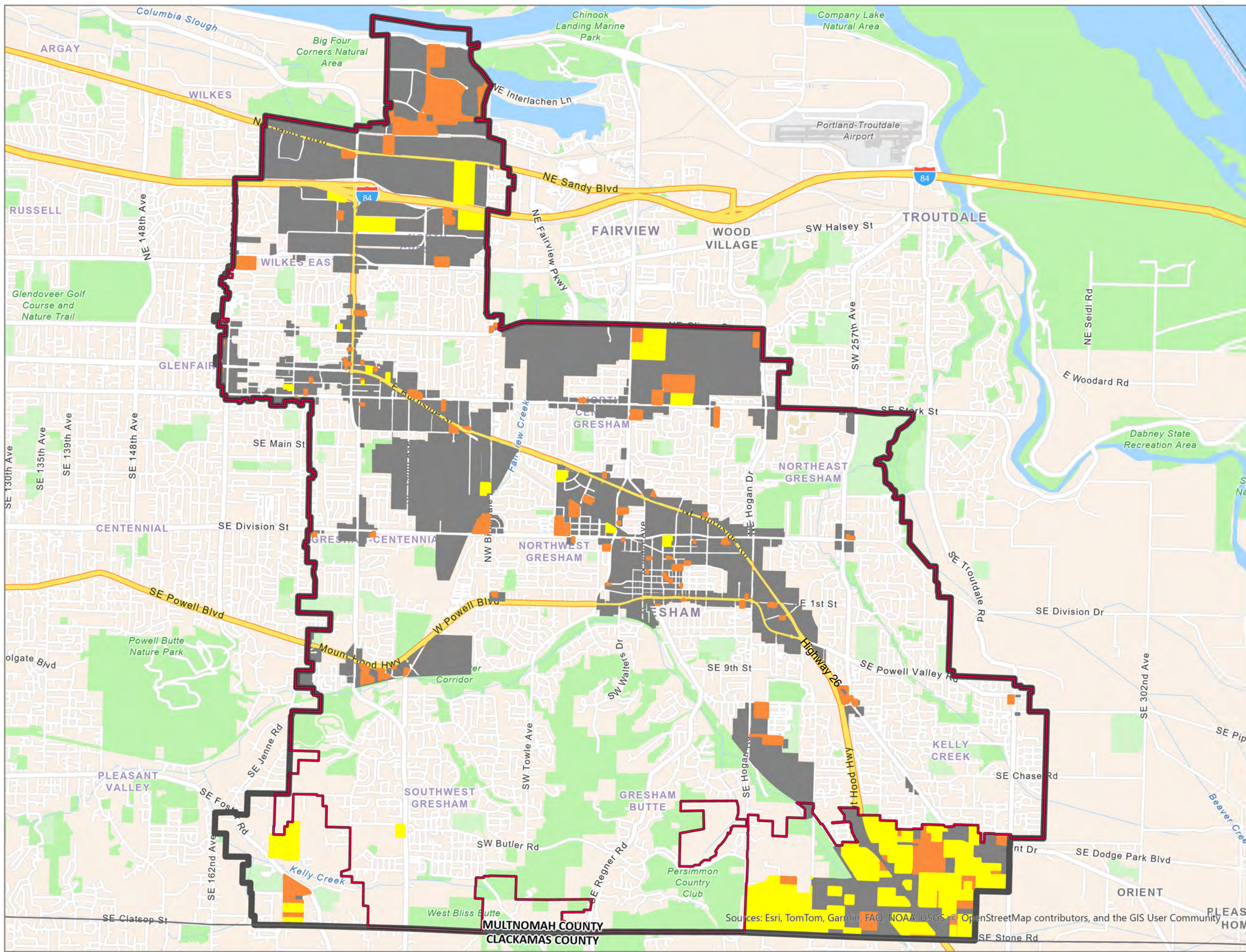
SOURCE DATA: Metro RLIS Life Base Data, City of Gresham Dec 2025  
 GEOGRAPHIC PROJECTION: NAD 83 HARN, Oregon North Lambert Conformal Conic

Date: 3/11/2026 Map Created By: SH  
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Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

## Development Constraints

OAR 660, Division 9 allows for reduction of buildable area in an employment lands BLI based on site development constraints, as defined in OAR 660-009-0005(2):

*'Development Constraints' means factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to, wetlands, environmentally sensitive areas such as habitat, environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas.*

Based on this definition, for the Gresham employment lands BLI, development constraints that render land undevelopable for employment uses were identified as land with any of the following characteristics:

- Property within the 1% annual chance (100-year) floodplain.
- Areas with slopes of 25% or greater in Commercial or Mixed Use Districts.<sup>3</sup>
- Areas with slopes of 10% or greater in Industrial districts.<sup>3</sup>
- City of Gresham Natural Resource Overlay – Resource Area (RA) and High Value Resource Area (HVRA). All the HVRA is considered undevelopable, and 25% of the remaining RA is accounted for as developable area.

These development constraints are depicted in Figure 4.

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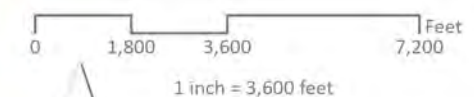
<sup>3</sup> Note, Figure 4 shows 10%-25% slopes and slopes greater than 25% City-wide to indicate the presence of steep slopes on areas that may be contemplated for potential further zoning studies.

**Figure 4: Constraints, Gresham Buildable Employment Lands Inventory**

**Gresham, Oregon**

**LEGEND**

-  City Limits
-  Urban Service Boundary
-  County Boundary
-  Inventory Area
-  10%-25% Slopes
-  25% Slope or steeper
-  High Value Resource Area
-  Resource Area
-  Floodway and 1% Annual Chance Flood Hazard



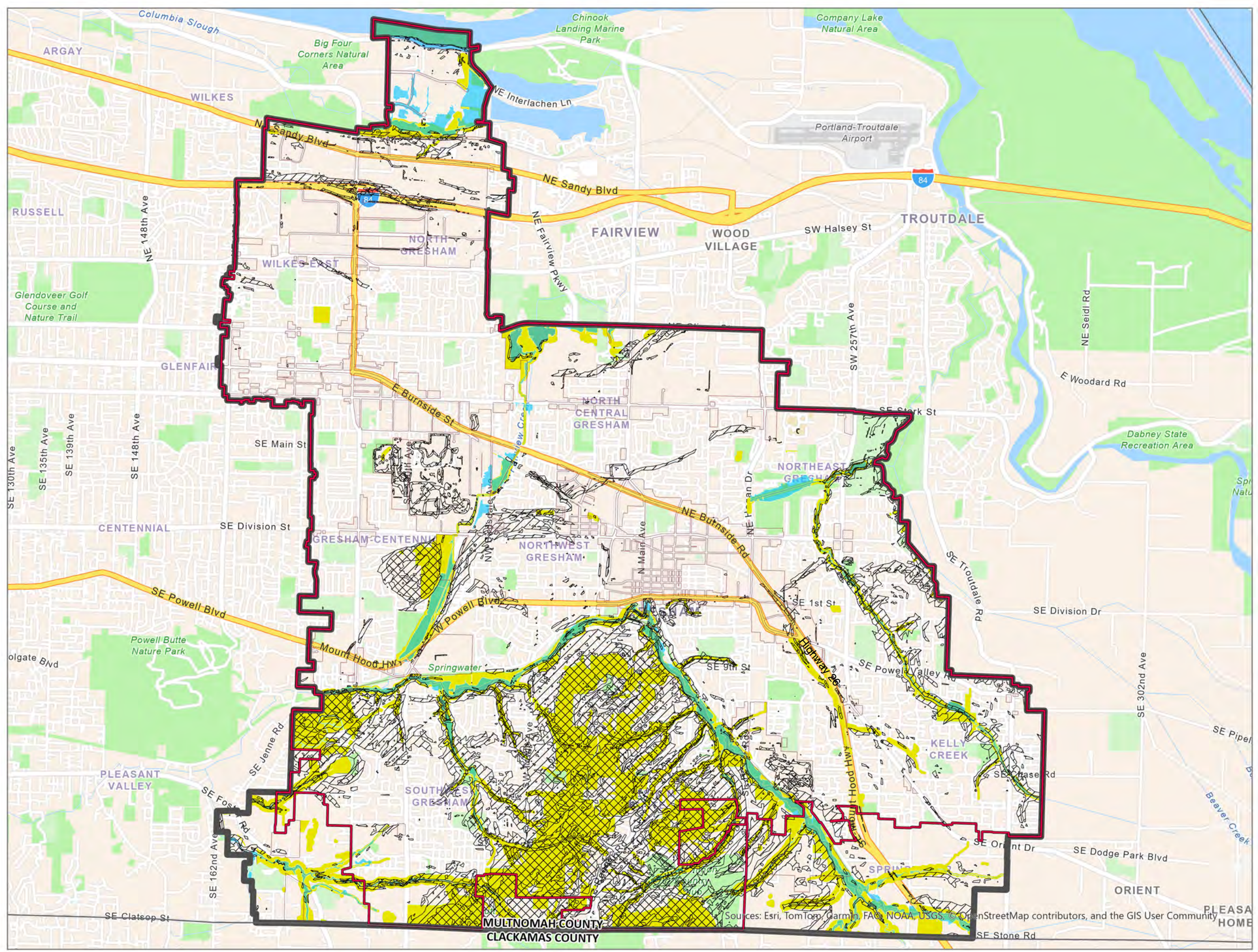
SOURCE DATA: Metro RLS Lite Base Data, FEMA City of Gresham Dec 2025  
 GEOGRAPHIC PROJECTION: NAD 83 HARN, Oregon North Lambert Conformal Conic

Date: 3/11/2026 File: Basemap Map Created By: SH Project No: 2240411.01



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Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

## Net Employment Buildable Lands

The areas with constraints (Figure 4) were then deducted from the vacant, partially vacant, and redevelopment employment land (Figure 3) to determine the net buildable portions of the vacant, partially vacant, and redevelopment sites. Sites resulting in less than 0.10 acres (Commercial and Mixed-Use Districts) and less than 1 acre (Industrial Districts) of net buildable land were removed since development of these smaller sites is infeasible. The results of this analysis are summarized in Table 2 and shown graphically in Figure 5.

TABLE 2: GRESHAM NET EMPLOYMENT BUILDABLE LANDS INVENTORY<sup>1</sup>

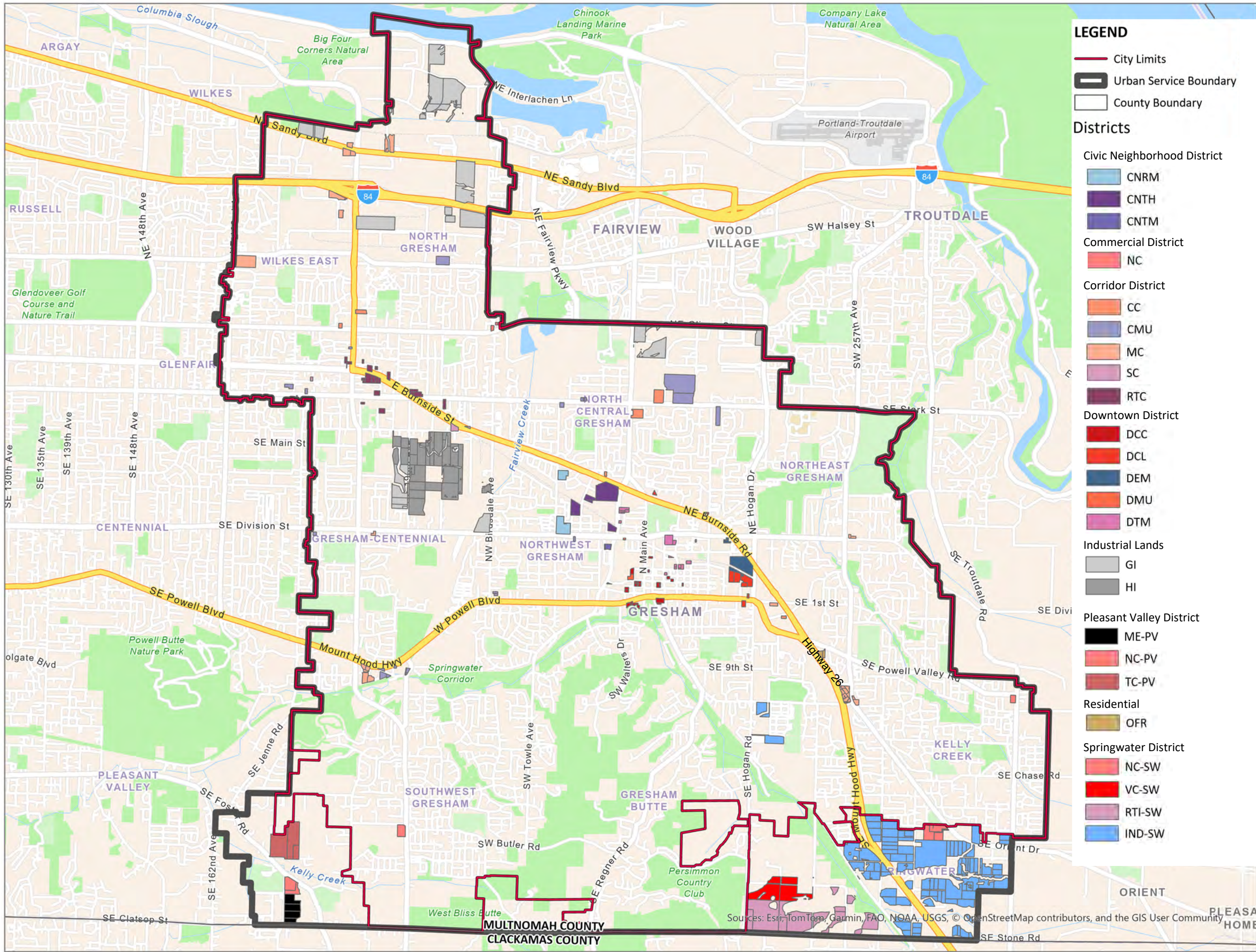
Category	Vacant		Partially Vacant		Redevelopable		Totals		
	Number of Sites	Acreage	Number of Sites	Acreage	Number of Sites	Acreage	Number of Sites	Acreage	Adjusted Acreage <sup>2</sup>
<b>Commercial</b>									
Neighborhood Commercial (NC)	4	2.0	0	0.0	0	0.0	4	2.0	<b>2.0</b>
Community Commercial (CC)	5	10.5	1	0.6	0	0.0	6	11.2	<b>11.2</b>
Moderate Commercial (MC)	29	28	1	0.7	2	1.7	32	30.4	<b>30.4</b>
<b>Mixed Use<sup>2</sup></b>									
Rockwood Town Center (RTC)	14	5.6	3	2.1	6	6.2	23	13.9	<b>7.0</b>
Station Centers (SC)	5	2.8	0	0.0	0	0.0	5	2.8	<b>1.4</b>
Corridor Mixed Use (CMU)	20	31.7	2	8.2	1	0.7	23	40.6	<b>20.3</b>
Station Center Ruby Junction (SC-RJ)	0	0.0	0	0.0	0	0.0	0	0	<b>0.0</b>
Downtown Commercial Core (DCC)	6	1.2	0	0.0	24	24.8	30	26.0	<b>13.0</b>
Downtown Mixed Use (DMU)	2	0.3	0	0.0	2	8.6	4	8.9	<b>4.5</b>
Downtown Transit Mid-Rise (DTM)	15	4.7	1	2.8	1	0.5	17	8.1	<b>4.1</b>
Downtown Employment Mid-Rise (DEM)	4	0.8	0	0.0	3	11.1	7	12.0	<b>6.0</b>
Downtown Commercial Low-Rise (DCL)	4	1.7	0	0.0	4	8.6	8	10.3	<b>5.2</b>
Civic Neighborhood Residential Mid-Rise (CNRM)	1	7.4	1	2.6	0	0.0	2	10.6	<b>5.3</b>
Civic Neighborhood Transit Moderate Density (CNTM)	1	1.3	0	0.0	0	0.0	1	1.3	<b>0.7</b>

Civic Neighborhood Transit High Density (CNTH)	3	6.3	1	1.9	4	23.4	8	31.6	<b>15.8</b>
Town Center – Pleasant Valley (TC-PV)	0	0.0	3	26.9	0	0.0	3	26.9	<b>13.5</b>
Neighborhood Commercial – Pleasant Valley (NC-PV)	2	7.3	1	2.4	0	0.0	3	9.7	<b>4.9</b>
Mixed Employment – Pleasant Valley (ME-PV)	2	8.4	2	4.9	0	0.0	4	13.3	<b>6.7</b>
Village Center – Springwater (VC-SW)	1	4.2	3	27.2	0	0.0	4	31.4	<b>15.7</b>
Neighborhood Commercial (NC-SW)	1	5.2	2	5.6	0	0.0	3	10.8	<b>5.4</b>
<b>Residential</b>									
Office/Residential (OFR)	0	0.0	0	0.0	2	1.5	2	1.5	<b>0.8</b>
<b>Industrial</b>									
Heavy Industrial (HI)	0	0.0	1	1.2	24	119.7	25	120.8	<b>120.8</b>
General Industrial (GI)	13	76.0	4	38.7	7	29.6	24	144.2	<b>144.2</b>
Research/Technology Industrial – Springwater (RTI-SW)	1	7.4	14	64.8	0	0.0	15	72.2	<b>72.2</b>
Industrial – Springwater (IND-SW)	14	65.2	67	134.4	0	0.0	81	199.7	<b>199.7</b>
<b>Totals:</b>	<b>147</b>	<b>278.1</b>	<b>107</b>	<b>325.1</b>	<b>80</b>	<b>236.4</b>	<b>334</b>	<b>839.5</b>	<b>710.4</b>
<b>Totals with adjusted acreage<sup>2</sup>:</b>	<b>147</b>	<b>233.6</b>	<b>107</b>	<b>282.7</b>	<b>80</b>	<b>193.7</b>	<b>334</b>	<b>710.4</b>	<b>710.4</b>

**Table Notes:**

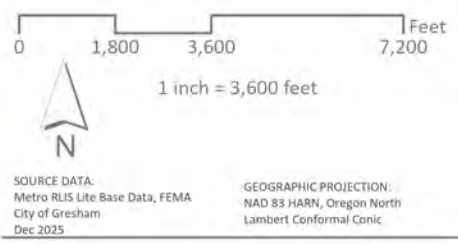
<sup>1</sup> Due to rounding, some totals may not correspond with the sum of separate figures.

<sup>2</sup> Since the Mixed Use Districts can accommodate either commercial or residential development, Mackenzie used Metro Regional Land Information System (RLIS) data to calculate the percentage of commercial development in Gresham Mixed Use Districts over the last 10 years. This rate (approximately 50%) has been applied to the identified Mixed Use Districts' supply of buildable land.

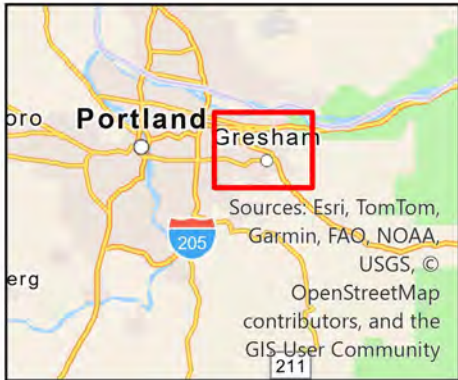


**Figure 5: Unconstrained Buildable Area by District, Gresham Buildable Employment Lands Inventory**

**Gresham, Oregon**



Date: 3/16/2026 File: Basemap  
Map Created By: SH Project No: 2240411.01



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After adjusting for the Mixed Used Districts:

- The Commercial and Mixed Use Districts have approximately 125 acres (24%) of vacant and partially vacant buildable land, and the Industrial Districts have approximately 390 acres (76%) of vacant and partially vacant buildable land, for a total of approximately 515 net acres of vacant and partially vacant buildable employment land.
- The Commercial and Mixed Use Districts<sup>4</sup> have approximately 45 acres (23%) of redevelopable land, and the Industrial Districts have approximately 150 acres (77%) of redevelopable land, for a total of approximately 195 net acres of redevelopable buildable employment land.
- In total, the Commercial and Mixed Use Districts<sup>4</sup> have approximately 170 acres (24%) of buildable land and the Industrial Districts have approximately 540 acres (76%) of buildable land, for a total of approximately 710 net acres of buildable employment land.

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<sup>4</sup> Buildable area within the Office/Residential (OFR) District is included as part of the Mixed Use District acreage.

## Buildable Employment Lands Site Sizes

Based on the buildable sites within the USB shown in Figure 5 and tabulated in Table 2, Mackenzie has sorted the net buildable land supply by site size for each District, the results of which are in Table 3. The majority (75%) of Commercial sites are smaller than 1 acre in size. The majority (66%) of Mixed Use sites are smaller than 5 acres in size. The majority (90%) of Industrial sites are smaller than 10 acres in size. There are no sites with buildable areas of 30 acres or larger.

TABLE 3: GRESHAM EMPLOYMENT NET BUILDABLE LANDS INVENTORY SITE SIZES									
<i>Districts</i>	<i>0 to 0.99 acres</i>	<i>1 to 4.99 acres</i>	<i>5 to 9.99 acres</i>	<i>10 to 19.99 acres</i>	<i>20 to 29.99 acres</i>	<i>30 to 49.99 acres</i>	<i>50 to 99.99 acres</i>	<i>100+ acres</i>	<i>TOTAL</i>
<b>Commercial Districts</b>									
Neighborhood Commercial (NC)	3	1	0	0	0	0	0	0	4
Community Commercial (CC)	3	3	0	0	0	0	0	0	6
Moderate Commercial (MC)	27	4	1	0	0	0	0	0	32
<b>Mixed Use Districts</b>									
Rockwood Town Center (RTC)	18	5	0	0	0	0	0	0	23
Station Centers (SC)	4	1	0	0	0	0	0	0	5
Corridor Mixed Use (CMU)	18	3	1	1	0	0	0	0	23
Station Center Ruby Junction (SC-RJ)	0	0	0	0	0	0	0	0	0
Downtown Commercial Core (DCC)	26	3	1	0	0	0	0	0	30
Downtown Mixed Use (DMU)	3	0	1	0	0	0	0	0	4
Downtown Transit Mid-Rise (DTM)	16	1	0	0	0	0	0	0	17
Downtown Employment Mid-Rise (DEM)	5	1	1	0	0	0	0	0	7
Downtown Commercial Low-Rise (DCL)	5	3	0	0	0	0	0	0	8
Civic Neighborhood	0	1	1	0	0	0	0	0	2

Residential Mid-Rise (CNRM)									
Civic Neighborhood Transit Moderate Density (CNTM)	0	1	0	0	0	0	0	0	1
Civic Neighborhood Transit High Density (CNTH)	1	6	0	1	0	0	0	0	8
Town Center – Pleasant Valley (TC- PV)	0	1	0	2	0	0	0	0	3
Neighborhood Commercial – Pleasant Valley (NC-PV)	0	3	0	0	0	0	0	0	3
Mixed Employment – Pleasant Valley (ME-PV)	0	4	0	0	0	0	0	0	4
Village Center - Springwater (VC-SW)	0	2	0	2	0	0	0	0	4
Neighborhood Commercial (NC-SW)	0	2	1	0	0	0	0	0	3
<b>Residential</b>									
Office/ Residential (OFR)	2	0	0	0	0	0	0	0	2
<b>Industrial</b>									
Heavy Industrial (HI)	2	13	9	1	0	0	0	0	25
General Industrial (GI)	2	12	5	5	0	0	0	0	24
Research/Technology Industrial – Springwater (RTI-SW)	5	7	1	1	1	0	0	0	15
Industrial – Springwater (IND – SW)	17	56	7	0	1	0	0	0	81
<b>Commercial, Mixed Use, Residential, and Industrial Districts Total</b>									
<b>Totals</b>	<b>157</b>	<b>133</b>	<b>29</b>	<b>13</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>334</b>