

employment land. The EOA calculated that Gresham has sufficient buildable employment land to meet estimated demands for industrial and commercial uses, with approximately 200 gross acres of industrial land and 194 gross acres of commercial land required for the 20-year period. The buildable lands inventory (BLI) conducted as part of the EOA, identified approximately 537 acres of buildable industrial land and 174 acres of buildable commercial and mixed-use land. The result is a surplus of buildable industrial land and small deficit of commercial land. As noted in the EOA, future commercial growth may depend more heavily on redevelopment, infill, and/or more intensive use of existing commercial buildings.

Primary Changes

The proposed amendments are to Volume 1 and Volume 2 of the City's Community Development Plan. The update provides new findings, goals and policies; reformatting of sections for consistency; and removes outdated or irrelevant information. The primary proposed changes involve:

- Repealing and replacing the findings in Volume 1, Section 4.700 Economic Development, including addressing the requirements of Statewide Planning Goal 9 (Economic Development), ensuring an adequate supply of suitable land to accommodate a diversity of industrial and other employment activities. It also requires the City to periodically evaluate its land supply over a 20-year planning period.
- Updating the Economic Opportunities Analysis, and repealing and replacing Volume 1, Appendix 20, with findings, analysis, and methodology for evaluation of industrial and commercial land in the study area, including:
 - Calculating anticipated employment growth during the 20-year period (2026-2046).
 - Identifying needed employment land to meet the growth of employment.
 - Providing an inventory of available (vacant or partially vacant) employment lands, for commercial, industrial and mixed-use development.
 - Summarizing economic opportunities in the context of Gresham's competitive advantages and disadvantages.
- Repeal of Appendices in Volume 1 that are superseded by findings in the 2026 EOA.
- Repeal and replacement of Volume 2, Section 10.414 with goals and policies to meet State Goal 9 requirements while reflecting Gresham's local economic development priorities. They are coordinated with Gresham's 2026 Economic Opportunity Analysis, Volume 1, Appendix 20, which provides the factual basis for the findings Volume 1 Section 4.700 and the goals and policies in this section.

Community Engagement and Involvement

Community engagement took place throughout the EOA project, which primarily focused on information gathering with the City's business community and representative bodies. Staff also provided an EOA project summary on the Urban Design & Planning page of the City of Gresham web site.

The project included the following outreach (with notifications for public meetings):

- One Virtual Focus Group (led by EcoNorthwest) – March 5, 2026
- Virtual Business and Organization Interviews (four interviews led by EcoNorthwest) – March 2026
- Planning Commission Work Session – May 11, 2026
- Neighborhood Coalition – May 12, 2026
- Council Work Session – June 9, 2026
- Planning Commission Hearing – August 24, 2026
- Council Hearing – October 6, 2026 (scheduled)

The following required notices were sent for the project:

- Notice of the proposed Comprehensive Plan changes were sent to the Department of Land Conservation and Development (DLCD) and Metro on July 20, 2026; complying with the requirement to provide such notice at least 35 days before the first hearing. Notice of the August 24, 2026, Planning Commission hearing was published in the Gresham Outlook on August 12, 2026. Notice of the October 6, 2026, City Council hearing will be published in the Gresham Outlook no later than September 23, 2026. A Measure 56 notice is not required for this comprehensive plan amendment.

Public Comments

As of the date of this report no public comments were received.

Proposed Comprehensive Plan Amendments Overview

The overview provided below summarizes the changes proposed to the Gresham Community Development Plan (GCDP). The plan consists of five volumes—Volume 1: Findings, Volume 2: Policies, Volume 3: Development Code, Volume 4: Transportation System Plan, and Volume 5: Capital Improvement Plan. Updates are proposed to Volume 1 and Volume 2. The text of the proposed updates for Volume 1 and Volume 2 is provided in Exhibit ‘A’ - Council Bill. Because the proposed Comprehensive Plan Amendment will repeal and replace existing sections, the Council Bill identifies which sections are repealed and replaced with the full replacement text provided in Exhibit A’s Attachments ‘A’, ‘B’, or ‘C’.

The following changes are proposed:

Volume 1 – Findings

4.700 Economic Development

Repeal and replacement of these findings in their entirety as the information is out of date. The updated Economic Development section (Attachment A) addresses Statewide Planning Goal 9 (Economic Development), which requires the City to periodically evaluate its land supply over a 20-year planning period. These findings address updates since the last economic opportunity analysis in 2003, and describes anticipated population and employment growth for the planning period of 2026 to 2046. The findings further summarize the existing industrial and commercial land capacity, and anticipated land demand for these sectors during the 20-year planning period.

Appendix 20 – Industrial/Commercial Lands Inventory Methodology

Repeal and replacement of these findings in their entirety as the information is out of date. Appendix 20, which describes the methodology by which vacant and underutilized land was identified for development in the City, is replaced with updated findings provided in the Economic Opportunity Analysis (Attachment B). The EOA's Chapter 4 – Buildable Lands Inventory provides a summary of the methodology employed by the City to categorize land designated or planned for employment; filter out developed or constrained properties; and then identify those properties that present opportunities for new development or redevelopment.

Appendix 21 – Commercial and Industrial Land Use Inventory

Repeal of these findings in their entirety as the information is out of date. Land use inventory is provided via map exhibits in the Economic Opportunity Analysis (Attachment B), identifying location, land use designation, and constraints (i.e., slopes, environmental overlays, etc.).

Appendix 22 – Baseline and High Growth Employment Forecast Methodology

Repeal of these findings in their entirety as the information is out of date. Economic Opportunity Analysis (EOA) Chapter 3 - Employment Growth and Site Needs (Attachment B), provides an estimate of existing employment in Gresham and projects total employment over a 20-year planning horizon based on Gresham's historic employment growth rate.

Appendix 23 – Gresham's Share of Study Area's Employment Growth

Repeal of these findings in their entirety as the information is out of date. The methodology for calculating Gresham's share of employment growth in the region is provided in EOA Chapter 3 – Employment Growth and Site Needs (Attachment B). The City's consultant included covered employment data from the Oregon Employment Department's Quarterly Census of Employment and Wages. Covered employment includes employment covered by unemployment insurance. To calculate non-covered workers, the consultant applied sector specific ratios from the analysis to estimate the number of non-covered workers in Gresham by employment sector.

Appendix 24 – Assignment of Employment Categories by Standards Industrial Codes to Land Use Types

Repeal of these findings in their entirety as the information is out of date. The data provided in this section, including standard industrial codes (SIC code) and the land use district where each type of use is permitted (by land use district) is not required as part of the EOA, and generally duplicates information provided in Volume 3 – Community Development Code.

Appendix 25 – Employment Density Calculations

Repeal of these findings in their entirety as the information is out of date. The methodology for calculating employment density is provided in EOA Chapter 3 – Employment Growth and Site Needs (Attachment B). The City's consultant estimated employment density by sampling built-

out industrial and commercial areas across the city, and then providing employment counts relative to total acreage within these sampled areas which were then used to calculate average employment densities by plan designation.

Appendix 26 – Method for Calculation of Needed Number of Industrial and Commercial Sites

Repeal of these findings in their entirety as the information is out of date. The methodology for calculating employment density is provided in EOA Chapter 3 – Employment Growth and Site Needs (Attachment B). Based on the forecasted growth in new employment (employees per sector) and the estimated number of employees per net acre (the “employment density”), a calculation for land demand was generated identifying the net and gross demand in gross acres.

Appendix 28 – Economic Development Opportunities Map

Repeal of these findings (specifically, a reference to the “opportunities map” providing a comprehensive inventory of commercial and industrial land) in their entirety as the information is out of date. EOA Chapter 4 – Buildable Lands Inventory (Attachment B) provides exhibits identifying employment land use districts in Gresham (commercial, mixed-use, industrial, and those residential districts that permit commercial uses).

Volume 2 – Policies

10.414 Economic Development

This section is repealed in its entirety and replaced with updated economic development goals and policies provided in Attachment C. The summary of findings for the chapter address social and economic trends that have impacted Gresham’s retail, office, and industrial markets since the last update in 2003. Goals and policies are updated and written for consistency with other sections of the Comprehensive Plan, with a topline goal followed by underlying policies intended to support the goal. Goals and policies are provided for both commercial and industrial uses.

Appendix 4 – Economic Opportunities Analysis – Industrial Lands

Appendix 5 – Economic Opportunities Analysis for Commercial Lands

These sections are repealed in their entirety. The data and analysis regarding state, regional, and local trends is replaced with updated findings provided in the Economic Opportunity Analysis (Attachment B). The EOA provides further analysis on local advantages and disadvantages, anticipated development of the Springwater Plan Area, and inventory of lands is updated in the EOA for both industrial and commercial lands.

SECTION II - Applicable Community Development Code Procedures

Section 11.0200 Initiation and Classification of Applications

Section 11.0600 Type IV Legislative Procedures

Section 11.1000 Public Hearings

Section 11.0200 – Initiation and Classification of Applications**11.0201 – Initiation of an Application**

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

Findings:

Updates to Comprehensive Plan Volumes 1 and 2, in support of the Economic Opportunities Analysis update project was initiated on September 16, 2025. City Council will review these amendments at a hearing on October 6, 2026.

11.0203 and 11.0204 – Classification of Applications and Review Authorities

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

Findings:

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

Section 11.0600 – Type IV Legislative Procedures**11.0602(A)&(B) – Pre-application and Neighborhood Meetings**

These meetings are not required of Type IV legislative applications.

Findings:

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

11.0602(C) – Application Initiation

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

Findings:

As noted above, the Economic Development Update project was initiated by City Council on September 16, 2025.

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

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

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

Findings:

Submittal to DLCD and Metro was made on July 20, 2026, which was more than 35 days prior to the scheduled Planning Commission hearing date of August 24, 2026. Required notice of the public hearing for these proposed amendments was published in the *Gresham Outlook* before August 12, 2026 (10 days in advance of the August 24, 2026 Planning Commission Hearing) and was made available through City Hall as required by this section.

11.0602(E) – Type IV Decision Authority and 11.602(F) Type IV Notice of Decision

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

Findings:

The Planning Commission will hold a public hearing on August 24, 2026, and will provide a recommendation to City Council. The Council will make a decision at a public hearing on October 6, 2026 that will be based on findings contained in this report and in the hearings record. The decision, findings, and order will be sent to those who participated in the hearings.

This standard will be met with issuance of a decision.

11.1000 – Public Hearings

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

Findings:

Public notice was provided in advance of the Planning Commission hearing on August 24, 2026, per the requirements of a Type IV hearing. The hearings will be held consistent with the requirements outlined in the code and per each body's procedures. The Council will make a decision at a public hearing on October 6, 2026 that will be

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

This standard will be met with issuance of a decision.

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

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

Section 10.014 Land Use Policies and Regulations

Section 10.100 Citizen Involvement

Section 10.414 Economic Development

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

Section 10.014 – Land Use Policies and Regulations

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

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

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

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

Policy 23: Gresham shall coordinate the development, adoption and amendment of its land use related goals, policies and implementing measures with other affected jurisdictions, agencies and special districts.

Policy 24: The City shall protect the economic development value and jobs potential of its designated commercial and industrial lands by restricting land uses not supportive of local and regional economic development objectives.

Action Measure 11. Revise the Comprehensive Plan Text, Map and related findings as needed to maintain its reliability and timelines to ensure consistency among goals, policies, implementing measures; accuracy of findings and compliance with regional, state and federal laws and rules. This includes review by the Planning Commission every two years; a formal evaluation every five years and an overall update at least every ten years.

Action Measure 12. Monitor and evaluate whether City actions and resulting community conditions and circumstances are consistent with the goal and policy directions of the Comprehensive Plan and, when appropriate, take actions to either:

- a. Amend the Plan to ensure it corresponds with current community conditions and circumstances, and/or*
- b. Change City actions, procedures, regulations or standards to be consistent with the Comprehensive Plan.*

Action Measure 13. Monitor actions, programs and policies of federal, state and regional governments and when appropriate amend the Comprehensive Plan to be consistent with new laws and administrative rules.

Findings:

City Council initiated the EOA update on September 16, 2025, and initiated the associated amendments to Volumes 1 and 2 of the Community Development Plan on February 17, 2026, consistent with Policy 21 and Action Measure 12.

The proposed amendments repeal the outdated Economic Development findings, policies, and appendices in Volume 1, including repeal and replacement of Section 4.700 – Economic Development and Appendix 20 - Industrial/Commercial Lands Inventory Methodology. As described in the Proposed Comprehensive Plan Amendments Overview in Section I of this report, the proposed updates fully repeal out of date economic development appendices in Volume 1.

The proposed amendments to Volume 2 include repeal and replacement of Section 10.414 – Economic Development of the Comprehensive Plan, with inclusion of updated goals and policies. Appendices 4 and 5, the Economic Opportunities Analysis for Industrial and Commercial use, respectively, are repealed in their entirety with adoption of the 2026 EOA (Attachment B). The 2026 EOA provides current information on employment growth, target industries, and employment land supply including short-term land supply for the 2026 to 2046 planning period. The amendments update the factual and policy basis of the Comprehensive Plan and maintain consistency with Statewide Planning Goal 9, OAR chapter 660, division 9, and applicable Metro requirements, consistent with Policy 1, Policy 20, and Action Measures 11 through 13 of Section 10.014.

Consistent with Policy 24 of Section 10.014, the EOA evaluates the job generating potential of Gresham's designated industrial and commercial lands. The proposed new Economic Development goals and policies support continued employment and economic activity on these lands through policies addressing employment land supply, industrial development and redevelopment, commercial development and redevelopment, business support, and coordination of infrastructure and transportation planning. The proposal does not change land use designations, zoning, or permitted uses.

The City submitted the proposed amendments to DLCD and Metro at least 35 days before the first evidentiary hearing, consistent with Policy 23.

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

Section 10.100 – Citizen Involvement

Goal: The City shall provide opportunities for citizens to participate in all phases of the planning process by coordinating citizen involvement functions; effectively communicating information; and facilitating opportunities for input.

Policy 1: The City shall ensure the opportunity for citizen participation and input when preparing and revising policies, plans, and implementing regulations.

Policy 2: The City shall consider the interests of the entire community and the goals and policies of the Comprehensive Plan when making decisions.

Policy 5: The City shall keep citizens informed of issues confronting the City.

Policy 6: The City shall ensure that technical information necessary to make policy decisions is readily available.

Policy 7: The City shall facilitate involvement of citizens in the planning process, including data collection, plan preparation, adoption, implementation, evaluation, and revision.

Policy 9: The City shall ensure that citizen involvement plans and activities incorporate Gresham's diverse constituencies regardless of age, sex, religion, social, or business affiliation.

Policy 10: The City shall ensure the opportunity for the public to be involved in all phases of planning projects and issues.

Action Measure 2: Ensure that the input, information, factual contributions, and expertise provided by citizens is considered...

Action Measure 4: Keep the public informed of opportunities for involvement in all phases of land use planning issues...

Action Measure 5: Provide citizens timely access to all public information related to land use matters...

Action Measure 6: Communicate information clearly and effectively

Action Measure 7: Engage in outreach activities to inform and encourage public involvement...

Action Measure 8: Facilitate citizen input in the process for revising local land use plans and ordinances...

Action Measure 9: Make public participation processes user-friendly...

Action Measure 10: Encourage broadly based public participation including all geographic areas and diverse interests...

Action Measure 11: When appropriate, provide culturally-sensitive participation opportunities, which may include language translation and interpretation.

Findings:

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

The EOA process included four stakeholder interviews and one focus group in March 2026 with local businesses, business support organizations, regional economic development partners, and infrastructure providers. The meeting and interviews were held virtually to allow for participation by a broad cross-section of the business community, at times and dates that were most agreeable for all parties. Feedback from these meetings informed understanding of the strengths and weaknesses in Gresham's business environment, including the importance of programs such as Enterprise Zones, Strategic Investment Zones, urban renewal, the Garage to Storefront program, storefront improvement grants, the Rapid Response Team, and expedited review processes for qualifying industrial projects. Stakeholders generally described Gresham as responsive and supportive of industrial and traded-sector projects. The project team also met with the Neighborhood Coalition and held work sessions with the Planning Commission and City Council, allowing decisionmakers an opportunity to review the technical analysis, discuss economic development objectives, and provide direction on the proposed policy amendments. The Planning Commission and City Council were supportive of general assumptions, such as anticipated employment growth for the 20-year period covered by the EOA.

The public was informed of opportunities for involvement through the City's calendar, information on the City's planning projects webpage, public meetings and participation with the Neighborhood Coalition. Public hearing notices were published in accordance with applicable City requirements.

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

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

Section 10.414 – Economic Development

Summary of Findings: In order to promote business retention and expansion and recruitment of new industries, the city must market its strengths and solve those weaknesses which can be resolved or reduced (Sections 4.700 to 4.743 - Findings document).

Policy I: It is the policy of the City to promote diversification of the community's economic base by promoting business retention and expansion, business recruitment and marketing.

Policy II: It is the City's policy to assure that public facilities are extended in a timely and economic fashion to areas having the greatest economic development potential.

Findings:

Section 10.414 contains the City's existing Economic Development findings, policies, and implementation strategies. These provisions are based on the City's prior economic opportunities analyses and no longer fully reflect current economic conditions, employment trends, employment land needs, or applicable state and regional planning requirements.

The proposed amendments repeal Section 10.414 and replace it with updated Economic Development findings, goals, and policies (see Attachment C – Volume 2, Section 10.414) supported by the 2026 EOA. The replacement provisions provide an updated policy framework for economic development planning based on current information about Gresham's economy, employment growth, target industries, employment land supply, and development opportunities.

Conclusion: The findings, policies, and implementation strategies in 10.414 - Economic Development are proposed to be updated as part of this application with new findings, goals, and policies. The proposal is consistent with the applicable Economic Development Goals, Policies, and Action Measures as outlined in the findings above.

IV. APPLICABLE METRO URBAN GROWTH MANAGEMENT FUNCTIONAL PLAN TITLES

This section identifies the applicable Metro Urban Growth Management Functional Plan titles. The summary of the title is followed by corresponding findings and conclusions.

Title 4: Industrial and Other Employment Areas

Title 4 supports a strong regional economy by protecting the supply of industrial and other employment sites, limiting the type and scale of non-industrial uses in designated industrial and employment areas, supporting industry clustering, and protecting freight mobility. It also directs most non-industrial uses to urban centers, corridors, main streets, and areas near transit rather than on industrial lands.

Findings:

The proposed amendments do not change Metro Title 4 designations, the Comprehensive Plan Map, the zoning map, or the uses allowed on individual properties. The EOA inventories Gresham's industrial and other employment land and identifies sufficient industrial land capacity to accommodate forecasted growth. It finds that commercial employment needs can be accommodated through the City's existing commercial and mixed-use land supply, including redevelopment, infill, reuse of existing buildings, and more intensive use of established employment areas.

The proposed new Economic Development goals and policies support the continued use of industrial land for employment, industrial site readiness, redevelopment, and commercial investment in established regional and town centers. The amendments maintain the City's existing Title 4 implementation framework.

Conclusion: The proposed amendments are consistent with Title 4.

Title 8 Compliance Procedures

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

Findings:

Notice of the proposed amendments to Comprehensive Plan were sent to Metro on July 20, 2026, complying with the requirement to provide such notice at least 35 days before the first hearing on August 24, 2026. As of the date of this report Metro has not contacted the City regarding this notice.

Conclusion: The City has submitted the proposed amendments to Metro at least 35 days prior to the first evidentiary hearing. The proposal is consistent with Title 8 (Compliance Procedures).

Conclusion: The proposed amendments comply with all the applicable Metro Urban Growth Management Functional Plan Titles.

V. APPLICABLE OREGON STATEWIDE PLANNING GOALS

This section identifies the applicable Oregon Statewide Planning Goals. The summary of the goal is followed by corresponding findings and conclusions.

Goal 1 - Citizen Involvement

This goal requires that each city “insures the opportunity for citizens to be involved in all phases of the planning process.”

Findings:

The EOA process included stakeholder interviews and focus groups with local businesses, business support organizations, regional economic development partners, and infrastructure providers. The project team also held work sessions with the Planning Commission and City Council, which were open to the public and broadcast online. These meetings provided opportunities for decision-makers to review the EOA, discuss economic development objectives, and comment on the proposed policy amendments before adoption. The City also published notice in advance of the Planning Commission and City Council hearings. See Section I and Section III of this report for a list and discussion of public outreach activities.

Conclusion: The proposed amendments are consistent with Statewide Planning Goal 1.

Goal 2 - Land Use Planning

This goal requires cities to “establish a land use planning process and policy framework as a basis for all decision and actions related to use of land and to assure an adequate factual base for such decisions and actions.” The goal requires that “plans and actions related to land use shall be consistent with the comprehensive plans of cities and counties and regional plans adopted under ORS Chapter 268.”

Findings:

The City has a state-acknowledged Comprehensive Plan. Sections II, III, and IV of this report describe findings and conclusions that the proposed Comprehensive Plan Amendments are consistent with applicable procedures and applicable goals and policies of the City’s Comprehensive Plan and the Metro Urban Growth Management Functional Plan.

The City provided notice of the proposed amendments to DLCD on July 20, 2026, 35 days before the first evidentiary hearing, as required by state law. Consistent with Goal 2, the

proposed amendments will be considered through the City's public hearing process, with opportunities for review and comment by residents, DLCD, Metro, and other affected governmental units.

Conclusion: The proposed amendments are consistent with Statewide Planning Goal 2.

Goal 9 – Economic Development

This goal requires cities “to provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens.” OAR chapter 660, division 9 implements Goal 9 through requirements for an Economic Opportunities Analysis, economic development policies, and land designations and implementation measures.

OAR 660-009-0015 (Economic Opportunities Analysis)

OAR 660-009-0015 requires cities and counties to review and, as necessary, amend their comprehensive plans to provide an EOA that compares demand for industrial and other employment land with the existing supply. The EOA must include: (1) a review of national, state, regional, county, and local trends; (2) identification of required site types; (3) an inventory of industrial and other employment land; and (4) an assessment of the planning area's economic development potential.

Findings:

1. *Economic trends:* The EOA must identify major categories of industrial or other employment uses that could reasonably be expected to locate or expand in the planning area based on information about national, state, regional, county, or local trends.

Chapter 2 and Appendix A of the EOA review national, state, regional, county, and local economic trends. Chapter 3 uses those trends, together with Gresham's economic advantages and constraints, to identify the major employment uses that could reasonably be expected to locate or expand in Gresham. These uses include manufacturing, wholesale trade and distribution, health care and social assistance, construction and specialty trades, and local services and retail.

2. *Required site types:* The EOA must identify the number of sites by type reasonably expected to be needed to accommodate expected employment growth based on site characteristics typical of expected uses. The EOA must demonstrate how employment growth is expected to be accommodated on the identified sites.

Chapter 3 identifies the site characteristics needed by industries expected to grow in Gresham, including site size, plan designation, transportation and freight access, infrastructure, visibility, and compatibility with surrounding uses. Chapter 5 compares those needs with the City's buildable employment land inventory and explains how growth can be accommodated through vacant and partially vacant sites, redevelopment, infill, reuse, site assembly, and more intensive use of existing employment areas.

3. *Employment land inventory:* The EOA must include an inventory of vacant and developed employment lands that describes site characteristics and development constraints within each plan or zone designation. For jurisdictions within a Metropolitan Planning Organization (MPO), the EOA must also identify the “short-term supply” of employment land—suitable sites that are ready for construction within one year of a building permit application or a request for extension of urban services.

Chapter 4 of the EOA includes a buildable employment lands inventory that describes employment sites by plan designation and accounts for key development constraints. The EOA identifies approximately 710 acres of unconstrained buildable employment land, including approximately 537 acres in industrial districts and 174 acres in commercial and mixed-use districts. The EOA also identifies Gresham's short-term supply consistent with MPO requirements: 110 industrial acres across 25 sites, 36 mixed-use acres across 101 sites, and 38 commercial acres across 31 sites. Together, these lands represent approximately 26 percent of Gresham's total unconstrained employment land supply.

4. *Economic development potential:* The EOA must estimate the types and amounts of industrial and other employment uses likely to occur in the planning area based on elements (1)–(3) and consider economic advantages and disadvantages.

The EOA evaluates Gresham's economic advantages and disadvantages, forecasts employment growth, estimates industrial and commercial land demand, and compares that demand with the City's employment land supply. It forecasts approximately 5,457 additional jobs and demand for approximately 200 gross industrial acres and 194 gross commercial acres. The BLI identifies approximately 537 industrial acres and 174 commercial and mixed-use acres. The City therefore has adequate industrial capacity and a modest commercial deficit that the EOA indicates can be addressed through redevelopment, infill, reuse, and more intensive use of existing commercial and mixed-use areas.

Conclusion: The 2026 EOA contains the analysis required by OAR 660-009-0015.

OAR 660-009-0020 (Industrial and Other Employment Development Policies)

OAR 660-009-0020 requires comprehensive plans to include economic development policies based on the EOA. The policies must state the jurisdiction's economic development objectives and the types of industrial and other employment uses it plans to accommodate; commit the jurisdiction to provide an adequate supply of suitable employment sites and necessary public facilities and transportation; and, for jurisdictions within a Metropolitan Planning Organization, the plan must include a commitment to maintain a competitive short-term supply of employment land and identify strategies to prepare the overall supply for development and replenish the short-term supply as it is used. Those policies must include a date, event, or both that trigger review of the short-term supply.

Findings:

The proposed amendments repeal Gresham's existing Economic Development goals and policies and replace them with updated goals and policies in Volume 2, Section 10.414, based on the findings in the 2026 EOA.

Taken as a whole, the proposed updated findings in the EOA and the goals and policies in Volume 2 - Section 10.414 state the City's objectives to maintain an adequate supply of suitable employment land, promote development and investment, strengthen industrial and commercial areas, coordinate infrastructure and transportation planning, and support businesses and economic development partnerships.

The EOA identifies manufacturing, wholesale trade and distribution, health care and social assistance, construction and specialty trades, and local services and retail as the principal categories of employment uses expected to account for future growth.

The proposed policies commit the City to maintain an adequate supply of suitable industrial and commercial land and a competitive short-term supply of development-ready employment land. They also support redevelopment, infill, site readiness, continued use of industrial land for employment, commercial investment in established centers, coordination of infrastructure and transportation planning with employment land needs, and business support programs.

Conclusion: The proposed amendments are consistent with OAR 660-009-0020.

OAR 660-009-0025, Designation of Lands and Implementing Measures

OAR 660-009-0025 requires local governments to designate suitable land and adopt measures adequate to implement the industrial and other employment development policies adopted under OAR 660-009-0020. Implementing measures may include comprehensive plan and zoning designations, land use regulations, public facility plans, and transportation system plans. The rule also requires an adequate total land supply and, for jurisdictions within a Metropolitan Planning Organization, a short-term supply of employment land.

Findings:

The proposed amendments repeal and replace Gresham's existing Economic Development goals and policies and Economic Opportunity Analysis with Volume 2 - Section 10.414 and the 2026 EOA, respectively. The amendments do not change the Community Development Plan Map, zoning map, Development Code, or Metro Title 4 designations. The City's existing industrial, commercial, and mixed-use designations and implementing regulations therefore remain in effect.

The EOA identifies approximately 537 acres of buildable industrial land compared with approximately 200 acres of projected industrial land need. The City has sufficient designated industrial land to accommodate forecasted industrial growth. The EOA identifies approximately 174 acres of buildable commercial and mixed-use land compared with approximately 194 acres of projected commercial land need. The proposed new Economic Development policies respond to this limited difference by focusing on redevelopment, infill, reuse of existing buildings, and more intensive use of existing commercial and mixed-use areas.

The EOA also identifies approximately 184 acres, or 26 percent of the City's employment land supply, as short-term supply. This exceeds the 25 percent target applicable to jurisdictions within a Metropolitan Planning Organization.

Existing employment land designations, land use regulations, public facility plans, the Transportation System Plan, the City's Capital Improvement Plan, and the City's Economic Development Strategy provide measures for implementing the proposed policies. The City finds that its existing employment land designations and implementing measures, together with the proposed new Economic Development policies, are adequate to implement the City's industrial and other employment development objectives.

Conclusion: The proposed amendments are consistent with OAR 660-009-0025.

Conclusion: The proposed amendments comply with all applicable Statewide Planning Goals.

VI. CONCLUSION

The proposed amendments to Volume 2 - Policies are consistent with all applicable procedures, goals and policies of the Community Development Plan, applicable Titles of the Metro Urban Growth Management Functional Plan, and applicable Statewide Planning Goals as indicated by findings contained or referenced in this report.

VII. RECOMMENDATION

Staff recommends adoption of the proposed Comprehensive Plan text amendments, CPA-25-00645, as contained in the attached exhibits and attachments, based on the findings, conclusions, and recommendations in the August 14, 2026 staff report.

End of staff report