

DATE: January 30, 2026
TO: City of Wilsonville
FROM: Nicole Underwood and Beth Goodman, ECONorthwest
SUBJECT: Findings for the adoption of the Wilsonville Economic Opportunity Analysis

Introduction

This Findings Report documents how the City of Wilsonville’s proposed amendment related to the Wilsonville Economic Opportunity Analysis (EOA) comply with applicable City, Metro, and State policies and regulations. The EOA report and the full project record provide the supporting analysis and evidence for these findings. The proposed amendment would adopt the Wilsonville EOA as a sub-element of the Comprehensive Plan, giving it the same legal and policy standing as the Plan’s other elements.

Statewide Planning Goals

Goal 9, Economic Development

Goal 9 requires that local governments have enough land available to realize economic growth and development opportunities. Commercial and industrial development takes a variety of shapes and leads to economic activities that are vital to the health, welfare and prosperity of Oregon’s citizens. To be ready for these opportunities, Goal 9 requires that local governments conduct Economic Opportunity Analyses based on a 20-year forecast of population and job growth.

Response: The proposed amendment adopts an updated EOA as a supporting document to the Wilsonville Comprehensive Plan, providing an updated factual basis for decisions related to employment growth and employment land. The City’s previous EOA was completed in 2012. The updated EOA assesses employment growth and land needs for the 2026–2046 planning period and includes an updated buildable lands inventory, a land sufficiency analysis, and a discussion of Wilsonville’s competitive advantages, challenges, and target industries.

Based on the EOA’s assessment of the City’s buildable employment lands and forecasted employment growth, the EOA includes the following findings and conclusions:

- ◆ Wilsonville’s employment base is projected to grow from 33,165 jobs (2026) to 39,297 jobs (2046), an increase of about 6,132 jobs. This growth is expected to generate demand for 321 gross acres of industrial land and 110 gross acres of commercial land over the planning period.

- ◆ Wilsonville has 2,396 acres of land designated for commercial or industrial use, including 366 acres that are vacant, unconstrained, and buildable. Of that buildable land, 353 acres (96%) are designated for industrial development, and 13 acres (4%) are designated for commercial uses.
- ◆ The EOA finds Wilsonville has a modest industrial surplus (about 32 acres) beyond the forecast of industrial land demand.
- ◆ The EOA finds the City has limited vacant commercial land compared to projected need. Wilsonville has 13 acres of vacant unconstrained buildable commercial land and 50 acres of potentially redevelopable land, primarily in Town Center. The result is a deficit of 47 acres of buildable commercial land. The City anticipates meeting commercial needs primarily through redevelopment and reuse, particularly in Town Center and along established corridors such as Wilsonville Road, including reuse/redevelopment opportunities at large vacant sites.
- ◆ The EOA provides information about Wilsonville’s competitive advantages, including its supply of industrial land, access to I-5, and a diverse workforce, and identifies target industries expected to drive growth, including manufacturing, wholesale trade/logistics, professional services, and local services/retail; these considerations inform the assumptions used to estimate employment land needs.

This goal is met.

Oregon Administrative Rules

OAR 660-009-0015, ECONOMIC OPPORTUNITIES ANALYSIS

Cities and counties must review and, as necessary, amend their comprehensive plans to provide an economic opportunities analysis (EOA) that compares demand for industrial and other employment land to the existing supply. The EOA must include (1) review of national, state, regional, county, and local trends, (2) identification of site types needed, (3) an inventory of industrial and other employment lands and (4) an assessment of the planning area’s economic development potential.

Response: The proposed comprehensive plan amendment adopts the updated EOA as a supporting document to the Comprehensive Plan. The EOA provides an updated employment forecast and land demand analysis and inventories the City’s employment land supply and development potential consistent with OAR 660-009-0015.

OAR 660-009-0015(1): Review of National, State, Regional, County, and Local 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.

Response: The EOA includes a trends review in Chapter 2 and Appendix A and uses



those trends to inform expected employment growth and major categories of employment uses (target industries) likely to locate or expand in Wilsonville in Chapter 3. **This standard is met.**

OAR 660-009-0015(2): Identification of 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 expected employment growth is expected to be accommodated on the identified sites. **Response:** The EOA addresses site types in Chapter 3, in the section titled “Site Needs for Potential Growth Industries.” The EOA organizes expected employment growth into site categories based on (1) plan designation (industrial versus commercial) and (2) site size. The site size categories reflect typical site needs for the target/potential growth industries identified in the EOA and are then compared to Wilsonville’s buildable land inventory using the lot size distribution shown in Exhibit 38 of the EOA. In Chapter 5, the EOA summarizes the buildable employment land supply and explains how projected growth can be accommodated through a combination of smaller sites, redevelopment and reuse opportunities, and (for industrial uses) assembly of larger sites over time. **This standard is met.**

OAR 660-009-0015(3): Inventory of Industrial and Other Employment Lands. 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. **Response:** 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 inventory identifies approximately 366 acres of vacant, unconstrained buildable employment land, including 353 acres designated industrial and 13 acres designated commercial. The EOA also identifies Wilsonville’s short-term supply consistent with MPO requirements: 200 industrial acres across 59 sites and 13 commercial acres across 7 sites. Compared to the City’s unconstrained vacant and partially vacant employment land, the EOA indicates that 100% of commercial land is in the short-term supply and 57% of industrial land is in the short-term supply. **This standard is met.**

OAR 660-009-0015(4): Assessment of Community 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. **Response:** The EOA identifies Wilsonville’s economic advantages and disadvantages and reviews relevant trends in Chapter 2, and uses that information to inform the selected employment forecast



and target industries in Chapter 3. The EOA then estimates employment growth and the associated demand for industrial and commercial land over the planning period, and compares that demand to the employment land inventory in Chapter 4 to evaluate land sufficiency in Chapter 5. **This standard is met.**

Based on the findings above, OAR 660-009-0015 is met.

OAR 660-009-0020, INDUSTRIAL AND OTHER EMPLOYMENT DEVELOPMENT POLICIES

Comprehensive plans must include industrial and other employment 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. The plan must also commit the City to provide an adequate supply of suitable employment sites and the public facilities and transportation needed to support planned employment growth. For MPO jurisdictions, 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.

Response: The proposed amendment adopts the updated EOA as a supporting document to the Comprehensive Plan. The Comprehensive Plan already includes economic development objectives and policies addressing industrial and commercial development, protection of employment lands, and coordination of public facilities and transportation to support employment growth. The EOA provides the updated factual foundation for Goal 9 and OAR 660-009 planning and is intended to inform future Comprehensive Plan policies and implementation updates. As Wilsonville's employment land supply has historically exceeded projected demand, prior policy emphasis has focused on protecting and managing an ample inventory. As supply and demand are becoming more closely aligned, the City may choose to revisit its Comprehensive Plan policies in a future update cycle to ensure they continue to support a competitive short-term supply of employment land, consistent with OAR 660-009-0020. Adoption of the EOA does not require Comprehensive Plan policy amendments at this time. **This rule is met.**

OAR 660-009-0025, DESIGNATION OF LANDS AND IMPLEMENTING MEASURES

Cities and counties must adopt measures adequate to implement policies adopted pursuant to OAR 660-009-0020. Implementing measures may include plan and zoning map designations, land use regulations, public facility plans, and transportation system plans.

Response: The proposed amendment adopts the updated EOA as a supporting document to the Comprehensive Plan and does not amend the Comprehensive Plan map, zoning map, or development code. The City's existing Comprehensive Plan designations and implementing



measures, including its land use regulations and adopted public facility and transportation plans, provide the framework for implementing Wilsonville’s employment land policies. The updated EOA strengthens the factual basis for evaluating whether future refinements to these implementing measures are needed. **This rule is met.**

Metro Urban Growth Management Functional Plan

Title 4: Industrial and Other Employment Areas

Title 4 supports a strong regional economy by protecting a 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, and areas near transit rather than on industrial lands.

Response: The City’s EOA provides the updated technical basis for employment land planning by evaluating Wilsonville’s employment land supply and the land needed to accommodate projected growth. The EOA concludes Wilsonville has sufficient vacant industrial land to accommodate projected growth. It also finds that commercial needs are expected to be met primarily through redevelopment and reuse in Town Center and along corridors, consistent with Title 4’s direction to focus non-industrial uses in centers and corridors rather than on industrial lands. Metro’s 2024 Compliance Report finds Wilsonville “In compliance” with Title 4. Adoption of the EOA as a supporting document does not amend the Comprehensive Plan map, Development Code, or Metro Title 4 map designations. Rather it provides an updated factual foundation to support continued planning for, and protection of, industrial and other employment land. **This title is met.**

Wilsonville Comprehensive Plan

LAND USE AND DEVELOPMENT

Economic Development

The Economic Development section of the Comprehensive Plan describes Wilsonville’s long-standing economic development context and objectives, including maintaining a high-quality and diversified industrial base, protecting industrial lands from incompatible uses, focusing commercial development in centers rather than strip development, and planning for employment growth in relation to housing and transportation access, consistent with Statewide Planning Goal 9.



Response: The proposed amendment adopts the updated EOA as a supporting document to the Comprehensive Plan and does not amend the Comprehensive Plan land use designations or implementing regulations. The updated EOA is aligned with the Comprehensive Plan’s economic development direction by providing the current factual foundation for Goal 9 planning, including employment trends, an employment forecast, estimates of industrial and commercial land demand, and an inventory of the City’s employment land supply and constraints. Consistency with the Comprehensive Plan’s specific Land Use and Development policies and implementation measures is addressed in the findings that follow for Commercial Development, Town Center Development, and Industrial Development. **This criterion is met.**

Commercial Development

Policy 4.1.2: The City of Wilsonville shall encourage commercial growth primarily to serve local needs as well as adjacent rural and agricultural lands.

Implementation Measures 4.1.2.a–d and f. Commercial growth focus, mix, and location

Response: The EOA updates the City’s factual basis for planning commercial land to meet local needs and for directing commercial growth to appropriate locations. The EOA identifies a limited supply of vacant commercial land and anticipates that commercial needs will be met primarily through redevelopment and reuse—particularly in Town Center and along established corridors—rather than through conversion of industrial land. This supports the Plan’s direction to cluster commercial activity and to allow limited supportive retail in Employment and Industrial areas consistent with Metro Title 4. **These criteria are met.**

Implementation Measures 4.1.2.h, j, and k. Mixed-use opportunities, neighborhood commercial, and limits on large retail in industrial areas

Response: The EOA’s conclusion that commercial needs should be accommodated primarily through redevelopment and reuse supports continued implementation of these measures by reinforcing that non-industrial commercial activity should be concentrated in designated centers/corridors and should not displace industrial development potential. **These criteria are met.**

Town Center Development

Town Center policies direct mixed-use redevelopment and reinvestment in the Town Center area, supported by multimodal access and public facilities, to accommodate a share of the City’s future commercial, employment, and residential activity in a compact, walkable center.

Response: The EOA identifies a limited supply of vacant commercial land and anticipates that commercial needs will be met primarily through redevelopment and reuse, particularly in Town Center. Adoption of the EOA as a supporting document to the Comprehensive Plan



does not amend Town Center policies or the Town Center plan, but it strengthens the factual basis for implementing those policies. **This criterion is met.**

Industrial Development

Policy 4.1.3 City of Wilsonville shall encourage light industry compatible with the residential and urban nature of the City.

Implementation Measures 4.1.3.a–g. Quality industrial development, diversification, environmental performance, and siting

Response: The updated EOA provides the City’s current factual basis for planning and supporting industrial development and maintaining a diversified employment base. The EOA concludes Wilsonville has a sufficient vacant industrial land supply to accommodate forecast demand, while identifying constraints that affect near-term competitiveness, including site readiness, infrastructure gaps, and the need to assemble larger sites. These findings inform future City decisions about where industrial growth is most feasible and what investments may be needed to support high-quality industrial development over time. **These criteria are met.**

Implementation Measures 4.1.3.h–j. Supportive retail limits and protecting industrial development potential

Response: These measures are implemented primarily through the Comprehensive Plan and Development Code, including limits on large retail in industrial areas and standards ensuring non-industrial uses do not limit industrial development potential. Adoption of the EOA does not amend these policies or standards; it strengthens the factual basis for applying them by documenting industrial land sufficiency and commercial land limitations, reinforcing the City’s approach of meeting commercial needs primarily through redevelopment and reuse in Town Center and corridors rather than conversion of industrial lands. **These criteria are met.**

Implementation Measures 4.1.3.k–m. Target industries and job-dense employment districts

Response: The updated EOA supports these measures by identifying the types of industries that are likely to locate or expand in Wilsonville and by evaluating the site types and locations needed to accommodate employment growth. This information provides an updated factual foundation to support strategies to attract and retain high-growth sectors and to encourage employment areas that offer a range of job opportunities and higher job densities over time. Adoption of the EOA does not itself amend zoning or create new incentive programs, but it informs future implementation decisions. **These criteria are met.**



Areas of Special Concern (Areas E, G, M, N, and 12)

The Comprehensive Plan identifies “Areas of Special Concern” with location-specific objectives to address transitions between industrial and other uses, site coordination challenges (e.g., small lots and fragmented ownership), mobility and freight access, and infrastructure coordination, to ensure development occurs in an orderly, compatible, and high-quality manner.

Response: The proposed amendment adopts the updated EOA as a supporting document to the Comprehensive Plan and does not change Comprehensive Plan map designations or the Areas of Special Concern framework. The EOA provides the factual basis for implementing the Comprehensive Plan objectives by providing updated information on employment land supply and site constraints. Areas of Special Concern most likely to be informed by the updated EOA include:

- ◆ **Area E:** Planned for industrial use and characterized by small lots and proximity to the Walnut Park mobile home park; objectives emphasize lot consolidation, buffering, and minimizing truck/residential conflicts. The EOA supports implementation of these objectives by updating the City’s employment land inventory and identifying site size patterns and readiness constraints that can inform future decisions about coordinated development, site assembly, access management, and compatibility measures in this Area.
- ◆ **Area G (Wilsonville Concrete):** Includes an aggregate-related operation and a mix of surrounding uses; guidance emphasizes conflict management and transportation access as urbanization occurs. The EOA provides an updated employment land baseline and highlights constraints relevant to continued industrial operations and freight access in this Area.
- ◆ **Area M (Basalt Creek):** Identified as a long-term industrial area with objectives focused on promoting a high-quality business district, avoiding incompatible uses, and coordinating access and infrastructure. The EOA identifies Basalt Creek as a major location of vacant industrial land and describes infrastructure, access, and ownership constraints affecting development readiness in the Area.
- ◆ **Area N (West Railroad/Basalt Creek):** An industrial area where extension of urban services and coordinated planning are central to development. The EOA’s buildable lands inventory can inform future annexation and infrastructure planning discussions for this Area.
- ◆ **Area 12 (Mentor Graphics):** The Comprehensive Plan outlines specific development objectives and standards, and emphasizes that coordinated utilities and street alignments require cooperation among property owners and City coordination. The EOA documents constraints that can only be addressed through coordinated planning and investment (e.g., infrastructure gaps and site readiness barriers) or future Plan Amendments for this Area to better align with current market conditions.



These criteria are met.

