

**ANALYSES & FINDINGS**  
**Woodburn Comprehensive Plan Map Amendment and UGB Expansion into Urban Reserve Area**

**I. INTRODUCTION**

In January 2024, the City adopted an update to our Economic Opportunities Analysis (“EOA”) which included an employment growth rate of 2.3%, adding an estimated 6,830 jobs by the year 2043. The 2023-2043 Economic Opportunities Analysis (“EOA”) and Buildable Land Inventory (“BLI”) reconciled the 20-year employment demand with existing employment land supply within the existing Urban Growth Boundary (UGB) for an identified need (deficit) of 379.2 total acres of employment land need- see Table 1 below.

Upon adoption of the 2023-2043 Economic Opportunities Analysis (“EOA”) and Buildable Land Inventory (“BLI”), the City Council initiated a Woodburn Comprehensive Plan Map amendment and an amendment to the City of Woodburn/Marion County Urban Growth Coordination Agreement (Coordination Agreement) to incorporate the 237 gross acres identified as the Urban Reserve Area/Southwest Industrial Reserve into the Woodburn Urban Growth Boundary (“UGB”), in order to comply with Goal 9 and Goal 14 under Oregon Administrative Rule (OAR) 660, and meet some of the adopted employment need/deficit.

**A. Timeline**

Following is the timeline of relevant events carrying out this Legislative Amendment:

- March 25, 2024: Resolution 2230-A Resolution Initiating Consideration of Proposed Legislative Amendments to the Woodburn Comprehensive Plan Map to Amend the Urban Growth Boundary and Incorporate the Previously Established Urban Reserve Area (URA)
- September 4, 2024: 35-day PAPA notice to DLCD
- September 24, 2024: Woodburn Development Ordinance (WDO) notice requirements for legislative amendments mailed and posted
- October 10, 2024: Woodburn Planning Commission Meeting, following a duly noticed public hearing notice
- October 28, 2024: Woodburn City Council Meeting, following a duly noticed public hearing notice

**II. APPLICABLE LAW**

**A. General**

Evaluation and expansion of a UGB requires application of several interrelated administrative statutes, Oregon Statewide Planning Goals, Oregon Revised Statute (ORS) 197.298, and the Woodburn Comprehensive Plan.

As part of the Goal 14 UGB analysis, Woodburn previously addressed capacity needs under Goal 9 (Economic Development) and related statutes and administrative rules under OAR chapter 660 via the previously adopted 2023-2043 Buildable Land Inventory and Economic Opportunities Analysis (Ordinance 2619, January 2024).

**B. Amount of Land**

The applicable requirements are found in ORS 197.298 and 197.712, Goal 9, OAR chapter 660-009, and Goal 14. The first step is to determine the “amount of land needed” and a “differentiation of land use types according to their land consumption attributes,” under Goal 14.

Goal 14 requires that (emphasis added):

“Establishment and change of urban growth boundaries shall be based on the following:

- (1) *Demonstrated need to accommodate long range urban population*, consistent with a 20-year population forecast coordinated with affected local governments; and
- (2) *Demonstrated need for housing, employment opportunities*, livability or uses such as public facilities, streets and roads, schools, parks or open space, or any combination of the need categories in this subsection (2).

“In determining need, local government may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need.”

**C. Alternative Sites Analysis**

The Goal 9 rule provides that cities “must adopt measures adequate to implement policies adopted pursuant to OAR 660-009-0020”. To accomplish that, compatible employment uses with similar site characteristics may be combined into “broad site categories (OAR 660-009-0025(1)). In addition, OAR 660-009-0025(2) requires jurisdictions to ensure the total acreage of land designated must at least equal the total projected land needs for each industrial or other employment use category identified in the plan during the 20-year planning period.

If there is a need to accommodate population or employment growth, the jurisdiction must first look to land inside the existing UGB to accommodate that need. If some or all of the identified need cannot be accommodated inside the UGB, the jurisdiction then moves to the second step: “application of ORS 197A.320(2)(c), together with Goal 14, to locate and justify inclusion of land to fill that quantified need.” The jurisdiction must follow the priority statute, ORS 197.298(1)(a-d), sequentially. When determining which lands to include within the UGB of a city outside of Metro, the rules of ORS 197A.320 must also be applied.

Marion County and the City of Woodburn adopted Woodburn’s current Urban Reserve Area via Ordinance 2530 in December 2015. Because the City has an adopted, designated Urban Reserve Area to meet 237 gross acres of industrial employment land that is suitable to respond to economic development opportunities and needs, the City Council intends to apply ORS 197.298(1)(a) first.

A local government cannot include lower priority lands within the UGB pursuant to an exception to that priority scheme without first applying the priority scheme to determine whether higher

priority lands can accommodate the identified need. **Since the subject property the City is proposing to bring into the UGB is already Urban Reserve Area (URA), it is the sequential first priority for UGB inclusion.**

As the subsequent priorities under ORS 197.298(1)(b-d) require a more in-depth and costly “locational factor” analysis such as soils analysis, engineering work related to the provision and cost of facilities and services, and assessment of other development hazards or natural resources, the City Council intends to address any remaining employment land deficits adopted in the 2023-2043 EOA and BLI via a later, separate land use process.

Put more simply, the City, when seeking a UGB expansion, will first look to lands within our previously designated Urban Reserve Area (URA) before addressing remaining need under ORS 197.298(1)(b-d) via a separate legislative amendment process.

### **III. LAND USE DECISION - UGB**

#### **A. Summary of Decision**

The Urban Reserve Area (URA) is west and south of Parr Road, and consists of approximately 237 gross acres, and forms the Southwest Industrial Reserve (SWIR). In particular, the URA was established to inform the City’s decisions to plan, zone, and protect future industrial land consistent with the City’s adopted Targeted Industries report and EOA for a diversity of lot size and type. The adopted EOA describes seven (7) targeted industries for Woodburn, with a variety of different site size and location preferences. The transportation needs also vary, from industries that desire foot traffic and local shoppers to those that move materials by freight and need good road access for trucks.

#### **1. Employment Land Need**

As part of the adopted Buildable Land Inventory (BLI), the City identified 696 individual tax lots and 1,302 gross acres of land zoned for employment (commercial or industrial) within the current Woodburn Urban Growth Boundary. After removing “development constraints” as defined under OAR 660-009, “developed” employment land under OAR 660-038, and other safe harbor deductions to calculate available net acreage of available employment, the resulting BLI study identified 64.8 net acres of remaining commercial/mixed use land and 77.3 net developable acres of remaining industrial land (identified as vacant, partially vacant, and redevelopable)<sup>1</sup>. This land is available for future industrial uses, either by new employers or by existing employers expanding their businesses. Notably, the BLI study also identified no availability of commercial/mixed use lots larger than 10 acres and no availability of industrial lots larger than 20 acres to meet targeted industries in the adopted Economic Opportunities Analysis (EOA).

Further, the EOA then provided a forecast for employment land need under Goal 9 and provided a reconciliation of remaining employment land from the BLI. The reports found that in order to reconcile our 20-year forecast of employment land need, the City of Woodburn faces a deficit of employment land over the planning period in both the commercial and industrial categories:

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<sup>1</sup> 2023 Buildable Land Inventory (adopted January 2024 via Ordinance 2619).

- **Commercial.** In addition to existing capacity within the UGB, Woodburn will need to add 107 gross acres for non-industrial employment land as identified in the BLI and EOA.
- **Industrial.** In addition to existing capacity within the UGB, Woodburn will need to add approximately 273 gross acres for new industrial capacity.

**IV. URBAN RESERVE AREA/URBAN GROWTH BOUNDARY MAP AMENDMENT**

In order to address the identified employment land need in an expeditious manner and to allow Woodburn to address the immediate lack of larger lots to meet identified targeted industries, the expansion of the Urban Growth Boundary to incorporate the previously established URA will include eight (8) tax lots and ~237 gross<sup>2</sup> acres of land to be zoned Southwest Industrial Reserve (SWIR). See Attachment 1 for the previously adopted Urban Reserve Area (URA) Map.

Map	Tax Lot	Acres
052W12	1100	24.02
052W14	0900	42.88
052W14	1000	10.0
052W14	1100	21.74
052W14	1200	3.88
052W14	1500	59.43
052W14	1600	25.0
052W23	0100	50.18

**V. STATEWIDE PLANNING GOALS AND STATUTORY FINDINGS**

**A. Applicable Goals**

Staff finds that the Statewide Planning Goals applicable to this land use decision are as follows:

- Goal 1: Citizen Involvement
- Goal 2: Land Use Planning
- Goal 3: Agricultural Lands
- Goal 5: Natural Resources, Scenic and Historic Areas, and Open Spaces
- Goal 6: Air, Water and Land Resources Quality
- Goal 7: Areas Subject to Natural Hazards
- Goal 9: Economic Development
- Goal 11: Public Facilities and Services
- Goal 12: Transportation
- Goal 13: Energy Conservation
- Goal 14: Urbanization

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<sup>2</sup> The employment buildable land inventory applies net acreage deductions to gross acreage because street and road improvements are anticipated for development of vacant properties as commercial and industrial properties require streets and roads, public facilities, setbacks, easements, etc. which deduct from actual buildable lot sizes. Meaning, net acreage results in less buildable lot size than gross acreage needed to meet identified demand.

Staff further determines that Goal 15 for the Willamette River Greenway and Goals 16-19 for Coastal Statewide Planning Goals are not applicable.

**B. Goal 1: Citizen Involvement - OAR 660-015-0000(1)**

The intent of Goal 1 is to ensure that citizens have meaningful opportunities to participate in land use planning decisions. In relation to Goal 1: Citizen Involvement, Staff finds that the City utilized an extensive public outreach effort via a technical advisory group established to work with the consultant prior to adoption of the BLI and EOA. In addition, the data upon which the UGB expansion is based was shared on the city's project website and with DLCD and Marion County prior to being reviewed at duly noticed public hearings before the Woodburn Planning Commission and the Woodburn City Council and eventual adoption via ORD 2619.

This legislative amendment (LA-24-01) was mailed to all property owners within the Urban Reserve Area (URA) as well as property owners within 250 feet of the URA boundary and interested parties in compliance with the WDO requirements. Notices of both tentatively scheduled Planning Commission and the City Council hearings were included with the WDO notice. All documents relied upon and the proposed amendments were available on the City's website. All of the public input received in the hearing processes was considered and retained under Exhibit B to the staff report.

Following public hearings before the Planning Commission and City Council, the Marion County Board of Commissioners will schedule and conduct a public hearing and provide an additional opportunity for public input on the proposed UGB expansion and Comprehensive Plan Map Amendment based on evidence contained in the record. On October 10, 2024, the Woodburn Planning Commission held their public hearing, reviewed testimony, and unanimously voted to recommend the Woodburn City Council adopt LA-24-01.

Staff concludes that Goal 1 is applicable to its decision and is met.

**C. Goal 2: Land Use Planning - OAR 660-015-0000(2)**

Goal 2 requires all incorporated cities to establish and maintain comprehensive land use plans and implementing ordinances. It also requires cities to coordinate with other affected government entities in legislative land use processes. The purpose of Goal 2 is to establish a land use planning process and policy framework as a basis for all decisions and actions related to use of land and to assure an "adequate factual basis" for such decisions and actions. Goal 2 also requires the City to communicate and coordinate with all affected cities, counties, special districts, state, and federal agencies.

In approving the UGB expansion and Comprehensive Plan Map Amendment, the City relies on the following land use studies, incorporated into the existing record, that have been prepared by the City or by firms contracted by the City:

- 2023-2043 Woodburn Buildable Land Inventory (Johnson Economics, January 2024)

- 2023-2043 Woodburn Economic Opportunities Analysis (Johnson Economics, January 2024), including Woodburn Population and Employment Projections 2023-2043
- City of Woodburn Public Facilities Plan (October 2005)
- City of Woodburn/Marion County Urban Growth Coordination Agreement (2015)
- Woodburn Comprehensive Plan and Proposed Plan and Zoning Map Changes (Woodburn Community Development Department, 2024)
- Woodburn Transportation System Plan (September 2019)
- Woodburn Parks Master Plan (February 2024)

Staff finds that the above referenced documents provide the foundation for the proposed UGB expansion and Comprehensive Plan Map Amendment. More specifically, the City prepared, and relies on, technical analyses for expanding the urban growth boundary area in accordance with applicable state laws. The City is implementing the Portland State University Population Research Center most current population forecasts and adopted employment growth forecasts, as adopted in the EOA.

Staff further finds, based on the existing record, that the specified studies that the City has undertaken and information received through the public hearing process has provided the City with an adequate factual basis for the UGB expansion into the Urban Reserve Area (URA).

Finally, Goal 2 requires that the City communicate and coordinate with all affected cities, counties, special districts, and state and federal agencies. A Notice of Public Hearing announcing the October 10, 2024 Planning Commission and October 28, 2024 City Council public hearings for LA-24-01, explaining the nature of the proposed amendments and soliciting comments, was mailed to the following potentially affected units of government and agencies on September 24, 2024:

- Marion County Planning Department
- Marion County Public Works
- Marion Soil and Water Conservation District
- Oregon Department of Land Conservation and Development (DLCD)
- Oregon Department of Energy (ODOE)
- Oregon Department of Environmental Quality (ODEQ)
- Oregon Department of State Lands (DSL)
- Oregon Department of Transportation (ODOT)
- Oregon Water Resources Department
- Pudding River Watershed Council
- Woodburn School District
- Woodburn Fire District

Specifically, in regard to coordination with Marion County, the City has followed the Coordination Agreement which provides guidance regarding the applicable UGB amendment process. As coordination with affected cities, Woodburn additionally provided notice and an opportunity to comment to the cities of Hubbard and Gervais.

Notice of the City public hearing was provided to the Department of Land Conservation and Development (DLCD) at least 35 days in advance of the Woodburn Planning Commission hearing date. Notices were sent to all of the other agencies noted above 20 days in advance of the joint hearing in compliance with the WDO. On October 10, 2024, the Woodburn Planning Commission held their public hearing, reviewed testimony, and unanimously voted to recommend the Woodburn City Council adopt LA-24-01.

Staff concludes that Goal 2 is applicable to its decision and is met.

**D. Goal 3: Agriculture Lands - OAR 660-015-0000(3)**

Woodburn is surrounded by lands designated for agricultural use. Compliance with Goal 3 in the context of a UGB amendment relies on satisfaction of Goal 14 requirements and ORS 197.298 for prioritization of land designated as urban reserve. The establishment of the 237-acre Urban Reserve Area (URA) was established in the 2015 UGCA with Marion County and DLCD provided their order approving the submittal in January 2016.

Staff concludes that Goal 3 is applicable to its decision and is met.

**E. Goal 4: Forest Lands - OAR 660-015-0000(4)**

Because no land within the URA is designated for forestry use, Goal 4 does not apply.

**F. Goal 5: Natural Resources, Scenic and Historic Areas, and Open Spaces - OAR 660-015-0000(5)**

Statewide Planning Goal 5 and OAR chapter 660, division 23, address protection of significant natural, scenic and historic resources and open space. Rules in OAR 660, division 23, specify which resource categories must be protected by comprehensive plans and which are subject to local discretion and circumstances; the rules provide guidance on how to complete inventories and protection programs, and when the rule requirements apply. OAR 660, division 23, requires cities to inventory significant riparian areas, wetlands and wildlife habitat.

Goal 5 requires cities to inventory specified resources and to adopt programs to “protect natural resources” and “conserve scenic, historic and open space resources.” Staff finds that some of the resources that the goal requires to be inventoried do not exist in Woodburn (specifically: federal wild and scenic rivers; state scenic waterways; approved Oregon recreation trails; natural areas listed on the register of natural resources; and federally designated wildlife areas). The Goal 5 resources that *may* apply to Woodburn are limited to the following:

- a. Riparian corridors, including water and riparian areas and fish habitat;
- b. Wetlands;
- c. Wildlife habitat;
- d. Groundwater resources;
- e. Mineral and aggregate resources;
- f. Energy sources;
- g. Cultural areas.

OAR 660-023-0030 through 660-023-0050 contain the requirements for all resources. For each resource category, the rule contains standard requirements and, in some instances, an alternative “safe harbor” standard for satisfying Goal 5. There are safe harbor alternatives for riparian corridors and wetlands (OAR 660-023-090 and 660-023-100).

Riparian Corridors and Wetlands (OAR 660-023-0090 and 660-023-0100)

Safe harbor provisions allow the City to determine significant riparian corridors by using a standard setback distance from all fish-bearing streams, based on ODFW maps indicating fish habitat. The Oregon Department of Fish and Wildlife has designated Mill Creek and Senecal Creek as fish bearing streams. For streams with an average annual stream flow less than 1,000 cubic feet, the riparian corridor standard setback distance of 50 feet upland from the top of each bank defined as the 2-year flood elevation. Where a riparian corridor includes all or part of a significant wetland, the riparian corridor extends upland 50 feet from the upland edge of the wetland. Woodburn has adopted plan policies and implementing regulations that satisfy the riparian corridor and wetland overlay district safe harbor provisions under our Riparian Corridor and Wetlands Overlay District (RCWOD)- see WDO 2.05.05 and 5.01.09. In addition, City staff reviewed and make note of the Oregon Department of State Lands (DSL) Statewide Wetlands Inventory (SWI) map and notes no identified wetlands within the adopted Urban Reserve Area (URA)- see Attachment 4<sup>3</sup>. Staff also conducted outreach to DSL with the URA SWI map for coordination and DSL notes that wetlands *may* be present and further investigation may be needed. However, the potential for hydric soils within the URA does not preclude the City’s ability to complete the UGB expansion for first priority lands, as requirements for wetland delineations can be conditioned at the time of proposed development and not at the time of a proposed UGB expansion. Staff notes that Woodburn Development Ordinance 2.05.05(H) for RCWOG requires the City to notify DSL “in writing of all applications to the City for development activities, including applications for plan and/or zone amendments, development or building permits, as well as any development proposals by the City that may affect any wetlands, creeks or waterways”. Staff further notes continued coordination with DSL but as no zone amendments or development activity is being proposed at this time, this criteria is met.

Wildlife Habitat for Special Status Species (OAR 660-023-0110(4))

OAR 660, division 23 contains safe harbor provisions for wildlife habitat areas that narrow potentially significant habitats to only the following:

1. Habitat used by a species designated as threatened, endangered or sensitive;
2. Nesting, roosting or watering habitat of osprey or great blue heron;
3. A habitat included in a ODFW adopted management plan;
4. A habitat mapped by ODFW for a species or habitat of concern.

Staff finds that there are no wildlife habitat resources in the UGB expansion area that the City is required to protect other than meeting the minimum protection requirements of the 50 feet riparian corridor and the wetlands protection requirements. The City has a tree preservation ordinance that aims to preserve as many trees as possible during development that received an update and public hearings in 2023.

<sup>3</sup> <https://maps.dsl.state.or.us/swi/> October 2024

Groundwater Resources (OAR 660-023-0140)

The City is required to inventory and protect significant groundwater resources. Significant groundwater resources are limited to: (1) critical groundwater areas and groundwater limited areas designated by Oregon Water Resources Commission and (2) wellhead protection areas if the City chooses to designate such areas.

The Oregon Department of Human Services and Oregon Department of Environmental Quality have developed a Source Water Protection Plan for the City. The plan inventories potential sources of contamination, establishes best management practices for industries within the influence zone of the City's wells, allows the City to develop ordinances to provide protection of the aquifer, and maps the flow patterns of the aquifers in compliance with the OAR. Additionally, the City has adopted and compliant stormwater discharge permits and a stormwater protection ordinance to eliminate illicit discharge (ORD 2556), in consultation with the Oregon Dept. of Environmental Quality.

Mineral and Aggregate Resources (OAR 660-023-0180)

OAR 660-023-0180 addresses identification of significant aggregate resources, approval of mining activity, and protection of the resource from conflicting uses. The rule sets criteria for significance and prescribes a process for evaluating potential impacts from the proposed mining activity. The City takes official notice of the Marion County Comprehensive Plan and notes that its inventory does not contain any mineral or aggregate resource sites in the UGB expansion area. Consequently, Staff finds that OAR 660-023-0180 is inapplicable to the UGB expansion.

Energy Sources (OAR 660-023-0190)

No natural gas, surface water, geothermal, solar, or wind area resource sites have been identified in the Woodburn area and Staff finds that OAR 660-023-0190 is inapplicable to the UGB expansion and URA.

Inventories Required by Goal 5 Performance

Woodburn has previously inventoried all natural resources, scenic, historic and open spaces, amending the Comprehensive Plan, Park Master Plan and Woodburn Development Ordinance accordingly. Adopted goals, policies, and land use standards meet state standards and the City has been found in compliance with Goal 5.

Staff concludes that Goal 5 is applicable to its decision and is met.

**G. Goal 6: Air, Water, and Land Resources Quality - OAR 660-015-0000(6)**

Goal 6 requires that “air, water and land resource quality” not be “degraded” because of planned urban development. DEQ is responsible for administration of the Clear Air Act and the Clean Water Act at the state level. Cities meet Goal 6 through demonstration of compliance with Environmental Quality Commission (EQC) air, water, and land quality administrative rules. Water quality standards typically are met through EQC approval of plans for sanitary sewer systems. DEQ also regulates point and non-point source emissions related to water and air quality.

Along with other affected state agencies, DEQ was notified of the proposed plan amendment package. Woodburn is in compliance with all applicable EQC requirements.

Staff concludes that Goal 6 is applicable to its decision and is met.

**H. Goal 7: Areas Subject to Natural Disasters and Hazards**

Goal 7 requires cities to adopt measures to protect people and property from natural hazards, such as floods, erosion, landslides, earthquakes, and weak foundation soils. Because Woodburn is relatively flat, it does not have significant land slide hazards or erosion and deposition hazards. Woodburn has land within the 100-year floodplains of Mill Creek, Senecal Creek and their tributaries. Woodburn has adopted National Floodplain regulations through the Woodburn Development Ordinance and the City is in compliance with Goal 7.

Staff concludes that Goal 7 is applicable to its decision and is met.

**I. Goal 8: Recreational Needs - OAR 660-015-0000(8)**

The City of Woodburn update its Parks and Recreation Plan in 2024 in compliance with Goal 8. While the proposed UGB expansion into the Urban Reserve Area is limited to a Southwest Industrial Reserve (SWIR) employment zone upon annexation and does not address or meet recreation land needs, the expansion does not propose removal or rezone of any public recreation land. Indeed, while employment land typically creates little impact upon park resources as compared to housing land, the City does have an adopted Parks SDC for employment lands which can have a net positive for future park and recreation land and connectivity via the development of the street network and connections via sidewalks and bike lane improvements.

Staff concludes that Goal 8 is applicable to its decision and is met.

**J. Goal 9: Economic Development- OAR 660-015-0000(9)**

The Goal 9 rule provides that “[t]he total acreage of land designated in each site category shall at least equal the projected land needs for each category during the 20-year planning period.” OAR 660-009-0025 (2024). This work was completed by the recently adopted EOA. To accomplish Goal 9, compatible employment uses with similar site characteristics are combined into “broad site categories.” In addition, OAR 660-009-0025(1) requires jurisdictions to limit incompatible uses on and adjacent to sites as necessary to protect them for their intended employment function.

This work was completed in the 2015 establishment of an Urban Reserve Area (URA) to be designated as Southwest Industrial Reserve (SWIR) upon annexation. When the 2015 UGB amendment to the Woodburn Comprehensive Plan was adopted, the amendment recognized that the City intended the expansion areas known as the SWIR to be reserved for large lot industrial, creating the specific SWIR zone that limited the size and number of future lots and further addressed development impacts upon adjacent agricultural activities. More specifically, the Woodburn Development Ordinance (WDO) for the Southwest Industrial Reserve (SWIR) Table 2.04.F applies large minimum parcel sizes to ensure needed large industrial sites are preserved,

cannot be converted or rezoned, to further protect the SWIR for intended employment functions. Further, the City's UGCA, Section V requires the City and County to "apply a rural resource zone that establishes a minimum parcel size of at least 80 acres", requires Marion County and City to ensure the URA lands comply with the Woodburn Comprehensive Plan until annexed to the City, and further stipulates that Marion County "shall forward land use activities being considered within the Urban Growth Area by the County to the City for comments and recommendations" (UGCA, I.2). Staff also notes that Woodburn Development Ordinance 2.05.02 for the Interchange Management Area Overlay District (IMA), of which the Urban Reserve Area (URA) is wholly within, protects these lands against rezoning or comprehensive plan map amendment of URA lands to any other uses outside of Southwest Industrial Reserve (SWIR) under Section 2.116.07.B. of the IMA and 2.05.02 of the WDO.

Upon UGB expansion and prior to annexation of the subject properties, Marion County will designate an urban zone (Urban Transition-UT) until the lands are annexed into the City.

Staff concludes that Goal 9 is applicable to its decision and can be met by implementation of the urban growth boundary expansion.

**K. Goal 10: Housing - OAR 660-015-0000(10)**

The overall intent of Goal 10 is to provide for the housing needs of citizens of the state. The City of Woodburn last updated its Housing Needs Assessment (HNA) in 2019. While some commercially zoned lands in Woodburn may provide housing opportunities, the intent of LA-24-01 is to solely address some of the need (deficit) of industrial employment land identified in the adopted EOA.

The adopted Woodburn HNA does not currently show a housing need (deficit) and Staff concludes that Goal 10 does not apply.

**L. Goal 11: Public Facilities and Services - OAR 660-015-0000(11)**

Goal 11 requires Woodburn to demonstrate that it can provide adequate public facilities and services to serve buildable land within the UGB. Woodburn and Marion County have agreed in their Coordination Agreement that Woodburn shall be responsible for public facilities planning within the Woodburn UGB. Goal 11 requires Woodburn to adopt "public facilities plans" that address sanitary sewer, storm drainage, water and transportation facilities necessary to support planned growth. The City of Woodburn has adopted and complaint Public Facilities Plans and Transportation Systems Plan, coordinated with Marion County, ODOT, and the Woodburn Fire District and School District to ensure adequate public facilities are available to meet the needs of the community. While the City currently has storm water, wastewater, and transportation system plan updates underway that take into consideration the Urban Reserve Area for future provision of public services, the City of Woodburn also requires a master development plan for streets, sanitary sewer, storm water and water facilities prior to annexation of any Southwest Industrial Reserve (SWIR) lands under WDO 2.05.06.D.

The net to gross acreage assumptions in the adopted EOA include a 20% net to gross for general commercial and a 15% net to gross for industrial uses generally. For example, 10 net acres of commercial land for development would require 2 acres for infrastructure for a total of 12 gross acres. The adopted EOA includes these allowances for needed infrastructure in the estimated gross acreage need, based upon zoning.

In addition, the City of Woodburn requires a master development plan for streets, sanitary sewer, storm water and water facilities prior to annexation of any Southwest Industrial Reserve (SWIR) lands under WDO 2.02.06.D.

Staff finds the City's current public infrastructure plans show an ability to serve the URA and concludes that Goal 11 is applicable to its decision and can be met.

**M. Goal 12: Transportation - OAR 660-015-0000(12)**

The Transportation Planning Rule (TPR) and the Oregon Highway Plan (OHP) implement Goal 12. The TPR requires local governments to prepare a transportation systems plan (TSP) that meets the requirements of OAR 660-012-020 through 055.

In compliance with OAR 660-012-0350(3), or the Transportation Planning Rule (TPR), where an urban growth boundary is intended to follow an existing or planned street, road or highway right-of-way, the boundary shall be placed on the rural side of the right-of-way or planned right-of-way, so that the right or way is inside the urban growth boundary. In order to comply with this rule, the proposed URA expansion area includes the 60 feet of ROW west of the URA expansion area to accommodate the existing Butteville Road, and 60 feet of future ROW east of the URA expansion area to accommodate the southern future extension of Parr Road.

Woodburn's adopted 2019 Transportation System Plan (TSP) establishes a transportation system that is adequate to serve lands within the UGB and is consistent with the Marion County TSP, and coordinated with ODOT and DLCDC. In 2024, the City initiated completion of a TSP "sub-area" plan update for portions of the Southwest Industrial Reserve (SWIR), including the previously adopted Urban Reserve Area (URA), to assess the needs of the road system; public transportation; bicycle and pedestrian system; air, rail, water and pipeline transportation, in coordination with Marion County and ODOT. In addition, the City of Woodburn requires a master development plan for streets, sanitary sewer, storm water and water facilities prior to annexation of any Southwest Industrial Reserve (SWIR) lands under WDO 2.05.06.D.

Woodburn Development Ordinance 2.05.02 for the Interchange Management Area Overlay District (IMA), of which the Urban Reserve Area (URA) is wholly within, ensures that certain industrial land envisioned by the City's adopted targeted industries and Comprehensive Plan are preserved. The Interchange Management Area (IMA) agreement, in coordination with ODOT, already included the adopted Urban Reserve Area in factoring for future employment and IMA trip counts.

The City's Transportation System Plan complies with the requirements of Goal 12 regarding transportation and Staff concludes that Goal 12 is applicable to its decision and is met.

**N. Goal 13: Energy Conservation - OAR 660-015-0000(13)**

Goal 13 provides as follows: To conserve energy. Land and uses developed on the land shall be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles. The URA is adjacent to the existing UGB, thus maintaining a contiguous, compact, energy-efficient urban growth form and reducing vehicle miles traveled by placing employment opportunities near available housing. The UGB expansion area will rely upon municipal services, thereby providing for a logical and economical extension of public facilities.

Staff concludes that Goal 13 is met.

**O. Goal 14: Urbanization - OAR 660-015-0000(13)**

The net to gross acreage assumptions in the adopted EOA include a 20% net to gross for general commercial and a 15% net to gross for industrial uses generally. For example, 10 net acres of commercial land for development would require 2 acres for infrastructure for a total of 12 gross acres. The adopted EOA includes these allowances for needed infrastructure in the estimated gross acreage need, based upon zoning.

Table 1. Employment Land need (Figure 7.04 from Economic Opportunities Analysis, 2024)

FIGURE 7.04: RECONCILIATION OF LAND SUPPLY AND 20-YEAR DEMAND (WOODBURN)

EMPLOYMENT ZONING DESIGNATION	20 YR. DEMAND (Gross Acres)	BUILDABLE LAND (Acres)	Plus Known Future Emp. Sites (Acres) <sup>1</sup>	TOTAL BLI + Known Sites (Acres)	SURPLUS OR (DEFICIT) (Gross Acres)
<b>COMMERCIAL (RETAIL AND OFFICE)</b>	<b>171.4</b>	<b>64.8</b>	<b>0.0</b>	<b>64.8</b>	<b>(106.6)</b>
Commercial General (CG)		38.2			
Commercial Office (CO)		4.4			
Downtown Dev. & Conservation (DDC)		0.8			
Mixed Use Village (MUV)		0.5			
UGB Commercial		21.0			
<b>INDUSTRIAL (INDUSTRIAL AND OFFICE)</b>	<b>460.7</b>	<b>77.3</b>	<b>110.8</b>	<b>188.1</b>	<b>(272.6)</b>
Light Industrial (IL)		36.6	110.8	147.4	
Industrial Park (IP)		20.4		0	
UGB Industrial		20.2		0	
<b>TOTAL:</b>	<b>632.1</b>	<b>142.1</b>	<b>110.8</b>	<b>252.9</b>	<b>(379.2)</b>

<sup>1</sup> Two known sites are currently permitted or under construction for new industrial space that will house future employment. Because of the development status of these sites, they were not counted among the inventory of remaining buildable land. However, these sites do not yet house their future employment and therefore are counted here as providing estimated capacity to hold a share of projected jobs over the next 20 years. These sites are the Amazon distribution facility (81.3 acres), near completion at the time of this analysis. The other site is a planned and permitted multi-tenant industrial development (29.6 acres) also located in the Southwest Industrial Reserve.

Source: Johnson Economics, MIG

Prior to pursuing a UGB expansion, a City must demonstrate that the land needs cannot reasonably be accommodated on land already within the existing UGB by evaluating measures for efficient development of existing land. The supply and type of vacant and partially vacant land within Woodburn’s existing UGB is limited however. As demonstrated in the adopted Economic Opportunities Analysis, the largest remaining contiguous development sites in Woodburn are under 20 acres in size, with most being five (5) acres or less (there are no commercial lots over 10 acres and no industrial lots over 20 acres). The EOA also identifies roughly one third of remaining

buildable land in the current UGB are classified as partially vacant parcels “where the decision to add further development is subject to the desires of current property owners and/or tenants... the land for large-lot industrial or large commercial employers is very limited” which limits the City’s ability to meet identified, adopted target services and industries such as those specifically reserved to be accommodated for in the Urban Reserve Area and future Southwest Industrial Reserve (SWIR) zone. Existing parcelization and lot sizes make much of this land unsuitable to meet the identified employment need as demonstrated under OAR 660-024-0067(5) subsections (a) through (g).

In addition, as part of the BLI and EOA public engagement work and eventual adoption, the City and consultant assessed Goal 14 efficiency measures and strategies and the City amended its Goal 14 Comprehensive Plan policies in 2023 (Ordinance 2619) to include:

*Goal E-1.1 The City should encourage a healthy, diversified, and sustainable job market within the City through fostering growth and recruitment of employers of a range of sizes, industries, and pay scales, and enough available industrial land for industrial growth to accommodate the residential growth expected in the City.*

*Goal E-2.1 Land within the SWIR designation shall be reserved exclusively for industrial uses identified in the EOA and shall not be converted to another commercial or residential land use map designation.*

*Goal F-1.8 Ensure that existing commercial sites are used efficiently. Consider the potential for reuse, re-tenanting, or redevelopment of existing commercial sites and modifications to zoning regulations that urbanize development to attract new investment.*

*Goal F-2.4 The City shall provide for a range of incentive options to attract targeted industries.*

City staff finds that in order to “encourage a healthy, diversified, and sustainable job market within the City through fostering growth and recruitment of employers of a range of sizes, industries, and pay scales, and enough available industrial land for industrial growth”, the proposed LA-24-01 complies with the City’s Comprehensive Plan Goal Policies and specifically, Goal 9 and Goal 14.

Further, City staff notes that of the 24 efficiency measures identified with the consultant through the EOA adoption process, the City of Woodburn currently uses or partners with local agencies to implement or support at least 23, if not all, efficiency measures / strategies for increasing the development capacity/efficiency of land within the existing UGB (see Attachment 5).

Pursuant to OAR 660-024-0065 and Statewide Planning Goal 14, the City Council has determined the Urban Reserve Area (URA) is identified as a higher priority than any other potential UGB expansion areas, and are therefore discarded from analysis at this time. As shown in Attachment 2 (Marion County zoning and comprehensive plan maps), there are a few acres of rural exception land or publicly zoned lands adjacent to the northeast corner of the city along Highway 99. However, as adopted in the City’s 2015 Comprehensive Plan map (see Attachment

1), the rural exception lands are subject to an adopted 20-year UGB expansion limitation (2015-2035). The Publicly zoned Marion County land, shown in the NE of the UGB along Highway 99E under Attachment A, is an existing youth juvenile facility currently in operation and not available to help meet the City's adopted employment land needs. Additionally, Urban Reserve Area land is first identified as the highest priority for UGB expansion under OAR 660-024-0065 (i.e. all other lands are considered lower priority and thus discarded from future analysis until such time that the Urban Reserve Area land is first brought in).

In accordance with OAR 660-024-0050(4), Staff finds that the BLI inventory "demonstrates that the development capacity of land inside the UGB is inadequate to accommodate the estimated 20-year needs determined under OAR 660-024-0040 (Land Need), and the local government must amend the plan to satisfy the need deficiency, either by increasing the development capacity of land already inside the city or by expanding the UGB, or both". As the adopted BLI indicates, the City lacks *any* remaining industrial lots >20 acres and, as included in the adopted EOA, the City finds "the largest remaining contiguous development sites in Woodburn are under 20 acres in size, with most being five acres or less and roughly one-third of the remaining buildable land is found in partially vacant parcels where the decision to add further development is subject to the desires of current property owners and/or tenants. The land for large-lot industrial or large commercial employers is very limited" or non-existent. As such, to meet the identified employment need as demonstrated under OAR 660-024-0067(5) subsections (a) through (g) and as identified in the Woodburn Comprehensive Plan, BLI, and EOA, the City cannot reasonably accommodate this employment land need inside the UGB.

The City Council directed the City to initiate completion of the priority expansion in the Urban Reserve Area (URA) and will direct staff to initiate work to address the remaining deficit of commercial and industrial land need following OAR 660-024-0065 and potential additional expansion study area(s), as is permitted under OAR 660-024-0065(9).

Staff concludes that Goal 14 and the City's Comprehensive Plan Goals for Goal 14 are met.

**P. Overall Conclusion – Statewide Planning Goals**

Based on the foregoing, Staff concludes that Woodburn's UGB amendment (File LA-24-01) conforms to all applicable Statewide Planning Goals.

**VI. WOODBURN DEVELOPMENT ORDINANCE**

FINDINGS: Amendments to the Comprehensive Plan map enacted by the City Council (see Resolution 2230) are considered Type V Legislative Decisions under Woodburn Development Ordinance (WDO) 4.01.02.E. In compliance with WDO 4.01.014.C. and 4.01.014.D, notice of public hearings for LA-24-01 was published in a newspaper of general circulation at least seven (7) days prior to the Planning Commission and City Council hearings and notice of the scheduled public hearings before the Planning Commission and City Council was sent to affected government entities and affected recognized neighborhood associations as required by the WDO.

Woodburn Development Ordinance 2.05.02 for the Interchange Management Area Overlay District (IMA), of which the Urban Reserve Area (URA) is wholly within, ensures that certain industrial land envisioned by the City's adopted targeted industries and Comprehensive Plan are preserved. In coordination with ODOT, the Urban Reserve Area is already included and accounted for in the IMA trip counts.

Further, the proposed comprehensive plan map amendment from Marion County designation as Exclusive Farm Use (EFU) to City of Woodburn comprehensive plan designation as Southwest Industrial Reserve (SWIR) is found to comply with WDO 2.05.02.F. as the URA is already included and accounted for in the IMA and WDO 2.05.06 which requires master planning prior to annexation.

Staff concludes that the applicable provisions of the Woodburn Development Ordinance are met.

## **VII. Woodburn Comprehensive Plan**

One of four employment areas in Woodburn, the Southwest Industrial Reserve (SWIR) and Interchange Management Area (IMA) overlay is identified in the Woodburn Comprehensive Plan as "an excellent site for target industries identified in previous economic planning efforts...*(with)* access to, and visibility from, Interstate 5... the SWIR was established along Interstate 5 and provides the primary location for some targeted industries in Woodburn."

As identified in the Woodburn Comprehensive Plan, as amended when adopting the 2024 BLI and EOA, Goal E-1 states, "Woodburn shall provide and maintain an adequate supply of suitable industrial sites to attract targeted firms consistent with Statewide Planning Goal 9 (Economy of the State), the recommendations of the 2023 Woodburn Economic Opportunities Analysis, and the Woodburn Economic Development Strategy". Staff finds that in order to "allow residents of the City of Woodburn to work in Woodburn and not have to seek employment in other areas... the City should encourage a healthy, diversified, and sustainable job market within the City through fostering growth and recruitment of employers of a range of sizes, industries, and pay scales, and enough available industrial land for industrial growth to accommodate the residential growth expected in the City (Policy E-1.1, Woodburn Comprehensive Plan).

The Urban Reserve Area (URA) was adopted and acknowledged as part of the 2015 Woodburn Comprehensive Plan update via Ordinance No. 2530 in December 2015 and is included as the first priority land for inclusion into the UGB once a demonstrated need for employment opportunities is adopted in compliance with Goal 9. Upon comp plan map amendment to bring in the URA, and in compliance with Woodburn Growth Management Policy G-1.24 and Figure G-1.21, "Consistent with other provisions contained in the Woodburn Comprehensive Plan, all land within the Southwest Industrial Reserve shall be reserved exclusively for industrial uses identified in the EOA and shall not be converted to another commercial or residential plan designation. Specific lot size standards shall be established limiting the size and number of future lots for these properties". Upon future annexation, the URA shall be zoned Southwest Industrial Reserve (SWIR).

Staff concludes that the applicable Woodburn Comprehensive Plan Goals and Policies are met.

### VIII. Marion County Code for Urbanization compliance

The Woodburn Comprehensive Plan is considered a component of Marion County's Comprehensive Plan, and Oregon Revised Statutes 197.025(1) gives the county responsibility to coordinate all planning activities with the county and consider whether to concur in a city's amendment. In addition, Goal 14—Urbanization, states:

*Establishment and change of urban growth boundaries shall be a cooperative process among cities, counties and, where applicable, regional governments. An urban growth boundary and amendments to the boundary shall be adopted by all cities within the boundary and by the county or counties within which the boundary is located, consistent with intergovernmental agreements [...].*

FINDINGS: The Marion County Board of Commissioners adopted the last Woodburn Urban Growth Boundary in December 2015 (Ordinance 2530). Marion County and the City of Woodburn also entered into an Urban Growth Coordination Agreement (UGCA) on December 23, 2015. The UGCA establishes procedures for coordinating land use matters of mutual concern, including County concurrence on a city's urban growth boundary amendment, including plan map amendments affecting properties in the urban growth area.

The City finds, and Marion County concurs, that the Urbanization and Agricultural Lands Goal apply to this legislative amendment. While the established Urban Reserve Area (URA), coordinated between the City and Marion County, maintains a Exclusive Farm Use (EFU) zone until such time as UGB expansion, the Urban Growth Coordination Agreement (UGCA) between the City and Marion County gave "careful consideration shall be given the adverse impact on the integrity of the farmland preservation program when considering the approval of non-farm uses in the midst of areas designated Primary Agriculture" and the City amended and adopted the Southwest Industrial Reserve (SWIR) zone and updated the UGCA to specifically address and meet these goals.

The establishment of the URA was completed in 2015, and the City and County found that Marion County's Agricultural Land Policies were addressed/met at that time and Goal 3 to discourage development of non-farm uses on high-value farmland to ensure uses do not cause adverse impacts on farm uses continues to be met through the UGCA and the careful consideration of the location and the establishment of the URA. Following public hearings before the Planning Commission and City Council, the City will forward the proposed UGB and Plan Map amendment to Marion County, including any comments received, prior to a hearing before the Marion County Board of Commissioners. The City will continue to work cooperatively with Marion County on the adoption of the UGB and Comprehensive Plan Map amendments.

The City further finds, and Marion County concurs, the following County comprehensive plan goals apply and are met:

*Urban Land Use Goals*

Urban Growth Policies

2. The provision of urban services and facilities should be in an orderly economic basis according to a phased growth plan.

3. Development of the urban area should proceed from its center outward.

4. Development should occur in areas of existing services before extending new services.

9. Sufficient developable land shall be made available to provide choices in the marketplace.

FINDINGS: The City finds and Marion County concurs that in the 2015 establishment of an Urban Reserve Area (URA), to be designated as SWIR upon annexation, the amendment recognized that the City intended the expansion areas known as the SWIR to be reserved for large lot industrial, creating the specific SWIR zone that limited the size and number of future lots and further addressed development impacts upon adjacent agricultural activities. The Woodburn EOA identifies a deficit of 272.6 acres of industrial employment land and, upon expansion of the UGB to incorporate the URA lands, said land will be zoned SWIR in order to partially address the adopted and identified need for large lot industrial in the Woodburn EOA. The previously identified URA site characteristics include that the site is adjacent to the city limits, and has direct access to urban services and facilities to provide for an orderly fashion. In conclusion, the City finds the proposed UGB amendment is consistent with Marion County's policies related to Urban Land Use Goals.

*12. An updated intergovernmental agreement between the County and a city that is consistent with the Urban Growth Policies may be required when a city goes through periodic review or updates its comprehensive plan where County concurrence is necessary.*

FINDINGS: The City finds, and Marion County concurs, that the existing 2015 Urban Growth Coordination Agreement established the 237- acre Urban Reserve Area. This legislative amendment action is implementing the policies and goals agreed to in the 2015 UGCA and therefore the UGCA is not in need of amendment or updating. At such time that the City initiates the process of a potential UGB amendment to address remaining need identified in the EOA, the City and County may wish to update the UGCA.

City staff concludes that the applicable Marion County Comprehensive Plan Goals and Policies are met.

**IX. ATTACHMENTS**

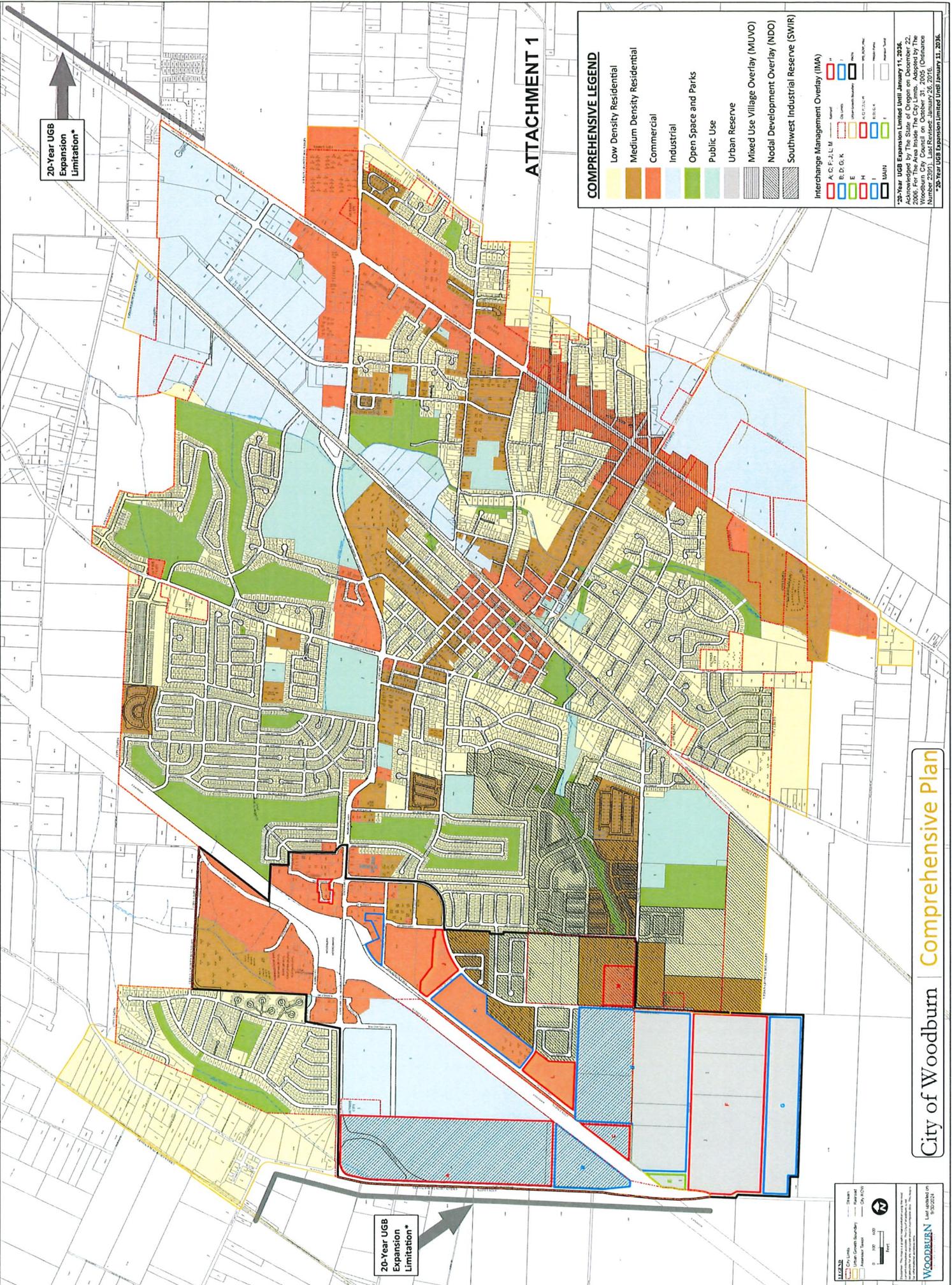
Attachment 1: Urban Reserve Area (URA) Map

Attachment 2: Marion County Zoning and Comprehensive Plan Map, including URA and one mile radius in compliance with OAR 660-024-0065(1)(a) and (b)

Attachment 3: Marion County Soils Map, including URA and one mile radius in compliance with OAR 660-024-0065(1)(a) and (b)

Attachment 4: Department of State Lands (DSL) Statewide Wetlands Inventory map, showing URA

Attachment 5: Goal 14 Efficiency Measures



20-Year UGB Expansion Limitation\*

# ATTACHMENT 1

**COMPREHENSIVE LEGEND**

- Low Density Residential
- Medium Density Residential
- Commercial
- Industrial
- Open Space and Parks
- Public Use
- Urban Reserve
- Mixed Use Village Overlay (MUVO)
- Nodal Development Overlay (NDO)
- Southwest Industrial Reserve (SWIR)

**Interchange Management Overlay (IMA)**

A, C, F, J, L, M	Interchange	IMA
B, D, G, K	On-Land	IMA
E	Interchange Boundary	IMA
H	On-Land Boundary	IMA
I	IMA	IMA
U, A, N	IMA	IMA

\*20-Year UGB Expansion Limited Until January 11, 2026.  
Approved by the City Council on October 31, 2005. Adopted by the Woodburn City Council on October 31, 2005 (Ordinance Number 2507). Last Revised: January 28, 2016.  
© 2020 Woodburn City. All Rights Reserved.  
\*20-Year UGB Expansion Limited Until January 11, 2026.

20-Year UGB Expansion Limitation\*

**WOODBURN** Last updated on 1/28/2020

City of Woodburn  
City Council  
Woodburn, OR 97141

Scale: 1" = 1000'

North Arrow



# ATTACHMENT 2

## Legend

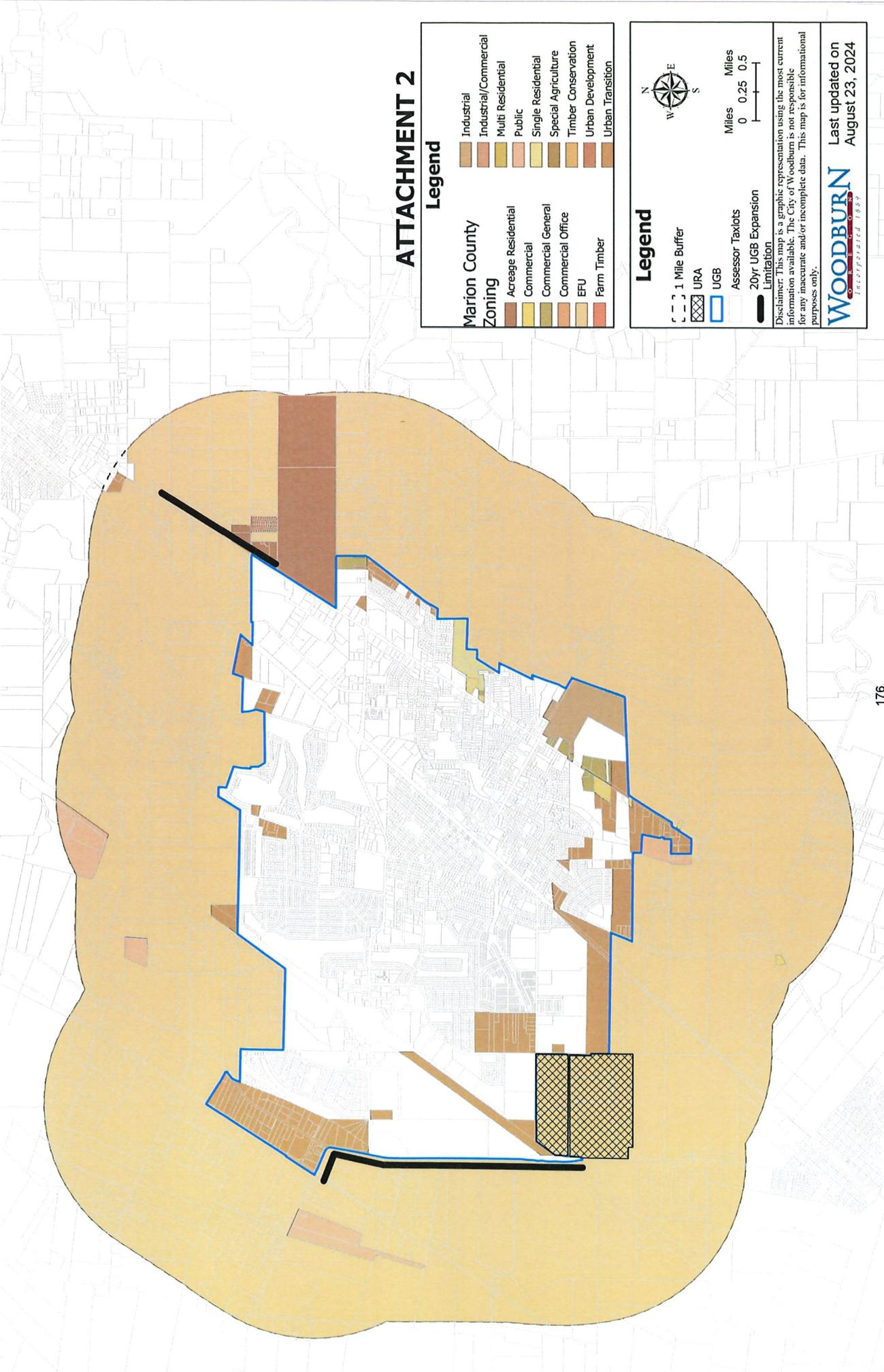
Marion County Zoning	
	Acreage Residential
	Commercial
	Commercial General
	Commercial Office
	EFU
	Farm Timber
	Industrial
	Industrial/Commercial
	Multi Residential
	Public
	Single Residential
	Special Agriculture
	Timber Conservation
	Urban Development
	Urban Transition

## Legend

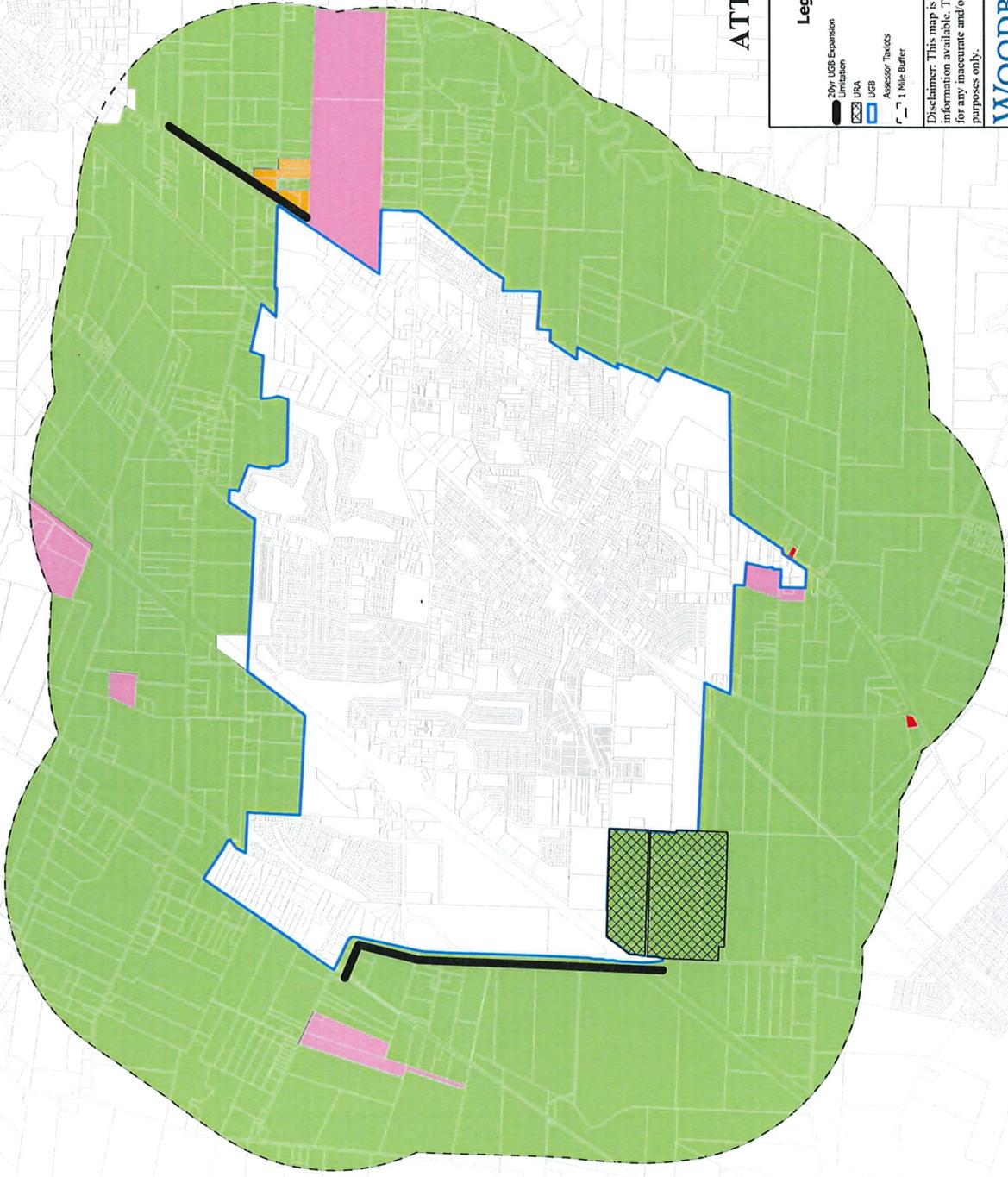
	1 Mile Buffer
	URA
	UGB
	Assessor Taxlots
	20yr UGB Expansion Limitation
	North Arrow
	Miles: 0, 0.25, 0.5

Disclaimer: This map is a graphic representation using the most current information available. The City of Woodburn is not responsible for any inaccurate and/or incomplete data. This map is for informational purposes only.

**WOODBURN**  
Incorporated 1889  
 Last updated on August 23, 2024



# ATTACHMENT 2



**Legend**

- 20yr UGB Expansion Limitation
- URA
- Assessor Tracts
- 1 Mile Buffer

**Marion County Comp Plan**

- Commercial
- Primary Agriculture
- Public
- Rural Residential

**Miles**

0 0.25 0.5

Disclaimers: This map is a graphic representation using the most current information available. The City of Woodburn is not responsible for any inaccurate and/or incomplete data. This map is for informational purposes only.

**WOODBURN**  
Incorporated 1889

Last updated on  
September 04, 2024

# ATTACHMENT 3

**Legend**

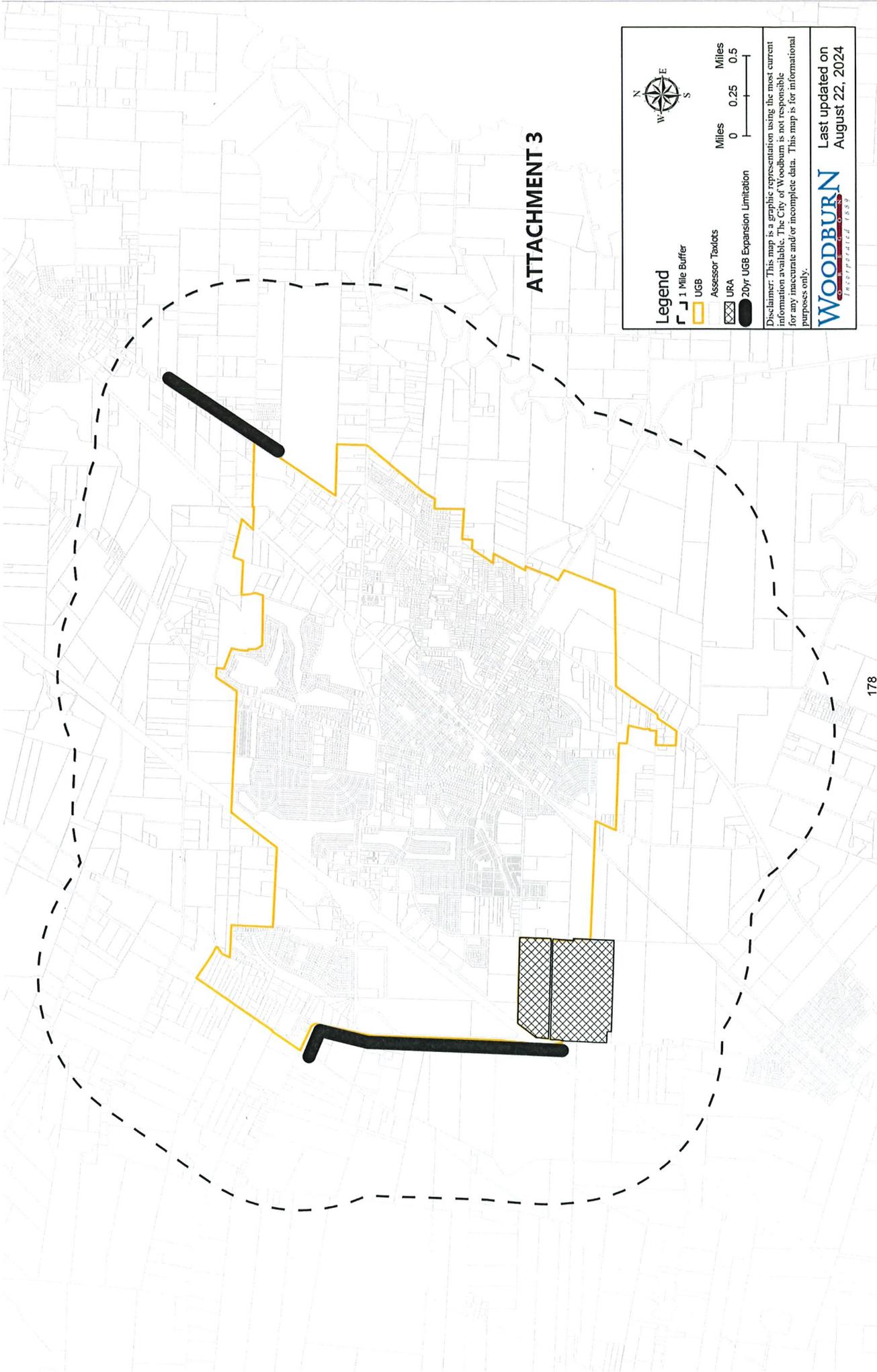
- 1 Mile Buffer
- UGB
- Assessor Taxlots
- URA
- 20yr UGB Expansion Limitation

Miles 0 0.25 0.5

**WOODBURN**  
INCORPORATED 1837

Last updated on August 22, 2024

Disclaimer: This map is a graphic representation using the most current information available. The City of Woodburn is not responsible for any inaccurate and/or incomplete data. This map is for informational purposes only.



# ATTACHMENT 3



- Legend**
- Marion County Soils
- Amity silt loam
  - Bashaw clay
  - Chehalis silty clay loam
  - Cloquato silt loam
  - Concord silt loam
  - Dayton silt loam
  - Labish silty clay loam
  - McBee silty clay loam
  - Newberg fine sandy loam
  - Terrace escarpments
  - Wapato silty clay loam
  - Water
  - Willamette silt loam, 0%-3% slopes
  - Woodburn silt loam, 0%-3% slopes
  - Woodburn silt loam, 12%-20% slopes
  - Woodburn silt loam, 3%-12% slopes

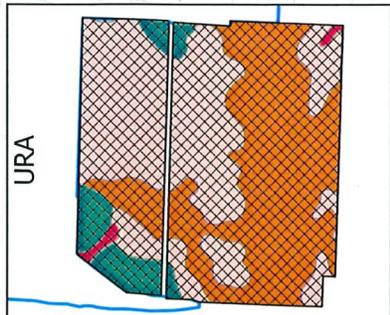
**Legend**

- 1 Mile Buffer
- USB
- URA
- Assessor Taxlots
- 20yr USB Expansion
- Limitation

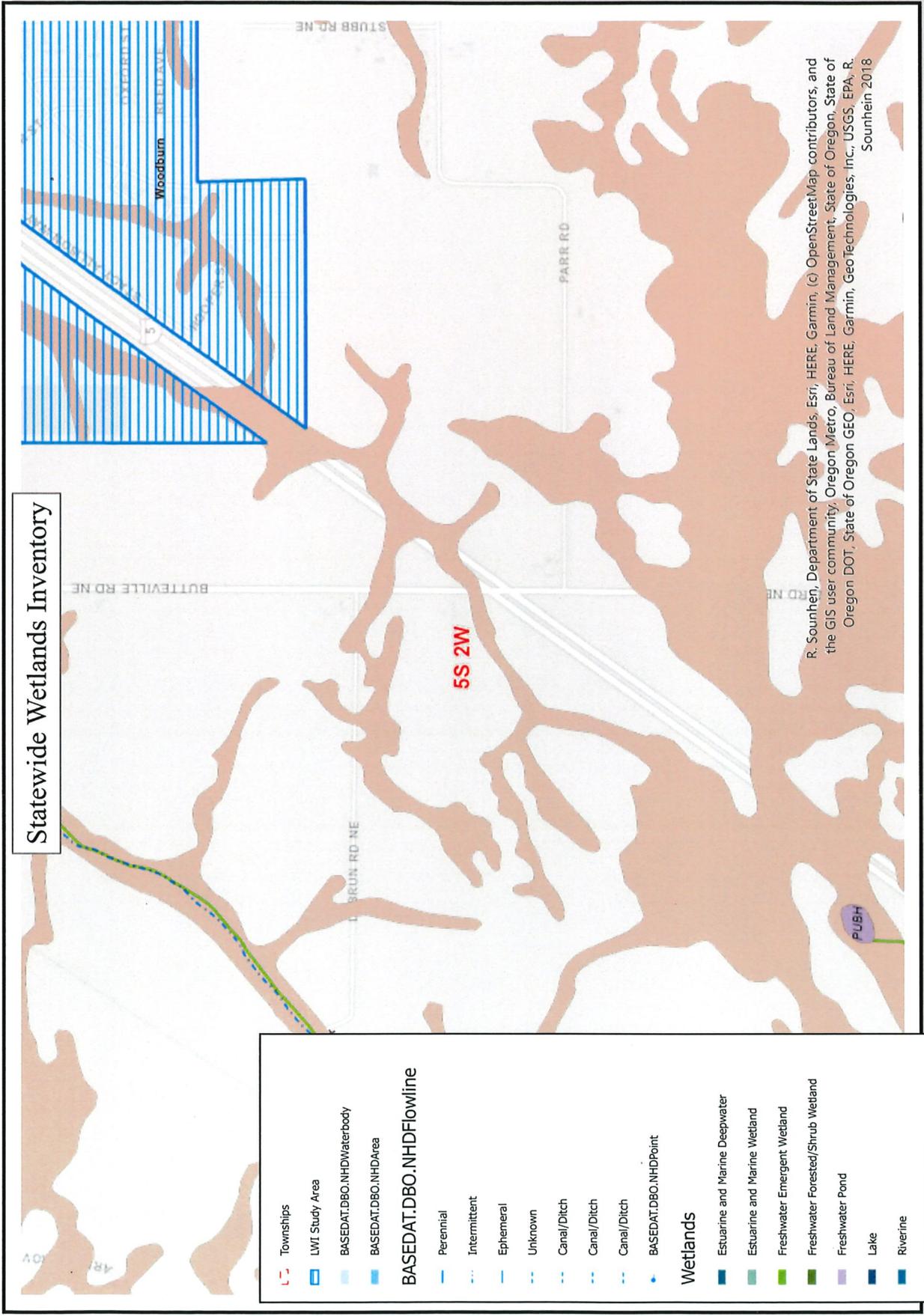
Miles 0 0.25 0.5

North arrow

Disclaimer: This map is for informational purposes only. The City of Woodburn is not responsible for any inaccuracies or incomplete data. This map is for informational purposes only.



- Legend**
- URA
  - USB
  - URA Soils
  - Soil Type, URA Percentage
- Amity silt loam, 47%
  - Concord silt loam, 44%
  - Dayton silt loam, 1%
  - Woodburn silt loam, 0%-3% slopes, 8%



Statewide Wetlands Inventory

	Townships
	LWI Study Area
	BASEDAT.DBO.NHDWaterbody
	BASEDAT.DBO.NHDArea
<b>BASEDAT.DBO.NHDFlowline</b>	
	Perennial
	Intermittent
	Ephemeral
	Unknown
	Canal/Ditch
<b>Wetlands</b>	
	Estuarine and Marine Deepwater
	Estuarine and Marine Wetland
	Freshwater Emergent Wetland
	Freshwater Forested/Shrub Wetland
	Freshwater Pond
	Lake
	Riverine
	SWI Agate-Wirlo Soils
	SWI Predominantly Hydric Soil Map Units

R. Sounhen, Department of State Lands, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, Oregon Metro, Bureau of Land Management, State of Oregon, State of Oregon DOT, State of Oregon GEO, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA, R. Sounhein 2018

Date: 10/2/2024



State of Oregon  
Department of State Lands  
775 Summer Street, NE, Ste 100  
Salem, OR 97301-1279



The Statewide Wetlands Inventory (SWI) represents the best data available at the time this map was published and is updated as new data becomes available. In all cases, actual field conditions determine the presence, absence and nature of wetlands and waters (such as creeks and ponds). An onsite investigation by a Wetlands Professional can verify actual field conditions.



## EXCERPT FROM November 1, 2023 MEMORANDUM from Johnson Economics, LLC

### Economic Opportunities Analysis Implementation Recommendations

This section discusses a range of strategies and/or action items that the city may consider that are consistent with the findings of the 2023 Economic Opportunities Analysis (EOA). Adoption of the EOA report does not imply commitment to any of these steps although some of these strategies may be incorporated in Comprehensive Plan policies in some form as part of the EOA adoption process.

PROVIDE AN ADEQUATE SUPPLY OF EMPLOYMENT LAND & SITES		
CORE INITIATIVE	Notes	City Findings
<b>MEET INDUSTRIAL AND COMMERCIAL LAND NEEDS</b>  1 Establish and maintain a competitive short-term and long-term supply of employment land, in readily developable sites.	The City should maintain an inventory of available employment land to meet the 20-year economic development needs of the community, including identifying sites of varying sizes that can be readily served with new infrastructure in the short- term. <u>Options:</u> UGB swap or expansion to increase the land supply; rezoning of other land categories to employment categories; public effort to prioritize and serve key employment areas.	✓ City Council Resolution 2230 and direction to initiate LA-24-01.



<p>2</p> <p>Prioritize serving key industrial subareas and sites in the TSP and Capital Improvement Plan</p>	<p>✓ Updates to the City sewer, water, and storm master plans are currently underway, and an update to the TSP SWIR subarea was initiated in August 2023.</p>
<p>3</p> <p>Encourage infill, redevelopment and/or adaptive reuse of obsolete or underused properties in current employment zones.</p>	<p>✓ City has an existing Urban Renewal Area and Enterprise Zone that include our Downtown areas and commercial corridors and includes URA programs such as façade renewal, business resource programming and assistance, and technical assistance on financial resources to support infill and reuse through our partnerships and Economic Dev. Dept.</p>
<p>4</p> <p>Inventory properties that might be good opportunity sites for potential public/private catalyst projects.</p>	<p>✓ The City's Economic and Community Development Depts. maintain inventories of public properties, the City has multiple adopted mixed-use, nodal, and Gateway zones which permit greater densities and mixed uses.</p>

ATTACHMENT 5 to LA-24-01 FINDINGS



<p>5</p> <p>Evaluate assisting in wetland mitigation to increase developable land inventory, including creating or partnering in a wetland mitigation bank</p>	<p>Costs of mitigating can be prohibitive for industrial users while on-site mitigation reduces usable site area and can be difficult for a business operator to maintain over time. Mitigation banks allow for off-site mitigation. Credits at existing banks can be difficult or expensive to obtain. A local bank would provide more certainty for mitigation; however, an extensive interagency process is involved.</p>	<p>✓ City staff has engaged with Oregon Councils of Governments (COGs) and Economic Development Districts (EDDs) MWVCOG, in coordination and convening meetings with Jevra Brown.</p>
<p>6</p> <p>Facilitate clean up and utilization of identified brownfield sites</p>	<p>Work with the appropriate agencies to identify requirements, as well as potential funding sources, to bring environmentally contaminated sites to productive use. Possible incentives include local and state tax abatement programs, and surcharge-based clean up funds.</p>	<p>✓ City staff are listed as a coalition partner in a 2024 EPA Brownfield Assessment Grant with MWVCOG. In addition, the City has a long history of partnerships with Business Oregon and Oregon Dept of Env Quality in assisting private and public cleanup of identified brownfield or USTs (First Street project, AWARE Food Bank Reconstruction, etc.)</p>



POLICY AND CODE STRATEGIES	
<p>7 Continue to improve and streamline development regulations and review processes where possible, to reduce cost and time, and provide predictability.</p>	<p>The community and city work to be development and employer friendly.</p> <p>✓ Woodburn partners and supports the Woodburn Area Chamber of Commerce which provides a meeting and office space to serve the region. In addition, the City has a full-time Economic Development Dept to respond to business needs and opportunities, including façade renewal, business lending programs, quarterly Industrial Business Roundtable meetings, the North Marion Tourism Alliance, a “Explore North Marion” website and resource <a href="https://nmc-works.com/">https://nmc-works.com/</a>, and quarterly business resource fairs to name a few.</p>
<p>8 Ensure that applicable Comp Plan designations and zoning allow the mix of uses sought in employment areas, and if necessary, limit those uses that don't contribute to goals.</p>	<p>Ensure that the desired zones are in place and permit the uses that are foreseen in the City's existing and future employment areas. Where current zoning does not match the vision, consider rezoning, or amending zone standards.</p> <p>✓ The City's Economic and Community Development Depts. maintain inventories of public properties and the City has multiple adopted mixed-use, nodal, and gateway zones which permit greater densities and mixed uses. However, in order to protect industrial employment lands, the Interchange Management Area (IMA) now prohibits residential uses in the IMA overlay in order to preserve and protect this employment zone/overlay.</p>



<p>9</p> <p>Review and update Development Code language to support the desired development types and streetscape initiatives.</p> <p>A review of code standards can reveal where the adopted standards for elements like building height, setbacks, floor-area-ratio, parking, etc. may be posing difficulties in achieving feasible development in the target industries. Some large-lot commercial businesses and industrial users may benefit from more flexibility in site and building design to allow for creative design solutions and make projects more feasible.</p>	<p>✓ The City's Economic and Community Development Depts. conducted comprehensive development code audit and updates in 2015 as part of the last EOA adoption and in 2019 for the HNA adoption, both in compliance with state building code and subsequent updates have occurred as part of legislative updates. The City has previously approved exception/variances to heights in industrial areas and our 2023 Transit Facility Plan is adding a new "Route C" electric bus to serve our employment areas. Development within the SWIR zone also allows for transportation demand management (WDO 3.04.05.D) which allows for improved walking, cycling, rolling, and public transit for cost effective parking mgmt. solutions and efficient use of the build environment. WDO 3.07.10 for design guidelines offer space for creative design solutions and are non-prescriptive to offer industrial flexibility.</p>
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TARGET INDUSTRIES AND BUSINESS DEVELOPMENT	
CORE INITIATIVE Actions	Notes
<p>10</p> <p>Adopt and regularly update target industry profiles.</p> <p>SUPPORT AND EXPAND EMPLOYMENT IN TARGETED INDUSTRIES</p> <p>Industry patterns can change significantly over time, and target industries should be assessed regularly for progress on metrics like job creation and new firms.</p>	<p>✓ The City has a lead Economic Dev Director and supporting staff who have completed TIA reports in 2016 and 2023.</p>

ATTACHMENT 5 to LA-24-01 FINDINGS



<p>11 Maintain and enhance business outreach and communication.</p> <p>Coordinate business cluster and employment district networking opportunities. Participate in efforts of major regional economic development partners.</p> <p>Potential actions in support of this strategy include developing and updating marketing materials, attending industry tradeshows, following up on referrals by partner organizations, publicizing the success of local businesses, and highlighting competitive advantages of the area for proposals.</p>	<p>✓ The City has a lead Economic Dev Director and supporting staff who lead the City's Urban Renewal Agency, quarterly Industrial Business Roundtable meetings, the North Marion Tourism Alliance, and a "Explore North Marion" website and resource <a href="https://nmc-works.com/">https://nmc-works.com/</a> to name a few.</p>
<p>12 Develop a marketing plan to attract businesses within the identified target industry business sectors.</p> <p>Assemble and distribute materials of specific interest to targeted industries and identify key industry groups.</p>	<p>✓ The City has a lead Economic Dev Director and supporting staff who lead the City's Urban Renewal Agency, quarterly Industrial Business Roundtable meetings, the North Marion Tourism Alliance, the North Marion Economic a "Explore North Marion" website and resource <a href="https://nmc-works.com/">https://nmc-works.com/</a>, and quarterly business resource fairs to name a few.</p>



<p>13 Support and engage regional and statewide partners.</p>	<p>Regularly meet and coordinate with groups such as the Woodburn Chamber of Commerce, SEDCOR, Portland General Electric (PGE), the Mid-Willamette Valley Council of Governments, Marion County, and Business Oregon. Promote available employment space and land.</p>	<p>✓ Staff and the City Council provide contractual relationship with MWVCOG, SEDCOR, and the Woodburn Area Chamber of Commerce and regularly attend or serve on regional economic development partner boards and committees.</p>
<p>14 Regularly update Oregon Prospector to promote available employment space and land to site selectors.</p>	<p>Business Oregon provides the Oregon Prospector tool which provides open, free data on available employment lands across the state, including both industrial and commercial properties. Ensure that all key sites are listed, and information is accurate and up to date.</p>	<p>✓ The City has a lead Economic Dev Director and supporting staff who work closely with Business Oregon in responding to “project leads” and in maintaining the Oregon Prospector tool.</p>
<p>15 Promote locally available tools: Enterprise Zone; Opportunity Zone; Urban Renewal Grant Programs.</p>	<p>In all site listings and marketing materials, ensure that the benefits of the existing zones are mentioned where applicable.</p>	<p>✓ Woodburn has an adopted Enterprise Zone, Urban Renewal, and a full-time Economic Development Dept to respond to business needs and opportunities.</p>
<p><b>SUPPORT SMALL BUSINESS DEVELOPMENT</b></p>		
<p>16 Develop and/or market programs to assist emerging and under-capitalized firms.</p>	<p>Technical assistance, micro loans, storefront improvement programs, master leases, and credit enhancement. Refer businesses to partner agencies providing grants, training, and other programs.</p>	<p>✓ Woodburn has an adopted Enterprise Zone, Urban Renewal, and a full-time Economic Development Dept to respond to business needs and opportunities, including façade renewal, business lending programs, quarterly Industrial Business Roundtable meetings, the North Marion Tourism Alliance, a “Explore North Marion” website and resource <a href="https://nmc-works.com/">https://nmc-works.com/</a> and quarterly business resource fairs to name a few.</p>
<p>17 Evaluate development of incubator space.</p>	<p>A shared work or incubator space, often affiliated with a college, economic development agency, or other agency, to provide space for small but promising companies to work and collaborate in a subsidized environment while they grow.</p>	<p>✓ Woodburn partners and supports the Woodburn Area Chamber of Commerce which provides a meeting and office space to serve the region.</p>



<p>18 Evaluate development of shared fabrication space and/or "makers" collective.</p>	<p>Look for opportunities to repurpose existing space to support multi-tenant maker spaces. These provide small spaces for craftsmen and artisans to work and share tools and knowledge, to incubate new businesses. A good fit for a local economy with diverse manufacturing base and workforce.</p>	<p>✓ This information has been shared with the City's Economic Dev Dept for future conversations with the Woodburn Area Chamber of Commerce, Willamette Workforce Partnership, and SEDCOR. The City's community center project has a \$40 million bond for the November 2024 election and can offer a commercial kitchen space and additional meeting and incubator space for Woodburn and the region.</p>
<p>19 Connect small business opportunities with property owners.</p>	<p>The City can serve as a clearinghouse or matchmaker, matching business needs with local property owners. This could include food carts, which can serve as an incubator for future food service tenants.</p>	<p>✓ Woodburn partners and supports the Woodburn Area Chamber of Commerce which provides a meeting and office space to serve the region. In addition, the City has a full-time Economic Development Dept to respond to business needs and opportunities, including façade renewal, business lending programs, quarterly Industrial Business Roundtable meetings, the North Marion Tourism Alliance, a "Explore North Marion" website and resource <a href="https://hmc-works.com/">https://hmc-works.com/</a>, and quarterly business resource fairs to name a few.</p>
<p><b>WORKFORCE INITIATIVES</b></p>		
<p>20 Support connections between local industry, K-12, CCC, Pacific U, and state education and training courses.</p>	<p>Help match training programs to employers, potentially coordinating internships, or regular interaction with local businesses. Ensure that these programs address target industries in particular, and stay up to speed on rapidly evolving industry norms and technology.</p>	<p>✓ Woodburn is a member of and meets regularly with our area Economic Development District, SEDCOR, the Willamette Workforce Partnership, Woodburn Area Chamber of Commerce, and the local branch of Chemeketa Community College.</p>



<p>21 Promote workforce training resources.</p> <p>Increase knowledge of existing resources for job seekers.</p>	<p>✓ Woodburn is a member of and meets regularly with our area Economic Development District, SEDCOR, the Willamette Workforce Partnership, Woodburn Area Chamber of Commerce, and the local branch of Chemeketa Community College. In addition, the City's Economic Development Dept hosts a quarterly Industrial Business Roundtable and periodic business resource fairs in our area.</p>
<p>22 Ensure the housing policies allow for an appropriate mix of housing for the local workforce.</p> <p>The community should strive to provide the full range of housing types and price points to meet the needs to the full workforce and encourage residents to both live and work in Woodburn.</p>	<p>✓ The City's Economic and Community Development Depts. maintain inventories of public properties and the City has multiple adopted mixed-use, nodal, and gateway zones which permit greater densities and mixed uses. However, in order to protect industrial employment lands, the Interchange Management Area (IMA) now prohibits residential uses in the IMA overlay in order to preserve and protect this employment zone/overlay.</p>
<p>23 Support local affordable housing developers.</p> <p>Low-wage positions are a foundational component of any local economy, and most industries rely on this workforce either primarily, or through their supporting firms. Subsidized affordable housing is one key segment of the workforce housing puzzle.</p>	<p>✓ The City partners and support local affordable housing developers, including past and current partnerships in the sale or transfer of opportunity sites for housing projects as they arise.</p>
<p>24 Prioritize childcare as a workforce readiness issue.</p> <p>Childcare is a commonly identified need for working households if all adults are working, or working unusual hours, etc. This topic is increasingly raised as an important part of attracting and maintaining an available workforce. Home-based childcare businesses are also usually a category of self-employment, which is identified as a target industry.</p>	<p>✓ The City has provided feedback to the Oregon Legislature and Business Oregon related to HB 3005 and recently provided support to a local non-profit childcare provider on a fund application related to HB 3005.</p>

ATTACHMENT 5 to LA-24-01 FINDINGS

# LA-24-01 - EXHIBIT B

20-Year UGB Expansion Limitation\*

20-Year UGB Expansion Limitation\*

## COMPREHENSIVE LEGEND

- Low Density Residential
- Medium Density Residential
- Commercial
- Industrial
- Open Space and Parks
- Public Use
- Mixed Use Village Overlay (MUVO)
- Nodal Development Overlay (NDO)
- Southwest Industrial Reserve (SWIR)

\*20-Year UGB Expansion Limited Until January 31, 2036.  
 Acknowledged by The State of Oregon on December 22, 2016.  
 Woodburn City Council on October 31, 2005 (Ordinance Number 2397). Last Revised: January 26, 2016.

0 500 1,000 FEET

WOODBURN 102227024

Disclaimer: This map is a plan. It does not show elevations or depths. It is not intended to be used for engineering or other professional purposes. The map is for informational purposes only.