



League of Women Voters® of Portland Oregon

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DATE: November 9, 2025

TO: Bureau of Planning and Sustainability staff
Tom Armstrong, Supervising Planner
Daniel Soebbing, Environmental Planner

FROM: League of Women Voters of Portland
Audrey Zunkel-deCoursey, President
Debbie Aiona, Action Committee Chair

Re: Economic Opportunities Analysis,
Columbia Corridor Industrial Lands Environmental Overlay Zone Project

The League of Women Voters of Portland appreciates the information and analysis you have provided to the public in discussion drafts on the Economic Opportunities Analysis (EOA) and the interrelated Columbia Corridor and Industrial Lands (CCIL) Environmental Overlay Zone Project. We are especially grateful for the virtual and in-person informational sessions you conducted and for your willingness to respond to questions.

Thank you for considering our comments and recommendations. In this letter, we lay out our reflections about both the Economic Opportunities Analysis and the Columbia Corridor Industrial Lands Environmental Overlay Zone Project.

The policy decisions from these projects will shape Portland's livability, economy, and environment well into the future.

The League supports a balanced approach to economic development

LWV Portland studied Portland's economic development efforts and reached a policy position through member agreement in 2015. Our position, in part, states that:

The most important factors to be considered when promoting economic development are:

- *Quality and number of jobs*
- *A healthful environment*
- *Creation and preservation of open spaces*
- *Neighborhood revitalization that benefits existing residents*
- *Effects on existing local businesses*
- *Equity issues*
- *Ability to attract private investment*
- *Overall return on investment of public funds*

League positions guide our organization's basis for commenting on governmental policies - in this case planning for future employment while protecting natural resources. It is encouraging that the EOA discussion draft takes into consideration the factors listed in our position and that, unlike in the past, the different scenarios in the September 2025 analysis all demonstrate that the city has sufficient industrial land to meet the 20-year demand. By completing the EOA, the CCIL Ezone project can move forward in a coordinated fashion with policy recommendations that protect natural resource areas at the same time maintaining capacity for industrial development.

Economic Opportunities Analysis

The EOA discussion draft presents options for balancing the various factors determining employment opportunities and livability. Your next step is submitting a proposal to the Planning Commission. The League strongly encourages you to recommend Scenario 6 in that proposal since it includes the high lever settings for natural resource protection, investment, and community livability. We recognize that the city's financial situation may present challenges for investing in brownfield clean up, infrastructure, and freight access, but these actions are key to unlocking the land needed for jobs and should be implemented to the extent possible. Scenario 6 calls for maximum natural resource protection and policies that would help buffer residential areas adjacent to industrial development from negative impacts. These are critical to protecting and restoring our natural areas and sensitive lands and safeguarding and enhancing quality of life in our neighborhoods.

Our Recommendations

- Recommend Scenario 6 in the staff proposal to the Planning Commission.
- Include in the staff proposal more rigorous policies to protect existing industrial land from political and market pressure for conversion to other uses. We have seen time and again the city converting industrial land to other uses, making it more challenging to meet the 20-year employment lands supply required by Goal 9.
- Include a policy that would prioritize access to financial and other public support of industrial land development to projects that provide well-paying jobs with benefits, particularly for workers without four-year degrees.
- System Development Charge waivers should be utilized cautiously with careful consideration given to how the cost of infrastructure improvements will be covered without that revenue. This is especially true when a number of the EOA scenarios rely on investments in brownfield clean up, freight access, and transportation improvements.

Employment Potential in Residential Areas

Residential Areas is one of the five economic geographies covered in the EOA discussion draft. It is of particular interest to the League because we have been closely tracking implementation of the Multnomah County Preschool for All (PFA) program. It offers an

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opportunity to site programs in residential areas that will boost employment and business ownership and support parental participation in the workforce.

The PFA program is scheduled to grow from 3,800 seats in 2025–26 to 11,000 seats in 2030–31. A number of seats will be in small center or family child care sites. The program requires that staff are paid livable wages, receive benefits, and have access to professional development. In 2024-25, over 75 percent of the small center and family child care sites have owners or directors that identify as BIPOC. In other words, PFA presents the potential to provide jobs and ownership opportunities to workers who often face challenges in achieving economic stability. Furthermore, smaller programs scattered throughout residential areas have the potential to offer convenient access and reduce the need to drive long distances to drop off children.

Our Recommendation

- Consider adding specific policy recommendations to the proposal to the Planning Commission that would streamline the process providers must follow to meet the city's development regulations for child care and early childhood education programs in residential areas.

Portland Harbor Superfund Site

The EOA discussion draft cites the challenges of predicting the economic and environmental impact of the Superfund site cleanup. We recognize there are many uncertainties at this point in the process, but the proposal to the Planning Commission would benefit from additional discussion of the potential for this huge undertaking to affect our city in terms of jobs, reclaimed industrial acres, and the environment.

Our Recommendation

- Include more information and analysis on the potential impact on the economy and environment of the Portland Harbor Superfund Site cleanup in the proposal to the Planning Commission.

Columbia Corridor and Industrial Lands (CCIL) Environmental Overlay Zone Project

The League recognizes how the CCIL project is interconnected to the EOA effort. We appreciate the information and presentations staff have provided on the conditions in the study area and the options for natural resource protection.

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We support the Maximum Resource Protection, or High Scenario, as stated in the CCIL discussion draft. The land and water features in the study area provide critical habitat, floodplain protection, and other critical ecosystem functions. The EOA projects a surplus of industrial land to meet employment needs, offering the city the capacity and opportunity to protect these natural resources. We further support the option for a 50-foot Willamette Greenway setback along the river's North Reach. That setback would be consistent with other segments along the Willamette.

The recommendations noted below on the CCIL and Willamette Greenway setback are based on the League's policy position on land use:

The League supports:

- *Management of land as a finite resource not as a commodity, since land ownership, whether public or private, carries responsibility for stewardship.*
- *Land-use planning that reflects conservation and wise management of resources.*
- *Identification and regulation of areas of critical concern:*
 - *Fragile or historical lands, where development could result in irreversible damage (such as shore-lands of rivers, lakes, streams, estuaries, and bays; rare or valuable ecosystems and geological formations; significant wildlife habitats; unique scenic or historic areas; wetlands; deserts).*
 - *Renewable resource lands, where development could result in the loss of productivity (such as watersheds, aquifers and aquifer-recharge areas, significant agricultural and grazing lands, forestlands).*
 - *Natural hazard lands, where development could endanger life and property (such as floodplains, areas with high seismic or volcanic activity, areas of unstable geologic, ice or snow formations).*

Our Recommendations

- Recommend to the Planning Commission the Maximum Resource Protection, or High Scenario, as stated in the CCIL discussion draft.
- Recommend to the Planning Commission a 50-foot Willamette Greenway setback along the North Reach.

Conclusion

Thank you again for the information you have presented to the public, for making staff available at informational sessions, and for considering our comments. Your work has made it possible to understand the underlying assumptions and options the city has for protecting the environment and providing future employment opportunities. We look forward to reviewing the upcoming staff proposal to the Planning Commission.