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DATE: February 2, 2026

TO: **Portland Planning Commission**
Steph Routh, chair

FROM: League of Women Voters of Portland
Debbie Aiona, Vice President of Action

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

The League of Women Voters of Portland appreciates the opportunity to offer our comments and recommendations to the Planning Commission on the CCIL project. We understand this project is closely connected to the Economic Opportunities Analysis and submitted a separate letter on that topic. We are grateful for the information and presentations staff have provided on the conditions in the study area and the options for natural resource protection. We thank the Planning Commission for considering our comments and recommendations.

The League supports 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 essential 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 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).*

Recommendations:

- Recommend to City Council in your final report the Maximum Resource Protection, or High Scenario, as stated in the CCIL discussion draft.
- Include in your recommendation to City Council a 50-foot Willamette Greenway setback along the North Reach.

Conclusion

Thank you for considering our comments and recommendations on the CCIL Environmental Overlay Zone Project. It is encouraging to see that the city is poised to take this important step towards protecting the natural resources in the Columbia Corridor. The area has the potential to provide valuable protections for critical habitat and environmentally sensitive areas.