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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: **Economic Opportunities Analysis**

The League of Women Voters of Portland appreciates the opportunity to offer our comments to the Planning Commission on the Economic Opportunities Analysis (EOA) proposed draft and the interrelated Columbia Corridor and Industrial Lands (CCIL) Environmental Overlay Zone Project. CCIL comments are in a separate letter. We are grateful to the staff for the written materials, the informational sessions, and for their willingness to respond to questions.

Thank you for considering the League's comments and recommendations on the EOA. The policy decisions stemming from these projects will shape Portland's livability, economy, and environment well into the future.

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

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 proposed draft takes into consideration many of the items listed in our position and that, unlike in the past, the different scenarios described 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.

The EOA proposed draft presents options for balancing the various factors determining employment opportunities and livability. The League strongly encourages the Commission to recommend to City Council the high lever settings for natural resource protection, investment, and community livability.

Following are our recommendations:

Recommendations:

- Include in your recommendation to City Council the maximum protection measures for natural resources in order to preserve and enhance wildlife habitat, streams and wetlands, and a healthy environment.
- Include a higher level of investment than the low level in the proposed draft. 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.
- Include high community livability measures in your recommendations in order to protect residents living near industrial sites from some of the ill effects of industrial activities. The low measures in the proposed draft are inadequate for protecting public health and environmental quality.
- The following suggestions are not covered in the proposed draft. The League encourages you to consider them in your deliberations:
    - Incorporate 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.

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

the proposed draft includes an Implementation Strategy that supports home-based child care and care economy uses and lists Multnomah County as a key partner (p. 89).

The PFA program is scheduled to grow significantly from the 3,800 seats anticipated in 2025–26. A number of seats will be in small center or family child care sites. The program requires that staff are paid living 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.

Recommendation:

- Include Implementation Strategy #4 (p. 89): Support Home-Based Childcare and Care Economy Uses in your final recommendation to City Council.

Portland Harbor Superfund Site

The EOA discussion draft cites the challenges of predicting the economic and environmental impact of the Superfund site cleanup. We appreciate the additional analysis included in the proposed draft. It paints a more detailed picture of the impact the city can anticipate in terms of employment, reclaimed industrial acres, and the environment.

Recommendation:

- The Planning Commission may agree it is premature to make Portland Harbor Superfund Site employment projections now, but it should strongly request that Bureau of Planning and Sustainability revisit this issue in future EOA updates.

Thank you for considering the League's recommendations and for all you do as volunteers to contribute to Portland's livability. We look forward to following your progress on this important work.