

Thanks you for the opportunity to testify on the draft Comprehensive Plan this evening.

I'd like to focus on three things: Chapter 6 policies related to economic development on harbor access and other industrial land; why as a City we should care about such policies and impediments; and inconsistencies contained in the draft Comp. Plan preventing such policies from being successfully implemented.

First, I'd like to acknowledge staff for inclusion of several significant policies that if properly implemented, would go a long way towards ensuring Portland's economic prosperity over the next 20+ years. For example, Policy 6.34 Industrial land encourages Portland's growth as a trade and freight hub and center for manufacturing as a widely accessible base of living wage jobs. Policies 6.14, 6.39 and 6.40 all relate to brownfield or Harbor Superfund clean-up, including the ambitious goal of cleanup of 60% of brownfield acres in the City by 2035.

Why should we care about such policies? Manufacturing jobs, as noted on page 33 of the Citywide systems plan, offer opportunities for living-wage careers for residents, often without requiring a 4 year college degree. They also have a high "employment multiplier" effect – one manufacturing job supports 3.69 total jobs in the region.

Beyond jobs, all forms of industrial development tend to result in high levels of capital investment, resulting in an ongoing revenue stream of property taxes and other fees used to fund schools and other essential City and County services.

Bringing brownfields back into productive reuse results in multiple benefits including protecting the environment and human health, in many cases taking advantage of infrastructure already in place as well as the benefits described above.

However, as currently written, several policies found in Chapter 7 make the Policies in Chapter 6 difficult if not impossible to achieve. Policy 7.46 suggests that grasslands and floodplains must be protected and enhanced within the Willamette River watershed. "Grasslands" as shown on the current City NRI map includes many fallow areas consisting of barren weedy fill not currently regulated. Floodplains are currently regulated from a flood hazard perspective but not as a habitat feature in and of themselves.

For brownfields such as Time Oil, the second largest identified site in the Portland Harbor, these new regulatory burdens would make the proposed City goal of 60% brownfield redevelopment very unlikely. For existing business seeking to grow, this policy runs contrary to Policy 6.38 which encourages reinvestment and intensification of existing industrial sites.

In conclusion, we urge staff and the PSC to take a closer look at how the policies mentioned above are in conflict and urge resolution consistent with another policy 1.3, ensuring that the elements of this document are internally consistent.

That concludes my testimony and I'd be happy to answer any questions.