



11 December 2024

Portland City Council
1221 SW 4th Ave.
Portland, OR 97204

Dear Mayor Wheeler and City Commissioners:

The proposed Montgomery Park Area Plan aims to address multiple needs in the city of Portland, including increased housing and improved transportation once that housing is constructed. It does this, however, on the backs of workers in family wage jobs who will see their businesses impacted by the introduction of non-industrial land uses and rail which impedes the industrial uses that remain.

This is a recurring issue with Portland's ongoing effort to reduce industrial land and place a significant amount of the burden of the city's many challenges on the business community, and more specifically industrial businesses which provide the most and most equitable middle wage jobs.

Industrial Land Supply

We do not argue the city is not in need of housing. This is, in fact, a dire need to solve the region-wide affordable housing and homelessness challenges. However, the city's own data shows housing land is not the issue, but instead land readiness, financing and supportive public policy are the major hurdles. Instead, a lack of industrial land threatens the kinds of middle-wage job which support a strong, sustainable economy, and while this proposal acknowledges this threat, the city takes no action to mitigate it.

The city actually does the opposite, essentially refusing to identify other areas of land which could be used for industrial work, thereby cutting into what is already a deficit of land for the current workload. This work does not just support family wage jobs, it is also where critical clean tech manufacturing will need to occur if Portland is to lead the transition into a clean energy future and address the climate crisis.

The coming Economic Opportunities Analysis is another area where this discussion is occurring, but the MPAP suggests the city will not only aim to cut industrial lands again, it will do so despite its own economic strategy, Advance Portland, calling for support of the fastest-growing sector of the region's economy. This trajectory is deeply concerning for the thousands of Portlanders who rely on these jobs.

Oversight

In November, our coalition submitted a series of oversight actions as part of a recommended amendment for this proposal. It is deeply concerning the city had not already considered these, as they are basic actions necessary to ensure the plan achieves its stated goals. These included:

1. Ensuring audits are completed on the number of jobs created, their income level, and the demographics of people employed in them;
2. The sources of jobs, determining whether they simply moved from another part of the city or are new;
3. The number of middle wage jobs lost or that were moved out of the city;

It is critical the city identify whether actual jobs were created, as opposed to simply creating a mitigation fund with no clear purpose or plan to replace these jobs elsewhere.

Ensuring Remaining Businesses Can Thrive or Relocate

Part of what makes industrial areas successful is a healthy freight street system. As the residential area is moving north, the need to establish a robust buffer and protect freight movement increases. One way to do this is to follow cities such as Amsterdam by creating freight-only roads. It would have the added benefit of reinforcing a buffer between residential and industrial areas. It would not be a simple task, but we stand ready to assist with the effort. We recommended designating NW Nicolai as a freight-only road. Details can be developed over the coming months.

The NWDA is correct in its analysis of the streetcar route. In addition, we call your attention to the fact that the streetcar routes between NW 23rd and NW 24th will preclude use of many of the existing loading docks. We recommended relocation assistance for tenants that are forced out of the district due to streetcar alignment.

The MPAP is one of many ways in which industrial land is being squeezed out of Portland, along with critical family wage jobs. While some goals are laudable, our city should not be pitting interests against each other when there are other options for addressing the goal at hand, or to increase property values for certain owners. We should be focused on building an economy that supports a strong middle class and employs people across the economic spectrum, which requires different types of land. This plan cuts a type – industrial – which is the only one in short supply and we hope the city considers mitigating for that loss in future policy discussions.

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