

October 26, 2015

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VIA EMAIL (PSC@PORTLANDOREGON.GOV)

Planning and Sustainability Commission  
City of Portland  
1900 SW Fourth Avenue, Suite 7100  
Portland, OR 97201-5380

**Re: PSC Employment Zones Testimony  
Broadmoor Golf Course's Comments on the Proposed Draft of the Employment  
Zoning Project (September 2015)**

Dear Chair Baugh and Members of the Commission:

This firm was recently retained to represent Broadmoor Inc. ("Broadmoor"), who has owned the Broadmoor Golf Course located at 3509 NE Columbia Boulevard for over 100 years. Please include this testimony in the record of the above referenced proceeding and provide us with notice of the final decision.

Broadmoor intends to continue to operate as a public golf course for the foreseeable future. However, as golf revenues have continued to decline over the past 10 years and the City's need for additional employment land increases, Broadmoor acknowledges that at some point developing a portion of the golf course with an industrial use, while preserving higher quality natural resources in open space, may be the highest and best use of the land. As a result, Broadmoor **supports** of the Employment Zoning Project's proposed Industrial comprehensive plan designation on a portion of the Broadmoor Golf Course. See Figures 1 and 13.

**Broadmoor requests that the zoning of the area on Figures 1 and 13 be amended to IG2 concurrently with the comp plan map amendment.** Broadmoor will continue to operate the golf course as a non-conforming use under the IG2 zoning designation, and will also have certainty about the site's zoning when the time comes to redevelop a portion of the golf course.

Broadmoor is also **supportive** of re-designating and re-zoning the approximately 50-acre area that Broadmoor sold to Metro as a natural area in 2012 from Industrial/IG2 to Open Space/OS.

Broadmoor **opposes** the proposed ecologically beneficial design development standards that would be applicable to only Broadmoor and Riverside. See PCC 33.565.410(C). Subjecting these two sites to standards that are in excess of what is required of other industrial sites (1) places these sites at a competitive disadvantage, (2) could discourage industrial development, and (3) diminishes the capacity of employment land, which is counter to the City's Goal 9 compliance efforts. For these reasons, we request that the ecologically beneficial design development standards in PCC 33.565.410(C) be removed.

In the alternative, so that employment land capacity is not reduced, we request that the PSC consider an amendment to PCC 33.565.410(C) that allows land owners the option of planting the required landscaping on Open Space land (e.g., the balance of the former golf course). While this solution does not address the cost disparity between Broadmoor and other industrial sites, it would allow for a more efficient use of the industrially zoned area. Finally, given the proximity of Broadmoor to the Portland International Airport and related concerns about aviation safety, we suggest that the required native plants be limited to those on the Airport Plant List section of the *Portland Plant List*<sup>1</sup>. Our alternative request can be addressed with the following changes PCC 33.565.410 (suggested changes underlined):

### **33.565.410 Additional Development Standards**

**A. Purpose.** The following development standards promote ecologically beneficial design by requiring buffers and plantings that provide ecological function and contribute to ecosystem services such as multi-objective stormwater management, cleaning and cooling of air and water, wildlife habitat, biodiversity, and aesthetic values. The development standards help reduce future demands on infrastructure, and reduce adverse impacts from development both on and off-site. The standards also buffer industrial development from abutting residential development and open space uses, and provide a pleasant work environment for employees.

**B. Where the standards apply.** The standards in this Section apply to development in the IG2 zone on the sites shown on Map 565-4.

### **C. Development standards.**

1. Minimum landscaped area standard. At least 20 percent of site area must be landscaped. The required landscaped area may be located off-site on land zoned open space. Area improved for active or passive recreational use, or for use by pedestrians, does not count toward the required landscaped area. Other required

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<sup>1</sup> Landscaping in the portions of Broadmoor that are located within the Airport Subdistrict of the Portland International Airport Plan District is limited to the Airport Plant List section of the *Portland Plant List*. PCC 33.565.220 and Map 565-1. The area of Broadmoor proposed for Industrial designation on Figures 1 and 13 is located in the Middle Columbia Slough Subdistrict, which currently does not limit landscaping to the Airport Plant List section of the *Portland Plant List*.

landscaping, such as setbacks and parking lot landscaping, applies toward the landscaped area standard. Area covered by an eco-roof also applies toward the landscaped area standard.

2. Native plants. At least 75 percent of all plants planted to meet Title 33 landscaping requirements must be native plants from the Airport Plant List section of the *Portland Plant List*.

Representatives from Broadmoor will testify at the October 27, 2015 hearing, and would be pleased to respond to any questions. Thank you for your consideration.

Very truly yours,



Dana L. Krawczuk

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