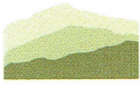


THE
TRUST
for
PUBLIC
LAND



CONSERVING LAND
FOR PEOPLE

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October 19, 2015

Mr. Steve Kountz
Portland Bureau of Planning & Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

Re: Draft Employment Zoning Project

Dear Mr. Kountz:

I am writing on behalf of The Trust for Public Land to comment on the proposed Employment Zoning Project.

The Trust for Public Land creates parks and protects land for people, ensuring healthy, livable communities for generations to come. We work across the country, including in the Portland metropolitan area, and have recently partnered with the City of Portland on park and natural area acquisitions that have helped improve citizens' access to parks, addressed ecological goals, and contributed to the City's investments in green infrastructure.

We also recognize the critical importance of maintaining an adequate supply of employment land in Portland, especially in prime industrial areas. As a case in point, we recently worked with the city, neighborhood and advocacy groups, and a private landowner to facilitate the rezoning of a portion of the former Colwood National Golf Course to industrial land, and the acquisition by the city of the remaining portion as parkland, habitat, and open space. This was a complex project that entailed thoughtfully balancing the competing needs of employment, park access for an underserved neighborhood, and protecting and restoring habitat along the Columbia Slough.

We strongly support balanced approaches to economic development and environmental protection and applaud the Comprehensive Plan's efforts to accomplish this balance. That said, we are concerned about the proposal to make certain parks and open uses a conditional use in the new Prime Industrial overlay zone. In our view, this further heightens already substantial hurdles to providing parks and natural areas in part of the community that has significant natural resources, restoration potential, and underserved communities.

The simple fact is that much of Portland's best industrial land also has important natural resource values that, even if currently impaired, are essential to the long term viability of Portland's natural resource base. Given existing funding constraints around natural areas acquisition and restoration, we are concerned the proposed changes – namely the conditional use requirement and a conceptual mitigation mechanism – would hinder the City's ability, and that of related organizations such as ours, to make the kind of investments that will ensure long term resilience and community benefit.

It would be unfortunate if a planning exercise intended to promote one very important value – industrial employment lands – hampered equally important goals. We are concerned this will be the case, and prefer to see the City focus on incentivizing compatibility of industrial development with natural resource protection through targeted acquisition and restoration, rather than zoning constraints.

We appreciate the opportunity provide comments and support the city as it undertakes the critical task of ensuring an appropriate supply of employment land, balanced with other essential goals of the Comprehensive Plan.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Nelson Mathews', with a long horizontal flourish extending to the right.

Nelson Mathews
Oregon State Director
The Trust for Public Land