




# PORTLAND PARKS & RECREATION

Healthy Parks, Healthy Portland

Date: October 23, 2015  
To: Planning & Sustainability Commission  
From: Mike Abbaté, Director   
cc: Commissioner Amanda Fritz, Patti Howard, Tim Crail, Brett Horner, Kia Selley  
RE: Comments and Concerns on the Employment Zoning Project

Dear Planning and Sustainability Commissioners:

Portland Parks & Recreation (PP&R) appreciates the opportunity to address the Commission and provide our concerns with this proposal. We thank you for listening to our concerns and we also wish to thank the staff at the Bureau of Planning & Sustainability (BPS) for making significant improvements to the original proposal, which we found to be quite harsh and without adequate consideration of parks and open space needs in the City.

Briefly, our remaining concerns are as follows:

**I. PARKS AND OPEN SPACE SHOULD REMAIN A PERMITTED USE – a Comprehensive Map Amendment should not be required where parks and open space needs exist, regardless of zone.**

Parks have long been a permitted use in each and every zone. They are a highly compatible use to all other uses, and should not be considered less desirable than other land uses. Once vacant land and open space is built on, it very rarely reverts back to landscape – it's essentially lost for at least several generations. There are several areas in the proposed overlay where current residents do not have half-mile access to a developed park. A 2-acre park, which is exempt, may not be adequate to serve these areas, and the parcel that is going to be acquired for a park may be much larger than 2 acres. PP&R does not divide up larger properties and allow development on the rest because doing so is in fact, a potentially very costly proposition due to the land division process. **We ask that you direct staff to remove the requirement for a Comprehensive Map Amendment for Parks larger than 2 acres.**

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Amanda Fritz, Commissioner  
Mike Abbaté, Director

*Sustaining a healthy park and recreation system to make Portland a great place to live, work and play.*



## **2. PROVIDE CLARITY ON NATURAL AREAS BEING EXEMPT FROM THE PROPOSED CODE CHANGES.**

Metro has made it clear in their letter to BPS on September 4, 2015 that they consider all natural areas exempt from the proposed overlay and new regulations. Parks will request that City Council ask Metro to clarify their Title 4 language so this is clear to all – the current Title 4 language is very prohibitive. We would ask that the Planning & Sustainability Commission (PSC) also ask City Council to pursue this with Metro, as BPS staff have indicated they are unwilling to do so. In the interest of avoiding future lawsuits, we ask that Title 4 be made more clear of Metro's intent. **We would also ask that BPS make it clear in the Employment Zoning Project and overlay proposal that natural area acquisition is exempt.** Currently, this is only referenced in the "commentary" and not in the actual code language. The commentary also requires the Bureau of Environmental Services (BES) to confirm that the natural area provides stormwater enhancement and represents a "stormwater facility." Many other entities purchase natural area in the slough area, including the two soil and water conservation districts, Metro, PP&R, and others. BES is not always involved in a particular acquisition. What is required of these other agencies? The code language, as proposed, is unclear. All natural areas, and indeed most developed parks, provide stormwater function and represent "stormwater facilities," and thus all should be made exempt from the proposal.

We remind both BPS, PSC, and City Council that the Council reviewed and accepted PP&R's Natural Areas Acquisition Strategy in 2006, which prioritizes the Columbia slough area as an area of the City much needed for natural area land acquisition to improve and restore the City's environmental health, habitat functions, and to address climate change.

## **3. HAVE THE CITY COUNCIL REQUEST THAT METRO (AGAIN) REVISE ITS TITLE 4 LANGUAGE.**

PP&R will also ask that the City Council ask Metro to revise the misguided Title 4 language so that a Comprehensive Map Amendment is not required for a developed park or natural area. We question why Metro has stipulated that natural areas are exempt, but other parks are not. The slough area is one of the only places left in Portland where larger tracts of land are available for parks. Limiting them to 2 or even 10 acres is too restrictive, and prohibits the City's ability to provide larger developed parks where needed. **We ask the PSC to support this request of Metro as well.** Metro has already revised the language in Title 4 once in recognition that it is too restrictive, and was not properly vetted for deleterious and unintended effects. We ask that you closely read Metro's September 4, 2015 letter and ensure that all final language in both the Portland zoning code and Metro's Title 4 provides clarity and consistency.

Thank you for your consideration of these very important issues to Portland Parks & Recreation.