

October 27, 2015

To: Members of the Planning and Sustainability Commission

From: Linda Robinson

Re: Employment Zoning Project

As a founding member of the Columbia Slough Watershed Council and a long-time park advocate, I have serious concerns about some of the provisions in the proposed Employment Zoning Project.

The outright ban of any new parks more than two acres in size, without a change in the Comprehensive Plan, is especially troubling – for a number of reasons.

- Parks have always been permitted uses in any zone; this is a dramatic change in policy with limited public input (e.g., it was never brought to the Parks Board for discussion).
- The maps show the new zone covering the Columbia Slough itself, the designated buffer zones along the Slough, and other areas that already have an Environmental Zone overlay on them. If the proposed overlay map must cover the entire lot of properties zoned industrial, then there needs to be a clearer statement in the code section that the existing environmental zones are exempt.
- BDS has known, for years, that there needs to be a review/revision of the environmental zone overlay along portions of the Slough, especially in the middle sections where some parcels have no designated buffer at all. The prohibitions of the new employment overlay zone should not be strictly enforced on those parcels until the review of the e-zones has been completed.
- It's not clear how the prohibition of parks greater than two acres applies to trails. There is a proposed linear trail along the full length of the Columbia Slough, but only portions have been built. When completed, will definitely exceed two acres total.
- The proposed overlay says that any parks built (two acres or less) must be designed to serve only the workers and residents within the industrial area, and not those in the surrounding residential neighborhoods. This is a major equity issue, especially when many of our poorer, most ethnically diverse neighborhoods are located in the impacted portions of North, Northeast and East Portland.
- There also needs to be clarification as to whether or not natural areas are exempt from this prohibition.

I don't understand the concern that new parks are going to convert a significant amount of industrial lands to open space uses. That has not been true, historically, and is not likely to be true in the future. The real culprit has been the conversion of prime industrial land into commercial use (e.g., 120 acres at Cascade Station).

Linda

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Organization Affiliations:

- Portland Parks Board
- Columbia Slough Watershed Council
- East Portland Action Plan (Parks Rep)
- East Portland Parks Coalition
- Hazelwood Neighborhood Assn (VP and Parks Chair)