

27 October 2015

Dear Planning and Sustainability Commissioner,

The last Portland Comprehensive Plan introduced the concept of an industrial sanctuary, a designation that has been a success. However, Portland still lost approximately 150 acres to natural areas (600 acres if you include wetlands) and another 150 acres to other zoning designations. This has led us to recognize the need to tighten our industrial zones to minimize further loss of industrial acreage.

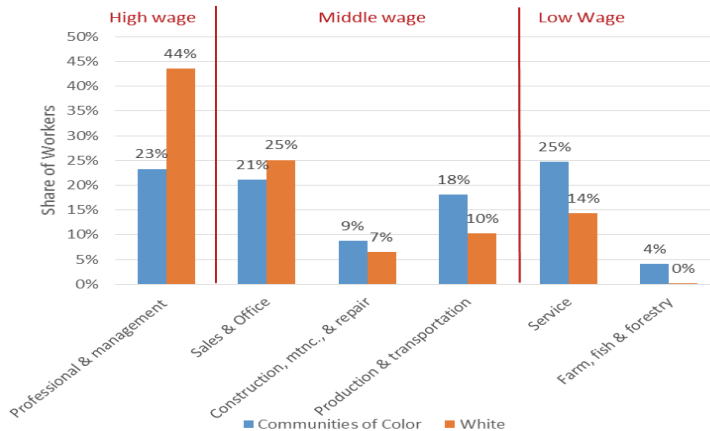
While considering proposals such as the Employment Zoning Project, it's natural to view the debate as a simple choice between industrial land vs. park space; manufacturing vs. commercial use; distribution space vs. retail. But that would be missing the heart of this discussion.

Industrial land per se is not the issue. Industrial land can exist almost anywhere: in the Columbia Corridor, outside our Urban Growth Boundary, or in Iowa. Our concern is for the middle wage jobs that go primarily to communities of color and residents of our poorest neighborhoods.

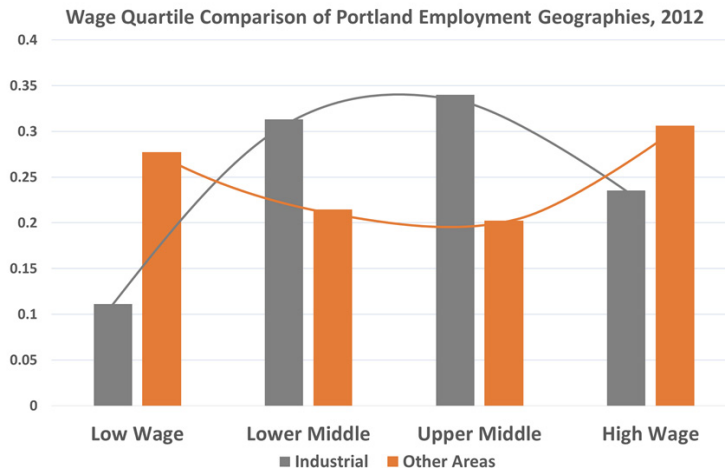
**Our industrial sector provides the best opportunities for a livable wage for communities of color in Portland.**

Occupational disparities by race, Multnomah County 2008

Source: Coalition for a Livable Future

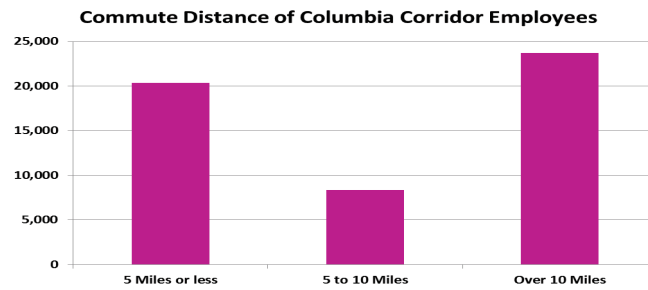


**Our industrial sector has very few low and high income wages; it's concentrated in the middle income range. The industrial sector offsets the middle wage gap created by the other sectors.**



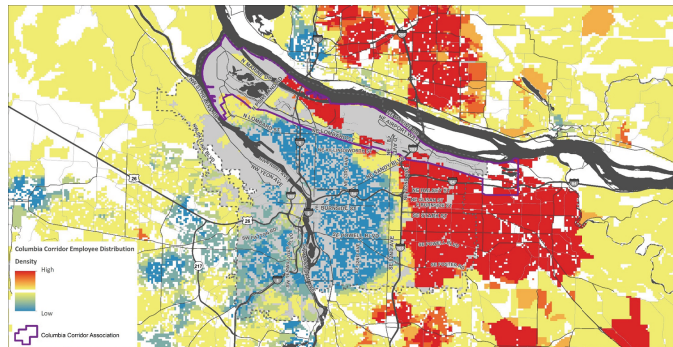
**39% of Columbia Corridor employees live within 5 miles of work—perfect bicycling range.**

Source: Portland BPS



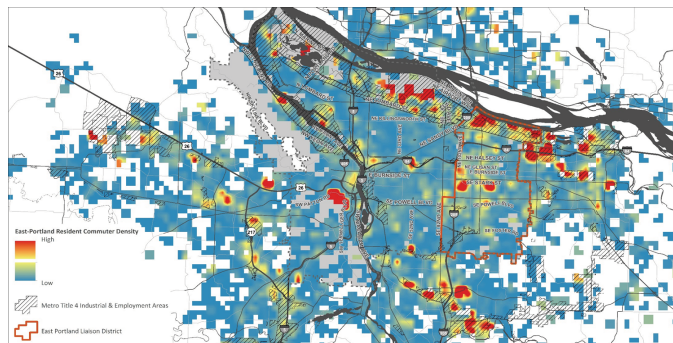
**The vast majority of industrial workers take those middle income wages back to the poorest Portland neighborhoods.**

Where Columbia Corridor workers live  
Source: BPS from LEHD data

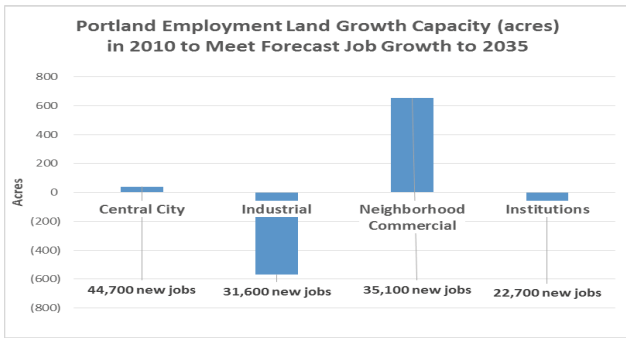


**The Columbia Corridor is where East Portlanders go for middle wage jobs.**

Where East Portlanders work  
Source: BPS from LEHD data



The Portland experiment is working. We're avoiding the industrial ring around the city. We're keeping it dense and close to neighborhoods. If we want to keep up the good work, we have to protect our remaining industrial lands from the pressures that have bled off too many acres since the last comp plan. In some cases, that's a choice between increasing natural space and providing a living wage for a family that's trying to send the first member of their family to college.



**While the industrial sector provides more middle wage jobs to communities of color, it's also the sector facing the largest shortfall of acreage.**

Portland's industrial land supply shortfall  
Source: BPS

Tightening the industrial zoning rules is not in the best financial interests of property owners, developers or real estate agents. It also makes it more expensive to purchase land for regional parks. The only group that clearly benefits is industrial employees.

The Employment Zoning Project is intended to make our city a better place to live, particularly for those that have it the hardest. Quality of life requires nature and recreation. It also requires a living wage.

Please adopt the Employment Zoning Project without changes that make it less effective.

Respectfully submitted,

Corky Collier  
Executive Director