



East Multnomah Soil and Water Conservation District

October 21, 2015

Portland Planning and Sustainability Commission
1900 SW 4th Ave., Suite 7100
Portland, OR 97201

Subject: EMSWCD comments on Employment Zoning Project

Dear members of the Portland Planning and Sustainability Commission:

Please accept the following comments from the East Multnomah Soil and Water Conservation District (EMSWCD) on the Employment Zoning Project.

EMSWCD's mission is to help people care for land and water. To accomplish this, we collaborate with government agencies, non-profit organizations, community groups, and residents to improve and protect soil and water-related resources in areas lying east of the Willamette River centerline within Multnomah County. Within the urban part of our service area, among other efforts, we assist partners with protecting priority natural resource areas and providing equitable opportunities for people to access natural areas, particularly in underserved communities. One recent example is EMSWCD's contribution of \$1,000,000 towards the City's purchase of the Colwood Golf Course site for the establishment of the Colwood Natural Area.

In general, EMSWCD understands the City's desire to protect important industrial land in Portland to provide for the region's industrial land needs, including making better use of existing industrial lands through densification and re-development of brown field sites, rather than converting new areas to industrial uses. There are, however, important natural areas in the North Reach and Columbia Corridor industrial areas, particularly along the Columbia Slough, that function as wildlife habitat and corridors, help manage stormwater, and provide recreational opportunities for the communities of north and northeast Portland. These natural areas and natural resource values cannot, for all intents and purposes, be replicated anywhere else and deserve protection and restoration.

We have concerns that the proposed industrial overlay zone is overly restrictive and will place an undue burden on the protection and restoration of new natural areas. This planning initiative would be a good opportunity to recognize important environmental and natural resource areas and exclude them from the industrial overlay zone. Addressing industrial concerns, while not addressing environmental concerns at the same time, only serves to perpetuate conflicts between industrial and environmental interests.

EMSWCD welcomes the initial changes to the Employment Zoning Project from the discussion draft, including: excluding existing parks from the industrial overlay zone; allowing stormwater facilities as identified by BES; and allowing for the off-site mitigation of natural resource impacts in prime industrial areas. In addition, we support excluding the industrial capacity off-set requirement for the establishment of new parks and natural areas in the industrial overlay zone.



In addition to the above, the EMSWCD:

- 1) Does not support the two acre size restriction on parks, especially for areas near (less than 0.5 miles) underserved communities currently without adequate access to parks and natural areas. Requiring a comprehensive plan amendment to establish a park larger than two acres places an undue burden on the establishment of new parks and natural areas and the ability to meet park and natural resource protection goals.
- 2) Supports all areas identified as high or medium natural resource value in the City of Portland Natural Resource Inventory, regardless of current protection status, being excluded from the industrial overlay zone, or be an allowed use without any size restriction or mitigation requirements for new natural area establishment.
- 3) Supports concurrent updates of the environmental overlays with the industrial overlay for the North Reach River and Columbia Corridor. In doing so, important open space and natural resource areas that should be protected can be identified and future conflicts over the use of those areas minimized.

Thank you for considering these comments.

Sincerely,

Jay Udelhoven, Executive Director
East Multnomah Soil and Water Conservation District