



Bureau of Planning and Sustainability

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## MEMO

**DATE:** November 6, 2015

**TO:** Planning and Sustainability Commission

**FROM:** Tom Armstrong, Supervising Planner  
Steve Kountz, Senior Economic Planner

**SUBJECT:** Employment Zoning Project

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A number of different policy issues were raised at the October 27, 2015, PSC public hearing for the Employment Zoning Project. The purpose of this memo is to provide additional information for each issue to help inform the PSC in making their recommendation. The key issues are:

1. Environmental Overlay Zones Compatibility with Prime Industrial Overlay
2. Parks and Open Areas Prohibition
3. E-zone Update Timing
4. Self-Service Storage
5. Golf Course Landscaping Standards
6. EG zone office uses at 3:1 FAR and Guild's Lake Industrial Sanctuary Plan District Limits
7. Residential Non-Conforming Uses in EG Zones
8. Industrial Office
9. Air Quality

This memo includes page references to the code language in the September Proposed Draft of the Employment Zoning Project.

The Map Issues section begins on page 10.



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## 1. *Environmental Overlay Zones Compatibility with Prime Industrial Overlay*

Simply, environmental overlay zones (e-zones) restrict the location and scale of development, while the prime industrial overlay restricts the types of uses. Two different elements of development. They can overlap and be compatible. For example, a warehouse can be built in an environmental conservation-zone (with mitigation) but it cannot be used for self-service storage if it is in the prime industrial overlay zone.

The Basics:

The Zoning Code establishes the rules that control the use, development standards, and review procedures for land development in Portland.

Primary Uses - different categories of uses (residential, retail, industrial services, parks) have different allowances (allowed, limited, conditional, prohibited). See the use table on page 27 of the Proposed Draft.

Development standards - clear and objective standards control the size, shape and location of the development.

Review procedures - different levels of process and public review depending on the type of land use decision.

The Zoning Map has a number of different overlapping elements that determine which parts of the Zoning Code apply to a specific parcel.

Base Zones - broad categories (residential, commercial, industrial) provide the basic regulations on use and development standards. Only one base zone can apply. These zones are designated with capital letters and numbers - IG1, CN2, R5, EX

Overlay Zones - apply supplemental, more specific regulations. More than one overlay zone can apply to a parcel. These overlay zones are designated with lower case letters (p, c, d, l)

Plan Districts - add special regulations based on a specific location. The plan district regulations supersede or augment the other regulations in the base and overlay zones. Only one plan district can apply. These districts are designated by lines on the map.

The attached diagram shows how all three elements can layer on top of each other to define the regulations that apply to a given site.

**Environmental Overlay Zones** (e-zones) protect natural resources and functional values. The environmental regulations discourage encroachment into significant natural resource areas, encourage flexibility in site planning, and provide for development that avoids adversely impacting the site's natural resources.

There are two types of environmental zones: protection (p zones) and conservation (c zones). Simply, the environmental protection zone severely restricts development, while the environmental conservation zone allows some development with mitigation. The e-zones

apply to significant natural resource area, which is typically a portion of the site, and regulates development in that that area.

The **Prime Industrial Overlay Zone** is proposed to protect the industrial development capacity of land in Portland’s freight-hub districts. It does this by:

- prohibiting non-industrial uses (self-service storage, commercial outdoor recreation, major event entertainment, and parks)
- prohibiting quasi-judicial comprehensive plan map amendments to convert industrial land to non-industrial map designations

The e-zones control the size and shape of the development. The Prime Industrial overlay controls what the development can be used for. If the two overlay zones do not overlap, then someone could build a warehouse for self-service storage in the c-zone portion of a site.

## ***2. Parks and Open Areas Prohibition***

Metro Title 4 says local jurisdictions shall prohibit parks intended to serve people other than those working or residing in Regionally Significant Industrial Areas (RSIAs). The Prime Industrial overlay zone boundary corresponds to the RSIAs. Where the overlay does not correspond to the RSIA map, the City will need to ask Metro to amend the RSIA map. The Metro Title 4 map is attached.

Metro does not define “parks”, but the Zoning Code use category is defined as Park and Open Areas. This category addresses land uses that consist of natural areas, large areas consisting mostly of vegetative landscaping or outdoor recreation, community gardens, or public squares. Examples include parks, golf courses, cemeteries, public squares, plazas, recreational trails, botanical gardens, boat launching areas, nature preserves, community gardens, and land used for grazing that is not part of a farm or ranch.

The Metro Title 4 provisions make specific allowances for parks intended to serve people working or residing in the RSIA. It is not intended to prohibit trails and trailhead amenities, which the proposed code specifically allows for up to 2 acres.

Testimony from the Parks Bureau, the Parks Commission, Metro, and the Audubon Society of Portland object to this prohibition.

Metro Title 4 is clear in that recreational, developed parks are prohibited. Metro’s direction is that if a recreational park needs to be in a RSIA, then there should be a comprehensive plan map amendment and a Metro map amendment to change the RSIA designation. If the City does not include this prohibition, then it is likely that Metro will find the City is out of compliance with the regional planning requirements.

Metro Title 4 is not clear with respect to natural preserves. The proposed code treats natural areas as open areas and prohibits them as a use, unless the area qualifies as a stormwater facility, as determined by BES. Metro’s testimony says that natural areas are primarily habitat with limited public access (trails), and therefore should not be defined as parks.

The Parks Bureau has suggested that parks up to 10 acres in size should be considered local serving. The two-acre limit is based on a standard in Statewide Planning Goal 9. An

alternative would be to consider parks greater than two acres as a conditional use with the approval criteria to demonstrate that the size is appropriate to serve the local area. The following table summarizes the proposed code along with options to address issues raised in testimony

	<b>Recreational Developed Parks</b>	<b>Nature Preserves</b>	<b>Stormwater Facilities</b>
Proposed Code	Prohibited except for local serving parks (less than 2 acres)	Prohibited	Allowed as a public utility (BES determination)
Options	1. Allow larger local serving parks as a conditional use	2. Allow. Habitat areas with public access/trails as an incidental accessory use	

### **33.475.080 Parks and Open Areas**

Parks and Open Areas uses are prohibited in the Prime Industrial overlay zone except for the following:

- A. Recreational trails and boat launching areas are allowed. Trailheads, parking areas, bathroom facilities, educational kiosks and other development or facilities that are accessory to a recreational trail and boat launching areas are limited to 2 acres per site;
- B. Nature preserves are allowed;
- C. Off-site mitigation is allowed if the mitigation is for impacts that occur in the Prime Industrial overlay zone; and
- D. Other Parks and Open Areas uses that are 2 acres or less in size are allowed. Parks and Open Areas over 2 acres in size may be allowed if approved through a conditional use review.

### **33.815.150 Parks And Open Areas Uses in the Prime Industrial Overlay Zone**

These approval criteria apply to Parks And Open Areas uses in the Prime Industrial overlay zone that require a conditional use review as specified in 33.475.080.D. The approval criteria promote preservation of land for industry while allowing Parks And Open Areas uses when they are supportive of the industrial area and not detrimental to the character of the industrial area. The approval criteria are:

- A. The proposed use will not have significant adverse effects on nearby industrial firms, or on truck and freight movement;
- B. The transportation system is capable of supporting the proposed use in addition to the existing uses in the area. Evaluation factors include street designations and capacity, level of service; on-street parking impacts; access restrictions; connectivity; neighborhood impacts; impacts on pedestrian, bicycle, and transit circulation; safety for all modes; and adequate transportation demand management strategies;

C. The proposed use will not significantly alter the overall industrial character of the area, based on the existing proportion of industrial and non-industrial uses and the effects of incremental changes;

D. City-designated scenic resources are preserved; and

E. The proposed use needs to be located in an industrial area because industrial area residents or employees constitute the primary market of the proposed use.

### 3. E-zone Update Timing

Testimony by the Bureau of Environmental Services and the Audubon Society of Portland request an update to the environmental overlay zones along the Columbia Corridor and Portland Harbor. About 400 acres of high- and medium-ranked natural resources lack protection under environmental overlay zones (see attached map).

In particular, they note that the Airport Futures Land Use Plan identified e-zone updates with an ESEE (Economic, Social, Environmental and Energy) analysis and request that these e-zone updates be included in the Task 5/Early Implementation phase.

These updates are on the BPS work program, but are not part of the Periodic Review (Task 5) work program. The proposed Airport Future e-zone changes on private land were not without controversy. In order to resurrect them at this time, it would take:

- additional analysis to update the ESEE to be consistent with the 2012 Natural Resources Inventory
- analysis of the specific impacts on the industrial land capacity and subsequent adjustments to the EOA
- considerable public outreach and process

The testimony requests that if the e-zones are not updated, then the prohibitions on natural areas on properties with NRI-ranked resources should be suspended or waived. In general, waiving or suspending code is not good planning practice. It is too complicated to administer.

Most of the e-zone updates for High and Medium unprotected resources are along the sloughs and probably qualify as a stormwater facility, and are therefore not subject to the prohibition (see map).

The natural area prohibition really impacts the low value and SHA (grassland) areas - which are the areas with the most industrial capacity. Therefore, it is appropriate to have these potential nature preserves (that do not qualify as a stormwater facility) go through a Comp Plan Map amendment process.

In response to testimony regarding the need for e-zone updates, the PSC has two options:

1. Keep the proposed code as written (*as amended above*).
2. Add the Airport Futures e-zone changes to the proposed zoning map.
3. Delete the prohibition on nature preserves until the e-zones are updated.

## **4. Self-Service Storage**

Self-Service Storage uses provide separate storage areas for individual or business uses. The storage areas are designed to allow private access by the tenant for storing or removing personal property. Examples include single story and multistory facilities that provide individual storage areas for rent.

A transfer and storage business where there are no individual storage areas or where employees are the primary movers of the goods to be stored or transferred is in the Warehouse and Freight Movement category. RV and boat storage is considered to be an Industrial Service use, similar to towing and vehicle storage.

Currently, self-service storage is categorized as a Commercial Use, but is allowed in all employment and industrial zones, subject to the special regulations in Chapter 33.284, Self-Service Storage. The industrial zone exception is EX, where self-storage is a limited use. It is also a limited use in the CG and CX zones.

This use prohibition is not required by Metro Title 4, so the Proposed Draft is more restrictive in order to protect prime industrial areas with good access to the freight infrastructure. This protection is necessary because self-service storage facilities have low employment densities.

In response to testimony objecting to these restrictions, the PSC has two options:

1. Keep the prohibition in place. Self-service storage would continue to be allowed in employment and industrial zones outside of the Prime Industrial Overlay Zone.
2. Delete the prohibition. No change to the current regulations.

## **5. Golf Course Landscaping Standards**

Portland International Airport Plan District (Chapter 33.565) implements the *Airport Futures Land Use Plan*. The Middle Columbia Slough Subdistrict promotes eco-industrial development on sites that transition to industrial use from golf course use. The draft code is intended to provide a balanced approach that supports industrial growth and watershed health.

The development standards require a minimum landscaped area of 20 percent, including setbacks and parking lot landscaping, as well as eco-roofs. At least 75 percent of the plants must be native plants from the Portland Plant List.

The Port of Portland testified that the plant list should be restricted to the Airport Plant List, which is part of the Portland Plant List. These plants were selected because they are generally non-seeding or non-fruiting and do not provide attractive roosting habitat, therefore do not attract wildlife that might pose a threat to aviation safety.

BPS staff does not support this change only for the two golf course sites. The Airport Wildlife Hazard Management Plan area applies to a much wider area. If the Airport Plant List should be considered for a larger area, then that discussion should be more holistic, and take place as part of the Columbia Corridor plan.

Scott Krieger from Broadmoor Golf Course objected to the additional landscaping standards.

In response to testimony objecting to these standards, the PSC has two options:

1. Keep the standards in place. A minimum landscaped area of 20 percent, including setbacks and parking lot landscaping, as well as eco-roofs. At least 75 percent of the plants must be native plants from the Portland Plant List.
2. Delete the proposed standards. The minimum landscaping standards in the base zone (IG2) would apply - 15 percent minimum landscaped area.

## ***6. EG zone office uses at 3:1 FAR and Guild's Lake Industrial Sanctuary Plan District limits***

Northwest District Association objects to the proposed increase in allowed office density from 1:1 to 3:1 floor area ratio (FAR) without evaluating transportation capacity to handle the significant potential increase in traffic, specifically related to the proposed map changes along NW Vaughan.

## ***7. Residential Non-Conforming Uses in EG Zones***

Public testimony has raised questions and concerns about the non-conforming status of existing residential uses in the EG zones.

First, in anticipation of prohibiting new residential uses in EG zones, BPS staff identified concentration of existing housing and proposed map changes to Residential or Mixed Use designations on the draft Comprehensive Plan Map. However, some dispersed residential sites were retained in Mixed Employment areas. Proposed new Mixed Employment areas in Gateway and along SE 82<sup>nd</sup> Avenue also include several existing residential sites.

To reduce the regulatory burden of “non-conforming use” status, proposed code changes would allow expansion up to 500 square feet without a non-conforming situation review (page 33).

Public testimony also raised concern about the ability to rebuild a house in the case of a fire. When a nonconforming use is damaged by fire or other causes, the re-establishment of the nonconforming use is prohibited if the repair cost of the structure is more than 75 percent of its assessed value.

## ***8. Industrial Office***

The Bureau of Development Services and others have recommended clarifying the definitions of both Industrial Office and Traditional Office. This issue was discussed in the SE Quadrant Plan process and refinements to these definitions, along with design standards for industrial office development, will be discussed in the next phase of the Central City Code Update.

## **9. Air Quality**

Public testimony raises air quality as a continuing concern in addressing human health, especially for residential neighborhoods that are nearby industrial areas.

The current zoning code includes buffer overlay zones (Chapter 33.410) that require additional buffering between nonresidential and residential zones. The separation is achieved by restricting motor vehicle access, increasing setbacks, requiring additional landscaping, and restricting signs. There are also limits on off-site impacts (Chapter 33.262) such as noise, vibration, odors, and glare that enable the City to require additional mitigation for uses that may cause off-site impacts and nuisances.

The City relies on the Oregon Department of Environmental Quality (DEQ) to regulate the type and amount of air emissions from land uses.

BPS has identified a future work program task to create additional buffer standards for mixed use and residential development adjacent to industrial areas (and freeways) that would include additional landscaping requirements to require more trees, HVAC requirements for air filtering, and sound insulation - similar to the standards proposed for the St. Johns Plan District (page 63).

### ***Map Issues***

Several zoning map change issues were identified at the October 27th public hearing and in written testimony.

Key map issues are:

1. ESCO on NW Vaughn
2. Montgomery Park on NW Vaughn
3. Freeway Land site at SE Foster and I-205
4. EX conversion to EG sites
5. PECO site on SE 17th Ave
6. Broadmoor golf course
7. Metro Greenspaces requests on Port land
8. Linnton Prime Industrial Overlay

Many of these mapping issues relate primarily to the Comprehensive Plan map, which is currently being reviewed by City Council. We will send each person that testified a letter that acknowledges their testimony and directs them to City Council with information on how to testify. If City Council amends the Comprehensive Plan map designation on the site, the proposed zoning map change will be adjusted accordingly.



## ***ESCO on NW Vaughn***

Northwest District Association submitted a letter (October 27th) objecting to (1) the proposed zoning map change to EG1 zoning on sites currently in industrial use and (2) the proposed increase in allowed office density from 1:1 to 3:1 floor area ratio (FAR) without evaluating transportation capacity to handle the significant potential increase in traffic. Christie White representing ESCO spoke in favor of these proposed map and text changes.

### **Code Changes**

The adequacy of the transportation system to accommodate the draft changes to the Comprehensive Plan Map have been modeled and evaluated citywide, and this analysis continues to be refined. Where capacity issues are identified, projects or refinement studies are proposed in the Transportation System Plan to address these issues. BPS will continue to work with PBOT and ODOT to update the transportation analysis based on the final Comp Plan map adopted by City Council. There will be additional information available as part of the zoning map discussions in February, 2016.

Currently, the development standard for maximum FAR in EG zones allows a 3:1 FAR, but limitations on office uses in the EG zone reduces the max FAR to 1:1, and requires a conditional use review for retail and services uses exceeding 1:1 FAR. The proposed code change to reclassify offices from limited to allowed uses in EG zones has the effect of increasing allowable office density from 1:1 to 3:1 FAR. (see pages 24 to 27 of the Proposed Draft)

Rationale for proposed change to allow 3:1 FAR in office uses:

- Meet 20-year land needs. New ME Mixed Employment areas are designated on the Comprehensive Plan Map to meet the 20-year land supply shortfall found in the Economic Opportunities Analysis (EOA) for Dispersed Employment Areas. These new ME areas are also part of the jobs strategy in East Portland to increase the density of middle- and high-wage jobs there. The development capacity in these new ME areas consist mostly of small, underutilized sites, and the additional FAR allowance would support redevelopment on more of these sites.
- Rationalize the density allowances with expected demand. EG zones are intended to primarily accommodate office and light industrial uses, rather than housing or retail and services. About half of the forecast job growth in Dispersed Employment Areas are in the office buildings and about one-third in industrial buildings, consistent with current conditions.
- Maintain property values in EG zones. Adding office density allowance in the EG zones is partly intended to help offset the lost development potential from proposed reduction in retail and residential use allowances.
- Transportation impacts would be moderated. Additional trip generation from higher office allowances is partly offset by reduced retail and residential allowances. The market in EG zones is expected to produce substantially lower office densities on average, estimated at 1.25:1 FAR in EG2 zones and 2:1 FAR in EG1 zones. And higher office densities are expected in EG locations with smaller sites and frequent transit access, where multimodal access is expected to further moderate traffic impacts.

In addition, the Guild’s Lake Industrial Sanctuary Plan District currently limits office uses to 1:1 FAR with an additional 0.85:1 FAR bonus for contributions to the Northwest Transportation Fund (NWTF).

In response to testimony objecting to these standards, the PSC has three options:

1. Keep the citywide 3:1 FAR for office uses in place.
2. Reduce the citywide 3:1 FAR for office uses in the EG zones.
3. Limit office use to 1:1 FAR (plus bonuses) in the Guild’s Lake Industrial Sanctuary Plan District.

## Guild’s Lake Industrial Sanctuary Plan District

### 33.531.140 Additional Regulations in Subdistrict B

- A. Purpose.** These regulations minimize conflicts between industrial operations in the Guild’s Lake Industrial Sanctuary and the mixed-use neighborhood to the south. Uses are limited or prohibited that may conflict with nearby industrial and residential uses or that can overburden the area’s transportation system. These regulations provide additional flexibility in the siting of the limited amount of Office uses allowed in the subdistrict, while preserving overall Office use limitations. The regulations also limit blank walls on the ground level of buildings to encourage a continuity of active uses along street frontages and to avoid a monotonous pedestrian environment. Parking access is limited along NW Vaughn Street to minimize impacts on the transportation system and to reduce conflicts with pedestrians.
- B. Where these regulations apply.** These regulations apply to sites in an EG zone within Subdistrict B, shown on Map 531-2.
- C. Retail Sales And Service uses.** Retail Sales And Service uses are allowed if the net building area plus the exterior display and storage area is not more than 10,000 square feet per site.
- D. Office uses.** Office uses are allowed but limited to an FAR of 1:1.

#### Map Changes

The proposed map changes from IG1 to EG1 along NW Vaughn would implement the ME Mixed Employment designation on the existing and proposed Comprehensive Plan Map. The ME designation would maintain a 1-block transition area along NW Vaughn between the IS Industrial Sanctuary designation to the north and MU3 Urban Center designation to the south.

#### ESCO on NW Vaughn

Proposed map	IG1 to EG1.
Options	Retain IG1 until transportation capacity is further evaluated.

## **Montgomery Park on NW Vaughn**

Bill Naito Co., owner of the Montgomery Park site at 2701 NW Vaughn, has submitted a letter (October 23) objecting to the proposed zone change from EX Central Employment to EG2 General Employment. Cited reasons include reduced flexibility for residential and mixed-use development, the location near the Central City, and large site size (nearly 20 acres).

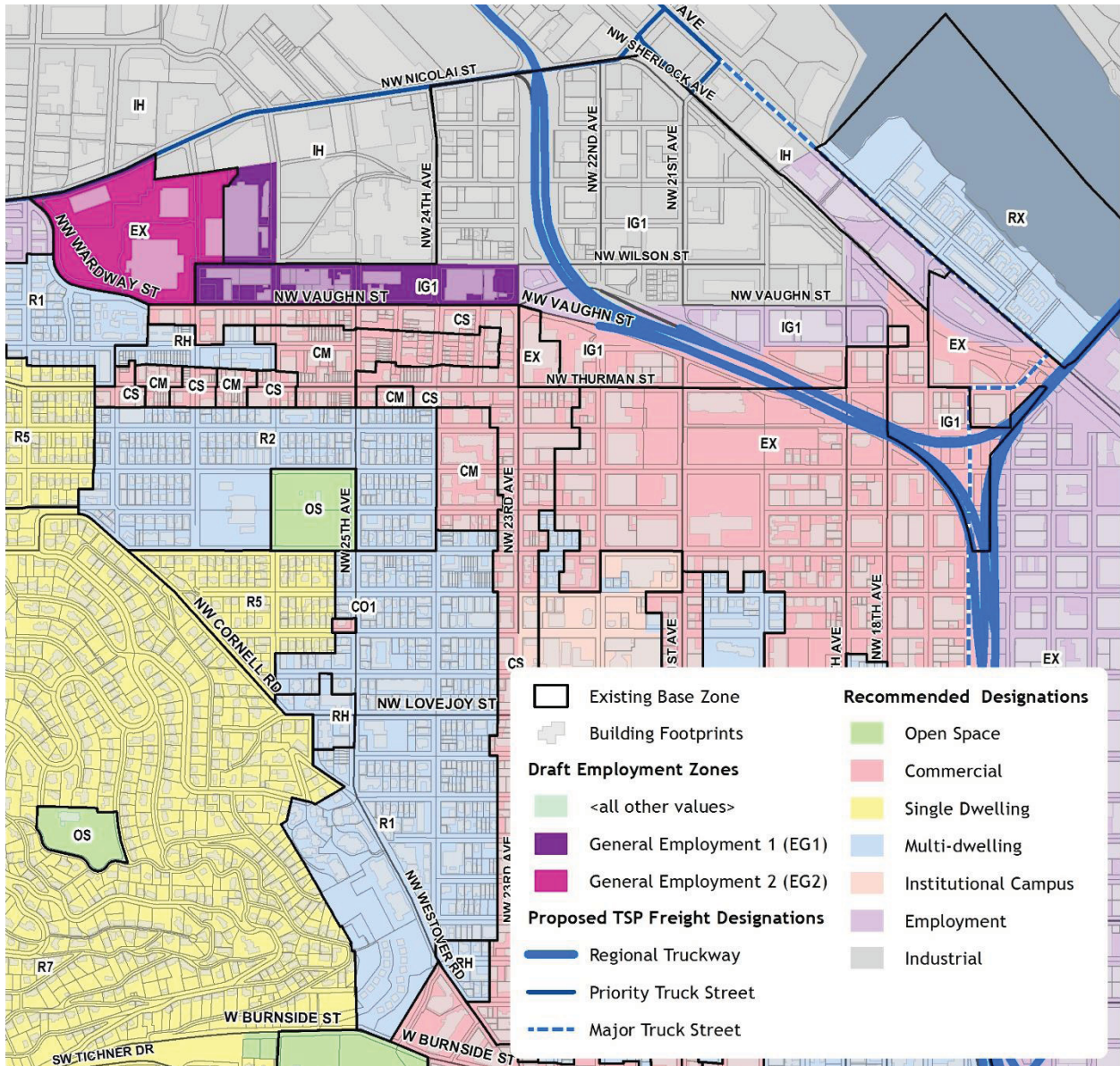
The proposed map change from EX and IH to EG2 would implement the ME Mixed Employment designation on the Recommended Comprehensive Plan Map. Approximately 13 acres of the Naito property currently has EX zoning and approximately 4.6 acres has IH Heavy Industrial zoning. The draft map changes are shown on the map on page 12.

The ME designation would maintain a transition area along NW Vaughn between the IS Industrial Sanctuary designation to the north and MU3 Urban Center designation to the south. Redevelopment of this large site for housing north of Vaughn would introduce compatibility conflicts and compromise the boundary between the Guild's Lake industrial district and Northwest town center.

The draft Comprehensive Plan Map eliminates all of the EX designations outside of the Central City (including OHSU) and Gateway. Existing EX plan designations are proposed to change to ME Mixed Employment or MU Mixed Use. In this case, the proposed ME designation is more appropriate to the edge location of the large Guild's Lake industrial district and is consistent with the existing use of the site, which is developed as an office complex at approximately 2:1 FAR.

### **Montgomery Park on NW Vaughn**

Proposed map	EX to EG2
Options	Apply EX zoning
	If City Council changes plan designation from EX Central Employment to one of the Mixed Use designations, and apply Commercial Mixed Use zoning.



## Freeway Land site at SE Foster and I-205

Lane Powell, representing Jameson Partners LLC, submitted a letter (October 26) objecting to the proposed zone change to EG2. Jameson Partners objects to the reduced residential and retail allowances on this large 100-acre site, which is located in the Lents URA, near the Lents Town Center and within one mile of two light rail stations. The owner proposes developing a master plan to guide redevelopment of the large site for a mix of uses commercial and residential uses.



growth strategies in East Portland, and the currently undermet market need for Dispersed Employment land.

**Freeway Land site at SE Foster and I-205**

Proposed map	EX to EG2
Options	If City Council changes plan designation from EX Central Employment to Mixed Use Dispersed on part of site, apply CE Commercial Employment zoning.

***EX conversion to EG sites***

Some property owners have objected that proposed zone changes from EX to EG will reduce development options and property values. In addition to the map issues at the Montgomery Park and Freeway Land sites discussed above, proposed zone changes from EX to EG include Central Gateway and some small sites in the Sellwood neighborhood.

In evaluating effects on property values, it is important to distinguish between current and potential future values. Appraisals generally examine current values based on site improvements and “comparable” recent property sale transactions. In contrast, property owners may have higher price expectations based on potential future market conditions. The areas where EX to EG rezoning is proposed typically have substantial underutilized land that has remained underutilized at this location. Current zoning and the proposed Comprehensive Plan map provide a substantial oversupply of mixed-use commercial capacity relative to forecast demand over the next 20 years. In contrast, the proposed ME Mixed Employment areas are currently undersupplied and the proposed new Mixed Employment areas result in a slight citywide surplus. As a result, redevelopment for higher property value in the next 20 years is more likely on average under EG zoning if conditions for EG-type development is viable, rather than current EX zoning where owners may forego redevelopment in the short-term in light of potential future price expectations.

Proposed EG zones provide for low- to mid-rise buildings with generally substantial opportunity for additional site development. Some of the sites where EX-to-EG rezoning is proposed are fully developed (not underutilized) consistent with proposed EG uses, such as the Montgomery Park and Sellwood sites. While each of the proposed EX-to-EG zone change sites have different circumstances, the proposed rezoning is expected to have little impact on current property values, potentially up or down depending on responsiveness to short-term and 20-year market conditions. Proposed code amendments also increase the allowable office FAR in EG zones from 1:1 to 3:1 FAR to facilitate redevelopment across varying site conditions and substantially offset the proposed reduction of retail and residential use flexibility.

## PECO site on SE 17th Ave

The former PECO manufacturing site on SE 17<sup>th</sup> Ave. (see map below), was recently closed. Representatives of the property have requested consideration for rezoning to allow industrial office development in proximity of new Orange Line light rail stations along SE 17<sup>th</sup>. Transit-oriented development options were considered at these new light rail stations in Brooklyn area as part of the Southeast Quadrant Plan. The results of that area planning effort were limited Comprehensive Plan Map changes north of Holgate and east of 17<sup>th</sup> Ave.



This site is part of the Brooklyn Yard industrial area, where a Prime Industrial overlay zone is proposed. Brooklyn Yard is Union Pacific's primary intermodal (container) rail yard in the region, where UP has recently made major improvements. Industrial vacancy rates in SE Portland have been persistently low and industrial market potential is expected to remain strong for small, close-in manufacturing and industrial service space, as well as small warehouse and distribution space near Brooklyn Yard. A site-redevelopment analysis conducted recently near SE 17<sup>th</sup> station areas and Central Eastside sites, industrial development options outperformed industrial office and mixed use scenarios in financial feasibility analysis at SE 17<sup>th</sup> sites.

“Industrial office” job growth and building reuse trends have been strong in the Central Eastside over the last decade, typically consisting of software, graphics and design businesses. In response, the Southeast Quadrant Plan land use proposals, consisting primarily of allowing industrial office uses in all IG1 zones, has increased the 20-year development capacity to 2035 of the Central City Industrial areas to 209% of forecast demand (Economic Opportunities Analysis). One option would be to create a new overlay zone to allow for Industrial Office uses along SE 17<sup>th</sup> Ave.

Orange Line MAX station area plans

At the October 27<sup>th</sup> hearing, there was a question about the station area assumptions for the Orange Line MAX stations. Per federal regulations, the initial planning for the Orange MAX line was based on adopted land use plans. There were no assumptions about future land use changes that would increase ridership. So, no land use changes were anticipated in order to justify the ridership forecast for the Orange line.

In 2014, BPS led a station area process as part of the SE Quadrant Plan to look for opportunities for employment focused transit oriented development. The focus of this planning effort was on the OMSI and Clinton stations, but it also looked at the Rhine and Holgate stations. The result was proposed land use changes at the OMSI and Clinton stations that were incorporated into the SE Quadrant Plan. No significant changes were identified for the Rhine and Holgate stations.

**PECO site on SE 17th Ave**

Proposed map	Apply Prime Industrial overlay to IG1 General Industrial base zone.
Options	Do not apply Prime Industrial overlay on SE 17th Ave. frontage sites. Leave IG1 General Industrial base zone.
	Create a different overlay zone to allow Industrial Office along SE 17 <sup>th</sup> Ave.

***Broadmoor Golf Course***

Perkins Coie, representing Broadmoor Inc., submitted a letter and Scott Krieger, representative, requesting that the zoning of the area be amended to IG2 General Industrial concurrently with the plan map amendment.

The requested map amendment from OS Open Space to IG2 would implement the IS Industrial Sanctuary designation on the Recommended Comprehensive Plan Map. The site area of the zone change is approximately 15 acres of the site at 3509 NE Columbia Blvd. as shown on the map below and includes the existing club house, parking areas, and some golf course area. Transportation and public services to serve the site were evaluated as part of the Comprehensive Plan Update and improvements are proposed in the Transportation System Plan and Citywide Systems Plan as needed to accommodate the map change. Additional development standards for ecologically beneficial design are proposed in the Airport plan district at this site area, which are discussed above.



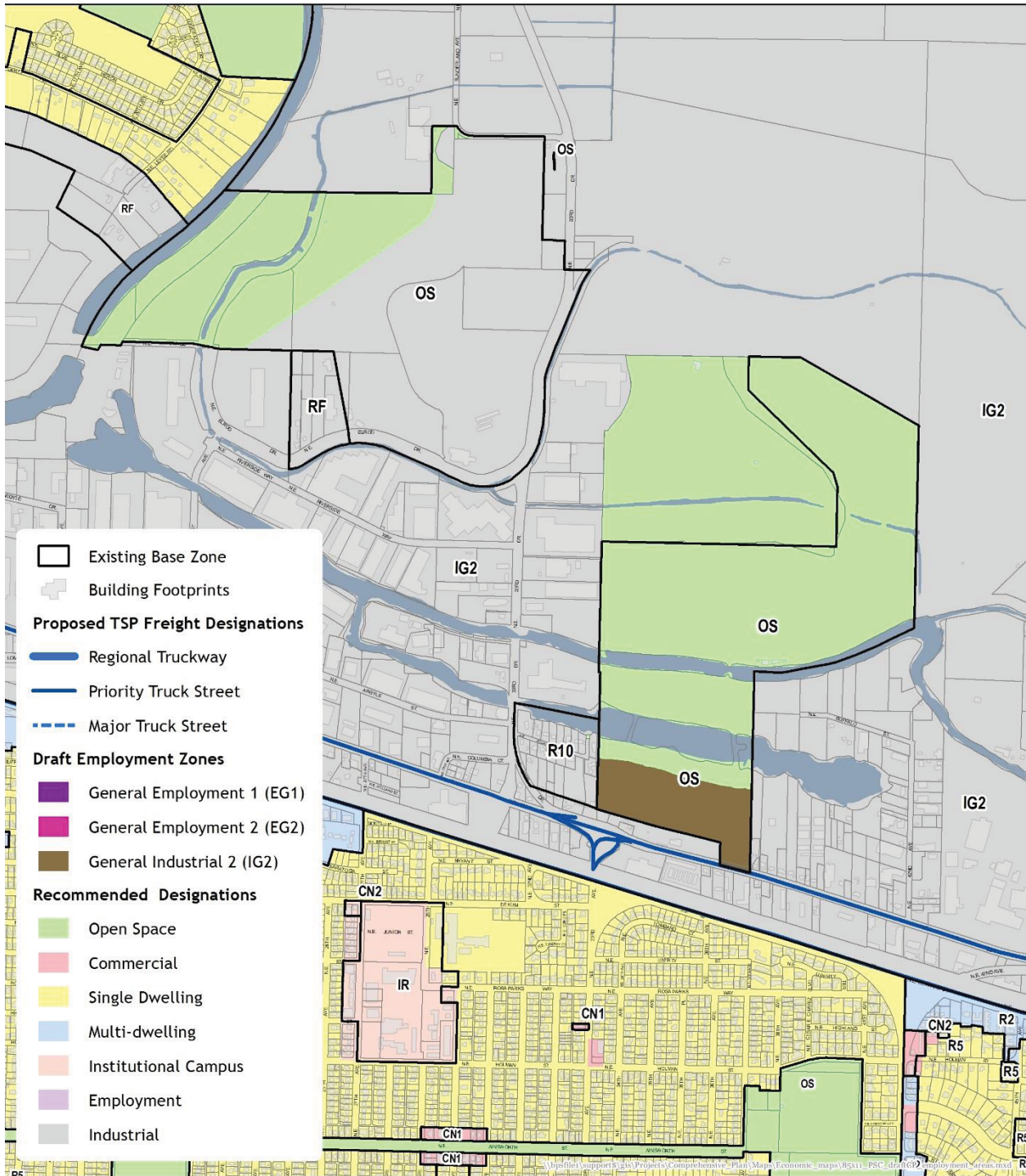
Rezoning was not proposed earlier as part of the Proposed Draft only because nearby Riverside Golf Course objected to rezoning at this time, and because comments from representatives of both golf courses indicated that current plans for continued golf course use.

Amendments to the environmental zoning at this site were anticipated to be proposed concurrent with a zone change request, consistent with the ESEE analysis of the environmental zoning adopted in 2011 as part of the Airport Futures plan district. If the PSC recommends going forward with this rezoning now, BPS staff will analyze and prepare a recommendation for environmental zoning map changes in the site area based on the base zone change, and bring the recommendation back to PSC prior to the public hearing on the citywide Zoning Map Update in February 2016.

**Broadmoor Golf Course**

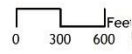
Recommended change to proposed map	Change OS to IG2 on the 15-acre part of the site proposed IS Industrial Sanctuary.

# Golf Course Sites



## Employment Zoning Project

November 6, 2015



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### ***Metro Greenspaces requests on Port of Portland land***

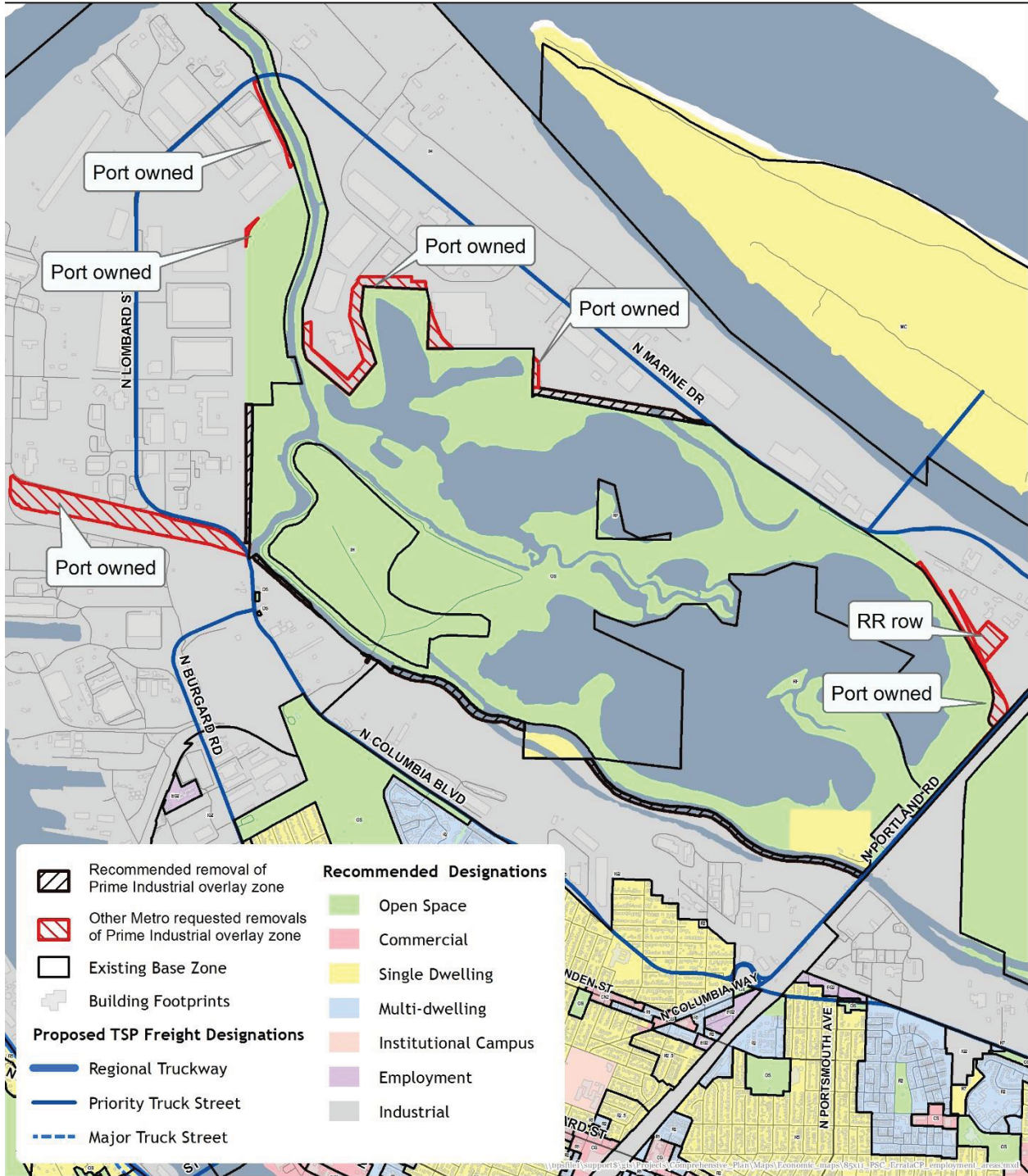
Metro Parks and Nature Department submitted a letter (October 23) recommending removal of 111 acres of land in the vicinity of Smith & Bybee Natural Area.

Reviewing these sites, some of them are owned by Metro or BES and some are submerged land in the slough. However, much of the affected acreage is owned by the Port of Portland, including part of the Bonneville Rail Yard, and other sites are railroad right-of-way. Port and railroad land represent freight hub infrastructure and facilities that specifically match the intended purpose of the Prime Industrial Overlay Zone. In response to Metro’s letter, the Port of Portland submitted comments recommending retention of all proposed Port-owned land in the Prime Industrial overlay.

#### **Metro Greenspaces requests on Port of Portland land**

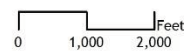
Recommended change to proposed map	Retain Prime Industrial l-overlay on Port-owned properties and railroad right-of-way and remove from other sites on maps below per Metro request.
Options	Remove Prime Industrial l-overlay from other sites recommended by Metro.

# Smith & Bybee Lakes Area



## Employment Zoning Project

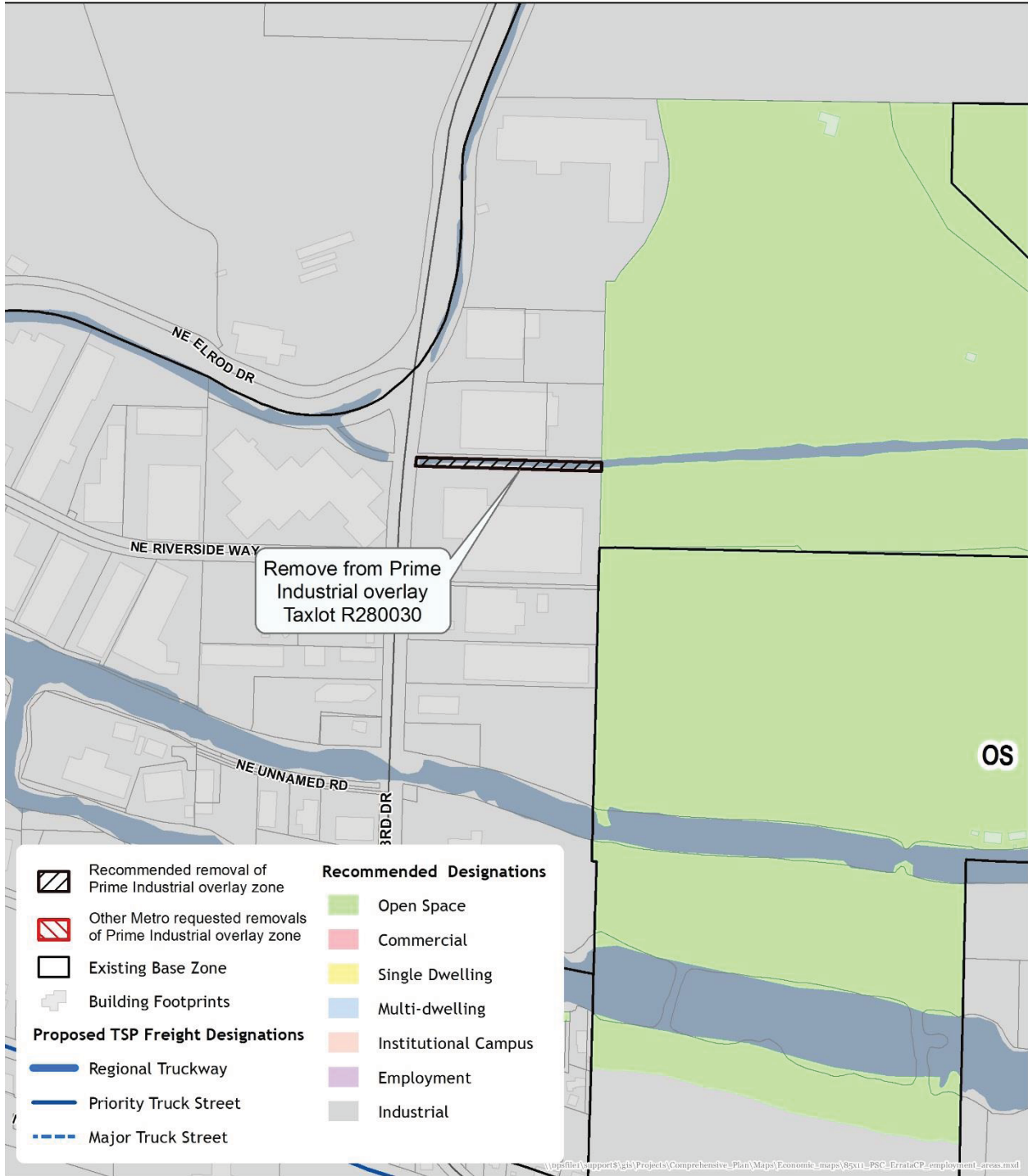
November 6, 2015



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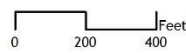


# Broadmoor Golf Course



## Employment Zoning Project

November 6, 2015



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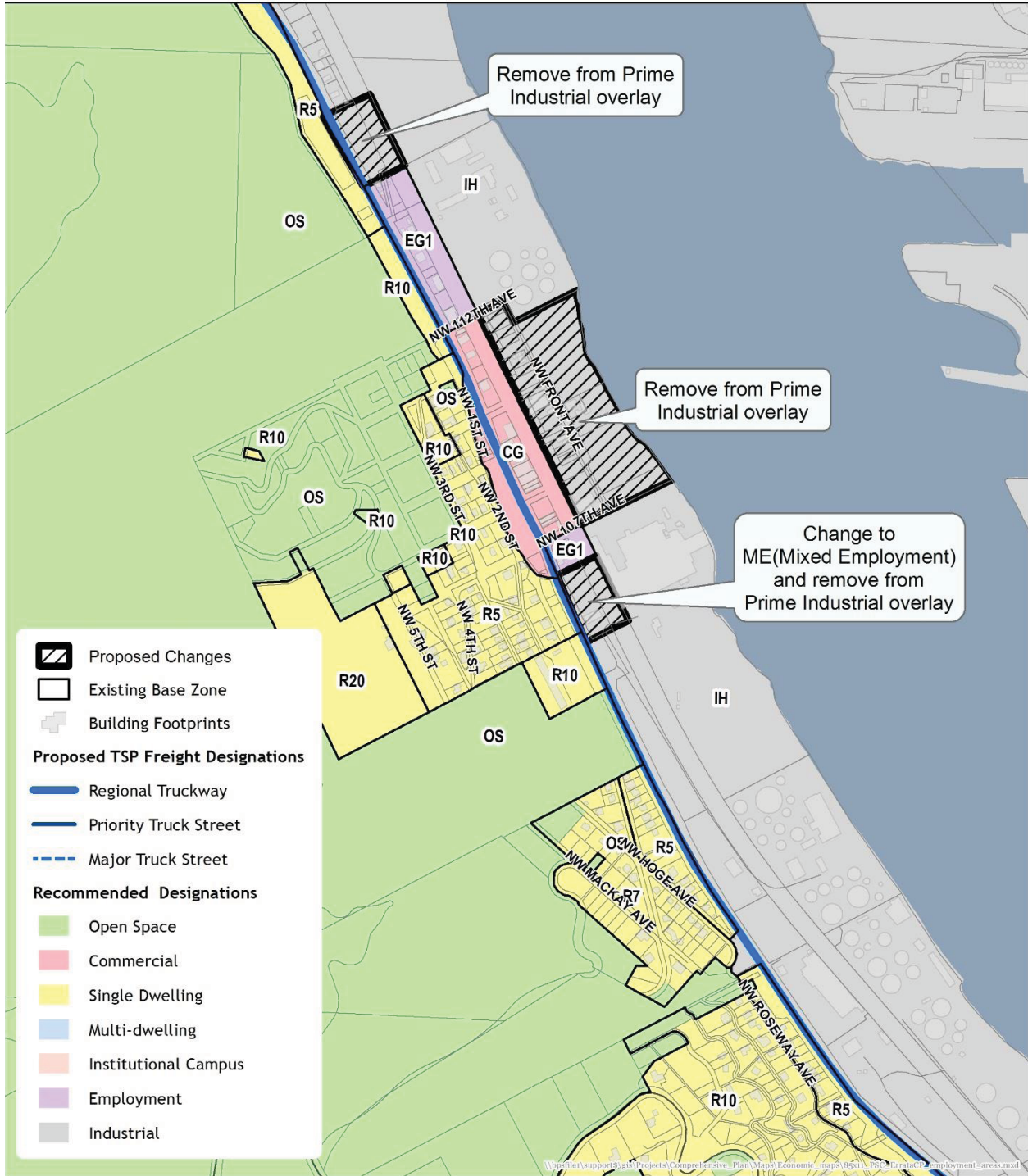


## ***Linnton Prime Industrial Overlay***

Representatives of the Linnton Neighborhood Association recommended changes to the Prime Industrial Overlay Zone near the commercial center of Linnton. After meeting with the neighborhood representatives, staff recommended changes to the Prime Industrial Overlay Zone in three areas, as shown on the map below:

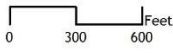
- Remove the overlay from Kingsley Park, a 2-acre undeveloped park zoned IH Heavy Industrial north of central Linnton. This site is one of a seven undeveloped parks with industrial zoning in the City parks inventory that were removed from the Prime Industrial Overlay in the Proposed Draft.
- Remove the overlay from a 1-acre, IH-zoned portion of the Linnton Plywood site between Highway 30 and the railroad. The remaining portion of the site between Highway 30 and the railroad has EG zoning. This amendment is one of several map changes proposed to address split zoned properties.
- Remove the overlay from the Front Avenue area in Linnton (about 13 acres) to retain flexibility to consider future plan map amendments. Reasons for a more flexible approach in this unique area include advantages of a finer-grain approach in this small-site, grid-block area, the lack of a Metro Title 4 Regionally Significant Industrial Area designation, and the Greenway g-overlay zone in this area requires a riverfront trail and doesn't require river-dependent uses.

# Linnton Employment Area Zoning



## Employment Zoning Project

August 31, 2015



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C-ZONE  
CONVERSATION ZONE

P-ZONE  
PROTECTION ZONE

E-ZONE OVERLAYS (c,p)

PRIME INDUSTRIAL OVERLAY (I)

AIRPORT OVERLAYS (h,x)

BASE ZONE (IH, IG, EG)

SITE

SLOUGH

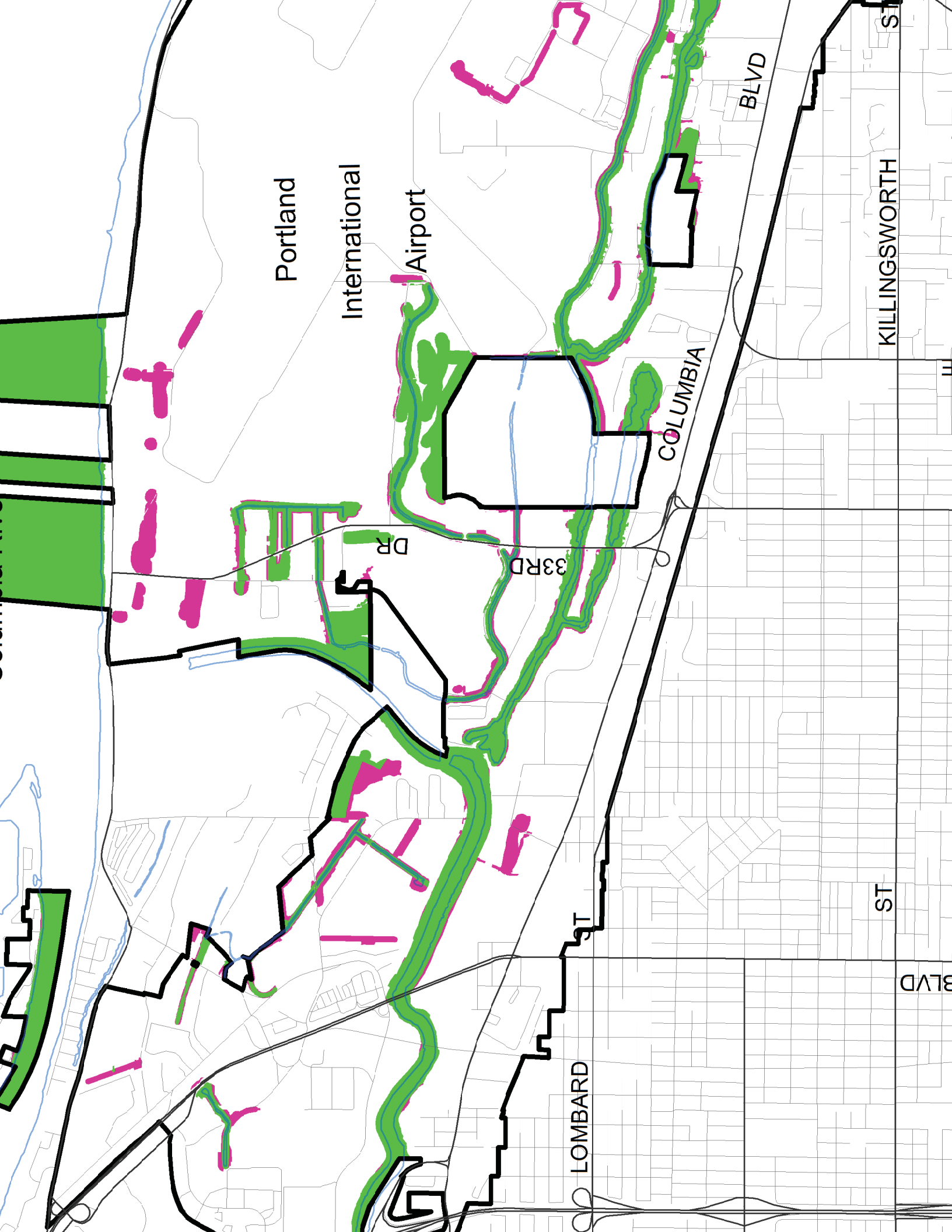
STREET

IG1

IG1

IG1





Portland  
International  
Airport

COLUMBIA  
BLVD

KILLINGSWORTH  
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LOMBARD  
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