



**NORTHEAST COALITION
OF NEIGHBORHOODS**

April 21, 2015

Planning and Sustainability Commission
City of Portland
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

Subject: Testimony regarding the Revised Economic Opportunities Analysis & Goal 9
Conformance

Dear Commissioners:

The following are comments and recommendations from the Northeast Coalition of Neighborhoods (NECN) on the Revised Economic Opportunities Analysis. NECN serves to amplify the voices of community members from twelve inner North and Northeast Portland neighborhoods. The comments included in the testimony below were referred by our Safety and Livability Team (SALT) and were endorsed by the NECN Board of Directors on April 21, 2015.

NECN opposes the City's strategy of its March 2015 Proposed Draft Economic Opportunities Analysis, to designate portions of golf courses north of Columbia Blvd. for industrial use to meet our future industrial development capacity needs. Instead of encroaching on undeveloped open spaces to satisfy the requirements of Statewide Planning Goal 9, the City should further bolster its strategies for industrial lands retention, intensification, and redevelopment. If it is unable to reach its Goal 9 industrial land requirements implementing these alternative strategies, we call on the City to seek an exception to Goal 9.

We urge the City of Portland to seek alternative strategies in lieu of new development and contamination of existing green spaces. The City's strategy to develop open spaces as new industrial lands to satisfy the requirement of Statewide Planning Goal 9 directly contradicts Portland's community livability goals and its Climate Action Plan.

Portland's natural resources and green spaces are what make this city desirable. Instead of re-zoning and converting existing golf courses (Broadmoor and Riverside) along the Columbia corridor, we urge the City to follow a more sustainable strategy and explore other ways to secure jobs for our communities that do not compromise the health and well-being of its residents. The City of Portland will not be able to remedy its deficit of new industrial lands without sacrificing the environment and sacrificing the health and livability of its North and Northeast communities.

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Instead of converting and developing pristine, open spaces to industrial sites, we urge the City to clean up existing brown fields, especially those in existing Industrial Zones, and to set a more ambitious goal: to redevelop greater than 70% of existing brown fields over the next 20 years to maximize otherwise underutilized and/or vacant parcels. Additionally, the City needs to prevent and prohibit further contamination of existing brown fields through the strongest possible policy regulations to prevent further obstacles to use.

Implementing strategies to intensify and retain existing industrial land can also help to ensure that adequate industrial land, and the jobs they provide, can be found within our current developed system. We urge the City to bolster programs to redevelop underused or obsolete facilities that are already part of the industrial lands inventory. Moreover, we urge the City to strengthen the policy that protects parcels currently zoned industrial from being down zoned for a commercial use; thus ensuring we use the lands already placed in industrial inventory in previous plans and decreasing the pressure to develop open spaces.

The City's current Economic Opportunities Analysis, and ultimately its Comprehensive Plan, must take into account the cumulative effect of its strategies to develop existing open space and natural areas, while investing in multimodal freight infrastructure improvements in the same areas. With the anticipated increase in freight traffic and transport along the Columbia Corridor and the accompanying increased diesel emission, pollution will intensify in a region of the City where air quality is already severely compromised. This air quality problem will only be exacerbated if portions of the Broadmoor and Riverside golf courses are developed. The resulting poor air quality will further harm the health of residents particularly in the adjacent North and Northeast Portland neighborhoods. This is neither economic nor environmental justice.

Rather than Portland bending to the State of Oregon's Goal 9 requirements, we call upon the City to request an exception to Goal 9. In fact, when new industrial development is proposed, the City must be held accountable for attaining environmental, safety, and health analyses prior to the approval of the said development, and must communicate these analyses to affected communities.

The NECN Board of Directors and our SALT members thank you for your important work in protecting the air, water, and land in our communities. We appreciate your consideration of our comments.

Sincerely,



Alan Silver
Chair, NECN Board of Directors