

To: Planning and Sustainability Commission
From: Urban Forestry Commission
RE: Employment Zoning Project
Date: October 22, 2015

Dear Members of the Planning & Sustainability Commission,

The Urban Forestry Commission was recently briefed about the Zoning Code amendments that are being considered as part of the Employment Zoning Project. While we recognize that stronger code language for industrial lands is needed to support economic growth, we are very concerned about some proposed changes that will adversely impact the City's ability to provide sufficient open space and recreation programs for the public, and preclude opportunities for increasing the forest canopy.

The Urban Forestry Commission concurs with several points made by the Audubon Society of Portland and the Parks Board. Specifically;

The Project proposes to limit parks and open space areas to just two acres or less, serving only employees and residents within the industrial overlay zone. Restricting public facilities and open space to serve a specific class of users is counter to the equity goals that the City promotes. Not only does this curtail the types of parks and recreation activities that serve the public, it also limits the types of trees and consequently, the city's ability to gain canopy in the areas where it is needed most; places where trucks, impervious surfaces and blacktop prevail. We are well aware of the rapid loss of Portland's large and most ecologically beneficial trees. And, we are well aware of the challenges we face with density goals. Parks have historically been and must continue to be one of the places where Urban Forestry staff have the ability to plant and maintain very large trees. We request that parks and open space are permitted uses in all zones and do not require mitigation.

The draft Comprehensive Plan includes visionary goals and strategies that encourage neighborhood parks, recreation facilities

and open space within industrial areas, and specifically within the Willamette North Reach and the Columbia Corridor. The Plan also encompasses a systems thinking approach to development that promotes enhancing and sustaining forest canopy, creating climate resiliency, and serving all Portland residents equitably with safe access to natural resources within minutes of their homes. We would like to see the employment Zone Project take a holistic planning approach that addresses both employment and environmental needs. We request that all lands rated as high, medium or low in the natural resources inventory be removed from the prime industrial land overlay until all of the natural resource inventory can be updated.

On behalf of the Urban Forestry Commission, thank you for taking our strong concerns into consideration as you finalize the Employment Zone Project.

Sincerely,

Meryl A. Redisch,
Chair, Urban Forestry Commission