



# Northwest District Association

Planning and Sustainability Commission  
October 27, 2015

Thank you for the opportunity to testify on the Proposed Employment Zoning Project on behalf of the Northwest District Association Planning Committee. We would like to bring several things to the attention of the Planning and Sustainability Commission. We support the existing configuration of the Industrial Sanctuary and the Guild's Lake Industrial Sanctuary Plan District, including existing zoning for the reasons stated below:

## General Concerns

### Land Use

We understand that Bureau of Planning staff and this Commission are considering the Employment Comprehensive Plan designation and General Employment (EG) Zoning for property that is currently zoned, and being used, for industrial uses. The Planning Committee has multiple concerns about the increase of intensity in land use for non-manufacturing purposes that will be one result of adoption of the Employment Zoning Project (EZP). This further erosion of the industrial sanctuary represents the loss of Prime Industrial Land – currently the only type of property in the city that is inadequate to meet existing and forecasted demand. In addition the potential loss of manufacturing jobs, triggered or the ultimate result of zoning and land use changes, will occasion the loss of manufacturing jobs, jobs that are generally characterized by higher than average wages, low barriers to entry and held by a greater diversity of Portlanders. Based on recent reports, manufacturing jobs are returning to the U. S. and Portland should not jeopardize it's ability to receive them.

### Transportation

The major change proposed to the General Employment Zone is to allow general office uses to be constructed to a 3:1 Floor Area Ratio (FAR), up from the current FAR of 1:1. This is a tripling of office development potential. It is our understanding that a transportation analysis was not done to evaluate whether the transportation system (existing and planned) has the capacity to handle a significant potential increase in traffic that could result from this change. Existing and proposed EG zoning often is located in close proximity to already heavily congested locations, including freeway interchanges.

## Specific Concerns

In the early 2000's, while the Northwest District Plan was under consideration, ESCO asked for Employment Zoning on their General Industrial (IG) property north of NW Vaughn. A transportation analysis, done by their consultant, showed that the maximum FAR that could be accommodated at the time was 1.85:1. Based on this analysis, City Council asked staff to amend the Guild's Lake Industrial Sanctuary Plan District to allow a Comprehensive Plan designation of EG, but retaining the IG zoning. As you know, since that time, traffic has increased significantly and is currently near failure at key intersections such as NW 23<sup>rd</sup>/Vaughn/1-405.

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As the Northwest District Plan states, “ NW Vaughn Street between NW 23<sup>rd</sup> and NW 27<sup>th</sup> Avenues is a unique area of interface between a successful industrial district and a mixed-use urban neighborhood.” Since it was unknown at that time, when ESCO would request EG zoning, the Guild’s Lake Plan District was amended to create “Subdistrict B that would allow for the potential for office uses up to a 1:1 FAR (EG Base Zone) and retail uses up to 10,000 square feet per site, under certain conditions. A bonus option allows up to an additional .85 FAR of office use when the property owner contributes to the Northwest Transportation Fund (created at the same time).” The problem that is created by the EZP is that, by increasing the FAR from 1:1 to 3:1 for office uses, it grants, BY RIGHT, additional FAR that was never anticipated by the Guild’s Lake Plan District, the NW District Area Plan or by tenants, businesses and residents in either neighborhood. In addition, by recommending that the current IG zoning be replaced by EG zoning, this increase in development potential is allowed without any transportation analysis.

It is our understanding that in addition to ESCO, other property owners are requesting EG zoning to allow the same 3:1 FAR for office uses if the Employment Zone Project is adopted. This will ultimately lead to the potential loss of manufacturing jobs at ESCO and other sites. These jobs are critical to the future of a Portland that retains a well-functioning middle class that has access to high-quality housing, schools, recreation, and transportation facilities that are dependent on taxes generated by a mix of employment types. That mix is threatened by the proposed EZP and related zone/comprehensive plan map changes.

### **Recommendations**

- Pending a detailed transportation analysis, there is no evidence that the transportation system can support this tripling of office development capacity from 1:1 FAR to 3:1 FAR. The NWDA Planning Committee is requesting that the proposed 3:1 FAR increase for offices be dropped from the EZP.
- In addition, the Committee is requesting that the Guild’s Lake Industrial Sanctuary Plan District be amended to clarify that the maximum FAR for office uses is 1:1 with the allowed bonus of .85:1 as the Plan District and City Council intended. Currently, only the EG Base Zone spells out the 1:1 FAR for office uses.
- At City Council, as part of our testimony on the Comprehensive Plan, we will be asking that the recommended Comprehensive Plan designation of Prime Industrial Land be placed on properties currently Zoned IH in the Guild’s Lake Industrial Sanctuary and that the existing designation of Employment be retained on the properties within Subdistrict B of the Guild’s Lake Industrial Sanctuary Plan District that are currently zoned IG. We believe it is essential to maintain the current designations and zoning to protect jobs and to not overwhelm the streets and freeway in the vicinity of these sites.

Thank you for your careful consideration of these recommendations.

Sincerely,

John Bradley  
Chair, NWDA Planning Committee