



October 27, 2015

Andre Baugh, Chair
Portland Planning & Sustainability Commission
1900 SW 4th Ave., Suite 7100
Portland, OR 97201

Re: Employment Zoning Project

Dear Chair Baugh:

Thank you for the opportunity to comment on the Employment Zoning Project (EZP) September 2015 Discussion Draft, part of the Comprehensive Plan Update. We have been very interested in this topic, with Port staff providing comments on the July 2015 version of this document; participating in the Industrial Land/Watershed Health Working Group, real estate brokers and developers focus group; as well as providing testimony on other related elements of the Draft Comprehensive Plan.

Prime Industrial Land retention

In general, we are supportive of the Prime Industrial overlay zone to implement draft Comprehensive Plan Policies 6.39.a through 6.39.f which should help to protect conversion of industrial land to non-industrial uses. Industrial land offers the most direct opportunity for middle income job development within the City of Portland and as such needs to be a priority within the Comprehensive Plan. In particular, we appreciate clarification contained in 33.475.080 C and the associated commentary that mitigation within the Prime Industrial overlay zone is allowed for development impacts elsewhere in the Prime Industrial overlay zone. As mentioned in our letter from August 28th 2015, this point is particularly important in the context of the Portland Harbor Superfund Cleanup.

Land efficient employment zones and Compatibility in residential settings

The Riverfront Subdistrict of the St. Johns Plan District currently has a designation of Town Center and Mixed Use Urban Center designation in the Comprehensive Plan. This designation allows for rezoning of an approximately 15 acre site bisected by the St. Johns rail lead, from EG2 to EX. In this particular subdistrict, according to 33.583.285, the minimum residential density is 1 unit per 1,000 square feet for EX zoned property. For the site in question, the minimum number of units would be approximately 640, with potentially over 2,000 units at maximum buildout.

We are concerned that this scenario would result in significant compatibility and safety issues for one of the primary rail corridors serving Terminal 4, the Rivergate Industrial District and the Columbia Corridor as a whole.

We do not believe this outcome would be consistent with a number of proposed Comprehensive Plan policies being addressed by this project including:

Policy 4.30 Land use transitions. Improve the interface between non-residential uses and residential uses in areas where commercial or employment uses are adjacent to residentially zoned land.

and

Policy 6.44 Dispersed employment areas. Provide small, dispersed employment areas for a flexible and affordable mix of office, creative services, small scale manufacturing, traded sector and distribution, and other small-format light industrial and commercial uses with access to nearby freeways or truck streets.

In addition, under the Human Health principle described on page 6, *"The project also proposes a prohibition of household living in General Employment zones, which are substantially located within and adjacent to industrial districts, that will limit the number of households living in close proximity to industrial areas."*

While the September 2015 EZP Discussion Draft document in 33.583.285 E proposes new noise insulation requirements consistent with the x noise overlay zone, it does nothing to either limit the number of units, or require context sensitive design features such as the orientation of parking and garages toward the tracks, or require mitigation to maintain rail safety for new residents. If housing is allowed, we request that mitigation be required to provide better compatibility between the existing heavy rail line and new residential units, as noted above.

Golf course rezoning

Requirements for golf course conversion are very onerous and even in a best case would result in a relatively small amount of new industrial land. Figure 13 on page 97 suggests that more than a third of Riverside Golf Course would remain as open space, with more than three quarters of Broadmoor Golf Course remaining as open space. 33.565.410 describes additional development requirements for golf courses rezoning to industrial. For example, of the remaining proposed developable portions of these golf courses, at least 20% must be landscaped using more expensive and difficult to obtain native plants.

As a result of the area and shape of the limited new developable area and additional cost, these golf courses are unlikely to convert to industrial. To encourage conversion of these sites to industrial, less area should be proposed as Open Space and the remaining developable portions of the site should have the same development requirements as any other industrial site in the Columbia Corridor.

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Thank you again for the opportunity to comment on the Employment Zoning Project September 2015 Discussion Draft. We look forward to further discussion on this topic this fall.

Sincerely,

A handwritten signature in cursive script, appearing to read "Susie LaSone". The signature is written in black ink and is positioned above the printed name.

Susie LaSone,

Director, Policy and Planning

