

March 19, 2008

Sheila Frugoli, Land Use Services
900 SW Fourth Ave., Suite 3000
Portland, OR 97201

RE: LU 05-138386 CP ZC PC # 04-065296

Dear Ms. Frugoli:

Thank you for the opportunity to comment on the proposal to rezone the current the site of the Colwood National Golf Course from Open Space (OS) to General Industrial 2 (IG2). Our comments are submitted on behalf of the Concordia Neighborhood Association (CNA). The CNA represents more than 5,000 households and scores of businesses in NE Portland.

The Concordia Neighborhood Association does not support the rezoning of this Open Space to General Industrial 2 (IG2) and adopted a formal resolution against this rezoning at its March 11 meeting. There are a variety of reasons for the CNA's formal opposition to this rezoning request:

1. Significant and Permanent Loss of Open Space: The adoption of the rezoning proposal would undermine the Comprehensive Plan's goal for open space.

This loss is especially significant since this particular open space has existed in Portland since the city's origins and has operated as a golf course for more than 80 years. Permanent loss of this historic open space is contrary to the City's commitment and vision. The location of this potential open space loss is also significant.

The Cully-Parkrose area is deficient in parkland, natural areas, and other open space access (see Parks Bureau Vision 2020 Plan). Cully's access rate is 2,780 people per park acre, compared with a citywide average of 40 people per park acre (Daily Journal of Commerce). Given this, it is not surprising that rezoning this area from open space to industrial use is contrary to the goals of the Cully Neighborhood Plan. Ultimately, the loss of 132 acres of open space for these neighbors is significant and the Cully Neighborhood has rightfully opposed this rezoning on these substantial grounds.

As the city continues to grow, the need and availability of open space for recreation opportunities and natural preservation will only increase. As such, this potential infringement on the Comprehensive Plan's Goal for Open Space is far from trivial.

2. Significant Environmental Impact: The location of this open space is along the Columbia and Whitaker sloughs. These areas are sensitive wildlife areas that include fragile riparian zones and important buffers to these zones.

A significant amount of riparian habitat in this area has already been lost. Preservation of this particular area in question – the Colwood open space - has mostly been the result of providential happenstance. Reversal of this good luck through administrative action is ill advised and is not supported by the Comprehensive Plan’s goals for the local environment.

The transition of this open space and habitat area to industrial use will also have a pronounced effect on local health. North and Northeast Portland already suffer from the long-term effects of environmental injustice resulting from existing and historic industrial uses in the area. The significant impact of new air and water pollution sources on the health of local residents in addition to the effects on local wildlife should not be discounted.

One potential use for part of the area if rezoning is adopted by Council is expansion of the airport. This type of land-use conversion would exacerbate existing concerns with noise pollution in North and Northeast neighborhoods. Unfortunately, the Port of Portland has failed to meet its existing promises for noise and air traffic abatement in the area. Providing the opportunity for increased air traffic in even closer proximity of affected neighborhoods will only increase the level of detrimental noise pollution suffered by Portland residents.

These outcomes are clearly divergent of the Comprehensive Plan Goal for the Environment: *“Maintain and improve the quality of Portland’s air, water, and land resources and protect neighborhoods and business centers from detrimental noise pollution.”*

3. Desire of Local Neighborhoods: As noted the Concordia Neighborhood Association has adopted a resolution opposing this rezoning. This rezoning is also opposed by the Cully Neighborhood; among other concerns, the rezoning does not comply with the Cully Neighborhood Plan.

Adoption of this rezoning in light of these clear expressions of neighborhood opposition would violate the overall spirit of and specific policies included in the Comprehensive Plan’s Goal for Neighborhoods.

4. Community-Guided Economic Development: Economic development is a Comprehensive Plan goal but the policies related to this goal are designed to ensure that land-used decisions that support economic development aren't short-sighted or detrimental to overall livability.

4.A. Urban Development: In considering Urban Development, the Comprehensive Plan includes key objectives that recognize the value of maintaining open space and recreation opportunities:

“Define and develop Portland’s cultural, historic, recreational, educational and environmental assets as important marketing and image-building tools of the city’s business districts and neighborhoods.”

“Recognize and support environmental conservation and enhancement activities for their contribution to the local economy and quality of life for residents, workers and wildlife in the city.”

The proposed rezoning of open space to industrial use is not supported by these Comprehensive Plan objectives.

4. B. Community-Based Economic Development. The Comprehensive Plan favors Community-Based Economic Development. Given the opposition to this rezoning by neighborhood groups and residents –especially the fact that this rezoning is contrary to the goals of the Cully Neighborhood Plan - the proposed rezoning does not meet this policy goal.

4. C. Protection of Non-industrial Lands. The Comprehensive Plan Policy 5.9 states, *“Protect non-industrial lands from the potential adverse impacts of industrial activities and development.”* The rezoning of open space in an environmentally sensitive area to industrial use is an affront to this policy. Rather than protecting this area as required by the Comprehensive Plan, the decision to rezone the area would provide the opportunity for increased contamination of vital wildlife habitat areas within the City.

Portland has vacant and available industrial land and areas that are properly zoned for industrial use. The fact that development on some of this land requires remediation because of past and present industrial practices is not a compelling criterion for the rezoning of pristine open space in an environmentally sensitive area to industrial use.

As noted above, even within its goal of economic development, the Comprehensive Plan is not blind to this reality and this proposal is not effectively supported by Comprehensive Plan policies and objectives even within the area of Economic Development.

In closing, we thank you again for the opportunity to comment on this proposal. We strongly encourage you to recommend against the change in zoning that has been requested.

As noted, the adoption of this proposed rezoning would represent a violation of many of the Comprehensive Plan's key policy goals. Any one of the issues highlighted in this testimony should result in doubt about the feasibility of this rezoning request under Comprehensive Plan goals and policies; the combination of concerns makes it clear that this rezoning application should be denied.

If you have any questions or require any additional information, please do not hesitate to contact either of us – Tony Fuentes: 971-570-6930, Milagros@milagrosboutique.com - Katie Ugolini: 503-296-7839, kugolini@earthlink.net

Thank you for your time.

All the best,

Katie Ugolini, Chair

Tony Fuentes, Co-Chair

Cc: Mayor Tom Potter
Commissioner Sam Adams
Commissioner Dan Saltzman
Commissioner Eric Sten
Commissioner Randy Leonard
Metro Councilor Rex Burkholder