

September 30, 2008

Editor  
Portland Tribune  
6605 S.E. Lake Road  
Portland, OR 97222

Dear Editor,

I was surprised to read a recent editorial in the Portland Tribune that chastised the Portland City Council for upholding the Hearings Officer's recommendation regarding the proposed rezoning of Colwood National Golf Course from open space to industrial.

The Tribune's opposition to the position of the Hearings Officer and Council seems primarily based on expectations for job creation. The editorial repeats the assertion that rezoning Colwood would result in "up to 2,000 jobs".

However, there are no formal development plans for Colwood. There has been no significant economic analysis conducted. Ultimately, despite assertions from rezoning proponents, we can't know what kind of jobs – if any – would result from a rezoned Colwood. There are some things that we do know, and these certainties call in to question any proclamation that rezoning would result in "up to 2,000 jobs."

We know that the Port of Portland wants to acquire over 1/3 of Colwood if it is rezoned industrial<sup>1</sup>. We know that they have been unclear on how they would use the property, if at all, in the near term and that a third runway is not permanently off the table. Further, we know that the Port of Portland is already sitting on hundreds of vacant or grossly underdeveloped industrial acres in the City.<sup>2</sup> How will adding Colwood to the Port's land surplus suddenly result in more jobs?

We also know that the ability to build any industrial development at Colwood will be significantly constrained by the limits of taxpayer-funded infrastructure in the area. For instance, because of the constraints of the I-205/Killingsworth interchange, industrial development could only be allowed on the Colwood site if a significant cap on generated auto trips were put into place.<sup>3</sup> We know that ODOT has not been able to identify any developer-funded improvements that could remedy this problem. This translates into a significant limit on the type, size, and scope of development and by extension a severe limitation on potential job creation – in other words, way south of 2,000 jobs even under the best-case scenario.

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<sup>1</sup> April 11, 2008 letter to the Hearings Officer from Portland of Portland General Manager of Long Range Planning & Noise Christopher Corich.

<sup>2</sup> For example, go to <http://www.portlandmaps.com/> and review the zoning and development data associated with these properties: R314209, R317082, and R317194 – these are only three of the Port's many parcels. Additionally, as noted at [http://www.portofportland.com/Prop\\_Home.aspx](http://www.portofportland.com/Prop_Home.aspx), there are of vacant parcels up to 100 acres in size in the Port's Rivergate facility – in fact much of this has been vacant for decades.

<sup>3</sup> September 12, 2008 letter to Council from ODOT Planning Manager Elaine Smith.

This significant cap on development also presumes that all development rights associated with the future Thomas Cully Park are transferred to the Colwood site; this presumption deserves careful consideration. The Cully Park development rights have a value and that value belongs to the City of Portland. Should the City just “give-away” its development rights to a private land-owner? Additionally, if these development rights are to be transferred, doesn't it make more sense to transfer them to a property already zoned for commercial development; rather than using such a transfer to support the conversion of open space to industrial?

We also know that rezoning Colwood would've undermined the City's Comprehensive Plan goals for open space and environment, restricted the city's ability to meet statewide Planning Goals for Open Spaces and Recreational Needs, ignored applicable neighborhood plans, and limited our ability to meet Metro's environmental requirements. Ultimately, as is required for any Comprehensive Plan amendment, the Council weighed these considerations against the questionable economic development assertions.

The bottom-line is that the decision to keep Colwood zoned open space was neither hurried nor political. It was based on the facts and the facts spoke for themselves.

All the best,

Tony Fuentes