



October 27, 2017

Portland Planning and Sustainability Commission
1900 SW 4th Ave, Suite, 700
Portland, OR 97201

Re: Code Reconciliation Project - Title 11 Tree Preservation

Dear Chair Schultz and Commissioners:

NAIOP, the Commercial Real Estate Development Association, is one of the leading organizations for developers, investors, owners & operators, brokers, and related professionals in office, industrial and mixed-use real estate throughout the United States, Canada, and Mexico. The Oregon Chapter's members represent a broad and diverse range of companies involved with commercial real estate activities in the Portland metropolitan area, including developers, owners, brokers, and managers, along with other professionals providing legal, finance, title, engineering, architectural, construction, and other services.

We have just become aware that extensive testimony was presented at the Commission's October 24th public hearing in support of eliminating the longstanding exemption from Tree Preservation Standards (11.50.040B.1) and Tree Density Standards (11.50.050B.1) for industrial and employment zones. Additionally, staff has recommended dropping the exemption from tree standards for the new commercial designations that were previously exempt under the old corresponding commercial designations.

On behalf of Portland's entire commercial and industrial real estate community, we would urge the Commission in the strongest possible terms not to approve such drastic changes that have been presented to you at the last possible moment in your process. Make no mistake, requiring Tree Preservation and Tree Density Standards for industrial and commercial uses will have devastating impacts on future development and redevelopment of job creating projects.

We also believe that this type of policy change is significantly outside the scope of the Reconciliation Project. As is described on the Planning & Sustainability website, "Near the end of the Comprehensive Plan Update

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Kelly Ross

process, City Council directed the Bureau of Planning and Sustainability (BPS) to evaluate the adopted 2035 Comprehensive Plan against a short list of potential map changes.” This directive is documented in Exhibit O – Further Refinement Directive, which states, “The Bureau of Planning and Sustainability is directed to evaluate the Comprehensive Plan designation and zoning of the following sites, and bring appropriate recommendations bac to Council for further consideration.” Obviously, a far-reaching policy change to all city commercial and industrial zones goes far beyond the scope of a very limited directive specifically focused on thirteen specific sites.

This type of change to the code requires thorough study and analysis as it will most certainly have significant Goal 9 ramifications. In a joint effort with the Port of Portland, Metro, Greater Portland Inc, Portland General Electric, Portland Business Alliance, NAIOP and our partners recently completed the third update of the Regional Industrial Land Readiness Inventory. The bottom line finding of the analysis is that the strong economic cycle of the last three years has significantly reduced the number of large industrial sites in the regional inventory. Any additional regulatory actions that would further erode the industrial land base must be approached with the utmost caution.

Thank you for your consideration of these comments and please let us know if we can provide any additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kelly Ross', with a long horizontal flourish extending to the right.

Kelly Ross
Executive Director