

2 EDA

Portland Planning and Sustainability Commission Public Hearing



Date: 4/28/15  
 Name: Raihana Ansary (Please print legibly)  
 Authorized Spokesperson representing: Portland Business Alliance (if applicable)  
 Address: 200 SW Market St.  
 City: Portland Zip: 97214 Phone: (503) 552-6768  
 Email Address and/or Fax No.: ransary@portlandalliance.com  
 What agenda item do you wish to comment on? EOA - 4:45 pm  
 Site Address, if different from above: \_\_\_\_\_

(check if written comments are included on back)

2:30 sign in.



1 EDA



Portland Planning and Sustainability Commission Public Hearing

Date: 4/26/14  
 Name: Dore Black (Please print legibly)  
 Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)  
 Address: 6495 SW Burlingame Pl.  
 City: Portland Zip: 97239 Phone: 503-246-2088  
 Email Address and/or Fax No.: \_\_\_\_\_  
 What agenda item do you wish to comment on? 4:45 - EOA OPPR Analysis  
 Site Address, if different from above: \_\_\_\_\_

(check if written comments are included on back)

3-EOA

Portland Planning and Sustainability Commission Public Hearing



Date: 4-28-15  
 Name: Jeremy "Byron" Tennant (Please print legibly)  
 Authorized Spokesperson representing: NECN (if applicable)  
 Address: 1133 NE Holman St.  
 City: Portland Zip: 97211 Phone: 503-269-8817  
 Email Address and/or Fax No.: j.byrontennant@gmail.com  
 What agenda item do you wish to comment on? (Revised) Economic Opportunities Analysis  
 Site Address, if different from above: \_\_\_\_\_

(check if written comments are included on back)  
See NECN Letter, April 2015

6 EOA

Portland Planning and Sustainability Commission Public Hearing



Date: 4/28/15  
 Name: Bob Sellinger (Please print legibly)  
 Authorized Spokesperson representing: Avdutor (if applicable)  
 Address: 5151 NW Cornell Rd  
 City: Portland Zip: 97210 Phone: 503-880-9728  
 Email Address and/or Fax No.: \_\_\_\_\_  
 What agenda item do you wish to comment on? EOA  
 Site Address, if different from above: \_\_\_\_\_

(check if written comments are included on back)

Portland Planning and Sustainability Commission Public Hearing

Date: April 24, 2015 ✓

Name: Ellen M. Wax (Please print legibly)

Authorized Spokesperson representing: Working WaterFront (if applicable)

Address: 200 SW Market St, Suite 190

City: Portland Zip: OR 97201 Phone: 503-220-2064

Email Address and/or Fax No.: ellen.wax@workingwaterfrontportland.org

What agenda item do you wish to comment on? Economic Opportunity Analysis

Site Address, if different from above: \_\_\_\_\_

(check if written comments are included on back)

Portland Planning and Sustainability Commission Public Hearing

Date: April 24, 2015 ✓

Name: Greg Theisen (Tyson) (Please print legibly)

Authorized Spokesperson representing: Port of Portland (if applicable)

Address: 7200 NE Airport Way

City: Portland Zip: 97218 Phone: 503-415-6522

Email Address and/or Fax No.: greg.theisen@portofportland.com

What agenda item do you wish to comment on? Economic Opportunity Analysis

Site Address, if different from above: \_\_\_\_\_

(check if written comments are included on back)

7 EDA

Portland Planning and Sustainability Commission Public Hearing

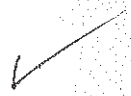


Date: 4-28-15  
 Name: Martha Johnston (Please print legibly)  
 Authorized Spokesperson representing: East Columbia NA, LAND use Chair (if applicable)  
 Address: 9509 NE 13th Ave  
 City: PORTLAND Zip: OR 97211 Phone: 503-720-5035  
 Email Address and/or Fax No.: ediplumb@gmail.com  
 What agenda item do you wish to comment on? Economic Opportunities Analysis  
 Site Address, if different from above: \_\_\_\_\_

(check if written comments are included on back)

8 EDA

Portland Planning and Sustainability Commission Public Hearing



Date: April 28, 2015  
 Name: Barbara Kerr (Please print legibly)  
 Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)  
 Address: 1150 NE Falgout Rd.  
 City: Portland Zip: 97211 Phone: 503-516-6464  
 Email Address and/or Fax No.: kerrclifford@hotmail.com  
 What agenda item do you wish to comment on? Economic Opportunity Analysis  
 Site Address, if different from above: 9000 block NE Levy

(check if written comments are included on back)

Portland Planning and Sustainability Commission Public Hearing

Date: 4-28-15

Name: JUSTIN CALLAWAY (Please print legibly)

Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)

Address: 4850 NE LEVEE RD

City: PORTLAND Zip: 97211 Phone: \_\_\_\_\_

Email Address and/or Fax No.: justin.callaway@gmail.com

What agenda item do you wish to comment on? Industrial Sanctuary Charade

Site Address, if different from above: \_\_\_\_\_

+ LOT R171714

(check if written comments are included on back)

Don Baack, President  
SWTrails PDX  
6495 SW Burlingame Place  
Portland, OR 97239  
503-246-2088 baack@q.com

April 28, 2015

Testimony today is on behalf of SWTrails, a 501(c)3 nonprofit organizations dedicated to improving the pedestrian and bicycle environment of SW Portland. We have about 100 members and sponsors and an interest list of about 1200 people.

## **Background**

SWTrails, working with the City of Portland Transportation Bureau, developed the SW Urban Trails Plan comprising over 40 miles in 7 linear trails, 2 north south and 5 east west across our part of the city. Between 80 and 90 percent of these trails are on City of Portland Rights of Way, most of which are low traffic, low speed streets mostly without sidewalks. The trail segments not on right of way are through Portland Parks and Portland Public School property.

With annual funding from the City of Portland's Bureau of Transportation in the years 2000 to 2007, we developed and maintained 25 to 30 connections on unbuilt rights of way in the SW Urban Trail network to provide essential connections for transportation and recreational purposes. We also did the field engineering necessary to install 600 or so city funded way finding signs along 6 of the 7 routes. The seventh route is the proposed Red Electric Trail, a multimodal trail connecting Washington County trails to the Willamette Greenway by several alternative routes. The Red Electric is an important TSP project.

The 30 or so connections developed by SWTrails comprised about 2 miles of trail and the installation of about 600 steps throughout SW Portland. The steps were installed on steep ground to make steep slopes safer and more walkable. Due to the terrain, the steps do not meet ADA requirements. We understand that volunteer constructed facilities in such circumstances are allowed under the City of Portland's interpretation of the ADA rules.

In 2007, we stopped bulding and maintaining the SWTrails due to the City position on liability. To remedy that situation, in 2011, the City of Portland, supported by members of SWTrails, requested the Oregon State Legislature to pass a modification to the recreational use of trails liability law to provide a waiver of liability for the adjacent property owners and the building

nonprofit organization providing proper permits were acquired. The law became effective in late 2011. SWTrails has been waiting patiently for reasonable policies to be put into place to implement the new law. In our opinion, we do not yet have a reasonable city proposal on the table to discuss.

### **Clarification of previous testimony**

First, I want to restate my request to transfer the Trails Policy from Parks to the general section of the Comp Plan. My intent was to request that all planning for active transportation facilities be handled in one location. Using the Red Electric Trail as an example, it appears to us that in 2007 when the Red Electric Plan was being developed, Portland Parks focused their planning on recreation uses to the exclusion of consideration of the greater need for a safe pedestrian and bicycle **transportation and recreation** connection from Washington County through Hillsdale to the then proposed Hooley Bridge. The community was successful in getting an alternative route included in the City Council adopted plan, over Parks staff objections. For the last 8 years, the entire SW community has been trying to get Portland Parks to focus on an inexpensive alternative using Slavin Road rather than building a very expensive set of ADA compatible switchbacks from near Corbett up to and above Barbur, about 150 to 200 feet higher on the hillside. A 5% grade route rising 150 feet would be 3000 lineal feet plus the length added for switchbacks.

My testimony was intended to centralize the planning, but let whichever organization can do construction most efficiently should do it. We also want the respective organizations to be responsible for the maintenance of the trails in their respective areas of interest: Parks for trails in Parks, Transportation for trails on public rights of way. It also was intended to assure SWTrails will continue to work with the Transportation Bureau on trails issues related to trails on rights of way and with the Parks Bureau on trails located in Parks. While not explicitly stated, it appears to us that PBOT would like to shift the responsibility for all trails to Portland Parks, to which we are strongly opposed.

A related issue is the absolute road blocks erected by Portland Parks in discussing the use of trails to move bicycles through what are frequently super blocks where alternative bicycle routes are a long distance away or developing them will be very expensive for the City of Portland.

Two examples: 1. For children seeking to ride their bicycles to Jackson middle school, a very reasonable route would go through Maricara Park. The alternative would involve riding

longer distances on streets that are more hilly, narrow and not safe. 2. There is a need for a safe bicycle route north south on SW 45<sup>th</sup> Avenue from Vermont to Multnomah. To build a safe bicycle facility will be very expensive do to the lack of space in the right of way. An alternative separated bicycle route through Gabriel Park would cost much less and be much safer to ride. In essence, Portland Parks needs to become a team player in our active transportation planning and cease being a dog in the manger.

**Today's Testimony is focused on a proposed policy that has not yet been presented to the PSC.**

I am working from a draft that is weeks old, copied below with some suggested changes proposed by SWTrails. I understand the proposal will be transmitted to the PSC within the next month. However, given the Comp Plan schedule of the PSC, **there will not be an opportunity for public testimony or comment before the trails policy is recommended to the Portland City Council.** Below are some of the policies that SWTrails would like included in the trails policy:

1. Include maps of the entire Region Trail Network, the SW Urban Trails Network and any future trails networks approved by Portland City Council as overlays in the Comp Plan so that they appear as "STARS" in the planning department and steps to retain and improve the trails are taken with every relevant development. In past years SWTrails has seen some of our work destroyed by development where the City did not take steps to even retain the work we had done, much less to assure it was improved to higher standards.
2. Set a goal to qualify our pedestrian SW Urban Trails and any similar trails as Neighborhood Greenways so that they can receive traffic calming and be posted with 20 mph speed limits. We do this for bicycles. It is our opinion that pedestrians walking in the street are as much at risk of injury from fast vehicles as those riding bicycles. We supported the state law change with the understanding it would apply to our Urban Trail system. To date, PBOT has not figured out how to implement it for our Urban Trails.
3. Include a requirement that the City of Portland **retain and maintain** the trails that are not on sidewalks. As noted above, The City provided funds to build, sign and maintain the SW Urban Trails System from 2000 to 2007. Over the years, numerous stairs and other key connections have been removed for lack of maintenance, resulting in a decrease in our pedestrian connectivity in some of the older parts of the city. We feel it



is important to reverse this trend and figure out how to retain and maintain this important grass roots infrastructure of our hilly city. This maintenance should include the SW Urban Trail Network as well as the hundreds of local trails that provide the close by cutoffs that save many many longer car trips, and contribute to the health of the person walking rather than driving.

4. Include a goal of developing relationships with nonprofit organizations who can partner with the City Parks and Transportation Bureaus to efficiently build and maintain major and minor components of our pedestrian infrastructure. Properly managed, this can be a very efficient component of our transportation infrastructure maintenance group.

# DRAFT new Comprehensive Plan policy section with changes suggested by SWTrails

(to be inserted after "Transportation" and before "Sanitary and Stormwater Systems" in Chapter 8. Public Facilities and Services)

## Trails

The City of Portland's trail system is a key part of both the City's multi-modal transportation system, its recreation system and constitute a tourist attraction. Trails provide Portlanders and out of town visitors with pedestrian and bicycle connections and access to many key destinations within the city. They also provide a place to recreate and allow Portlanders and visitors to experience the city's parks, our transportation system diversity and natural areas. The policies in this section support continued improvement, management, and coordination of the trail system.

- Policy 8.47**      **Public Trails.** Establish, improve, and maintain a citywide system of public trails that provide transportation and/or recreation options that may be a component of larger networks of bicycle, pedestrian, and recreational facilities or a local trail connection between other pedestrian facilities.
- Policy 8.48**      **Trail system connectivity.** Plan, retain and improve the citywide trail system and linkages to connect and improve access to Portland's neighborhoods, commercial areas, employment centers, schools, parks, natural areas, recreational facilities, regional trail system, and other key places that Portlanders access in their daily lives.
- Policy 8.49**      **Trail coordination.** Coordinate planning, design, improvement and management of the trail system among City agencies, other public agencies, non-governmental partners, and adjacent landowners.
- Policy 8.50**      **Public access requirements.** Require public access and/or improvement of public trails along the future public trail alignments shown in Figure 8-1. *Future public trail alignments and any other trails so designated.*
- Policy 8.51**      **Trail and City Greenway coordination.** Coordinate the planning and improvement of trail and City Greenway systems. Incorporate the pedestrian trails into the Neighborhood Greenway network and classify them alike.
- Policy 8.52**      **Trail and Habitat Corridor coordination.** Coordinate the planning and improvement of trails with the establishment, enhancement, preservation, and access to Habitat Corridors.
- Policy 8.53**      **Trail Hierarchy Suggested by SWTrails**

### 1. Regional Trails A. Multimodal Trails

#### B. Pedestrian Trails

### 2. Urban Trails

### 3. Local Trails

### 4. Demand Trails

Map not attached

**Testimony of Raihana Ansary  
Government Relations Manager  
Portland Business Alliance  
Before Planning and Sustainability Commission  
Regarding Economic Opportunity Analysis  
April 28, 2015**

Good evening Chair Baugh, Commissioners.

My name is Raihana Ansary, here on behalf of the Portland Business Alliance. Thank you for the opportunity to comment on the updated 2015 Economic Opportunity Analysis (EOA).

As we stated in an earlier letter addressed to the commission, we are gravely concerned about a number of unrealistic assumptions that have been made to artificially fulfill the state of Oregon's planning Goal 9 requirements on economic development. In summary, we are concerned about the following:

1. **The proposal to accommodate a low marine cargo forecast** despite recent trends that indicate otherwise. Since the early 1960's, the lower Columbia River Gateway, including the Portland Harbor, have experienced sustained cargo development with an annual growth rate of 3 percent. Recent commodity flow forecasts show continued growth at 3 percent. Yet, the revised EOA projects an annual growth rate of 1.3 percent.

The low marine cargo forecast is not justified by recent market trends nor is it consistent with existing plans that have been approved by this body and / or Portland City Council including the city's *Economic Development Strategy, Portland Plan, We Build Green Cities Campaign*, and the *Greater Portland Export Plan*. These plans all aim to promote our traded-sector economy and yet, the EOA assumes a low marine cargo forecast.

As we have shown in our Value of Jobs reports, 90 percent of Oregon's exporters are small and medium sized businesses, and export-related jobs pay on average 18 percent more than non-exporting jobs across sectors. In particular, the production of traded-sector goods is still the backbone of Portland-metro's traded-sector employment. Manufacturing

jobs are also found to provide higher wages and better benefits than non-manufacturing jobs, particularly for communities of color and those with less than a four-year college degree. A low marine cargo forecast does not support middle-income job growth or our city's equity goals.

2. **Aspirational brownfield redevelopment.** Second, the revised EOA assumes that 60 percent of brownfields will convert over the next 20 years. This is dependent in large part, however, on the ability of the Oregon Legislature to enact and fund legislation and programs. Additionally, brownfields do not often convert to industrial land due to cost burdens and cumbersome regulations associated with their redevelopment.
3. **Aspirational golf course conversion.** The revised EOA also relies on golf course conversion to meet its employment land forecasts and in particular, industrial land needs. Golf courses are privately owned and an owner must be willing to sell their property. It is our understanding that the only golf course that has expressed a willingness to sell is the Colwood Golf Course and that the owners of other golf courses that are being counted in the EOA to help meet industrial land acreage have not confirmed an interest to sell.

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While we appreciate efforts to meet the shortfall, these strategies are aspirational at best and do not reflect market realities. We urge that the EOA and comprehensive plan reflect market realities in an honest attempt to ensure a prosperous and equitable future for our region's residents.

Thank you.



Portland Planning and Sustainability Commission  
Comprehensive Plan Update  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

April 28, 2015

**Subject: 2015 Economic Opportunities Analysis (EOA)**

Dear Planning and Sustainability Commissioners:

The Working Waterfront Coalition (WWC) is pleased to submit this testimony to the Planning and Sustainability Commission (PSC) on the 2015 Economic Opportunities Analysis (EOA).

Providing adequate growth capacity to meet 20-year employment growth by choosing the low end of the cargo forecast does not reflect what is happening in reality, on the ground in Portland's harbor lands. A low growth forecast is not supported by market trends and there is no evidence to suggest that harbor activity is slowing. In fact it is just the opposite. Companies such as Vigor Industrial, Canpotex, Daimler, Columbia Grain and Louis Dreyfus have all invested millions of dollars in expanding and improving their sites to accommodate current and anticipated cargo and industrial growth.

Examples of recent harbor lands investment include: Vigor Industrial, which brought in the largest dry dock for ship repair in the western hemisphere; Canpotex is installing a new ship loader and undertaking on site building expansion; Daimler's site reinvestment and development; Columbia Grain's \$40 million in improvements including storage and facility expansion, new conveyance system and building addition; and Louis Dreyfus investment of \$35 million in new equipment including loading and storage equipment. These substantial financial commitments indicate that these companies expect to move more products through their harbor facilities. The public investment needs to be considered as well including the Columbia River channel deepening completed in 2010, a multi-million public investment in the whole river system, which has served as a catalyst for billions of dollars in private investment throughout the lower Columbia River system.

Facility expansions and improvements allow for companies to hire more people for longer periods of time thereby contributing to middle-income job growth. Additionally, the 2035 population growth forecast indicates that new Portland residents will be looking for jobs; and they will be consuming goods and services, much of which are supplied by the movement of goods via our harbor industrial lands.

A low cargo forecast is counter to what is occurring on our harbor lands. Using a low cargo forecast is sending the wrong message, a message that says that Portland is not open for business. The low forecast could result in sending our industrial jobs elsewhere. It is contrary to previously adopted plans and what has been stated as a priority for our City. It is also inconsistent with Metro's regional growth forecast.

The low cargo forecast recommendation counters the economic prosperity direction set forth in the Portland Plan including prioritizing economic growth that supports an economically and socially diverse community, robust traded sector growth, increasing income self-sufficiency, trade and freight hub expansion, and adequate industrial land supply to meet future growth. There is also a social equity impact since an inadequate supply of industrial land limits opportunities for middle-wage job

# Working Waterfront



## C O A L I T I O N

growth. The City has adopted previous plans with goals and policies that herald jobs and equity as important priorities for Portland yet now there is a proposed low cargo forecast that reverses the direction set forth in previous plans.


We understand the physical constraints of an Urban Growth Boundary (UGB). However, the existence of the UGB is not as impactful to harbor lands. Harbor lands are already constrained by a limited waterfront. Moreover, only a portion of already scarce river frontage is capable of supporting industrial activity. In addition, the amount of investment made in harbor lands over the past 170 years cannot be forgotten, which includes the massive rail and highway infrastructure to serve these lands. Harbor lands and harbor businesses have been steadily developed and cultivated over the last 100 years and are now receiving investments for the next 100 years.

In addition, the 60 percent brownfield redevelopment goal, at a cost of over 100 million dollars is unlikely to be achieved since the land value of industrial/harbor lands cannot support this expense. Brownfield redevelopment is an un-dependable source of future industrial land, most specifically in the next 20 years. The remediation cost for industrial – to – industrial brownfield redevelopment is four times the market cost for industrial land. There is a funding gap and the City and State do not have budget policies or economic strategies to address this gap.

Recommending a low cargo forecast is a policy choice --a discretionary choice--that the City can elect or forego. Will you send a message of support for industrial lands and middle-income job growth, or send a message that says the City is not supportive of our harbor lands, businesses, and middle-income workers? The City needs to support policies that improve opportunities for its residents through thoughtful stewardship of industrial lands, not cavalierly remove opportunities in pursuit of perhaps existential goals and pyrrhic successes. A low cargo forecast today will yield disinvestment in industry activity that produces negative economic consequences for generations that follow.

In conclusion, the WWC is concerned that the 2015 EOA does not fully recognize the importance of harbor businesses to Portland's economy by considering a low cargo forecast in the EOA. The low cargo forecast is not based on fact. We appreciate the opportunity to comment on this important document and ask that the planning commission consider an EOA and Comprehensive Plan that are fact-based and reflects the realities of historic and current activity and investment on Portland's harbor lands.

Sincerely,



Jack Isselmann  
President

*Established in 2005, the Working Waterfront Coalition, with its extensive knowledge of harbor industry needs and active industry participation, is dedicated to working with its partners to ensure an appropriate balance between environmental concerns and the needs of river-related, river-dependent employers. Portland's Harbor is a vital employment area: home to thousands of valuable high-wage, high-benefit jobs. In addition, WWC members are conscientious stewards of the environment, making significant investments in the harbor consistent with state and federal laws and regulations to reduce the impacts of human activity on the harbor's ecological resources.*



April 28, 2015

Dear Chair Baugh and Members of the Portland Planning and Sustainability Commission,

Please accept the following comments from the Audubon Society of Portland regarding the revised Economic Opportunities Analysis (EOA). Audubon has previously submitted several sets of comments on other aspects of the comprehensive plan.

Audubon views the EOA as a step in the right direction in terms of placing a heavier emphasis on making better use of the existing industrial land base and decreasing emphasis on conversion of open space for industrial use. However, we also believe that the analysis ultimately represents an elaborate exercise in postponing the inevitable: the need to seek an exception from statewide land-use planning Goal 9. Portland is a landlocked city that is simply running out of land on which to expand uses. Continuing to prioritize finding new acres to meet industrial land demand creates an arbitrary and unrealistic emphasis on industrial development at the expense of other equally important land uses. It can only continue to occur within the current paradigm if we are willing to sacrifice the health of our environment and the livability of our communities.

It is notable that the City recently recognized this exact point in terms of how it addresses open space. In the proposed methodology for the PP&R System Development Charge (SDC) Update, currently before City Council, the City recognizes that "a level of service methodology based on acres of park per 1,000 per population would require the City to acquire an unrealistic number of acres of parkland." The City writes:

*The 2008 methodology is based on acres per 1,000 people. This method would require Parks to purchase a large amount of land in order to maintain the same ratio of acres per 1,000 people as Portland's population grows. Portland has a limited amount of vacant land, which limits fulfillment of the 2008 methodology.<sup>1</sup>*

It is time for the City to apply the same logic to industrial lands. In the same manner that the proposed Park SDC methodology recognizes that a landlocked city cannot continue to rely on a rigid acreage based approach to finding parkland, so too must it recognize that it cannot continue to rely on a rigid acreage based approach to finding industrial lands or other land use types that may run a deficit in the future.

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<sup>1</sup> <http://www.portlandoregon.gov/parks/article/523731>

We recognize that seeking a Goal 9 exception is no simple task. However the question is not “if” the City will need to seek an exception but rather “when.” We believe that the City would be best served by recognizing in this EOA that Portland can no longer find large amounts of acreage to meet new land use demands and that future growth is going to have to be predominantly achieved via intensification of use of the already developed land base or growth in other areas within the UGB. In short, it is time to take the Goal 9 exception.

**To the degree that the City does continue to operate within a Goal 9 paradigm, there are several elements of the draft EO that represent steps in the right in terms of focusing on intensification of use of the existing industrial land base and a more balanced approach to meeting industrial land demand while also protecting the health of our communities and our environment.** These include:

- Taking a leadership role in the clean-up of the Portland Harbor Superfund Site (Policy 6.40)
- Intensifying efforts to reclaim brownfields (Policy 6.39)
- Intensification of use of existing industrial lands (Policy 6.38)
- Use of the low end of the marine-terminal commodity movement forecast
- Expansion of natural resource protection, restoration and enhancement and ecological site design on industrial lands, including the methodology developed by the City to predict future acreage impacts of these efforts. However, we question whether 1) the methodology allocates adequate acres to meet future regulatory demands that may be placed on the city and 2) we believe the methodology should also account for implementation of the tree code on industrial lands.

With more than 900 acres of brownfields and many industrial sites currently under-utilized or inefficiently utilized, policies 6.38, 6.39 and 6.40 are logical steps towards meeting industrial land demand in Portland. For the health of our communities and our environment, it is imperative that the City focus on cleaning up the existing industrial land base rather than allowing these industrial developers to simply move to less expensive green fields to meet industrial land needs.

It is also important to note that the EOA explicitly recognizes that marine terminals provide a “relatively low number of jobs per acre.” (EOA at 1-85) In fact Harbor Access Lands are anticipated to provide only 1,905 jobs out of a total 141,600 new jobs that Metro has allocated to Portland for the period extending from 2010-2035. This means that Harbor Access lands will provide only 1.3% of the direct job growth anticipated in the region in the coming decades. (EOA at 2-7, 15) In addition, the EOA correctly notes that harbor access related job have been decreasing even as the harbor access land base and throughput have been increasing. Harbor Access Lands experienced declining employment at a rate of 2.2%/year between 2000 and 2008 even as economic output grew at a rate of 1.6%/ year and cargo volumes increased at 4.8%/year during the same time period (EOA at 29). While harbor access lands remain an important part of our economic infrastructure, predicating future job growth on these lands simply does not make sense.



**The Following are our specific areas of concern with the Draft EOA and associated policies in the Draft Comp Plan:**

- 1. Golf Courses should not be converted to industrial use (Policy 6.48):** We strongly oppose the conversion of portions of Columbia Slough golf courses (Broadmoor and Riverside) for industrial use. These golf courses could provide critical habitat restoration and open space opportunities for some of Portland's most environmentally degraded and underserved neighborhoods. It is notable that Policy 8.9 of the 1980 Comprehensive Plan explicitly sought to protect Golf Course through open space zoning. The Policy read: "Protect Portland Parks, cemeteries and golf courses through an Open Space designation on the Comprehensive Plan Map."<sup>2</sup> The 1980 Comprehensive Plan recognized that protecting golf courses was an important component of the overall goal to "Maintain and improve the quality of Portland's air, water and land resources and protect neighborhoods and business centers from detrimental noise pollution." The fact that the current draft Comp Plan and EOA propose to partially reverse this policy 35 years later is not a reflection that the Importance of these lands for open space and natural resource protection has somehow diminished---in fact, as the surrounding landscape has become increasingly developed, the value of these lands for open space and natural resource protection has only been magnified. Instead it is a sad reflection of how a rigid adherence to meeting Goal 9 has warped the city's priorities to elevate the search for new industrial lands above all other community goals.
- 2. Focus Groups are heavily biased towards industrial development Interests** (EOA at 92): It is notable that the focus groups for the updated EOA consisted 100% of business interests who would be directly financially impacted by the EOA. It is disappointing that the City did not include any community groups, independent economists, outside business experts, etc that might have brought a more objective viewpoint to the process. In all other aspects of the City's planning processes the City strives to establish advisory committees that are balances and representative of the community. It is only when it comes to economic issues that the city narrows its advisory bodies to include exclusively directly affected interests. As a result the input into the EOA is uniquely biased and unrepresentative of the community at large.
- 3. Constrained lands methodology overstates the degree to which industrial lands are constrained:** We believe that the City's methodology overstates the degree to which industrial lands are constrained. The EOA states that the City has 2,346 acres of vacant industrial land but that 48% of that land is constrained, thereby reducing the amount of developable land to approximately 1,365 acres. (EOA at 2-33) We believe that many of the development constraint factors significantly exaggerate the degree to which a property is actually constrained. This results in an underestimate of the actually amount of developable land and drives the argument for developing openspace and natural resource lands. Two specific constrains that we would highlight are the 50% reduction in development capacity attributed to industrial properties with either environmental or greenway overlays. A 50% reduction in development capacity does not pass a straight-faced test---greenway

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<sup>2</sup> [http://www.portlandonline.com/bps/Comp\\_Plan\\_Nov2011.pdf](http://www.portlandonline.com/bps/Comp_Plan_Nov2011.pdf)

overlays only affect the edge of properties bordering the Willamette River and in most cases environmental overlays only apply to a very small portion of industrial properties. In the case of both C-Zones and Greenway Overlays, development is almost always allowed to proceed, so long as impacts are minimized and to a limited degree, mitigated. Discounting the use of the entire properties by 50% in the cases where Greenway and/ or Environmental overlays are in place anywhere on the property is simply at odds with reality. We would urge the City to revisit the constraint factors and model discounts that are more realistic.

4. **The EOA under-estimates underutilized industrial lands:** The EOA does not include underutilized industrial parcels on industrial lands that are designated as industrial sanctuary. The EOA rationalizes this approach by stating that industrial development tends to “have lower building coverage with large areas for outdoor storage and maneuvering areas.” (EOA at 3-29) This methodology results in a situation in which industrial sites that are only partially utilized or inefficiently utilized are still mapped as being at 100% capacity. The fact that the 40 acre site at Terminal 6 which is currently under consideration for the Pembine propane facility was not originally captured in the buildable lands inventory is evidence of significant gaps in the current methodology. The City should develop a more sophisticated methodology for assessing use of the existing industrial land base that more realistically evaluates the efficiency with which the current industrial land base is utilized.
  
5. **The Policy basing Marine Terminal needs on throughput should be revised or eliminated:** The EOA argues that marine terminal land needs are “more closely related to the volume of transportation throughput handled at these facilities than to related sector employment trends.” The EOA predicts that the volume will “roughly double in tonnage and triple in value between 2007 and 2040 (EOA at 2-20) Based on this approach the EOA predicts that the City will need an additional 110-340 acres for marine terminals plus an additional 200 acres for railyards (EOA at 2-21). We believe that the analysis supporting this policy is severely deficient. First, the primary driver of this land demand is for automobile import facilities. The City continues to ignore the fact that the Port of Vancouver is currently sitting on more than adequate vacant land to meet the demand for new auto import facilities between now and 2035. Second, the current situation at T-6 reflects the uncertainty of marine cargo forecasts. It was only a decade ago that the Port of Portland was anticipating building 1-2 new container facilities on West Hayden Island to meet a demand that never materialized. Today it is highly uncertain that the City can support even a single container terminal. While it is nobodies desire to see T-6 fail, it is not clear at this time that the Port can find tenants for its existing land base let alone and additional 130-340 acres. Finally, the projections indirect jobs associated with marine terminals appear highly uncertain and inflated. The City should review the report from ECONorthwest which highlighted the diminishing potential for marine terminals to drive job growth and economic development:

*Historically, ports played a significant role in local economic development --firms found it advantageous to locate near ports because locating near a port meant substantially lower transportation costs; however significant declines in transportation costs have*

*diminished the effects of ports on firm location and local economic development.*  
(EcoNorthwest Report at 1-9)

*The goods currently expected to flow through West Hayden Island (autos, grain or dry bulk) will not come from local firms or end up in local stores. Instead West Hayden Island would serve as a convenient transshipment point in part of a much longer supply chain. For instance, if a Canadian firm ships potash from Saskatchewan to China through Portland, the user benefits from this transaction will be captured by the Canadian company or the Chinese consumers (or other middlemen). While the benefits to these parties are real, they are global in scale. Important for our analysis, most of these benefits do not occur in the Portland metro area.* (EcoNorthwest at 6-4)

6. **Specific Policies of Concern in Chapter 6 of the Draft Comprehensive Plan:** There are several policies in Chapter 6 of the Draft Comprehensive Plan that we believe go too far in terms of protecting industrial land at the expense of environmental protection, community involvement, and the need to achieve other equally important goals. These include the following:
- a. **Policies that require the City to maintain a supply of industrial land without any consideration of how this might impact other city goals:** The Land Development and Industrial and Employment Sections are now replete with redundant policies that require the city to find an ongoing supply or new industrial land regardless of conflicts with other city goals. This includes policies 6.12, 6.15, 6.18, 6.36.d, 6.47. It is important to note that the action verb used in these sections (“provide”) is not discretionary. Given the fact that the city is already converting openspace and natural areas to find new industrial land, these policies can only result in additional losses for the environment.
  - b. **Policies which appear to restrict the City’s ability to require natural resource protection or restoration on industrial lands:** Several policies appear to limit or prohibit the city from instituting new protections for natural resources on industrial lands. These include 6.35, 6.36.b, and 6.37. The draft ignores the fact that our industrial lands often overlap with some of our most high value natural resource areas. These policies should be rewritten to ensure that it is clear that the city can implement and update environmental policies on industrial lands.
  - c. **Policy 6.17 Regulatory Climate:** This policy appears to severely limit the city’s ability to put new regulations on industrial lands by requiring that the city prioritize economic development over all other goals (6.17), requiring that the city’s regulations be competitive with other cities (a “middle of the pack” mentality rather than maintaining Portland as an environmental leader) (6.17a), and potentially eliminating city jurisdiction over areas where the state or federal government have regulatory programs (6.17e) even though the City has long recognized the importance of local regulatory authority over our urban natural resources.
  - d. **Policy 6.36 Prime Industrial Land Retention:** This policy appears to prevent the city from updating environmental or community protections on industrial lands if those protections in anyway diminish the capacity of those industrial lands. Policy 6.36b explicitly limits conversion of industrial lands through land use plans, regulations, or non-industrial uses. This

policy appears to completely ignore the need to also protect health of the community and the environment. Policy 6.36c requires the city to minimize the impacts of regulations on industrial lands without consideration of any other goals. Policy 6.36d requires the city to strive to offset any loss of industrial land with replacement lands---given the existing deficit, this policy could effectively prevent any new regulations on along the river that protect natural resources. Taken together, these policies appear to us to make it practically impossible to establish new natural programs on these lands and negate the responsibility of industrial landowners to protect and restore the natural environment

Taken together, these policies appear to move us into an era in which other public values such as protection of natural resources, protection of human health, Goal 15 objectives, etc. appear to have been abandoned on industrial lands. This is inconsistent with our land use planning system, community values, the city's past planning practices, and Policy 10.2b in the draft comp plan. It places the interests of industrial developers above all other city goals.

7. **Policy Direction supporting future consideration of West Hayden Island for industrial development should be removed (Policy 6.41):** We strongly oppose the policy direction in the Comp Plan and EOA which "continues to support future consideration of a marine terminal development as needed at West Hayden Island." (EOA at 4-14) The Port of Portland explicitly rejected the City's mitigation requirements to address adverse impacts on the community and the environment. Keeping West Hayden Island development alive via the Comprehensive Plan under these circumstances is totally at odds with the position that the PSC outlined in its West Hayden Island Plan transmission letter to council (August 14, 2013) which read in part as follows:

*A unanimous comment expressed by PSC members was that if Council chooses to annex West Hayden Island, it should be done right. That means moving forward with a holistic set of actions that protect and advance the health of the community, environment and economy.*

That letter and the attached documents, including and Intergovernmental Agreement (IGA), laid out an explicit and extensive set of mitigation actions and processes that the PSC felt was necessary to "do it right." The letter also noted that the PSC "could not support adding industrial zoning to Hayden Island without the additional transportation system the CRC would have provided." The Port of Portland chose to explicitly reject this package of mitigation items and the CRC is now officially dead. We urge the Commission to keep faith with the community and the multiyear West Hayden Island public process and not identify West Hayden Island for future industrial development in the Comp Plan.

It is also critical to note that West Hayden Island is not needed to meet overall 2035 demand for industrial development and job growth across all industrial geographies (EOA at 4-15). The primary argument for annexing and industrializing portions of WHI is not jobs but rather the commodity movement forecast. (EOA at 4-14) However, this forecast is rendered somewhat moot by recent developments at the Ports Terminal 6 where the Port has lost 80% of its current business.

8. **We would encourage the addition of Policy 5.9 from the 1980 Comp Plan to protect surrounding neighborhoods from industrial use:** This policy reads as follows:  
5.9 Protection of Non-industrial Lands: Protect non-industrial lands from the potential adverse impacts of industrial activities and development.  
Objectives:
  - A. Where possible, use major natural or man-made features as boundaries and buffers for industrial areas.
  - B. When industrial zoned lands abut residential zoned lands, and there are no natural boundaries, apply special buffer overlay zone provisions to ensure that development is compatible.
  - C. Use off-site impact standards to ensure industrial activities will not cause nuisance effects on lands whose zoning permits residences.
  - D. Prevent hazardous conditions by ensuring that larger users of hazardous materials are located away from residential areas and that all users of hazardous materials meet applicable building, fire and other safety codes and regulations.
  
9. **The EOA and Comprehensive Plan should explicitly ban fossil fuel export facilities from Harbor Access Lands:** In order to achieve Portland's Climate Action Plan objectives, the Comprehensive Plan should explicitly restrict harbor access lands from being used for fossil fuel export facilities. The City should not be adding to infrastructure that will sustain the fossil fuel export industry for decades to come.
  
10. **The EOA and Comprehensive Plan should include policies that explicitly direct the City to consider safety of products being shipped by boat or rail through Portland and other local communities when it approves new industrial development proposals and to work with the railroads to ensure that local communities are adequately protected from hazards associated with rail transport:** The recent Pembina process has highlighted glaring deficiencies in the City's current approach to ensuring that local communities are adequately protected from hazards associated with transport of hazardous materials through Portland.
  
11. **The EOA should consider the role that greater inter-port cooperation and coordination could accomplish in terms of increasing efficient use of the currently existing marine dependent industrial land base along the Columbia Corridor:** It is disappointing that the City continues to ignore the issue of inter-port cooperation and coordination. While not a traditional focus of EOA's, the City, Port and industrial development community can no longer afford to conduct business as usual. It is long past time to take a hard look at strategies to promote real collaboration and cooperation and potentially unification of the Columbia River Ports in order to maximize efficient use of land, promote a sustainable regional Port economy and stabilize our Port system which is on the brink of system failure. This is something which has been in the Port of Portland's Marine Terminal Masterplan since 1991 but which has never been seriously pursued. Our land use system was intended to foster innovative approaches to land use, but unfortunately Goal 9 has increasingly been used to protect and justify approaches that are stagnant and unsustainable.
  
12. **The EOA is a foundational document that should have informed the Draft Comp Plan, not followed it:** The EOA, like the Natural Resource Inventory, is a foundational document that should have been available for public review, comment and adoption prior to development of the Comp Plan. The Comprehensive Plan process would have been much more effective and credible if the public had

been able to review the data and analysis on which policies were based when they testified on those policies.

Thank you for your consideration of these comments.

A handwritten signature in black ink that reads "Bob Sallinger". The signature is written in a cursive, slightly slanted style.

Bob Sallinger  
Conservation Director  
Audubon Society of Portland

East Columbia N.A.  
Land Use Committee

April 28, 2015

Portland Planning and sustainability Commission  
1900 S.W. 4<sup>th</sup> Ave.  
Portland, OR 97201

Re: Economic Opportunities Analysis Draft/Dated March 2015

Dear Chair,

This is a request by the East Columbia N.A. Land Use committee to delay the time for comments by at least **several weeks** and to allow time for a review of these documents to go out through the Pdx Neighborhood Coalitions so as to affect Neighborhood Associations with sincere outreach.

It appears from the list of Focus Group member's roster, not one Neighborhood Association appears to have participated in the development of this Analysis. This does not serve the process of adoption, of its contents, nor does it disseminate the important information in the report out to the established neighborhood network. This appears a costly expense by PDX citizens was put into this analysis. What harm would it be taking it out to North Portland Neighbors?

We do not understand why the focused Neighborhood Network for communication and review in our area did not even discuss this extensive report. We are a member of North Portland Neighborhood Coalition and Martha Johnston is our representative on that Coalitions Monthly Land Use meeting and did not hear about this till yesterday.

We are very active in the PDX Comprehensive Plan process and were not even aware that this huge study existed until yesterday when we stumbled onto it through speaking to a senior planner. Our area appears to be affected in the Draft and in this limited time can not adequately reply.

As this Commission should know, after receiving extensive comments from individual Neighbors and the East Columbia N.A., in the recently completed Zone mapping process, we have a particular issue. This appears to be affected by this EOA and is involving 7ea Landowners in our neighborhood on the approx. 9000 block area of NE Levee Rd.

These landowners have been impacted since the 1980 Comp. Plan which designated these 7 properties as Industrial Sanctuary (IS). There an imbalance in the Economic Equity in this Designation and the Landowners are requesting an R-20 Designation. These 20 acres have no industrial road access, are severely impacted by an E-zone (C and P) overlay zones and have a large section of mitigated Wetlands just south of the Eastern properties.

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PSC testimony, ECNA Land Use Comm.  
4-28-15

Also, a private conservation easement is known to exist and the area is heavily planted with a forest of native vegetation.

From first glance at this proposal, these properties appear to be considered in these analysis and projections. This could possibly skew the figures and perhaps provide a reason for denying the map designations Change request to (R-20).

More time is needed to review and we respectfully request an extension.

Sincerely,

A handwritten signature in cursive script that reads "Martha Johnston".

Martha Johnston  
East Columbia Neighborhood Assoc.  
Land Use Comm. Chair  
9509 NE 13<sup>th</sup> Ave.  
Portland, Or 97211



TESTIMONY to PORTLAND PLANNING AND SUSTAINABILITY COMMISSION

On Economic Opportunities Analysis

In Regard To: properties on NE Levy Road designated in Comprehensive Plan as Industrial Sanctuary and counted in industrial land inventory

1. If you take out the land that is environmentally protected, the usable land is considerably less than is being counted as available for industrial use.
2. The only access is through private property or residential streets.
3. The adjacent property owner is the only one that can use the property industrially. So that is less likely to happen and they would be unlikely to pay full price because of the environmental protection and the low market value due to the lack of access.
4. The property would be worth more to the existing residential property owners or urban farming than for industrial use.
5. Home-based industry or urban farming production, sales, and transportation of goods could provide more employment.
6. Other uses would be more compatible with the environmental restrictions. For example, intensive agriculture does not need as much acreage so could leave environmentally protected area undisturbed or use for grazing.

Therefore, this land should not be designated as Industrial Sanctuary in the Comprehensive Plan or counted as available industrial land.

Thank you,

*Barbara J. Kerr 4/28/15*  
Barbara Kerr

ARE YOU A GOOD FAITH PARTNER?

BY NO MEANS CAN YOU CLAIM THE

ENTIRE ACREAGE OF THESE RESIDENTIAL

FARMING PROPERTIES WITH A COMBINATION

OF ENVIRONMENTAL OVERLAYS AND

CONSERVATION EASEMENT TOWARD YOUR

INDUSTRIAL INVENTORY AS LESLIE LUM

SAYS YOU ARE, AFTER BEING SHOWN A

MAP AT THE LAST COMP PLAN TESTIMONY THAT

SHOWED NO ZONE CHANGES, I THANKED YOU

FOR ACTUALLY LISTENING TO PREVIOUS TESTIMONY,  
IT APPEARED INSTEAD, AFTER ENDURING YEARS  
OF INDUSTRIAL POLLUTION (NOISE, AIR, LIGHT) WITH NO  
ENFORCEMENT OF MY RESIDENTIAL LIVABILITY,  
THE MULTI-BUREAU EFFORT TO FAIL EAST COLUMBIA,  
AND MY FAMILY AND PROPERTIES.

CONTINUES.  
THIS IS NOT A MAP OR  
PLANNING OBJECTIVE, IT IS PEOPLE

Portland Planning and Sustainability Commission Public Hearing

Date: 4-28-15

Name: JUSTIN CALLAWAY (Please print legibly)

Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)

Address: 4850 NE LEVEE RD

City: PORTLAND Zip: 97211 Phone: \_\_\_\_\_

Email Address and/or Fax No.: justin.callaway@gmail.com

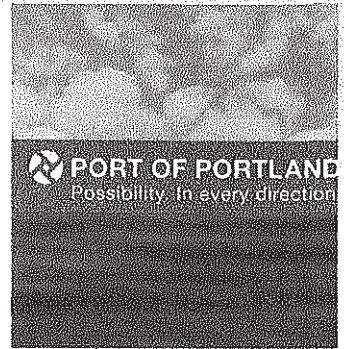
What agenda item do you wish to comment on? Industrial Sanctuary Charade

Site Address, if different from above: \_\_\_\_\_

+ LOT R171714

(check if written comments are included on back)

**Mission:** To enhance the region's economy and quality of life by providing efficient cargo and air passenger access to national and global markets.



April 27, 2015

Andre Baugh, Chair  
Portland Planning and Sustainability Commission  
1900 SWE Fourth Avenue, Suite 7100  
Portland, Oregon 97201

Dear Chair Baugh and Planning and Sustainability Commissioners:

The Port of Portland (Port) would like to thank you and the Bureau of Planning and Sustainability staff, in particular Steve Kountz, for your work on the City of Portland Economic Opportunity Analysis (EOA) March 2015 Proposed Draft. We appreciate this opportunity to comment on the EOA and the hard work of bringing multiple versions to the fore with changes based on public review.

In 2012, having participated on the EOA Technical Review Committee, we shared our support for the new methods the City used in assessing the need for freight facility land and the need for a detailed understanding of the City's industrial land market. That work has carried forward to the newest draft of the EOA. We continue to maintain that industrial land of all types is a vital part of the City's employment and economic fabric. The Port continues to support an EOA that is responsive to land demand needs as dictated through the Oregon Department of Land Conservation and Development Goal 9 process. To us, that means an EOA completed on the basis of a forecast and trends that more closely represents the harbor's ongoing economic significance and the irreplaceable value of harbor industrial lands.

In general, we find the EOA March 2015 Proposed Draft is problematic. By choosing the low forecast for harbor lands as opposed to the mid-range forecast cited in the last draft, the EOA diminishes the overall significance of the harbor in the City's economy; reduces the pressure to revitalize brownfields, and makes the goal of 60% brownfield redevelopment unlikely. The low harbor forecast also reduces the likelihood of limiting development constraints on harbor lands that are already in short supply. The tone of the EOA and its utilization of the low harbor forecast doesn't reflect the need for growing personal and household incomes through export and traded sector industries.

Selection and implementation of the low-end forecast for harbor lands is inconsistent with 50 years of cargo trends in the Lower Columbia River. This forecast is not aligned with current and anticipated market activity in the Portland Harbor and Columbia River. Finally, the low-end forecast is likely to create a self-fulfilling prophecy that will impact the ability of the City to attract investment and clean-up the Portland Harbor.

7200 NE Airport Way Portland OR 97218  
Box 3529 Portland OR 97208  
503.415.6000

Andre Baugh  
April 27, 2015  
Page 2

We urge the City of Portland to select the mid-range/most-likely harbor forecast, consistent with the Portland Plan policies and original direction established in the Comprehensive Plan.

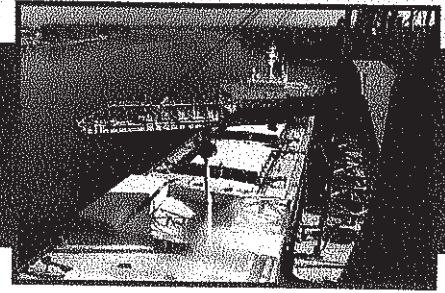
Thank you for the opportunity to share our perspective on the EOA. The need for industrial land, diverse job creation and freight transportation are very important to the Port of Portland. They are highlighted as strategic areas of focus in the Port's strategic plan and directly shape our business plans and budget. We look forward to continuing to work jointly with the City on these issues.

Sincerely,

A handwritten signature in cursive script that reads "Susie Lahsene".

Susie Lahsene  
Land Use and Transportation Policy Manager

# Impacts of Channel Deepening on the Columbia River



## IMPORTANCE OF THE SHIPPING CHANNEL

The Columbia River Navigation Channel runs from the Astoria bar to the Portland Harbor, a distance of 105 miles. Every year millions of tons of cargo worth billions of dollars flow into and out our region making this shipping channel a critical connection between our region and the rest of the world. In the fall of 2010 the Army Corps of Engineers completed deepening the navigation channel from 40 to 43 feet. Private industry responded with a wave of new investments coming into the river system. Since 2010 there has been more than \$1.3 billion dollars of investments made to facilities and transportation capabilities that are dependent on river commerce. Much of the investment made by private industry has been a result of the channel deepening.

## IMPORTANCE OF CHANNEL MAINTENANCE

Maintaining the shipping channel to 43 feet will help ensure the continued growth in cargo movement and related economic activity seen since the deepening. Firms made investments and built capacity assuming a level of commerce supported by a 43-foot shipping channel. A channel less than this depth would strand investments, reduce economic activity, and limit growth.

**\$489 Million**

Total Investment in the Portland Harbor

**\$1.3 Billion**

Total Investment on the Columbia River Since 2010

**\$4.7 Billion**

Additional Investments Planned for the Columbia River

Port	Project (On-Line Date)	Investment Amount	Description
Longview	Export Grain Terminal (2012)	\$230 million	New grain terminal
Kalama	Temco LLC (2015)	\$50 million	Increase capacity (grain)
	Kalama Export Grain (2011)	\$36 million	Increase storage capacity
St. Helens Port Westward	Global - Columbia Pacific Bio-Refinery (2018)	\$80 million	Increased storage and rail improvements
Vancouver	United Grain Corporation (2012)	\$80 million	Enlarge storage and handling capacity
	West Vancouver Freight Rail Access (2015)	\$228 million	Rail expansion, new loop track, and road improvement
	Tesaro/Savage CBR (2018)	\$100 million	Rail improvements and loading facilities.
	Tidewater Barge Lines (2015)	\$20 million	Three new tugboats
Portland	Columbia Grain (2015)	\$44 million	Upgraded grain storage and handling
	Kinder Morgan Bulk Terminal (2013)	\$10 million	New ship loading facilities
	ICTSI Oregon, Inc. (2011)	\$120 million	Long term lease of container terminal
	International Raw Materials (2014)	\$2 million	Improvements to rail and storage tanks
	LD Commodities (2014)	\$21 million	Expanded grain storage and moving facilities
	Vigor Industrial (2014)	\$50 million	Largest dry dock in the US
	Rivergate Road and Rail Improvements (2012)	\$82 million	improve road and rail access and capacity
	Canpotex - Portland Bulk Terminal (2013)	\$140 million	Increase efficiency of shiploading
Shaver Transportation (2014)	\$20 million	New barge, new tug and new engines	
<b>Total Investment Since 2010</b>		<b>\$1.29 Billion</b>	
<b>Proposed Investments</b>			
Longview	Millennium Bulk Terminal (2018)	\$600 million	New coal terminal
	Millennium Bulk Terminal (2018)	\$25 million	Smelter removal and environmental cleanup for new bulk terminal
Kalama	NW Innovations Works (2017-18)	\$1.8 billion	New methanol plant
St. Helens Port Westward	NW Innovations Works (2017-18)	\$1.8 billion	New methanol plant
Portland	Pembina (2018)	\$500 million	Propane export terminal
<b>Additional Investments Planned</b>		<b>\$4.73 Billion</b>	



**NORTHEAST COALITION  
OF NEIGHBORHOODS**

April 21, 2015

Planning and Sustainability Commission  
City of Portland  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

Subject: Testimony regarding the Revised Economic Opportunities Analysis & Goal 9  
Conformance

Dear Commissioners:

The following are comments and recommendations from the Northeast Coalition of Neighborhoods (NECN) on the Revised Economic Opportunities Analysis. NECN serves to amplify the voices of community members from twelve inner North and Northeast Portland neighborhoods. The comments included in the testimony below were referred by our Safety and Livability Team (SALT) and were endorsed by the NECN Board of Directors on April 21, 2015.

NECN opposes the City's strategy of its March 2015 Proposed Draft Economic Opportunities Analysis, to designate portions of golf courses north of Columbia Blvd. for industrial use to meet our future industrial development capacity needs. Instead of encroaching on undeveloped open spaces to satisfy the requirements of Statewide Planning Goal 9, the City should further bolster its strategies for industrial lands retention, intensification, and redevelopment. If it is unable to reach its Goal 9 industrial land requirements implementing these alternative strategies, we call on the City to seek an exception to Goal 9.

We urge the City of Portland to seek alternative strategies in lieu of new development and contamination of existing green spaces. The City's strategy to develop open spaces as new industrial lands to satisfy the requirement of Statewide Planning Goal 9 directly contradicts Portland's community livability goals and its Climate Action Plan.

Portland's natural resources and green spaces are what make this city desirable. Instead of re-zoning and converting existing golf courses (Broadmoor and Riverside) along the Columbia corridor, we urge the City to follow a more sustainable strategy and explore other ways to secure jobs for our communities that do not compromise the health and well-being of its residents. The City of Portland will not be able to remedy its deficit of new industrial lands without sacrificing the environment and sacrificing the health and livability of its North and Northeast communities.

[www.necoalition.org](http://www.necoalition.org)

Alameda | Boise | Concordia | Elliot | Grant Park | Humboldt | Irvington | King | Sabin | Sullivan's Gulch | Vernon | Woodlawn  
At King Neighborhood Facility, 4815 NE 7<sup>th</sup> Avenue, Portland, OR 97211. 503-388-5004 main, 503-894-8534 fax, [info@necoalition.org](mailto:info@necoalition.org)

Ord. 187831, Vol. 2.3.B, page 6071

Instead of converting and developing pristine, open spaces to industrial sites, we urge the City to clean up existing brown fields, especially those in existing Industrial Zones, and to set a more ambitious goal: to redevelop greater than 70% of existing brown fields over the next 20 years to maximize otherwise underutilized and/or vacant parcels. Additionally, the City needs to prevent and prohibit further contamination of existing brown fields through the strongest possible policy regulations to prevent further obstacles to use.

Implementing strategies to intensify and retain existing industrial land can also help to ensure that adequate industrial land, and the jobs they provide, can be found within our current developed system. We urge the City to bolster programs to redevelop underused or obsolete facilities that are already part of the industrial lands inventory. Moreover, we urge the City to strengthen the policy that protects parcels currently zoned industrial from being down zoned for a commercial use; thus ensuring we use the lands already placed in industrial inventory in previous plans and decreasing the pressure to develop open spaces.

The City's current Economic Opportunities Analysis, and ultimately its Comprehensive Plan, must take into account the cumulative effect of its strategies to develop existing open space and natural areas, while investing in multimodal freight infrastructure improvements in the same areas. With the anticipated increase in freight traffic and transport along the Columbia Corridor and the accompanying increased diesel emission, pollution will intensify in a region of the City where air quality is already severely compromised. This air quality problem will only be exacerbated if portions of the Broadmoor and Riverside golf courses are developed. The resulting poor air quality will further harm the health of residents particularly in the adjacent North and Northeast Portland neighborhoods. This is neither economic nor environmental justice.

Rather than Portland bending to the State of Oregon's Goal 9 requirements, we call upon the City to request an exception to Goal 9. In fact, when new industrial development is proposed, the City must be held accountable for attaining environmental, safety, and health analyses prior to the approval of the said development, and must communicate these analyses to affected communities.

The NECN Board of Directors and our SALT members thank you for your important work in protecting the air, water, and land in our communities. We appreciate your consideration of our comments.

Sincerely,



Alan Silver  
Chair, NECN Board of Directors



April 14, 2015

Planning and Sustainability Commission  
1900 SW Fourth Avenue, Suite 7100  
Portland, Oregon 97201

Dear Chair Baugh and Commission Members:

The Portland Business Alliance (Alliance) appreciates the opportunity to comment on the 2015 Economic Opportunities Analysis (EOA). We understand the significance of the EOA in ensuring that there is an adequate supply of employment land to accommodate a variety of job classifications and promote economic prosperity over the next 20 years. We commend Bureau of Planning and Sustainability (BPS) staff for their hard work over the last several months conducting extensive research and technical analysis to guide the future economic direction of our city.

Overall, we appreciate the attempt to accommodate 142,000 new jobs on 3,000 acres of employment land over the next 20 years. We are, however, gravely concerned about a number of unrealistic assumptions that have been made to artificially fulfill the state of Oregon's planning Goal 9 requirements on economic development. In particular, we are concerned about the following:

- 1. The proposal to accommodate a low marine cargo forecast.** The revised EOA assumes a low cargo growth forecast despite recent trends that indicate otherwise in the Columbia River Gateway, including the Portland Harbor. In fact, since 2008 there has been a significant amount of investment and planned investment in the Portland region and lower Columbia River in the amount of \$3.6 billion that does not comport with the low marine cargo growth forecast.

Since the early 1960's, the lower Columbia River Gateway, including the Portland Harbor, have experienced sustained cargo development with an annual growth rate of 3 percent. The recent commodity flow forecast by Cambridge Systematics projects continued growth at 3 percent. The revised EOA projects an annual growth rate of 1.3 percent which is substantially lower and inconsistent with the actual development planned in the harbor.

It should also be noted that the recent decision by Hanjin Shipping Company to end operations out of the Port of Portland's Terminal 6 was not based on a lack of demand and should not be used as rationale for a low marine cargo forecast. The decision, rather, was the result of a labor dispute between the longshoremen and the Port operator ICTSI.

The low marine cargo forecast is not justified by recent market trends nor is it consistent with existing plans that have been approved and adopted by the Planning and Sustainability Commission (PSC) and / or Portland City Council. These plans include but are not limited to the city of Portland's *Economic Development Strategy, Portland Plan, We Build Green Cities Campaign*, and the *Greater Portland Export Plan*. One of the primary objectives in the city's

*Economic Development Strategy* is to “grow traded sector jobs through the implementation of a cluster strategy.” Similarly, the *Portland Plan* aims to grow exports and retain Portland’s competitive market access as a West Coast trade gateway. The *We Build Green Cities Initiative*, a program administered by the Portland Development Commission, positions local architecture, design, engineering and planning firms for knowledge-based and product export opportunities by connecting them to foreign markets. It is also a key strategy in our *Greater Portland Export Plan* as part of the *Metropolitan Export Initiative* (MEI). The MEI, an effort of Greater Portland, Inc. assisted by the Brookings Institute, aims to double exports out of the Portland-metro region from 2012 to 2017, from \$21 billion to \$42 billion over the time period. The low marine cargo forecast will hinder achieving the traded sector goals outlined in these recently adopted city plans.

Simply put, the assumption of a low marine cargo forecast is a way around a marine terminal on West Hayden Island and only lowers expectations for economic performance for the Portland-metro region and for the state of Oregon as a whole. As a result, we risk increased income polarization and foregone income tax revenue that could help fund critical public services such as education and law enforcement.

As we have shown in our Value of Jobs reports, 90 percent of Oregon’s exporters are small and medium sized businesses, and export-related jobs pay on average 18 percent more than non-exporting jobs across sectors. In particular, the production of traded-sector goods is still the backbone of Portland-metro’s traded-sector employment. Manufacturing jobs are also found to provide higher wages and better benefits than non-manufacturing jobs, particularly for communities of color and those with less than a four-year college degree. A low marine cargo forecast does not support middle-income job growth or our city’s equity goals.

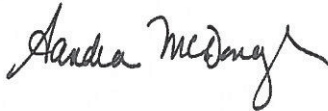
2. **Aspirational brownfield redevelopment.** We understand that the revised EOA assumes that 60 percent of brownfields will convert over the next 20 years. The 60 percent figure is dependent on the ability of the Oregon Legislature to enact and fund legislation and programs, including House Bill 2289 and House Bill 2734. While we support these bills, the city should not rely on pending legislation that is subject to political complexities to meet its Goal 9 requirements. Additionally, brownfields do not often convert to industrial land due to cost burdens and onerous regulations associated with their redevelopment. More often, brownfields convert to mixed-use development that will yield a greater return on investment and should therefore not be overly relied on to fulfill the availability of industrial acreage. Brownfield redevelopment already takes place over a long time horizon and it will be difficult to achieve results within the next 20 years even if legislation is passed.
3. **Aspirational golf course conversion.** We are concerned that the revised EOA relies on golf course conversion to meet its employment land forecasts and in particular, industrial land needs. Golf courses are privately owned and an owner must be willing to sell their property. It is our understanding that the only golf course that has expressed a willingness to sell is the Colwood Golf Course and that the owners of other golf courses that are being counted in the EOA to help meet industrial land acreage have not confirmed an interest to sell. In the case that an owner is willing to sell, there is no guarantee that they will sell to an industrial developer, especially if there is greater profit to be gained for other uses.

**4. Shifting administrative jobs out of the Portland harbor.** We do not understand the rationale that there will be industrial land intensification as a result of harbor-related businesses moving administrative offices off-site and onto adjacent properties. We do not see an indication that this would occur and to the extent it would, we are unclear how land would be intensified as a result. We request a more thorough analysis and explanation of this assumption.

While we appreciate efforts to meet the shortfall with strategies such as brownfield redevelopment and golf course conversion, these options are aspirational at best and do not reflect market realities. Further, arbitrarily lowering economic expectations in the cargo forecast circumvents the policy discussion we should have about what we envision for our city's economic health. Complying with state land use Goal 9 may be difficult, but manipulating the numbers to make an industrial land shortfall disappear is not the right answer. Because the ability to address employment land needs is based on such assumptions, under no circumstances should policies be adopted in the comprehensive plan that add additional costs and burdens to redevelopment. We urge that the EOA and comprehensive plan reflect market realities in an honest attempt to ensure a prosperous and equitable future for our region's residents.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Sandra McDonough". The signature is written in a cursive, flowing style.

Sandra McDonough  
President & CEO

cc: Susan Anderson  
Bureau of Planning and Sustainability

# NAIOP

COMMERCIAL REAL ESTATE  
DEVELOPMENT ASSOCIATION

OREGON CHAPTER

VIA E-MAIL (PDXCOMPPLAN@PORTLANDOREGON.GOV)

March 13, 2015

Portland Planning and Sustainability Commission  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

Re: PSC Comprehensive Plan Testimony, related to Testimony Related to  
2035 Comprehensive Plan (July 2014 Draft) Goals and Policies and the  
Economics Opportunity Analysis

Dear Portland Planning and Sustainability Commission:

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.

One of the issues that is most important to NAIOP's members is that the City, and our region, include an adequate number of sites to accommodate projected employment demands. While land that is available over the long term is an element of planning, our focus is on sites that are readily available for productive use. For this reason, we have partnered with Metro, the Port of Portland, Portland Business Alliance, and Business Oregon since 2011 in a series of studies of the region's supply of large lot industrial land [*Land Availability: Limited Options, An Analysis of Industrial Land Ready for Future Employers*. Value of Jobs Coalition (2012, updated in 2014)].

It is through this site availability lens that we analyzed the draft comprehensive plan and monitor the City's Goal 9 work, including the Economic Opportunities Analysis ("EOA"). As detailed below, while Chapter 6: Economic Development includes policies supportive of economic growth, we are very concerned that prosperity is unachievable because Chapter 7: Environment and Watershed Health will prevent job retention and growth.

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## Executive Director

Kelly Ross

## **Lack of Balance in the Comprehensive Plan**

Chapter 7 currently requires the “protection” of many resources, which likely means that development is prohibited, regardless of quality of the resource, the economic and equity consequences of prohibiting development, and regardless of the ability to avoid, minimize and mitigate potential negative environmental consequences. We understand that the PSC has considered this “balance” issue.

Requested Solution: We request that the comp plan policies be revised so that the term “protect” is used in a more restrained manner. Additionally, we request that the comp plan specifically define “protect” so that it is abundantly clear that the City does not intend for the term to prohibit development, which is a departure from how “protect” has been interpreted in the past.

## **Refinements in Chapter 6: Economic Development**

We believe that Chapter 6: Economic Development includes Goals and policies that will help our community prosper, although some refinement is appropriate. For example, we support that the draft plan includes a policy directed at the Portland Harbor Superfund (Policy 6.40), and we appreciate the City’s recognition that industrial jobs are relevant to our community’s equity goals. However, we believe that these important policies could be strengthened.

Additionally, we understand that the EOA relies upon the City’s business-friendly business climate as a means to increase the capacity of our limited supply of industrial land. This concept needs to be elaborated upon in the comp plan, particularly given the lack of balance between Chapters 6 and 7, and the City’s recent history in imposing (or considering imposing) significant mitigation measures on employment uses, such as Airport Futures, the River Plan, West Hayden Island and Pembina’s proposed propane export terminal.

Requested Solution: Revise the comp plan so that Superfund and brownfield remediation efforts are increased, so that the link between equity and industrial jobs is strengthened, and meaningful and measurable gestures that ensure a fair, predictable and not overly-burdensome regulatory climate.

## **Site Specific Needs Must Be Emphasized**

Another major concern is that Chapter 7 does not acknowledge the site needs or operational characteristics of industrial uses, and requires the introduction of vegetation regardless of whether there is an impact on the functionality of the use. These issues raise serious concerns about the erosion of the city’s industrial land supply, from both a total acreage perspective and ability to feasibly provide jobs on the land that is remaining.

Requested Solution: Revise the comp plan policies to acknowledge that the functionality of industrial sites, which includes operating in a financially viable manner, must be maintained.

## Preliminary Concerns with the EOA

We understand that an updated draft to the EOA is forthcoming, and there will be additional opportunities to provide public comment. In the meantime, there are two issues that are of concern to our members.

1. The forecasted marine commodity demand has been reduced -- The marine terminal commodity movement demand forecast has been reduced so that now only the low end demand will be met. The 2012 EOA assumed a mid-range cargo forecast, which was described, at the time, as the "most likely scenario." We understand that the basis for the reduction is the City's likely policy choice to not assume that West Hayden Island will be developed within 20 years. We urge the City to not let this presumed outcome dictate the assumptions in the EOA, particularly when the assumption (cargo demand) sends a strong message about whether the City is open for business.
2. Accountability for, and reasonableness of, capacity creating measures -- It appears as if the measures that the City is relying upon to increase industrial land capacity are ambitious. For example, the conversion of golf courses is assumed, even though the owners are on record objecting to a change in use. Additionally, the assumed brownfield remediation rates exceed historic rates, notwithstanding the significant uncertainty related to Superfund. We understand that the capacity management approach is a potential method for determining whether the assumed capacity generating measures are working. We support the inclusion of metrics of success. However, we wonder whether it is premature for the EOA to take credit for the success of these significant capacity generating measures from the outset.

Thank you for the opportunity to comment on the com plan and EOA. We look forward to continued participation.

Sincerely,



Kelly Ross  
Executive Director



**PORTLAND**  
**BUSINESS ALLIANCE**  
Commerce • Community • Prosperity

March 13, 2015

Planning and Sustainability Commission  
1900 SW Fourth Avenue, Suite 7100  
Portland, Oregon 97201

Dear Chair Baugh and Commission Members:

The Portland Business Alliance (Alliance) appreciates the opportunity to comment on the Proposed Draft 2035 Comprehensive Plan. We understand the significance of this plan in accommodating future growth; it sets the framework for both infrastructure investment and physical development of the city over the next 20 years. We commend Bureau of Planning and Sustainability (BPS) staff for their hard work over the last several months conducting extensive research and technical analysis to inform the proposed goals and policies to guide the future growth of our city.

Overall, we appreciate the attempt to emphasize the importance of economic development, however there are still opportunities to strengthen the goal of creating a prosperous economy. If we are truly to achieve a “prosperous, healthy, equitable and resilient city” then even greater priority should be given to economic development. A business climate that supports private sector job creation and a robust economy is critical to growing good middle-income jobs and achieving equitable income distribution among households. Many studies show that a key indicator of health and quality of life is a good living wage job. Given this, attached are specific suggestions for improvement to the plan.

The Comprehensive Plan is an opportunity to better align land use and transportation with middle-income job growth. Industrial land is the primary generator of middle-income jobs that do not require a four-year college degree and are critical for a balanced economy. While our region has regained jobs lost at the low and high-end income levels, we have not regained those middle-income jobs lost during the recession. BPS’ own report, *The Industrial Middle of Portland’s Changing Income Distribution*, finds that East Portlanders, whom make up a large share of the city’s middle income workforce, rely on jobs on industrial lands. The middle-income jobs industrial lands generate are significant for achieving an equitable city as previously outlined in the adopted *Portland Plan*.

The availability of market ready industrial lands are also critical for a prosperous traded-sector economy. As we have shown in our Value of Jobs reports, 90 percent of Oregon’s exporters are small and medium sized businesses and export-related jobs pay on average 18 percent more than non-exporting jobs across sectors. In particular, the production of traded-sector goods is still the backbone of Portland-metro’s traded-sector employment and is dependent on adequate industrial land. Manufacturing jobs are also found to provide higher wages and better benefits than non-manufacturing jobs, particularly for communities of color and those with less than a four-year college degree.

*The Industrial Middle of Portland’s Changing Income Distribution* estimates that if the city’s 600 acre industrial lands shortfall is met nearly 32,000 middle-income jobs would be created and help to

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Ord. 187831, Vol. 2.3.B, page 6079

address income polarization in our community. While we appreciate efforts to meet the shortfall with strategies such as brownfield redevelopment and golf course conversion, these options are aspirational at best and do not reflect market realities. The future economic health of our city depends on meeting the shortfall and in order to execute such strategies that promote industrial land development, such as those related to freight mobility. We recognize an updated Economic Opportunity Analysis has been completed and, as a result, these numbers have changed. We will provide additional comment on that at a later date, but would note our concern that the shortfall is reduced in part by lower expectations for the economy's performance.

Unfortunately, there are policies that hinder an adequate supply of industrial land and the potential for industrial development. We understand, for example environmental overlays proposed on new natural areas would actually add to the industrial land shortfall, particularly in the Columbia Corridor and harbor. West Hayden Island is another example where flood and forest mitigation requirements on the 300 acres allocated for industrial land would prevent its actual development. Such policies are in direct conflict with those aimed at meeting any shortfall. We strongly urge that additional actions are not taken to further increase the shortfall of industrial land if and until progress is realistically made on addressing the current shortfall.

While we understand the challenge of addressing a variety of potentially competing issues in one document, there is a need to reconcile and prioritize conflicting goals and policies among different chapters within the plan. The plan itself states, "ensure that the components of the Comprehensive Plan are internally consistent," (Policy 1.3 Internal Consistency). However, there is no guidance for how to reconcile policies that are inconsistent, and conflicting goals and policies are found throughout the plan.

For example, while the economic development narrative in chapter six is strong, some of the policies contained in the chapter are in direct conflict with those in the environment and watershed health section contained in chapter seven. The clash between policies 6.39 industrial brownfield redevelopment and 7.29 brownfield remediation is just one example of internal inconsistency. Policy 6.39 provides incentives and technical assistance for brownfield redevelopment whereas policy 7.29 imposes additional cost burden by incorporating ecological site design and resource enhancement to brownfield remediation. It is obvious that policy 6.39 is more favorable to achieving the stated goal to redevelop 60 percent of brownfield acreage by 2035 whereas policy 7.29 would hinder achievement of this goal.

Because the ability to address the significant industrial land shortfall is based on difficult to remediate brownfields, golf course conversions and the like which may or may not come to fruition, under no circumstances should policies be adopted that add additional costs and burdens to redevelopment. The plan tries to accommodate varying interests, and therefore must be read as a whole to understand its implications. Failure to address internal inconsistencies simply kicks the can down the road as future decision makers struggle with how to balance competing priorities.

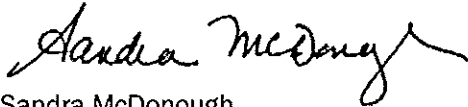
Furthermore, many of the goals and policies are aspirational and we are concerned about how broadly they may be interpreted when implemented into city code. The subjective and open ended nature of these goals and policies may create legal land use challenges once implemented. To the



extent possible, we strongly urge that goals and policies be as specific as possible and include corresponding action items to avoid misinterpretation in city code and legal entanglements in the future.

Thank you for considering these proposed changes to create a prosperous, healthy, equitable and resilient city. Please let us know should you wish to discuss these comments.

Sincerely,

A handwritten signature in cursive script that reads "Sandra McDonough". The signature is written in black ink and is positioned above the printed name and title.

Sandra McDonough  
President & CEO

Cc: Susan Anderson  
Bureau of Planning and Sustainability



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March 13, 2015

Planning and Sustainability Commission  
1900 SW Fourth Avenue, Suite 7100  
Portland, Oregon 97201

Dear Chair Baugh and Commission Members:

The Portland Business Alliance appreciates the opportunity to comment on the city of Portland Transportation System Plan (TSP). The Alliance is committed to improving the region's multi-modal transportation infrastructure, advocating for strong transportation policies and projects that encourage job growth and prosperity. A strong transportation network is absolutely critical to growing middle-income jobs for our region's residents. Our transportation system needs to promote the efficient movement of goods in order to support our traded-sector economy. Our Value of Jobs studies have found that traded-sector jobs produce higher wages that in turn raise more revenue for critical public services such as education and law enforcement.

We understand that, as our population grows, the capacity of our city's transportation system will be tested. There will be increased demand for all transportation options including bike/ped, transit, freight and auto. With limited system capacity and funds, we need to be strategic when crafting transportation policies and investing in projects to ensure a well-functioning multi-modal system. Projects and policies must be evaluated holistically and trade-offs considered when making investment decisions among a variety of modes. We, therefore, appreciate the addition of economic benefit criteria for opportunity access, freight access and freight mobility to help prioritize projects that provide the greatest return on investment and offer the greatest opportunity for quality middle-income jobs.

While we understand that it is not an exact science, we are concerned about the significant gap in financial resources proposed among different modes and the overwhelming commitment of resources to active transportation, specifically. Such a vast difference infers a prioritization of modes as opposed to projects and a shift away from a multi-modal system that would encourage job growth, livability and prosperity.

We would like to review the Portland Bureau of Transportation's (PBOT) citywide transportation capacity analysis to better understand gaps in the existing network but also determine future system needs given population growth projections. We need to ensure that projects that are included in the TSP fulfill not only neighborhood-level needs but the demands of our citywide transportation system and its role in connecting the greater Portland-metro region over the next 20 years.

We understand that the demand for transportation improvements continue to far exceed existing funding resources. As a result, those projects that demonstrate the greatest potential return for the least investment should be prioritized. For example, projects that add traffic lights and synchronize

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signals help improve traffic flow at a comparatively low cost and should therefore be prioritized (e.g. project numbers 20002, 20016, 20017, 20018, 20073, 20104, and 20105).

In addition to the aforementioned central city projects, we recommend the following:

Central City Project Priorities:

- **TSP 20027 (I-405/US26/Ross Island Bridge, SW):** Construct new freeway access from Ross Island Bridge to I-405 and US 26 to improve connections between regional facilities and separate traffic from neighborhood streets.
- **TSP 20050 (Southern Triangle Circulation Improvements):** Improve local street network and regional access routes in the area between Powell, 12th, Willamette River, railroad mainline, and Hawthorne Bridge. Improve freeway access route from CEID to I-5 SB via the Ross Island Bridge.
- **TSP 20075 (Water/Stark Corridor Improvements):** Construct the multimodal transportation enhancements laid out in the Central Eastside Street Plan.
- **TSP 113230 (Sullivan's Gulch Trail, Phase 1):** Construct a multi-use trail for pedestrians and bicycles within the Banfield (I-84) Corridor from the Eastbank Esplanade to NE 21<sup>st</sup> Avenue.

Freight Project Priorities:

Based on our review of the TSP freight project list we recommend the following projects be prioritized for funding:

- **TSP 30084 (Columbia Blvd/Columbia Way Bridge Replacement):** Replace the existing structurally deficient Columbia Blvd bridge (#079) over Columbia Way.
- **TSP 30005 (Columbia Blvd/Railroad Bridge Replacement):** Replace the existing fracture critical Columbia Blvd bridge (#078) over railroad with a new structure, and perform seismic upgrades on parallel bridge (#078A).
- **TSP 10011 (Freight Priority Program):** Improve freight speed, reliability, safety, and access along major freight routes to include signal priority, freight-only lanes, queue jumps, loading zones, and turning radius improvements.
- **TSP 50016 (Airport Way ITS):** Install needed ITS infrastructure to include communication network, new traffic controllers, CCTV cameras, and vehicle /pedestrian detectors.
- **TSP 30038 (Marine Drive ITS):** Install CCTV at N Portland Rd and changeable message signs at Portland Rd, Vancouver and 185<sup>th</sup>.
- **TSP 20002 (I-405 Corridor ITS):** ITS improvements at six signals between Clay and Glisan including communications infrastructure; closed circuit TV cameras, variable message signs for remote monitoring and control of traffic flow.
- **TSP 116590 (Rivergate Blvd Overcrossing):** Build a grade-separated overcrossing of N Rivergate Blvd.
- **TSP 40009 (NE 47th Ave Corridor Improvements):** Widen and reconfigure intersections to better facilitate truck turning movements to the cargo area located within the airport area.
- **TSP 40061 (Columbia/MLK Intersection Improvements):** Complete the unfunded project segment: northbound MLK to eastbound Columbia Blvd.

- **TSP 40102, Columbia Blvd Street Widening (Widen Columbia Blvd to a five-lane cross-section 60th-82<sup>nd</sup>):** This project has been identified as a bottleneck area on a Major City Traffic Street/Priority Truck Street. It would leverage other recent improvements on Columbia Blvd.
- **TSP 103750 (Cathedral Park Quiet Zone):** Add the city as a co-lead agency and move the project to the major city projects list.

Other Agency Project Priorities:

The Alliance also supports the inclusion of other agency projects to signify the city of Portland's partnership and future coordination with other agencies including the Port of Portland and the Oregon Department of Transportation:

- **TSP 30039 (Marine Drive Rail Overcrossing):** Reroute rail tracks and construct an above-grade rail crossing at Rivergate West entrance to improve safety and reduce vehicle and rail traffic conflicts.
- **TSP 30069 (Columbia Slough Rail Bridge):** Construct a rail bridge across Columbia Slough to provide rail connection to South Rivergate from Terminal 6.
- **TSP 103780 (T6 Internal Overcrossing):** Construct an elevated roadway between Marine Drive and Terminal 6.
- **TSP 108840 (I-5/Broadway/Weldler Interchange, Phase 2):** Acquire right-of-way to improve safety and operations on I-5, connection between I-84 and I-5, and access to the Lloyd District and Rose Quarter.
- **TSP 116540 (Time Oil Road Reconstruction):** Reconstruct Time Oil Road to improve industrial land access in South Rivergate.

Recommended Studies:

The Alliance would also like to see the following studies initiated and completed within the next five years:

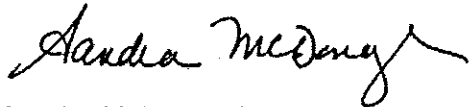
- **Freight Master Plan Update:** Incorporate freight-related studies and other projects that were initiated after the FMP was adopted in 2006.
- **Transportation System Capacity Analysis:** Evaluate impacts from reduced freight route capacity from completed and planned projects impacting major freight routes and industrial districts, such as North Interstate Avenue, SE 17<sup>th</sup> Avenue and NE Sandy Boulevard.
- **Airport Industrial District Truck Assess and Circulation Study:** Evaluate freight system needs in the PDX area.
- **Columbia Corridor Truck/Rail Access and Circulation Study:** Evaluate the interaction between the UP Kenton line and truck access along NE Columbia Blvd and US 30 Bypass.
- **River Transportation Study:** Evaluate the feasibility of river transport including water taxis and other transportation-related boat tours.

While these projects and studies alone will not address all of our transportation needs, they will increase access to vacant and underutilized industrial lands, including traded-sector facilities, while

increasing access to middle-income jobs. They also provide capacity for auto and freight mobility, promote regional connectivity, tourism, and include seismic upgrades that are fundamental for system integrity.

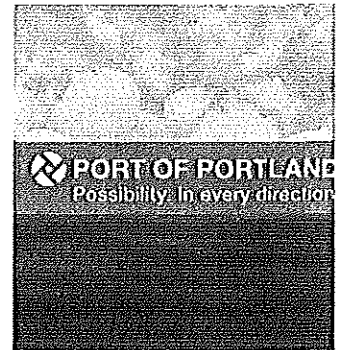
Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Sandra McDonough".

Sandra McDonough  
President & CEO

cc: Mayor Charlie Hales  
Commissioner Steve Novick  
Leah Treat, Portland Bureau of Transportation  
Susan Anderson, Bureau of Planning and Sustainability



March 13, 2015

Andre Baugh, Chair  
Portland Planning and Sustainability Commission  
1900 SW Fourth Avenue, Suite 7100  
Portland, Oregon 97201

Dear Chair Baugh and Planning and Sustainability Commissioners:

Thank you for the opportunity to comment on the Draft Portland Comprehensive Plan (July 2014), Draft Transportation System Plan (TSP) and subsequent work session memos from Portland Bureau of Planning and Sustainability (BPS) staff. The Port of Portland (Port) has been an active participant in the Comprehensive Plan process. We have provided written testimony on earlier versions of this document and supporting materials in May and December 2013, as well as oral testimony during the recent slate of Planning and Sustainability Commission hearings. Port staff has also played a role on a number of technical advisory committees.

Our current comments on the draft Comprehensive Plan and related BPS staff memos are consistent with comments we have raised in earlier communications. Our concerns can be organized under three themes: Adequacy of economic policy, equity and growth, and balance. All three themes broadly embrace and are reinforced by the Port's sustainability policy whereby:

"... we make business decisions that support long-term economic health, integrate community concerns into our work and reflect a deep and broad commitment to environmental stewardship for the benefit of future generations." (Port Administrative Policy Sustainability 7.4.19, May 2014)

As the Port pursues new avenues for growth, communication and partnership, as outlined in our Strategic Plan FY 2016 – FY 2020, the success of a sustainable Port is dependent on ensuring adequate revenue to fund operations, make capital improvements, address legal obligations such as the Portland Harbor Superfund site, and deliver on our mission to state and regional stakeholders.

The State Legislature created the Port in 1891 for the original purpose of improving, dredging and maintaining the harbors and channels of the Willamette and Columbia Rivers. Over time, the Port's responsibilities were expanded by the State to include promoting the general maritime, shipping, aviation, commercial and industrial interests of the Port (Oregon Revised Statute 778.015). With overlapping interests but different missions, it is our hope the City's Comprehensive Plan would complement and support this legislative mandate. It is with this in mind that we offer the following comments.

## ADEQUACY OF ECONOMIC POLICY

The Portland Plan emphasized the role of economic prosperity and affordability as one of three strategies, with a framework of equity integrated into all three as a foundation for greater alignment and collective action among public agencies in Portland. The vigor and intensity of economic prosperity goals, policies and their ultimate implementation is the foundation upon which Portland achieves success. The Port's comments on economic policy are based on our vision; "...to be a prominent, innovative economic development engine while stewarding the region's community and environmental best interests."

Even with the recent good job growth news, we still find that Portland wages are not keeping up with other major cities. The most recent analysis of the Portland Region's Economic Health 2014 by Eco Northwest indicates that Portland's median household incomes are \$4,400 below pre-recession levels and that Portland's per capita income is 4.6% below the national average for metropolitan areas. This issue is of particular concern when our state is so reliant on income taxes to fund the public's expectations for services.

The emphasis on trade in the Portland Plan was reflective of the Brookings Institution's recognition of the strength of trade activity in the Portland region. It also reflected the fact that 95% of consumers live outside of the U.S. and tapping into those markets is an important strategy for businesses to grow. Greater economic well-being is generated by the traded- sector economy than by those serving only the local economy. According to the Brookings Institution, one traded-sector job is equal to three local jobs; companies that export (or sell outside the region) experience higher sales, generate greater employment, and offer higher wages than firms which do not export.

Trade and transportation is of critical importance to the Portland-Vancouver region. While investment in harbor businesses has continued to be robust following the deepening of the Columbia River shipping channel, the Comprehensive Plan and Economic Opportunity Analysis (EOA) downplay and may even impact the viability of this investment. The level of investment in new, expanded or more efficient facilities in the Portland-Vancouver Harbor and on the entire Columbia suggests that there is a much greater demand for Harbor Access Lands than is being accounted for or planned for. While the City's initial draft EOA used a medium forecast based land demand, the January 2015 Proposed Draft EOA assumes a low forecast based land demand. We believe this is not supported by the facts of actual harbor demand and will leave the City and state behind the curve of economic upturns restricting opportunities for growth and greater job diversity.

For these reasons, and because the Comprehensive Plan sets the 20 year direction for the City of Portland (and the region), the Port believes it is prudent to have a policy calling for the future annexation of West Hayden Island "for a combination of open space and deep-water marine industrial uses" through a process that "ensures mitigation of impacts and provision of public benefits". As indicated West Hayden Island is a longer term development opportunity but, should remain a key component of the City's industrial land inventory and the City EOA. This policy is supported by City Council Resolution 36805 and action taken by the PSC in the fall of 2013. Policy 6.41 should be limited to that direction provided by City Council. This policy dovetails with other City initiatives such as the Greater Portland Export Initiative, led by the Office of the Mayor and the Portland Development Commission, to double the region's exports in five years.

A supportive West Hayden Island annexation policy also has a direct connection to other policies contained in the Comprehensive Plan, including land supply, traded sector competitiveness, equitable household prosperity, industrial and employment districts, preservation of open space, and enhancement of various habitat types critical to listed species.

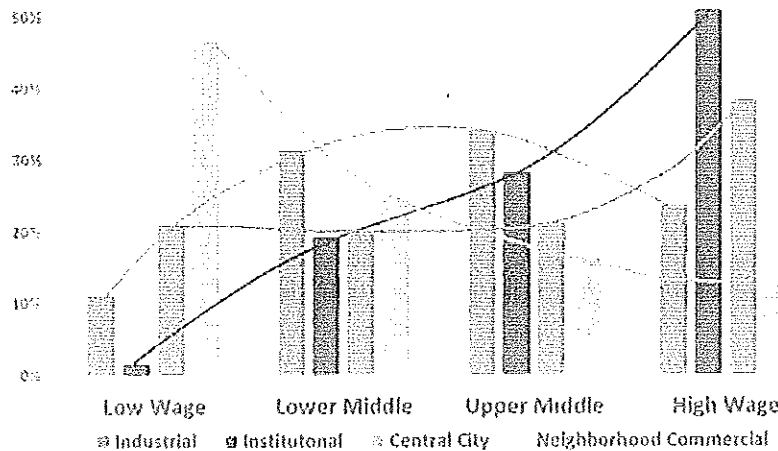
The provision for additional industrial lands, especially harbor access lands, is critical to the future of Portland. We commend staff for inclusion of several significant policies that, if properly implemented, would go a long way toward ensuring Portland's economic prosperity through greater equity based on strong growth in accessible middle-income jobs.

**EQUITY AND GROWTH**

Certain elements of disparity in equity can be tied to income inequality and the lack of well-paying employment opportunities for under-served and under-represented populations. The Port's role of providing access to markets results in public infrastructure expenditures and facilities that serve all job classes, but largely result in growth in middle-wage jobs. Although Oregon is creating jobs, they tend to be at the two ends of the spectrum: very high paying jobs and very low paying jobs. Strengthening every element of the Comprehensive Plan that addresses job growth, especially middle-income job growth continues to be a priority for the Port.

Using the Comprehensive Plan as a tool, the City has an opportunity to focus its efforts on supporting middle-income job growth. As shown in the wage quartile comparison of Portland's employment geographies developed by BPS staff, middle-wage occupations are concentrated in Industrial employment and in the City's industrial geographies, especially the Portland Harbor and the Columbia Corridor. Policies that support economic growth in these geographies, such as brownfield redevelopment, intensification and expansion of existing uses and Willamette Superfund site cleanup are to be applauded.

Figure 35. Wage Quartile Comparison of Portland's Employment Geographies, 2012, (BPS, EOA, 2015)





## **BROWNFIELD REDEVELOPMENT**

While brownfield redevelopment affords one of the best opportunities for new industrial land capacity and associated middle income job opportunities, there are a number of unresolved challenges to realizing this potential. Brownfield redevelopment is an important goal for our region and state and the Port has brought back to use one of the largest Industrial brownfields in the state in Troutdale. Based on that work, and the recent Portland and Metro brownfield redevelopment studies, industrial brownfield redevelopment has the greatest return on investment to the public yet is one of the most difficult to achieve given industrial land prices and remediation costs.

Without policies to support and incent this type of brownfield redevelopment, and partnerships among many stakeholders, it will be challenging for the City to achieve the goal of 60% redevelopment of industrial brownfields by 2025 outlined in the current draft EOA. The Portland Development Commission (PDC), the agency historically in the lead on brownfield redevelopment with its Harbor ReDI Program and the Willamette Urban Renewal Area, has drafted a Strategic Plan 2015-2020 that does not include any mention of brownfield redevelopment. Reaching 60% redevelopment of brownfields by 2035 seems that much more insurmountable without a stronger commitment from all bureaus in the City.

Public resources will be needed to support this effort. While new tools are being proposed, only limited loan funds are currently available. Redevelopment of Portland Harbor lands will be even more challenging and require partnerships and creative solutions. The specific policy in Chapter 7 that will make brownfield redevelopment (as envisioned in Chapter 6 policies; 6.14, 6.39, and 6.40) difficult if not impossible to achieve is 7.46. This policy suggests grasslands and floodplains must be protected and enhanced within the Willamette River watershed. Grasslands as shown on the current City Natural Resources Inventory map includes many fallow areas consisting of barren and weedy fill on existing developed industrial sites and underdeveloped brownfield sites not currently regulated within industrial districts. Floodplains are currently regulated for flood protection, not as a habitat feature. It is hard to imagine how both outcomes can be accomplished with these conflicting policies.

## **TRANSPORTATION**

The Port sees similar challenges with implementation of transportation policies that are intended to support middle-income employment area geographies (Harbor Access Lands and the Columbia Corridor). The Portland Plan identified the advantages of Portland as a freight hub and international port City. From our perspective, transportation continues to be both a strategic advantage for the City and region and a potential vulnerability. Maintaining and growing that advantage is critical to equity and growth. Oregon is a relatively small, trade-dependent market, and good access to markets beyond our region is critical for the businesses that locate here and for business expansion, retention and job growth. Robust market access is critical to businesses that rely on the timely delivery and shipment of products to the national and international marketplace.

As reinforced by statewide shippers' reaction to the recent departure of Hanjin container service to Asia, the Portland freight hub is critical to the state and local economy. Distillers depend on glass bottles shipped by low-carbon methods from factories in Asia, while blueberry growers depend on the same mode to export perishable products to Japan. Having direct-calling service (both ocean and air) for moving cargo adds to the quality of life in our region. Local exporters have reduced shipping costs and are more competitive the marketplace, creating jobs for Portland residents. Lower costs are also enjoyed by importers such as Fred Meyer and Les Schwab. In turn, they are able to reduce prices to their customers, affording greater access to consumer goods to a wider range of Portland residents. Decisions in Portland have implications for other counties in the region and state that rely on the Portland freight hub. This rural-urban economic linkage should be acknowledged in the Comprehensive Plan.

Strategic freight investments in all parts of the transportation system are essential to address choke points, excessive congestion and poor connections. In order to address business and passenger transportation market access and freight bottlenecks, improvements that address these needs must be prioritized and included in the Transportation System Plan (TSP).

Freight and goods movement is important to accommodate the anticipated increase in Portland's population and economy, approximately 280,000 new residents and 140,000 new jobs by 2035.

Efficient freight movement is also a key element to providing an adequate industrial land supply (as described in Policy 6.12), in part by increasing throughput on existing industrial sites (as described in Policy 6.38).

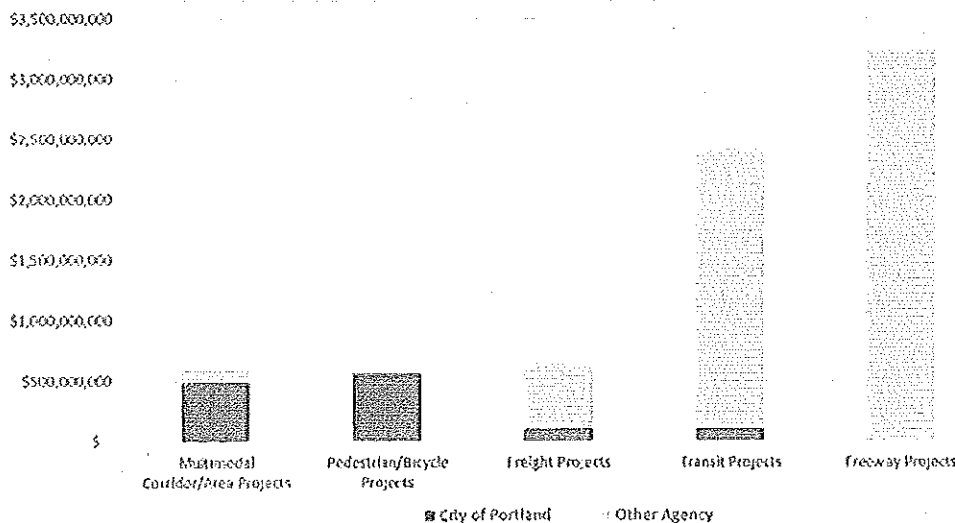
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In consideration of the above, the Port appreciates and supports the addition of the economic benefit criteria for opportunity access, freight access and freight mobility that was used to prioritize the City's transportation project list. These criteria appropriately reflect our diverse, multi-modal system needs, provide the greatest return on our investment, and offer the greatest opportunity for higher wage jobs for our workforce.

However, it seems that the prioritization and funding for freight improvements on the project list proposed by the City is not in line with the importance of the freight network to the economy of the region. As shown by the slide in the Portland Office of Transportation presentation at the February 24<sup>th</sup> PSC hearing on the TSP, the City is allocating a minimal amount of expenditures to freight when compared to other transportation modes.

From February 24 PBOT presentation at PSC:

## Constrained Investments by Mode & Agency



The region has set a five-year goal to double export trade volumes to support a strong and growing economy. A related goal is to sustain a vibrant and prosperous regional economy that generates middle income jobs and sufficient tax revenues to support critical public services that can address other social equity issues. Our concern is that the proposed implementation of the TSP will leave a significant segment of transportation system users and the traded-sector economy behind.

The strong connection between economic growth, equity and access to middle income jobs is acknowledged in the Comprehensive Plan, but implementation actions seem insufficient. The PDC Strategic Plan 2015-2020 also makes this connection:

- *Leverage and maintain Portland's economic competitiveness and create access to high quality employment by supporting traded-sector business growth, access to new domestic and foreign markets, and connections for Portland residents to quality employment opportunities across both traded-sector and local serving industries;*

Andre Baugh  
March 13, 2015  
Page 7

While a strong connection between economic growth, equity and access to middle income jobs is acknowledged in the comprehensive Plan, implementation actions seem insufficient. A stronger commitment to freight transportation would reinforce goals in the Comprehensive Plan, Portland Plan, Climate Action Plan, and PDC Strategic Plan. The Port recommends updates to the TSP balance the emphasis on active transportation with the freight and commercial vehicle mobility needs of industry engaged in trade. We also urge the City to continue to review how the transportation hierarchy will be administered and how it should apply to freight routes. We have attached a Port recommended TSP project list that supports economic development oriented initiatives that reinforce the connection between growth, equity and access to middle income jobs.

Finally, in consideration of the importance of auto and freight mobility to the economy of the City and job access, we encourage the use of a measure of vehicle hours of delay in addition to reduction of vehicle miles travelled as proposed in Policy 9.39.

Please see attached TSP list changes.

#### **BALANCE**

The Port encourages the City to consider the recommendations around word choice as it relates to Chapters 6 and 7. We are aware of the challenge of writing findings when the word emphasis is applied differently from one chapter to another.

The Guiding Principles seem to elevate some specific approaches to prosperity over others, such as support of a "low-carbon economy" to meet reduced carbon emission goals, while not mentioning growth in the City's overall export values.

There are multiple instances where language (verb) choices are inconsistently attached to policy statements. We urge additional efforts to understand the "on balance" approach and the hierarchy ascribed to certain policies.

We appreciate your consideration of our comments and look forward to working with you to resolve these issues prior to adoption of the Comprehensive Plan.

Sincerely,



Susie Lahsene  
Senior Manager, Transportation and Land Use Policy

cc: Susan Anderson, Bureau of Planning and Sustainability  
Eric Engstrom, Bureau of Planning and Sustainability  
Kristen Leonard, Port of Portland

**Attachment - Port of Portland Recommendation for the TSP project list:**

**TSP ID 40032: Columbia/Alderwood/Cully Intersection Improvements**

This project is listed as funded but it is only partially funded. It should be moved to Major Projects and Citywide Programs list.

**TSP ID 40009: NE 47<sup>th</sup> Ave Corridor Improvements**

Consider revising the project description to note that the intersection improvements at 47<sup>th</sup>/Columbia are complete but 47<sup>th</sup> Avenue between Columbia and Cornfoot still needs to be improved.

**TSP ID 110190: Killingsworth/I-205 Interchange Improvements**

Remove the Port as a lead agency. The Port listing dates back to the first Colwood plan amendment but the Port no longer has any involvement in this project.

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Consider moving this project from the Unconstrained list to the Constrained list.

**TSP ID 30055: North Portland Junction: Undoing the X**

Replace the Port as lead agency with Region. This project was identified as part of the I-5 Rail Capacity Study and again as part of the Port Rail Plan but the project is regional in nature and benefit.

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Change lead agency from Port to Region. This and other grade separations associated with the Kenton Line are of regional scale and benefit.

**TSP ID 40025: 82<sup>nd</sup> and Airport Way Grade Separation**

Change estimated cost to \$50,000,000.

**TSP ID 40085: Kenton Rail Line Upgrade**

Change lead agency from Port to Region. This and other components of double tracking the Kenton Line are of regional scale and benefit.

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Add the City as a co-lead agency and move the project to the Major City projects list.

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**Add the following Other Agency Projects with Port of Portland as Lead Agency:**

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Construct two interior yard tracks and complete the double track lead from the wye at the east end of the yard to Barnes Yard. Add rail staging capacity for South Rivergate.

Cost: \$3,600,000

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Add new lane to provide additional capacity for anticipated growth in passenger traffic.  
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Deepen the portions of the Willamette River with deep draft infrastructure to -43' where appropriate. Allow Willamette River terminals to also benefit from the Columbia River's new controlling depth.  
Cost: \$200,000,000

March 13, 2015

Andre Baugh, Chair  
Portland Planning and Sustainability Commission  
1900 SWE Fourth Avenue, Suite 7100  
Portland, Oregon 97201

Dear Chair Baugh and Planning and Sustainability Commissioners:

Thank you for the opportunity to comment on the Draft Portland Comprehensive Plan (July 2014), Draft Transportation System Plan (TSP) and subsequent work session memos from Portland Bureau of Planning and Sustainability (BPS) staff. The Port of Portland (Port) has been an active participant in the Comprehensive Plan process. We have provided written testimony on earlier versions of this document and supporting materials in May and December 2013, as well as oral testimony during the recent slate of Planning and Sustainability Commission hearings. Port staff has also played a role on a number of technical advisory committees.

Our current comments on the draft Comprehensive Plan and related BPS staff memos are consistent with comments we have raised in earlier communications. Our concerns can be organized under three themes: adequacy of economic policy, equity and growth, and balance. All three themes broadly embrace and are reinforced by the Port's sustainability policy whereby:

“... we make business decisions that support long-term economic health, integrate community concerns into our work and reflect a deep and broad commitment to environmental stewardship for the benefit of future generations.” (Port Administrative Policy Sustainability 7.4.19, May 2014)

As the Port pursues new avenues for growth, communication and partnership, as outlined in our Strategic Plan FY 2016 – FY 2020, the success of a sustainable Port is dependent on ensuring adequate revenue to fund operations, make capital improvements, address legal obligations such as the Portland Harbor Superfund site, and deliver on our mission to state and regional stakeholders.

The State Legislature created the Port in 1891 for the original purpose of improving, dredging and maintaining the harbors and channels of the Willamette and Columbia Rivers. Over time, the Port's responsibilities were expanded by the State to include promoting the general maritime, shipping, aviation, commercial and industrial interests of the Port (Oregon Revised Statute 778.015). With overlapping interests but different missions, it is our hope the City's Comprehensive Plan would complement and support this legislative mandate. It is with this in mind that we offer the following comments.

## ADEQUACY OF ECONOMIC POLICY

The Portland Plan emphasized the role of economic prosperity and affordability as one of three strategies, with a framework of equity integrated into all three as a foundation for greater alignment and collective action among public agencies in Portland. The vigor and intensity of economic prosperity goals, policies and their ultimate implementation is the foundation upon which Portland achieves success. The Port's comments on economic policy are based on our vision; "...to be a prominent, innovative economic development engine while stewarding the region's community and environmental best interests."

Even with the recent good job growth news, we still find that Portland wages are not keeping up with other major cities. The most recent analysis of the Portland Region's Economic Health 2014 by Eco Northwest indicates that Portland's median household incomes are \$4,400 below pre-recession levels and that Portland's per capita income is 4.6% below the national average for metropolitan areas. This issue is of particular concern when our state is so reliant on income taxes to fund the public's expectations for services.

The emphasis on trade in the Portland Plan was reflective of the Brookings Institution's recognition of the strength of trade activity in the Portland region. It also reflected the fact that 95% of consumers live outside of the U.S. and tapping into those markets is an important strategy for businesses to grow. Greater economic well-being is generated by the traded-sector economy than by those serving only the local economy. According to the Brookings Institution, one traded-sector job is equal to three local jobs; companies that export (or sell outside the region) experience higher sales, generate greater employment, and offer higher wages than firms which do not export.

Trade and transportation is of critical importance to the Portland-Vancouver region. While investment in harbor businesses has continued to be robust following the deepening of the Columbia River shipping channel, the Comprehensive Plan and Economic Opportunity Analysis (EOA) downplay and may even impact the viability of this investment. The level of investment in new, expanded or more efficient facilities in the Portland-Vancouver Harbor and on the entire Columbia suggests that there is a much greater demand for Harbor Access Lands than is being accounted for or planned for.

For these reasons, and because the Comprehensive Plan sets the 20 year direction for the City of Portland (and the region), the Port believes it is prudent to have a policy calling for the future annexation of West Hayden Island "for a combination of open space and deep-water marine industrial uses" through a process that "ensures mitigation of impacts and provision of public benefits". As such, West Hayden Island should remain a key component of the City's industrial land inventory and the City EOA. This policy is supported by City Council Resolution 36805 and action taken by the PSC in the fall of 2013. Policy 6.41 should be limited to that direction provided by City Council. This policy dovetails with other City initiatives such as the Greater Portland Export Initiative, led by the Office of the Mayor and the Portland Development Commission, to double the region's exports in five years.

A supportive West Hayden Island annexation policy also has a direct connection to other policies contained in the Comprehensive Plan, including land supply, traded sector competitiveness,



equitable household prosperity, industrial and employment districts, preservation of open space, and enhancement of various habitat types critical to listed species.

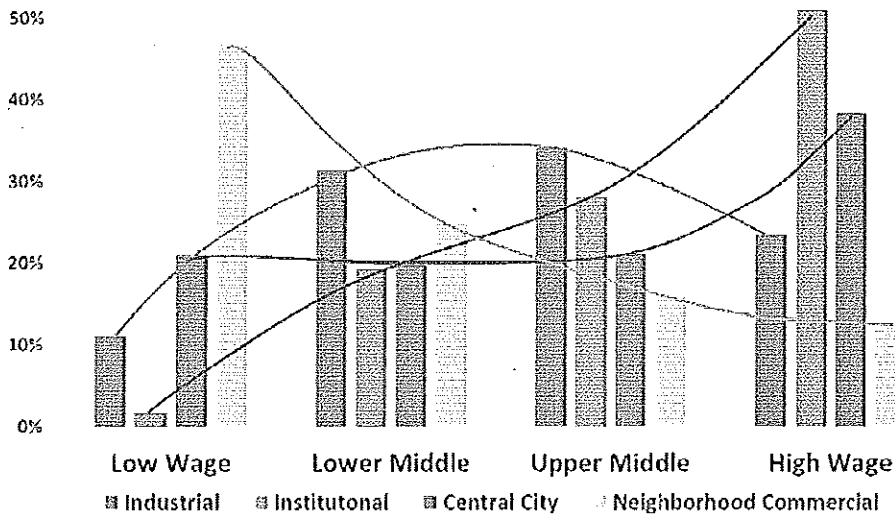
The provision for additional industrial lands, especially harbor access lands, is critical to the future of Portland. We commend staff for inclusion of several significant policies that, if properly implemented, would go a long way toward ensuring Portland's economic prosperity through greater equity based on strong growth in accessible middle-income jobs.

**EQUITY AND GROWTH**

Certain elements of disparity in equity can be tied to income inequality and the lack of well-paying employment opportunities for under-served and under-represented populations. The Port's role of providing access to markets results in public infrastructure expenditures and facilities that serve all job classes, but largely result in growth in middle-wage jobs. Although Oregon is creating jobs, they tend to be at the two ends of the spectrum: very high paying jobs and very low paying jobs. Strengthening every element of the Comprehensive Plan that addresses job growth, especially middle-income job growth continues to be a priority for the Port.

Using the Comprehensive Plan as a tool, the City has an opportunity to focus its efforts on supporting middle-income job growth. As shown in the wage quartile comparison of Portland's employment geographies developed by BPS staff, middle-wage occupations are concentrated in industrial employment and in the City's industrial geographies, especially the Portland Harbor and the Columbia Corridor. Policies that support economic growth in these geographies, such as brownfield redevelopment, intensification and expansion of existing uses and Willamette Superfund site cleanup are to be applauded.

Figure 35. Wage Quartile Comparison of Portland's Employment Geographies, 2012, (BPS, EOA, 2015)



While brownfield redevelopment affords one of the best opportunities for new industrial land capacity and associated middle income job opportunities, there are a number of unresolved challenges to realizing this potential. Brownfield redevelopment is an important goal for our region and state and the Port has brought back to use one of the largest industrial brownfields in the state in Troutdale. Based on that work, and the recent Portland and Metro brownfield redevelopment studies, industrial brownfield redevelopment has the greatest return on investment to the public yet is one of the most difficult to achieve given industrial land prices and remediation costs.

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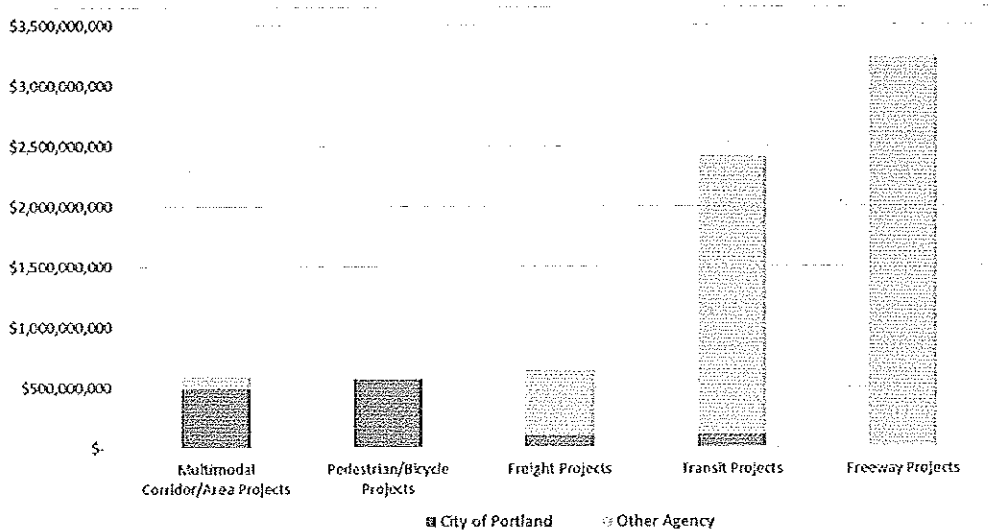
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33 PORTLANDOREGON.GOV/TRANSPORTATION

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Sincerely,

Susie Lahsene  
Senior Manager, Transportation and Land Use Policy

#### **Attachments**

- Detailed Comments on the TSP (reference in letter if included)

cc: Susan Anderson, Bureau of Planning and Sustainability  
Eric Engstrom, Bureau of Planning and Sustainability  
Kristen Leonard, Port of Portland

#### **Attachment - Port of Portland Recommendation for the TSP project list:**

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From: lanning and Sustainability Commission  
Sent: riday, March 13, 2015 1:53 PM  
To: ovacs, Madeline  
Subject: W: ATTN: Leslie Lum; Levee Rd. Comprehensive Plan R-20 Change Request Proposal comment submission

Follow Up Flag: ollow up  
Flag Status: lagged

Julie Ocken  
City of Portland  
Bureau of Planning and Sustainability  
1900 SW 4th Ave, Suite 7100  
Portland, OR 97201  
503-823-6041  
[www.portlandoregon.gov/bps](http://www.portlandoregon.gov/bps)

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To help ensure equal access to City programs, services and activities, the City of Portland will provide transportation, reasonably modify policies/procedures and provide auxiliary aids/services/alternative formats to persons with disabilities. For accommodations, translations, complaints and additional information, contact me, City TTY 503-823-6868, or use Oregon Relay Service: 711.  
-----

From: BPS Mailbox  
Sent: Friday, March 13, 2015 1:40 PM  
To: Planning and Sustainability Commission  
Cc: Lum, Leslie  
Subject: FW: ATTN: Leslie Lum; Levee Rd. Comprehensive Plan R-20 Change Request Proposal comment submission

NaTasha Gaskin  
City of Portland  
Bureau of Planning and Sustainability  
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Sent: Friday, March 13, 2015 11:23 AM  
To: BPS Mailbox  
Subject: ATTN: Leslie Lum; Levee Rd. Comprehensive Plan R-20 Change Request Proposal comment submission

Justin Callaway  
8850 NE Levee Rd.



Portland, OR 97211

ATTN: Leslie Lum,

My name is Justin Callaway, I own the property at 8850 NE Levee Rd and I am the steward for the conservation easement held on my step father's parcel at R171714 by the Wetlands Conservancy.

I support the attached proposal for an R-20 zoning change request of my residential farming property by removing the Industrial Sanctuary designation. When this was proposed in the past I felt it made no sense for both my property and my dad's as the noise code has never been enforced with nearby trucking operations that have had an incredibly negative impact on my wellness and mental health, especially as a result of my experience with code enforcement staff that refuses to enforce in a timely, comprehensive or meaningful way when engaged in good faith only to experience something quite the contrary. When trucking operations are allowed to honk semi's or crash triple trailers in the middle of the night such that is impossible to expect an uninterrupted night's rest and code enforcement staff is derelict in duty, there is as reason why we did not develop the vacant lot. Of course, the irony is in the Nov. Comp Plan testimony, my kids and I waited four and half hours to testify and we got to hear Paul Van Orden defend his half acre on Fremont and the assault on his equity with a zone change from r2 to 2.5 and the millions lost for his kids inheritance and his retirement, yet he has never defended my protections afforded to me through the noise code, weakened as they are with the Noise Ghetto +5db Noise overlay. I wish I could have the long view Mr. Van Orden can have but unfortunately that's kind of hard when he won't enforce your right to an uninterrupted night's sleep with proven out of compliance trucking operations. But I digress.

I do believe that this R-20 Change Request offers the possibility for a group of landowners to do what the City of Portland refuses to do: find a real balance between residential livability, healthy natural habitat and code compliant industrial operations. Perhaps with this zone change there will be a real effort to find fairness and equity for East Columbia. First and foremost, you need to get it right when these industrial properties were permitted under the guise of being compatible with nearby residential housing stock and there has never been any attempt to address the original industrial developments and the negative impact, the unbearable negative impact, that these out of compliance operations have had and code enforcement staff has permitted. Please keep in mind when I first engaged the noise code enforcement staff reluctantly, I

was told I had to complain and subsequently I received a retaliatory complaint on the donkey that came with our property as not being permitted. Immediately addressed. Asked about protections against those with more resources like multi-million dollar interstate trucking operations-- NONE. Please explain how a system that is supposed to be your check and

balance for noise then becomes a form of further victimization? Of course, I've never complained about Oak Harbour's invasive weed army that invades my property line. Or the rampant light pollution with new developments more than a half

a mile away such that not only can you not see stars and better yet this light pollution blasts the whole tree canopy along

the Peninsula Canal that has conservation and environmental overlays. Dare I risk retaliatory action by complaining when your BDS staff permits such new developments or environmental staff doesn't try and ensure that when your property is

to  
lose development equity in the name of natural habitat that is the best habitat possible. The City that imposed these  
could  
really care less about what kind of habitat is created by nearby industrial noise, light and air pollution. Diesel for  
breakfast  
is not an uncommon experience in drainage district surrounded by levees where low pressure systems and air pollution  
stagnate in our shared residential, environmental and industrial low lying basin. But who really cares about the health of  
families near industrial properties when you live in East Columbia, where the bus is 1.5 miles away and an uncovered  
stop  
at that. When there is no safe route for schools, and when I mentioned to you Leslie Lum about the 40 Mile Loop, you  
thought this would be a good homework project for East Columbia residents. I am confused because this is a past  
planning  
promise that included the Safe Route that has never been fulfilled, why would this not be an immediate and primary  
concern handled by planning staff? I could be wrong, but I thought it was a past Comp Plan effort to complete East  
Columbia, yet there is nothing on that level in this Comp Plan like the gifts to West Hayden Island when not even  
annexed. Why is the Comp Plan not addressing the horrific realities of industrial trucking yards near residential  
properties  
which clearly have a negative impact, before doubling down on Industrial Sanctuary changes from IG2 on our  
properties?

When I hear Comprehensive Plan, I think that genuine planners are trying to assess the challenges to each neighborhood

and ensure that thought planning brings the necessary solutions, but my experience couldn't be further from the case.

Barry

Manning at the first open house, pointing to a map of East Columbia as all industrial, and when prompted, "What about  
the neighborhood that is there?" He said, "They can stay if they want." Yes, the same Barry Manning when prompted  
about lack of industrial access just assumes all residential farming properties will give up and sell together to help make  
his map a reality. There are a lot of assumptions in that but he is right that many of have homes that are unlivable or  
barely

livable. Ah, yes, the same Barry Manning who had the audacity to say that some retired white people who championed  
that they do not want bus service closer in the neighborhood was a valid point of view as a City of Portland planner,  
when

my neighbor's kids walk a mile and a half on a road with no sidewalk and semi trailers and drainage ditch below  
because

Tri-Met is there school bus. Is that a valid Planning Bureau position? I think not. But he's in good company, because Jay

Saugnet, in that condescending Portland Planning way, responded to my concern about the lack of sidewalks when  
dealing

with the trainwreck in participatory democracy that was Airport Futures, by saying he lives in SW Portland and  
looooooves

his lack of sidewalks. At least Mindy Brooks was candid enough in saying that Portland is "just holding it's breath to see

what it has to do here." Don't you think Airport Futures or the Comprehensive Plan would have been a more honest  
process if you just say it outright that you want to kill this neighborhood with no basic services and trash basic rights  
with

relentless insistence on more industrial impacts in a way that comprehensively undermines residential livability and true

biodiversity.

So, I have to ask, when I corresponded with Leslie Lum after finding out when I went to the Nov. Comp. Plan testimony

that when I saw maps that showed no zone change, I was jubilant because for the first time in any of the many, many  
planning processes did my feedback actually get implemented. I sung the praise of the wonderful visionary people  
seeking

to provide redress to years of intentionally engineered planning processes, like Airport Futures that stopped at 13th, to divide a neighborhood but also to conveniently make sure no pesky environmental overlays existed for the ensuing Comp

Plan industrial property parade past 13th later. Commissioner Fritz had no desire to help heal the neighborhood in the aftermath. So, when Leslie told me that I was mistaken the Industrial Sanctuary was to stay in place, I was dumbfounded

and confused. She stated that nothing has changed with the old IG2, everything is the same. Huh? What about all of the additional environmental overlays and wetland delineations on residential farming properties, especially those flooded by

Oak Harbour's wetland per MCDD staff, yet Oak Harbour sued and had removed. Nothing has changed but a full scale assault on the development equity of those properties and to find any industrial property developer that would want to help

fulfill Barry Manning's vision for East Columbia of all industrial. Or, when asking Leslie Lum about the limited development equity on my property with environmental overlays and industrial inventory potential, she said that most likely I would IG1. Wait but the last Comp Plan put in IG2 and if they wanted IG1, would not that be what would be reflected? Nothing has changed? I am confused. Industrial Sanctuary seems like sleazy effort to make it not a change but

creating these as subcategories to unleash more industrial with no concern about the impact or to address past impacts, so this is not a change?

Most importantly, it took two emails and finally Leslie Lum did share with me the answer to the following question: i asked in the last email, please clarify will the industrial acreage you are claiming actually account for past planning impacts with environmental, conservation and most recently wetland overlays (resisted through public testimony but only the preferred industrial property class, like oak harbour that sue and do not engage in good faith in a non-litigious way with a public planning process, no do not have them) that have rendered these areas as essentially non-developable (as you agreed as much in our conversation) and thus one would think should be subtracted from any such actual total submitted in the end toward planning goals as to not mislead the public if you are being genuine having already diminished development equity of these properties in the name of degraded natural habitat thanks to adjacent industrial activities and having asking for public input and having already received it from many of these proposed IS property owners requesting to not make this change and imposing it anyway? in short: are you claiming total acreage vs developable acreage on these IS proposed properties? I believe we are counting all acreage that is zoned or has a comp plan designation of Industrial.

So, how is it that property that is known to not have full development equity claimed in entirety toward viable, industrial

inventory acreage? A good question if I am a business seeking to locate here and looking to buy all of these residential farming properties and then realizing that City of Portland is misrepresenting the full industrial acreage potential of these

properties. Or, is the taxpayers in Portland who are so ecstatic to see so much viable industrial inventory in East Columbia? Or is it Metro/State of Oregon planning goals being reported that when "ground-truthed" (A Paul Van Orden

phrase, quite lovely since he seems to change facts depending on the audience and denies conversations that took place as

reason to deny code enforcement protection) turns out to be not actually developable industrial property at all.

Has anyone ever stopped to think that there are actually people, families and property owners that are personally affected

by these planning processes, and that when they engage and all input or concerns are ignored? Or when they seek to find solutions to past nightmares created by 24-hour trucking yards when noise code enforcement refuses to their job and go

to  
BDS to review original documents, Michelle Seward makes no attempt to address the actual operations and the impact  
but  
is more interested in the cyclocross races at the landfill that the Fazio's got in trouble for claiming a farm credit, which I  
believe is the same landowner responsible for why we don't have a Safe Route or 40 mile loop (could be wrong) for East

Columbia but I guess that's homework for me to find out, but she makes sure to tell me because of all of the  
environmental

overlays I will have to go through three different agencies if I ever wanted to build a dock on my waterfront property. I  
am

just glad that all East Columbia residents with any environmental, conservation or wetland delineations actually have to  
pay fees to a drainage district that no other Portlanders not in a drainage district don't have to pay when their properties  
are

conserved for the public good. In essence, we doubly subsidize habitat for the public good and we are rewarded with  
light,

noise and air pollution and a colossal destruction of equity for degraded habitat.

And this is why I support this proposal for R-20. Because I know how hopeless it is to decline into mental illness when  
engaging with public employees who have no sense of compassion or reality of the impact, like trucking yards, when  
you

create participatory democracy processes or code enforcement for your property or individual rights or the complete  
lack

of oversight of staff and bureaus that are not a good faith partner but instead treats public service as a political  
calculation

ignoring the human impact on people and the families. It's brutal and shameful that such an amazing neighborhood like  
East Columbia that should be a jewel in natural conservation and residential livability, is really nothing more than a  
degraded habitat with compromised residential rights with a whole lot more to come based on the Comprehensive Plan.

So, I support this initiative because when you claim something exists, whether natural habitat, residential housing stock  
or

industrial inventory, you should really, really mean it. And if you haven't and the result is mess that a real  
Comprehensive

Plan would seek to address, then maybe this proposal allows you a chance to see that there is a human component and a  
lot

of work to do to show how to find a balance of residential, nature and industry. And the first place to start is removing  
the

absurd Orwellian "new math" Industrial Sanctuary designation onslaught and then by seeking to find out how to give  
equal

priority to true biodiversity for habitat and restore residential livability of homes like mine that predate the trucking  
yards

by FOUR DECADES, so please don't go down the condescending multi-bureau "established industrial" excuse for not  
fixing problems that you own. The corollary is we degraded habitat so badly and so adversely impacted livability, we  
just

need to become the Barry Manning industrial prophecy. No. Please own your role and become a good faith partner for  
once. So, while it is unclear if I would actually benefit until the City of Portland addresses the impact of 24-trucking  
operations, I do believe that collectively this R-20 plan allows for enough good meaning citizens to have the hope that  
for

the first time, the City of Portland cares and is ready to begin a conversation that is circumspect and genuine, not just  
satisfying some contradictory planning objective at the expense of our property rights or livability.

Finally, I am immeasurably frustrated and disappointed in my experience throughout almost all planning processes.

They

have been foregone conclusions leaving no oxygen in the room for anyone contributing to have a voice. When protocols  
or

conflicts of interests have occurred there has been no follow through. Furthermore, to have actually Planning staff advocate for positions completely contrary to the most basic concepts of distributive justice issues like public transportation for kids invalidates any desire to continue to engage. Or, to have to repeat questions and then to get answers that on face value mock the whole intent of the process with no sense of shame or interest in elucidating contradictions or addressing agonizing on the ground realities as such. Simply, my experience has eroded any faith in local governance to provide oversight or earnestness from its public employees, that should either be unbiased facilitators or compassionate enforcement staff but instead champion interests incredibly contrary to their capacity as a liaison to the public with no compunction in doing so.

I believe in true public service and I believe in an inclusive participatory democratic process. This is a fine opportunity to show it exists.

--  
Justin Callaway  
503.477.7298  
justincallaway@gmail.com

# Working Waterfront



## C O A L I T I O N

Portland Planning and Sustainability Commission  
Comprehensive Plan Update  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

March 12, 2015

**Subject: PSC Comprehensive Plan Testimony (TSP)**

Dear Planning Commissioners:

In addition to previous submitted testimony, the Working Waterfront Coalition (WWC) is submitting this letter regarding Portland's Transportation System Plan (TSP) as part of the Comprehensive Plan update. The WWC's previously submitted testimony on January 21, 2015 asked that the Planning and Sustainability Commission's recommended draft of the proposed Comprehensive Plan recognize the importance of harbor businesses to the economy and middle-income job growth; reduce regulatory burden and provide predictability for development and redevelopment; provide an adequate supply of developable harbor industrial land with acceptable site characteristics; and ensure that policy language is balanced to accomplish the above.

In addition, the WWC would like to take the opportunity to reinforce the message regarding the importance of Portland's freight transportation system to Portland's industrial areas, and how critical it is to the success of Portland waterfront properties.

Portland's freight transportation system supports the growth, expansion and productivity of industrial businesses. Without a strong freight system, growth and expansion are compromised and harbor business productivity is impacted. The transportation freight system allows for the efficient movement of goods and services, and access for employees to and from their living wage jobs.

The WWC requests that considerable weight be given to TSP projects that improve freight mobility and access to industrial lands and employment. Further, we encourage the use of city transportation funds to ensure those priority projects are implemented. We appreciate the opportunity to comment.

Sincerely,

  
Jack Isselmann, President

*Established in 2005, the Working Waterfront Coalition, with its extensive knowledge of harbor industry needs and active industry participation, is dedicated to working with its partners to ensure an appropriate balance between environmental concerns and the needs of river-related, river-dependent employers. Portland's Harbor is a vital employment area: home to thousands of valuable high-wage, high-benefit jobs. In addition, WWC members are conscientious stewards of the environment, making significant investments in the harbor consistent with state and federal laws and regulations to reduce the impacts of human activity on the harbor's ecological resources.*



January 28, 2014

Planning & Sustainability Commission  
1900 SW 4<sup>th</sup> Avenue  
Portland, OR 97201-5380  
psc@portlandoregon.gov

RE: Comprehensive Plan Testimony

*(via postal and electronic mail)*

Dear Planning & Sustainability Commission:

I write on behalf of the Northeast Coalition of Neighbors ("NECN") to provide testimony regarding the proposed draft of the Portland Comprehensive Plan. The NECN appreciates the hard work by City staff and community stakeholders to create a thoughtful vision for Portland's future. The draft Plan articulates a set of policies that point in a direction that may serve our community well through the coming years. However, we believe that the draft Plan could be improved in several ways, as discussed below.

**OVERVIEW**

NECN values this comprehensive planning process as a once-in-a-generation opportunity to address concerns shared citywide by many neighborhood associations and individual citizens. Some specific concerns bear highlighting:

***Residential Demolitions:***

New planning guidelines should discourage unnecessary demolitions of single-family homes and encourage preservation of dwellings and other buildings where feasible. At present, demolitions in our neighborhoods are typically no longer just replacing dilapidated dwellings or filling in previously-vacant full-size lots. Instead, new construction is replacing older, generally sound homes that tend to be affordable to median-income households, with much larger single-family homes that tend to be unaffordable to all but the highest-income households within our neighborhood. This trend is slowly chipping away at the historically affordable housing stock within our neighborhood, is environmentally destructive, and does little or nothing to contribute to density.

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The Plan should adopt policies to favor preservation and renovation over demolition where feasible. Demolition should be a tool of last resort, deployed only when the existing structure has reached the end of its useful lifespan.

***Sullivan's Gulch Trail***

The Sullivan's Gulch Trail is a necessary addition to the Rose Quarter, Lloyd District, and Sullivan's Gulch areas and provides an opportunity to enhance existing infrastructure investment. Adjacent to regional private and public investment, the Sullivan's Gulch Trail provides an opportunity to complete an ideal multi-modal network of transit related options necessary to support and sustain regional economic areas. Therefore we believe this project is a priority for inner North and Northeast Portland and encourage funding be identified and secured as soon as possible for the full build-out of the project, from the Willamette River to the existing trail adjacent to I-84, east of I-205.

***High Speed Rail***

We support a thorough study of high speed rail (HSR) development in our region, particularly addressing specific impacts (positive and negative) on the Portland Metro Area. A study should evaluate the possible High Speed Rail corridors in the region, and illuminate their benefits and possibilities for implementation, while also proactively considering any negative impacts and equity concerns that may arise from such a large scale project. Ongoing long term planning projects, such as the City of Portland's Central City Plan, should also incorporate preliminary high speed rail studies into their scope.

***"Flats" in Single-Family Zones Served by High-Quality Transit***

To ensure that it is economically feasible to build new units affordable to median-income households, the Plan should allow for multiple dwelling units within structures that otherwise meet the form requirements for single family homes. The City should implement and enforce these policies through changes to its building and zoning codes.

Within the portions of the R5 and R2.5 zones served by high-quality transit service, a new overlay zone should be created, whose boundaries would be reviewed and edited by neighborhood associations prior to finalization. This overlay zone would allow for multiple residential units, up to two per floor, in structures that otherwise met the guidelines for single-family structures. This transition in the code, from a strict focus on density towards more of a form-based code, would place the emphasis on minimum lot size, maximum lot coverage, building setbacks, height, protection of existing mature trees, and other issues relevant to neighborhood livability.

***Re-zone Land Banked parcels owned by Legacy Emanuel Hospital***

Emanuel hospital sits at the corner of N Stanton and N Gantenbein, a full half mile away from the corner of N Williams and N Russell Street. They own several



oversized blocks that have remained vacant since urban renewal removed all of the buildings on them in the 1960s. 50 years later, the hospital claims that they have "ideas" of what they want to do with the land but no concrete plans. The lots are between N Williams and N Vancouver, between Russell Street and a fresh community investment at Dawson Park. This land should be re-zoned from Institutional to CM2 or CM3 as they are a great opportunity to help absorb the growth from the neighborhood center at N Fremont and N Williams and ease pressure on the single family neighborhoods from being subject to additional demolitions. Perhaps the Portland Development Commission should take/buy the land from Legacy Emanuel in order to facilitate the redevelopment of these lots in a reasonable amount of time.

***Skinny houses on undersized lots in the R5 zone:***

R5 zones are viewed by neighbors as areas with roughly 5,000 square foot lots. Though it is understood that the City has allowed lot sizes down to 3,000 square feet in some areas of R5 zones, there should be a minimum lot size in the R5 zone, below which development of new primary dwelling units is not allowed (because, in fact, a legal "lot" does not exist; instead, the area in question is the yard of the adjacent house). In certain areas, "lots of record" or "historically platted lots" were sold off with dimensions of 25x100, two, three, or four at a time, so that buyers could choose whether they wanted 5,000, 7,500, or 10,000 square foot lots for their upscale homes and gardens. The City has recently taken the opinion that these are, in fact, all buildable 2,500 square foot lots, despite the fact that they are located in an R5 zone, and thus are smaller than the minimum lot size required to be buildable in that zone. The City should halt all new development on lots of substandard size, and require that a lot be of a certain size, within R5 zones, in order to be considered buildable without a zone change. This policy would still allow for the construction of accessory dwelling units; and, if implemented along with the other recommendations in this letter, would also allow for the primary residential structure to be divided into multiple dwelling units. The yard size, however, would remain large enough to preserve the character of the R5 zone.

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**RECOMMENDATIONS ON SPECIFIC POLICIES PROPOSED IN THE DRAFT PLAN:**

**Page GP3-14:**

**"Freight Corridors**

Freight Corridors are the primary routes into and through the city that supports Portland as an important West Coast hub and a gateway for international and domestic trade. ~~While the forms of~~ These streets are ~~not expected to change significantly,~~ they are integral to the growth of traded sector businesses such as manufacturing, warehousing and distribution industries." *In some cases, they may need to be upgraded to allow all modes to access destinations along the corridor, including employees and customers using bicycle and pedestrian modes or transit.*

**NECN Concern:** Freight Corridors must still allow employees and customers to access businesses and other destinations along the corridor safely using all modes, including bicycles and pedestrians, not just trucks and automobiles. This is an equity issue, and one that will become absolutely relevant if the city has any hope of meeting its future mode split targets.

- **NECN Recommendation:** One way to change the language to reflect this may be to strike the words “While the forms of” and “not expected to change significantly, they”, and to insert an additional sentence that acknowledges that these corridors may, in fact, have to change significantly in order to safely accommodate multi-modal access in the future. These suggested edits are shown above.

**Page GP3-16:**

**“City Greenways**

City Greenways are a network that includes the following types of infrastructure:

...

4. Neighborhood greenways are an extensive network of streets with low volumes of *local access only* motor vehicle traffic that are prioritized for bicycles and pedestrians, working in conjunction with the rest of the City Greenways system to extend the system into all neighborhoods.”

**NECN Concern:** The city needs to enact a specific policy for neighborhood greenways that specifies that motor vehicles are guests only on these streets, and indeed that they are open to motorized vehicles for local access only. This needs to be implemented by installing traffic diverters at intersections between greenways and arterials, as well as traffic diverters that are spaced between 2 and 10 blocks apart between arterials along neighborhood greenways (where the grid is intact). These diverters would allow bicycles & pedestrians to continue, but force motorized vehicles to turn and find another route (where a reasonable parallel route exists). Specific traffic diverter locations and styles should be chosen in a context-sensitive manner, in coordination with local neighborhood and business associations.

- **NECN Recommendation:** Add language to this policy statement that specifies that neighborhood greenways are open to motor vehicle traffic for local access only, as shown in the edits above.

**Page GP3-17:**

**“Employment Areas**

**Industrial Districts** – Industrial districts are in the low, flat areas along Portland Harbor and the Columbia Corridor, Oregon’s freight infrastructure hub. The manufacturing and distribution sectors concentrate here. *Though in the past they typically have needed*

one-story buildings, medium to large sites, and locations buffered from housing, *in the future these areas are expected to become more inclusive of multiple-story buildings containing a mix of complementary uses.* There is also an industrial district in the Central Eastside and smaller industrial areas scattered around the city, mostly adjacent to major transportation hubs.”

**NECN Concern:** Some language needs to be inserted to clarify that, while in the past (since World War 2), our industrial districts have been characterized by single-story buildings on large sites, in the future they will need to become more like industrial districts of the late 19<sup>th</sup> and early 20<sup>th</sup> century, with multiple-story buildings containing a mix of complementary uses. We have a shortage of industrial lands within city limits, so those lands that are already zoned for industrial should see an intensification of uses. Additionally, we should double down on our efforts to reclaim appropriate brownfield sites as future industrial land development opportunity areas.

- **NECN Recommendation:** Modify this policy statement to specifically state that industrial lands are expected to see an intensification of uses in the future. Potential language to accomplish this goal is shown above.

**Page GP3-22:**

**“Policy 3.77: Inner Neighborhoods street patterns.** Preserve the area’s urban fabric of compact blocks and its highly interconnected grid of streets, *including alleys where they exist. Where alleys do exist, do not allow new curb cuts on streets – require property auto access to off-street parking only from the alley, to protect the pedestrian environment on the sidewalk and preserve the neighborhood alley infrastructure.*”

**NECN Concern:** Alleys need special mention within these policies, as they have been neglected by City policy for too many years. New development must use alleys to provide auto access to properties where alleys exist, even if this means making modest improvements to the alleys.

- **NECN Recommendation:** Add language that requires all development on lots served by alleys, to provide auto access to the property from the alley. Potential language to accomplish this goal is shown in the edits above.

**“Policy 3.79: Inner Neighborhoods infill.** Fill gaps in the urban fabric through infill development on vacant and underutilized sites, and re-use of historic buildings on adopted inventories. Integrate new development into these districts’ historic development patterns.” *Ensure that development preserves and incorporates, rather than removes, mature trees.*

**NECN Concern:** Mature trees merit special consideration as something that new development should seek to preserve. The Concordia neighborhood has lost over 20 mature, old-growth trees due to development in the past year

alone. These century-old trees provide carbon sequestration and habitat benefits that are not included in development pro-formas. Their removal imposes negative externalities on the neighborhood, including its ecology. It is apparently too easy currently for a developer to remove mature trees without having to pay for the true cost, including quantified externalities, associated with their removal.

- *NECN Recommendation:* Add stronger language to protect mature trees. An example of potential language to accomplish this goal is shown in the edits above.

**Page GP4-6:**

**“Policy 4.11: Alleys. Encourage** *Require* the continued use of alleys for parking access, where they exist, and expand their use as the location of accessory dwelling units and as multi-purpose community space.”

**NECN Concern:** This policy is great, except that it needs to be mandatory in order to be effective where alleys do exist. What the City needs, at this point, is a concerted effort to revitalize its alleys, especially in areas where they have long experienced neglect, to allow them to become viable locations to construct accessory dwelling units and serve other community needs.

- *NECN Recommendation:* Insert stronger language into this policy statement, making it clear that development shall be required to use existing alleys, where they exist, to provide automobile access to properties. Potential language to accomplish this task is shown in the edits above.

**“Policy 4.12: Adaptable neighborhoods.** Encourage more housing choices to accommodate a wider diversity of family sizes, incomes, and ages. Allow adaptive reuse of existing buildings and the creation of *detached* accessory dwelling units to serve the changing needs of a household over time.” *Allow structures to be built in single family detached zones that meet height, setback, site coverage and minimum lot size requirements for single-family structures (and otherwise are visually similar to single-family homes), but that contain multiple units stacked vertically (“flats”), in zones served by high-quality transit.*

**NECN Concern:** Create a new policy to allow flats to be built in single-family neighborhoods. There is currently a lot of anger within the neighborhoods of Portland over the home demolition epidemic. People feel that they are being subjected to the stress of demolitions, of losing affordable housing stock within the neighborhood, without seeing any potential benefit. Currently, affordable homes are being demolished to construct homes that are only affordable to higher-income households, without doing anything to help with the supply of affordable housing. At least within the Concordia neighborhood, neighbors would rather have the new larger structure that is built following a demolition be full of perhaps three flats, each affordable to a middle-income

household, rather than one single expensive home. This would aid in the supply of affordable housing within the neighborhood, reduce pressure on the UGB, increase the supply of customers for neighborhood businesses, and generally help to meet community goals and needs.

- *NECN Recommendation:* Insert language that allows structures in single-family zones in areas served by high-quality transit to contain multiple units, as long as the building envelope meets the requirements for those zones in terms of height, setbacks, lot coverage, etc. Some potential language to accomplish this goal is shown in the edits above.

**Page GP4-7:**

**“Policy 4.13: Scale and patterns.** Encourage design and development that complements the general scale, character, and natural landscape features of neighborhoods. Consider building forms, scale, street frontage relationships, setbacks, open space patterns, and landscaping. Allow a range of architectural styles and expression, and respect existing entitlements.” *Remove strict restrictions on dwelling units per structure in transit zones.*

**NECN Concern:** Current zoning codes are too restrictive on development, and often impose artificial limits on density that are based primarily on the number of dwelling units. Rather than focusing on the number of dwelling units, codes should focus on the form of development, the height of the structure, treatment of existing mature trees on the site, the relationship to the street, and the relationship to adjacent structures. Because the number of dwelling units is itself a function of the size of each unit as much as anything else, developers and property owners should be given more freedom to size each unit as they see fit, as long as they meet code requirements for the form of the building.

- *NECN Recommendation:* Insert language into Policy 4.13 that allows for the removal of restrictions on dwelling units per structure within transit zones. One possible way to do so is shown in the edits above. It may be preferable to use FAR, or simply height and lot coverage, as the mechanisms through which building size is regulated between different zones.

**“Policy 4.16: Street environment.** Encourage development in centers and corridors to include amenities that create a pedestrian-oriented environment and provide places for people to sit, spend time, and gather.” *Buildings should have awnings to provide shade and protection from the rain for pedestrians and other users of sidewalk space.*

**NECN Concern:** Awnings should be specifically called out as something that should be provided in pedestrian corridors. Too many buildings do not include awnings, probably because modern architecture often fails to recognize their functional value. The code must thus compensate for this

architectural facade, and require buildings in centers and corridors to provide awnings.

- *NECN Recommendation:* Insert language requiring buildings to provide awnings within the pedestrian districts of centers and corridors. Some potential such language is shown in the edits to Policy 4.16, above.

**“Policy 4.20: Residential uses on busy streets.** Improve the livability of places and streets with high motor vehicle volumes. Encourage landscaped front setbacks, street trees, and other design approaches to buffer residents from street traffic.” *Prevent new single-use single-family houses in commercial retail zones. Require a ground floor use that contributes to a retail-oriented pedestrian environment, such as ground-floor retail space.*

**NECN Concern:** There have been too many instances in recent years of new development on our neighborhood main streets, such as Alberta and Belmont streets, that is purely residential. This creates “dead zones” on these streets. New development should seek to prevent the production of more such “dead zones” by requiring ground-floor uses that are compatible with the intent of a retail mixed-use pedestrian environment.

- *NECN Recommendation:* Insert language requiring ground-floor retail or similar uses in development in the pedestrian zones of centers and corridors. Some potential language to accomplish this is shown in the edits to Policy 4.20, above.

**Page GP4-9:**

**“Policy 4.52: Water use efficiency.** Encourage site and building designs that make efficient use of water and manage stormwater as a resource.” *Encourage the re-use of graywater from showers, sinks, kitchens, and laundry for landscape irrigation, especially for permaculture.*

**NECN Concern:** Graywater does not appear to be specifically addressed anywhere in this draft of the Comp Plan, so this may be the most appropriate place to insert a reference to it. Given our increasingly long summertime droughts in Portland, graywater makes sense as a way to re-use water to reduce water consumption for landscape irrigation purposes. It can be used untreated in completely underground applications, or it can be treated and re-used for other purposes.

- *NECN Recommendation:* Add a new sentence to Policy 4.52 that clarifies City support, as a matter of policy, for the re-use of graywater from showers, baths, sinks, kitchens, and laundry. Establish policies to encourage the responsible installation and use of graywater systems within the City.

**Page GP4-14:**

**“Policy 4.63: Urban heat islands.** Encourage development, building, landscaping, tree planting, and infrastructure design that reduces urban heat island effects.”

**NECN Concern:** This section on urban heat islands seems to read as if technological fixes are preferred to help reduce the urban heat island effect. The most cost-effective solutions may indeed be the simplest, however: plant more trees and perennial shrubs. At the very least, a nod in this direction could be added by inserting the word “landscaping” into this list.

- **NECN Recommendation:** Add the planting of trees and landscaping to the lists of solutions to reduce the urban heat island effect. Work to establish City policies that encourage wider adoption of permaculture practices that reduce the Urban Heat Island effect and sequester additional atmospheric carbon on a long-term basis. This could be done by modifying Policy 4.63, as shown above.

**New Policy Suggested, perhaps 4.69? Organic Practices Within City Limits.** *Within the City of Portland, all City-owned lands and buildings shall be managed under a standard that is equivalent to Oregon Tilth certification. This shall include banning on all lands owned and/or managed by the city, all pesticides, herbicides, insecticides, fertilizers, etc. that are not approved for use by Oregon Tilth, except for in cases of extreme urgency (such as, if it were to be otherwise prohibited, to inoculate Dutch Elm trees against Dutch Elm Disease). Doing so will encourage the restoration of wildlife habitat, protect endangered fish and wildlife populations, protect threatened bee populations, and protect the health of human and other living inhabitants of the city.*

**NECN Concern:** To protect the health of humans and other inhabitants of our city, the City of Portland should seek for the properties it controls to be managed according to standards that could be certified as organic by Oregon Tilth. This policy is expected to save money for the City in following it, and to have positive impacts on the health and economy of the City and its residents and businesses. This policy should apply to all lands controlled by the City of Portland.

- **NECN Recommendation:** A new policy should be created to this effect, based on language such as that above.

**New Policy Suggested, perhaps inserted after 5.36? Multiple Dwelling Units in Single Family Zones.** *Encourage the development of flats in single-family neighborhoods within high-quality transit zones, that is, vertically separated multiple housing units within buildings that otherwise resemble single-family homes and comply with single-family zone requirements related to height, setback, lot coverage, and minimum lot size.*

**NECN Concern:** A new policy should be created to specifically legalize “flats” in single-family neighborhoods (R5 and R2.5 zones), where multiple vertically separated housing units are housed within structures that otherwise appear to

be single-family homes and meet all of the zoning regulations for single-family zones except those relating to number of units.

- *NECN Recommendation:* A new policy should be created to allow for multiple dwelling units within each dwelling structure in single-family zones, based on language such as that above. This policy should allow for a new overlay zone to be created and applied within the portions of the R5 and R2.5 zones that overlap with high-quality transit zones, as defined by the City for the purposes of allowing multifamily development with no or reduced off-street parking. The resulting overlay zone map should be shown to neighborhoods prior to final adoption, for the purposes of collecting input and revising the boundaries of the overlay zone based on input from neighborhood associations. This policy could be written as shown in the suggested text above.

**Page GP6-10:**

**“Policy 6.23: Trade and freight hub.** Encourage investment in transportation systems and services that will retain and expand Portland’s competitive position as a West Coast trade gateway and freight distribution hub, *while transitioning towards a goal of net zero emissions in this sector.*”

**NECN Concern:** While it is good for the economy for Portland to be a trade and freight hub, it is bad for the environment and for the health of the population. As such, the City needs to establish a goal to move towards net zero emissions for the traded sectors and freight/goods movement. Setting this goal now will allow predictability for businesses in the future, so they can work with the City to achieve this goal over the course of multiple decades.

- *NECN Recommendation:* Adopt a policy goal of net zero emissions from the trade and freight sectors of the economy by the plan horizon year. This could be done by modifying Policy 6.23, as shown above.

**Page GP6-17:**

**“Policy 6.59: Neighborhood business districts.** Provide for the growth, economic equity, and vitality of neighborhood business districts (Figure 6-3). *Eliminate “by right” single family development in commercial or mixed use zones; require all new development to provide ground-floor space for uses (such as retail) that support the retail-oriented pedestrian environment within neighborhood business districts.*”

**NECN Concern:** Some language should be inserted here to clarify that, indeed, for neighborhood business districts to survive and thrive, they must be districts for business. Space must thus be allocated specifically for supportive uses, and new single-family (or other) development that does not



acknowledge the need to provide this space, especially on the ground floor, must be prohibited.

- *NECN Recommendation:* Adopt a policy requiring ground-floor commercial space (or others uses that support the retail-oriented pedestrian environment) in all new development in centers and corridors, eliminating “by right” single family development in these areas. This could be done by modifying Policy 6.59, as shown above.

**Page GP7-14:**

**“Policy 7.48: Connected upland and river habitats.** Enhance habitat quality and connectivity between the Willamette riverfront and upland natural resource areas.”  
*Daylight creeks through urban areas; use these creeks as the centers of habitat corridors.*

**NECN Concern:** Daylighting can be an effective strategy to not just connect streams to rivers, but also to connect upland to lowland habitats along new (restored) habitat corridors.

- *NECN Recommendation:* Adopt a policy supportive of daylighting creeks that are currently in underground culverts. This could be done by modifying the test of Policy 7.48, as shown above.

**Page GP8-13:**

**“Policy 8.29: Resource efficiency.** Reduce the energy and resource use, waste, and carbon emissions from facilities necessary to serve designated land uses.” *Public facilities will have net zero carbon emissions from fleets, buildings, and other emissions sources.*

**NECN Concern:** The current language of Policy 8.29 is very vague, and needs to have stronger language with specific desired outcomes. An achievable policy goal would be net-zero carbon emissions from City vehicles and properties, especially by the plan’s horizon year of 2035. Setting such a goal would place Portland at the vanguard of cities willing to do something tangible about climate change; it would also come with a host of co-benefits for Portlanders, including better public health outcomes.

- *NECN Recommendation:* Adopt a policy requiring the City of Portland to produce net zero carbon emissions from public facilities by the Plan’s horizon year. This could be done by modifying the test of Policy 8.29, as shown above.

**Page GP8-15:**

**“Policy 8.43: Right-of-way vacations.** Adopt and maintain City code that identifies when street vacations are appropriate. That code should:

- Maintain existing rights-of-way unless there is no existing or future need for them.

- Require pedestrian or bicycle facilities, if ~~needed~~ *the ROW serves or could serve as a connection in the neighborhood pedestrian and/or bicycle network.*"

**NECN Concern:** Because the word "need" can be taken different ways by different people, it should be clarified: if a particular ROW does or could serve as a link in the local pedestrian/bicycle network, then pedestrian/bicycle facilities shall be required, and the ROW shall not be vacated.

- **NECN Recommendation:** Adopt a policy relating to street vacations that strongly favors not vacating any street that serves or could serve as a link in the surrounding area's bicycle and/or pedestrian network, as shown in the above modifications to Policy 8.43.

**Page GP8-16:**

**"Policy 8.49: Pollution prevention.** Reduce the need for wastewater treatment capacity through land use programs and public facility investments that manage pollution as close to its source as practical and that reduce the amount of pollution entering the sanitary system." *Encourage the development of on-site graywater systems for landscape irrigation during the dry season (or for other re-use purposes if treated on-site).*

**NECN Concern:** Graywater, or the re-use of water from kitchen, laundry, sinks, showers, baths, and most other domestic wastewater sources except toilets, has a huge potential to reduce water consumption in Portland during the dry season. It should be specifically encouraged as City Policy, encoded in the Comprehensive Plan. The City should cooperate with other partners to develop a graywater program that educates property owners as to the responsible installation, maintenance and operation of graywater systems, including what substances and products can and cannot be used in conjunction with an active graywater system.

- **NECN Recommendation:** Adopt a policy encouraging the use of graywater systems, where appropriate, within the City of Portland. The edits to Policy 8.49, as shown above, are intended to support the accomplishment of this goal.

**Page GP8-18:**

**"Policy 8.66: Storage.** Provide sufficient in-city water storage capacity to serve designated land uses, meet demand fluctuations, maintain system pressure, and ensure supply reliability, *even during extended drought periods.*"

**NECN Concern:** Many residents are concerned that, with the closure and proposed closure of many of the City's open-air water reservoirs, that the door is being closed on water storage capacity that could be crucial in the

future as climate change brings longer, drier summertime drought conditions to our region. The City should, as a matter of policy, ensure that it has adequate water storage capacity to allow adequate supply even during the most long-lasting, extreme drought conditions, without having to resort to groundwater pumping (which should only be a strategy of very last resort).

- *NECN Recommendation:* Adopt a policy requiring the City of Portland to provide enough water storage capacity to allow the City to ensure supply reliability without needing to support to groundwater pumping, even during extended drought periods. The edits to Policy 8.66, as shown above, are intended to support the accomplishment of this goal.

**Page GP8-23:**

**New Policy, perhaps 8.105? Sustainable Energy Production.** *Maximize opportunities to produce sustainable energy within the city, especially on city-owned facilities, through solar, wind, hydro, geothermal and other renewable energy production technologies.*

**NECN Concern:** The City should be actively seeking to produce sustainable energy on buildings, facilities, and lands that it owns or controls. The current power portfolio of the City's power sources is weighted currently very heavily to fossil fuels; one way to make this portfolio more renewable is for the City itself to begin generating more sustainable energy. Doing so could have direct financial, environmental, and economic benefits for the City.

- *NECN Recommendation:* Adopt a policy requiring the City of Portland to maximize the production of sustainable energy on lands and facilities that it owns or controls, while reasonably balancing this policy goal against other competing needs and interests for those lands and facilities. Some potential policy language to accomplish this goal is shown above, as a suggested new Policy 8.105.

**Page GP9-8:**

**"Policy 9.15: Repurposing street space.** Encourage repurposing street segments portions of street Rights-Of-Way that are not critical for transportation connectivity to other community purposes."

**NECN Concern:** The existing language in this policy seems to support removing links from the transportation network. Rarely, aside from cul-de-sacs that don't actually front on properties with driveways, would it be possible to find links in the transportation network that couldn't possibly be used, even by bicyclists or pedestrians. This language should thus not refer to street "segments" but instead to street "areas." It is eminently practical to seek to shrink the transportation footprint by reducing the amount of street rights-of-way (ROW) that is paved and dedicated to vehicle movement.

Portions of the ROW can easily be converted to use by non-auto modes, as greenspace, as bioswales, and/or as community space. This policy should support those sorts of activities, not the removal of potential links in the transportation network, especially those which may already by their nature be more suited to pedestrians and bicycles than other vehicles.

- *NECN Recommendation:* Modify Policy 9.15, as shown above, to clarify that the City seeks to re-purpose under-used portions of the street Right-Of-Way to allow them to find their highest and best use; but that the City has no interest in closing any existing or potential links in its pedestrian and/or bicycle networks.

**Page GP9-9:**

**“Policy 9.21: Bicycle transportation.** Create conditions that make bicycling more attractive than driving for most trips of approximately ~~three~~ *five* miles or less.”

**NECN Concern:** The City of Portland is aiming too low with this policy. If the City truly seeks to gain bicycle mode share deep into the double-digits, it should seek to make bicycling more attractive than driving for most trips of approximately *five* miles or less. This radius allows most of inner Portland to find trips to and from downtown to be more attractive trips by bicycle than by auto. This doesn't seem to be a difficult standard to achieve, as long as the City is willing to make the choices required to devote the necessary portions of the ROW to bicycles, especially on the main arterials that connect downtown to the neighborhoods, and within downtown.

- *NECN Recommendation:* Modify Policy 9.21, as shown above, to clarify that the City seeks to create conditions to make bicycling more attractive than driving for most trips of approximately *five* miles or less.

**Page GP9-10:**

**“Policy 9.29: Intercity passenger service.** Coordinate planning and project development to *create/expand electric rail* intercity passenger transportation services, including *High Speed Rail*, in the Willamette Valley, ~~and~~ from Portland to Seattle and Vancouver, BC, and from Portland to nearby cities including Hood River, The Dalles, Bend via Mt. Hood, and destinations on the Oregon Coast including Astoria to Tillamook.”

**NECN Concern:** The City should seek stronger, carbon-neutral passenger transportation connections to more of its hinterlands. Electric interurban/intercity passenger rail service, including high speed rail in appropriate locations, should be planned to connect Portland to Eugene (and points south), the Oregon Coast including Astoria to Tillamook (and possibly points south), the Columbia Gorge including Hood River and the Dalles (and possibly points east), Bend and Central Oregon via Mt. Hood, as well as points to the north, including Vancouver (WA), Olympia, Seattle, and Vancouver, BC.

- **NECN Recommendation:** Modify Policy 9.29, as shown above, to clarify that the City seeks to become the epicenter of an electric interurban passenger rail network that connects it via a rapid carbon-neutral mode of transportation to the major population and destination centers of its hinterlands that it is currently connected to via the road network. The end goal should be to offer better travel times than are available currently from road-based transportation modes. Existing tracks should be electrified and upgraded incrementally, and new alignments built as funding becomes available, so that high-speed rolling stock could be operated at speeds in excess of 150 m.p.h. (and even at speeds above 200 m.p.h.), where appropriate.

**“Policy 9.32: Multimodal system and hub.** Maintain Portland’s role as a multimodal hub for global and regional movement of goods. Enhance Portland’s network of multimodal freight corridors.” *Seek ways to achieve net zero emissions from freight movement.*

**NECN Concern:** While it is important for Portland to maintain its role as a multimodal freight hub, the technologies currently involved are some of the dirtiest sources of air pollution in the entire region, and their pollution plume extends deep into adjacent residential neighborhoods. The City, at the very least as a matter of risk management, should therefore seek to enforce a zero emission goal on the multimodal freight hub portions of the economy. This could involve electrifying the entire regional freight rail network, transitioning trucks to hybrid biodiesel/electric vehicles, and other technological paths that could not only lead to reduced emissions but also reduced operating costs and additional jobs in the local green economy.

- **NECN Recommendation:** Modify Policy 9.32, as shown above, to clarify that the City seeks to achieve net zero emissions from freight movement.

**Page GP9-11:**

**“Policy 9.35: Freight rail network.** Coordinate with stakeholders and regional partners to support continued reinvestment in, and modernization of, the freight rail network, including electrification and double-tracking to accommodate passenger rail growth where feasible and eliminate emissions from freight rail activities.”

**NECN Concern:** While growing and modernizing the regional freight rail network is certainly a laudable goal, the City should be more specific about the sought improvements: electrify the system, and create additional capacity to allow freight to peacefully co-operate with passenger rail expansion on the same corridors. Other goals may include seeking to move some freight rail yard operations away from the river, where they may no longer represent the best and highest use of those lands (as has already happened at the north end of the Pearl District.)

- **NECN Recommendation:** Modify Policy 9.35, as shown above, to clarify that the City seeks to electrify its regional rail network, and double-track it where necessary to allow for the co-existence of both freight and passenger rail operations in a manner that allows both to maintain their growing schedules.

**Page GP9-13:**

**“Policy 9.52: Share space and resources.** Encourage the shared use of parking and vehicles to maximize the efficient use of limited urban space, *both on and off street.*”

**NECN Concern:** In order for the City to meet some of the goals mentioned elsewhere in this document, real estate that is currently dedicated to vehicle storage will need to find a higher and better use in the future, no matter where it is located – on street or off street. This policy should clarify that it applies to both situations.

- **NECN Recommendation:** Modify Policy 9.52, as shown above, to clarify that the City seeks to encouraged the shared use of both on- and off-street parking.

**Page GP10-9:**

**“Policy 9.52: 6. Single-Dwelling — 5,000**

This designation is Portland’s most common pattern of single-dwelling development, particularly in the city’s inner neighborhoods. It is intended for areas near, in, and along centers and corridors where urban public services, generally including complete local street networks and access to frequent transit, are available or planned. Areas within this designation generally have few or very limited development constraints. ~~Single-dwelling~~*structure residential will be the primary use. The maximum density is generally 8.7 units per acre, except where an overlay zone allows up to 8.7 primary structures per acre, where each structure may have up to two dwelling units per floor. The corresponding zone is R5. The minimum buildable lot size shall be 4,000 square feet.*”

**NECN Concern:** While the R5 zone is intended for areas near, in, and along centers and corridors with access to frequent transit, this language focuses too much on density rather than form, while losing sight of the goal of preserving yards of a decent size in this zone. Especially beginning with this zone and continuing into the higher-density residential zones, Portland should transition to more of a form-based code, one which focuses on minimum site size, maximum lot coverage, setbacks, height, protection of existing mature trees, and other issues relevant to neighborhood livability. The code should transition away from a strict focus on density, which can often be counter-productive towards achieving other livability-related goals, including affordable housing and achieving the critical mass of neighborhood

population required to support the services of commercial centers within a 20-minute walk.

- *NECN Recommendation:* Modify the definition of the R5 zone, as shown above, to clarify: that the focus, especially within high-quality transit zones, is on primary structures per acre, rather than dwelling units per acre: that up to two dwelling units are allowed per floor of the structure (including basements and attics) in these areas; and that the minimum buildable lot size shall be 4,000 square feet.

**RECOMMENDATIONS NOT CORRESPONDING TO SPECIFIC POLICIES PROPOSED IN THE DRAFT PLAN:**

**Skinny Houses in R5 Neighborhoods.** In neighborhoods zoned R5, lot sizes shall be about 5,000 square feet. Lots shall certainly not be subdivided to create new lots that are smaller than 3,000 square feet, nor shall “historic lot lines” be interpreted to allow development on existing lots that previously were used as side yards for existing houses.

*NECN Concern:* To ensure that the character of our R5 communities is maintained and respected, the City’s development standards shall not allow by-right development of skinny houses on new lots in R5 zones that are nowhere near 5,000 square feet in lot area. If the City desires to allow two houses on a 5,000 square foot lot, it should endeavor to convince the neighbors to allow it to re-zone the lots to R2.5, which is the appropriate zone to allow for lot sizes of 2,500 square feet.

- *NECN Recommendation:* Modify the Zoning Code to clarify that all new construction requiring permits within the City in R5 zones shall be on lots that are as close as possible to 5,000 square feet. A single lot of 5,000 square feet in size shall not be subdivided, nor any interpretation of historic plat lines interpreted to allow, for two skinny houses to be constructed in such a zone. The minimum buildable lot size for a new primary structure in the R5 zone shall be 4,000 square feet.

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The NECN encourages the City to incorporate our recommendations into the Comprehensive Plan and to follow through with actionable and enforceable policies for future growth and development.

Please feel free to contact me, or the Chair of our Land Use & Transportation Committee, Garlynn Woodsong, at (503)936-9873 or at garlynn@gmail.com, should you have any questions about any of the comments in this letter. Thank you very much for your thoughtful consideration of our input.

Sincerely,



Alan Silver  
Chair, NECN Board of Directors  
NE Coalition of Neighborhoods  
4815 NE 7<sup>th</sup> Avenue  
Portland, OR 97211

cc: Mayor Charlie Hales, [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)  
Commissioner Amanda Fritz, [Amanda@portlandoregon.gov](mailto:Amanda@portlandoregon.gov)  
Commissioner Nick Fish, [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov)  
Commissioner Steve Novick, [novick@portlandoregon.gov](mailto:novick@portlandoregon.gov)  
Commissioner Dan Saltzman, [dan@portlandoregon.gov](mailto:dan@portlandoregon.gov)  
BPS Director Susan Anderson, [Susan.Anderson@portlandoregon.gov](mailto:Susan.Anderson@portlandoregon.gov)



Comment2751\_2015.01.15\_Tennant

From: Planning and Sustainability Commission  
Sent: Thursday, January 15, 2015 4:15 PM  
To: Kovacs, Madeline  
Subject: FW: Opposition to amending environmental overlay zone for Pembina Pipeline proposal

Julie Ocken  
City of Portland  
Bureau of Planning and Sustainability  
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From: J.Byron Tennant [mailto:[j.byrontennant@gmail.com](mailto:j.byrontennant@gmail.com)]  
Sent: Thursday, January 15, 2015 1:31 PM  
To: Planning and Sustainability Commission  
Subject: Re: Opposition to amending environmental overlay zone for Pembina Pipeline proposal

Hello Julie,  
Thank you for alerting me to my mistake. My full name is Jeremy Byron Tennant, and I live at 1133 NE Holman St., Portland OR, 97211. I intend to contribute additional written testimony highlighting relevant Comprehensive Plan "Goals and Policies" ASAP.

My immediate questions after hearing spoken testimony include:

Process:

-Why was the Pembina Pipeline and proposed Terminal 6 Environmental Overlay Zone (E.O.Z.)

amendment forwarded to the public input process, when it seems clear that many key questions remain unanswered?

-In Portland, historically we have unique and cherished opportunities for public input in government decisions. Has this process been an example of "best practices" in terms of time spent by PSC, BPS, and informed, active citizens?

-Is it incumbent upon citizens involved in the public input process to inform local leaders of the basic considerations required to make sound decisions, as well as the potential consequences and precedent influenced by these decisions?

-Should the public input process be required to judge of the accuracy, honesty, and veracity of claims made by proponents of major projects? What negative consequences may result from this approach?

-Should a case such as the proposed Terminal 6 E.O.Z. amendment be hastily reduced to technical interpretation as the result of an apparently fast-tracked process, with so much at stake in terms of precedent?

Specifics and Apparent Factual Discrepancies:

-How much land is immediately at stake in this process? At the spoken testimony, I heard 62 acres. This represents about a 50% discrepancy in excess of figures commonly circulated in news outlet reports.

- It appears several last-minute commitments were proposed by Pembina in order to placate various interests. How many of these commitments were guaranteed in writing, and can we expect more delayed announcements on or near March 17th? Is there a deadline for input from proponents of the code amendment which allows reasonable response time?

-I am hearing that the 62 acres, as amended, would provide 35 or more permanent jobs at a pay rate of \$50,000 or more. These numbers, as presented, would seem to guarantee \$1,750,000 total salary for a jobs-per-acre ratio of .56 jobs/acre. Why am I reading \$7,000,000 per year in news reports? Could more jobs-per-acre be achieved by alternate use of the land, as currently protected by the E.O.Z.?

-What is a "permanent job"? Are permanent jobs guaranteed in a written contract?

-If the Terminal 6 E.O.Z. amendment is approved, will a competitive bidding process then ensue, to ensure equitable opportunities to apply for development of the land in question? Portland Comprehensive Plan:

-In Woodlawn, neighbors have repeatedly expressed concern about the potential for explosive accidents involving transport of fossil fuels by train. Neighbors report seeing coal and oil trains passing nearby, despite media claims to the contrary (i.e. "no" to coal and "not now" to oil). Many businesses and residences are within possible blast zones, in the event of an accident.

Woodlawn School, which is currently the benefactor of a federal School Improvement Grant, is located within about 1000 feet of train tracks. Train noise in the middle of the night disrupts sleep of neighbors, and we experience elevating levels of daytime noise with the airport nearby, sometimes to a painful extent. Is there language in the Comprehensive Plan addressing

Environmental Justice that can be applied to the train component in this case? Can this establish precedent?

-When considering the short-term benefits of temporary construction jobs, do decision makers consider the historical lessons of the social and economic impacts of Vanport?

Thanks,  
Byron

On Wed, Jan 14, 2015 at 10:48 AM, Planning and Sustainability Commission <psc@portlandoregon.gov> wrote:

Hello Byron,

Thank you for your comments to the Planning and Sustainability Commission. So that I may forward your message to the Commissioners and include your comments in the record, can you please email me your mailing address? That is required for all testimony.

Thanks,  
julie

Julie Ocken  
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From: J.Byron Tennant [mailto:[j.byrontennant@gmail.com](mailto:j.byrontennant@gmail.com)]  
Sent: Tuesday, January 13, 2015 1:44 PM  
To: Planning and Sustainability Commission  
Subject: Opposition to amending environmental overlay zone for Pembina Pipeline proposal

Hello,  
My name is Byron Tennant, and I am a Portland resident. Please do not amend the existing environmental overlay zone in order to clear the way for the proposed Pembina project. The environmental overlay zone should be left intact as designated. Even before potential adverse impacts of the Pembina project have been thoroughly analyzed, changing the environmental overlay zone would seem to set a troubling precedent for further environmental protections to be stripped. Please also consider the following excerpts from Comprehensive Plan public input, as represented on [necoalition.org](http://necoalition.org) under Land Use and Transportation:

NPLUG Health Overlay:

"Portland's comprehensive plan update, Policy 4.28.d, encourages design and land use patterns that mitigate negative air quality and noise impacts in Portland neighborhoods, especially near high vehicle traffic areas, and other sources of air pollution. Similarly, Portland's Climate Action Plan (CAP) goals 1-4 aim to reduce the environmental impacts of new development through more sustainable land use and design principles."

PIAC Letter:

"It is important to avoid the implication that the Comp Plan only applies narrowly to land use decisions and the work of the Bureau of Planning and Sustainability. PIAC is tasked with recommending policies and practices to expand public involvement in city government. Even if the term is defined broadly, we are concerned that the use of "land use" alone could limit public involvement by creating the perception that the Comprehensive Plan does not apply to other kinds of government decisions."

Woodlawn LUTC Comp Plan Feedback (Please note- this is a Draft):

"Safety: Deep concerns about the volatile items being shipped on trains through our neighborhoods and the potential for explosions or environmental catastrophe. We now have propane tanks added to the areas near the railroad. Shipping oil, gas, ammonia, coal, or flammable liquids carries risk. The plan proposes adding another track. (Kenton Rail Line project). This additional track could increase shipping of volatiles and at higher speeds. We have grade schools and residences extremely close to the tracks. Our neighborhood center is well within the blast radius (which goes from the tracks to almost Holman Street, in the Woodlawn neighborhood."

BPS Summary of Comprehensive Plan Public Testimony (Memo 5):

"Some of the most frequently-commented on topics at this time include but are not limited to:

- Concerns about current proposals for West Hayden Island... expressing a desire to keep the island as a nature preserve/open space...
- Desire to carefully consider the development of green-fields, and to prioritize re-development of brownfields in meeting projected employment land needs.
- Requests to extend PSC hearings..."

Micah-Meskel\_Industrial-Zoned-Lands-Testimony-11-4-14:

"In general, the City needs to take a more sustainable and balanced approach in its strategy for addressing industrial land demand in its comprehensive plan... the quest to secure additional industrial land should not trump the health of our communities and environment. The livability of our neighborhoods is a huge asset and should not be compromised... the surrounding neighborhoods will likely see an increase in pollution and loss of significant environmental benefits that these open spaces provide, with no real promise of economic benefits to the effected communities."

"The city should take a more sustainable strategy forward;... A strategy that includes a greater

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emphasis on cleaning up existing brownfields, one that strives to redevelop greater than 60% of existing brownfields... A strategy that looks at promoting the intensification of jobs on current and future industrial lands which will provide more jobs per acre... A strategy that restricts the ability of industrial landowners to up-zone industrial land for other uses."

"If these strategies don't bring the City to reaching its industrial lands goals then it needs to consider taking a serious look at seeking a Goal 9 exception from the State of Oregon. Goal 9 is the driving force behind many of these proposals that will adversely affect our North and Northeast Portland neighborhoods. The City needs to determine if a landlocked Portland can really continue to find large parcels of developable lands without completely compromising the health of its communities and environment now and into the future."

As Comp Plan public input continues to develop, I support the above statements and sentiments to the best of my current understanding, and therefore I must recommend against amending the environmental overlay zone in question. Thank you for providing this public comment opportunity.

-Byron Tennant

Northeast Coalition of Neighborhoods, Safety and Livability Team At-Large Representative



November 10, 2014

Dear Chair Baugh and Members of the Planning and Sustainability Commission,

Please accept the following comments from the Audubon Society of Portland regarding the Comprehensive Plan Update. These comments supplement our prior comments submitted on 9-23-14. These comments reflect our testimony at the November 4 PSC Hearing.

**Process Issues:**

- 1) **Please Consider Adding Additional Hearings:** We would urge the PSC to add additional hearings to allow for additional general comments on the Comprehensive Plan. The development of the Comprehensive Plan has been years in the making. The two volume document and supplemental materials are very dense and complex and the drafts have changed tremendously since the prior review drafts to the point where some sections are virtually unrecognizable. In addition it is important to also have time to cross reference the plan with the equally complicated Portland Plan We are hearing from numerous organizations that have only recently become aware of the draft plan and are still formulating positions. Under ordinary circumstances a three month review and hearing period would be reasonable, but for a document of this significance and complexity, three months seems truncated, especially when compared with more deliberate pace of prior portions of this process.
- 2) **The Economic Opportunities Analysis (EOA) should have been released for comment prior to the release of the draft Comprehensive Plan:** The EOA provides the basis for some of the most difficult and controversial decisions included in the comprehensive plan. It provides an analysis of economic trends, supply and demand of buildable lands and policy alternatives. By releasing the draft Comp Plan prior to the EOA, the City has functionally denied the public the opportunity to evaluate or understand the basis for many of the policies included in the Comp Plan or to explore other strategies for meeting Goal 9 not included in the draft Comp Plan. It is important to note that all other background reports were released for public review and adoption far in advance of the draft Comprehensive Plan. The EOA should serve as a starting point for policy discussion development, not a post hoc rationalization.

**Substantive Issues:**

**1) The City Should Seek a Goal 9 Exception**

The focus of the Goal 9 discussion to date has been West Hayden Island. However, West Hayden Island is only one example among many of how the City's efforts to remedy the 670 acre industrial land deficit are undermining its ability to protect natural areas, openspace and natural resources in the City. The July 2014 draft Comprehensive Plan includes not only the conversion of 300 acres of wildlife habitat on West Hayden Island, but also includes the conversion of significant portions of two golf courses along the Columbia Slough and strict limitations on regulations to protect natural resources on industrial sites along the Willamette and Columbia Rivers and Columbia Slough. In addition, the Industrial Development Chapter includes numerous policies which mandate that the City continue to find new industrial lands above and beyond the existing deficit if 5 and 20 year growth forecasts indicate an increased demand. In recent years the PSC has approved and forwarded several natural resource plans to council including North Reach River Plan, Portland Tree Code Update, and Airport Futures, only to have elements of the plans that applied to industrial lands abandoned due to Goal 9 conflicts. All of the above is indicative of the fact that Portland has run out of capacity to meet goal 9 mandates unless it is willing to compromise the health of our environment. Our rivers are already seriously degraded and the policies contained in this plan ensure that they will continue to degrade over the life of this plan.

The City of Portland has reached a major decision point that will define whether it retains its reputation as a "green" city in the coming decades.

First, it is critical to understand that the land use system does allow the city to inform the state that it has run out of land and is unable to meet industrial land targets. State land use planning goals do not require the city to sacrifice our environment or our neighborhoods in order to meet industrial land goals. In fact Goal 9 explicitly states that industrial land objectives "should consider as a major determinant, the carrying capacity of the air, land and water resources of the planning area." Instead, Portland should inform the state that it will meet job targets through strategies other than creation of new industrial lands.

Second, the City has over 900 acres of brownfields---contaminated industrial sites that have either limited or no productive use. In short there are more than enough brownfield sites to meet the industrial land deficit. The problem has been that owners of these sites have been reticent to invest the capital to clean them up and put them back into productive use. It is absolutely critical that the city to develop an aggressive strategy to hold polluters accountable for these sites through a combination of enforcement actions and incentives.

Finally, to the degree an industrial land crisis exists at all, it is a self-inflicted crisis. Although city forecasts predict a surplus of commercial and residential property, the city and industrial stakeholders have spent the last 15 years rapidly converting industrial lands to residential and commercial uses. Today the city brags about the transformation of the Pearl District and South Waterfront from "industrial wasteland" to high end development. The Port of Portland, one of the loudest advocates for more industrial land, sold its property at Terminal One to make way for low rise condos and it converted industrial land next to Portland International Airport for a big box shopping center. Whether intentional or not, the strategy pursued by both industrial interests and the city over the past 15 years has been one of allowing industrial land owners to cash out by

upzoning their industrial land to more profitable use and then backfilling the industrial land deficit through conversion of greenspace.

It is time for a new strategy, one that does not necessitate destruction of our natural resources, open spaces and undermine the health and livability of neighborhoods. We urge the City to take the following approach to addressing the industrial lands deficit:

- The City should inform the state that it has run out of adequate undeveloped land to meet industrial land forecasts and therefore will develop other strategies to meet jobs supply objectives. This does not mean that the city will never add new industrial land to the inventory, but it does mean that the city will not be held hostage to an artificial target that would necessitate destruction of natural areas, openspace and neighborhoods.
- The City should develop an aggressive strategy to force industrial polluters to clean-up brownfields. This should include a combination of enforcement actions as well as non-subsidy based incentives. The City should set a target of 80% clean-up of Portland's brownfields over the next 20 years. **(The current draft lowers the goal from 80% to 60%)**
- The City should put in place regulatory and non-regulatory programs to increase use intensification on the existing industrial land base, something that is already occurring in cities in Europe and Asia with limited land supply. Far too much of Portland's existing industrial land base is used inefficiently. We need a real consolidation and intensification strategy for industrial lands in Portland. **(The draft does this but is not clear about what portion of the deficit it hopes to meet with this strategy)**
- The City should put in place strong protections to prevent the upzoning of existing industrial lands except in extraordinary cases. **(The Draft does effectively incorporate this policy)**
- The City should ensure that whenever land is rezoned for industrial development that strong mechanisms are in place to ensure the significant numbers of jobs are actually delivered. Public investments in public infrastructure should be tied to job creation targets. **(The Draft does not address this issue)**
- The City should avoid policies in the Comprehensive Plan which limit the City's ability to protect natural resources on industrial lands through both regulatory and non-regulatory mechanisms. It is critical that the city retain the ability to protect natural resource values which often overlap with prime industrial land, especially along our urban waterways. **(The Draft does the opposite)**
- The City should reject proposals to rezone 300-acres on West Hayden Island for industrial development. This irreplaceable resource should be permanently protected as openspace. **(The Draft does the opposite)**
- The City should reject proposals to rezone Columbia Corridor golf courses for industrial use. If it does move forward, it should simultaneously put in place zoning and other mechanisms to implement a landscape scale Columbia Slough Restoration Strategy including expanded P-Zones along the entire Slough within Portland, implementation of the new tree code on industrial lands, and permanent protection and restoration strategies on golf course areas that will be retained as openspace. **(The draft proposes to rezone the golf courses without committing to any of the other objectives)**
- The City and State should take a hard look at strategies to promote real collaboration and cooperation and potentially unification of the Columbia River Ports in order to maximize efficient use



of land, promote a sustainable regional Port economy and stabilize our Port system which is on the brink of system failure. This is something which has been in the Port of Portland's Marine Terminal Masterplan since 1991 but which has never been seriously pursued. (The draft does not address this issue)

## **2) Environment and Watershed Health (chapter 7)**

In general the language in the Environment and Watershed Health Chapter has become significantly less detailed, weaker, and more difficult to track and understand than the January 2013 draft. Many reasonable and important policies have simply been eliminated without explanation. This stands in stark contrast to the Industrial Development Chapter (discussed below) which has been expanded, strengthened and been infused with far more detail since the January 2013 draft. We will provide additional specific details to staff and the PSC in the coming weeks, but for now we would like to highlight the following issues as a sample of our concerns:

- a) **Goals:** The goals of this chapter have been entirely rewritten since the 2013 draft. While we agree with the new goals we would note that two very significant goals have been removed from this chapter since the 2013 draft: 1) Sustain the quality of Portland's environment by preserving natural resources and focusing development in already built areas" and 2) "consider cumulative effects of decisions on the environment." Both of these goals should be restored. In addition Goal 7.B should be strengthened from "watershed conditions have improved over time" to "Healthy watershed conditions are achieved." In addition the goals should explicitly reference protecting and restoring biodiversity.
- b) **The action verbs throughout the section have been substantially weakened from the 2013 draft and in many instances now indicate the goal is simply to maintain the status quo rather than enhance and restore ecosystem health:** The 2013 draft clearly and explicitly stated that the goal was to "protect, enhance and restore" Watershed quality and function (4.1) groundwater systems (4.2), vegetation (4.3), Fish and Wildlife Habitat (4.4), At-risk habitats (4.5), biodiversity (4.6) and prevent and minimize the effects of invasive species. These policies have been replaced with a new section "improving environmental quality and preventing degradation" which is far weaker placing an emphasis on preventing degradation, "considering impacts" "improving" "addressing" "encourage" and inserting qualifiers such as "where practicable." We would urge the city to restore the "protect, enhance and restore" verbiage and make it explicitly clear that the goal is not just improvement but achieving ecological health in each of the target areas.
- c) **The draft inserts the following new language at the start of many policies: "ensure that plans and investments are consistent with and advance programs..."** This is nothing more than bureaucratic gobbledygook that confuses the reader. No other section has this type of obscuring language and it should be removed.
- d) **Cumulative Effects:** Goals and policies requiring the city to consider cumulative effects of decisions on the environment found in the 1-2013 draft have been removed entirely from the current draft. These should be restored.
- e) **Mitigation:** The requirement to "fully mitigate" impacts on natural resources (policy 4.12) in the 1-2013 draft has been weakened to simply require "mitigation: (policy 7.11) The city should restore the requirement to "fully" mitigate for unavoidable impacts to natural resources and that it should also

add language requiring that mitigation result in "net increase in ecological function." The goal should be improvement in ecological health over time.

- f) **Carrying Capacity:** Policy 4.11 b from the 2013 draft, "Strive to maintain and sustain the carrying capacity of air land and water resources by enhancing natural resource quality and function" has been removed in the current draft. It should be restored. Notably Goal 9 has very similar language about economic development being done such that it does not exceed the carrying capacity of the land, air and water.
- g) **Goals and Policies encouraging the efficient use of already developed land before encroaching on natural resources found in the 2013 draft have been completely removed.** The current draft appears to have completely abandoned the commitments of the 2013 draft to focus on already developed land before destroying natural resource land. In fact the 2014 draft appears go entirely the opposite direction by including several policies on the Economic Development Chapter which promote encroachment onto non industrial lands. The priority on already developed lands should be restored.
- h) **Johnson Creek:** Policy 42.2 in the 1-2-13 draft "to protect and enhance connectivity of natural resources in the East Buttes that provide habitat and natural stormwater management..." has been removed. It should be restored. This is a critical part of the JC Watershed Strategy.
- i) **Goal 7.D Environmental Equity** should be changed to: "All Portlanders have access to clean air and water, can benefit from development designed to lessen the impact of natural hazards and environmental contamination and development designed to protect, enhance, and restore nature in all neighborhoods."
- j) **Policy 7.3** should mention recovering threatened, endangered sensitive species; it only a reference to "including at-risk" species. More could be in here to continue support for the species recovery planning the City committed to over a decade ago.
- a) **Policy 7.9 Impact Evaluation**" could be stronger: Analyze the potential direct and cumulative impacts of proposed development on significant natural resources, their functions, and the ecosystem services they provide.
- b) **Policy 7.10 Add:** "Adopt regulations, plans and programs that address cumulative environmental impacts of development on environmental quality."
- c) **Policy 7.11** - "Require" instead of encourage "mitigation approaches..."
- d) **Policy 7.12** – This policy should be changed. Local policies do not have to be consistent with State and Federal Policies. While we agree that the City should coordinate with state and federal regulators, the city should also be free to develop its own policies and priorities.
- e) **Policy 7.14 and 7.16:** We would suggest "with an emphasis on underserved and underrepresented communities most vulnerable to health impacts." The reason to prioritize these communities is because they lag behind in many human health indicators so this policy should be more specific in this respect.
- f) **Policy 7.24.** "Limit and remove impervious surfaces to reduce impacts on hydrological function air and water quality, habitat connectivity, and tree canopy.
- g) **Policy 7.22** - "Require and encourage low impact development, habitat-friendly development, bird-friendly design, and green infrastructure into all new and existing development including but not limited to City-owned, managed, and funded facilities.

- h) **Policy 7.23 - Access to Nature.** This policy is focused on access to nature in the macro-landscape and in balancing access and conservation in protected natural areas. In reference to the environmental equity goal, it should also address equitable neighborhood access to nature where people access "nature in their daily lives" there by promoting the interstitial green; we need anyway for biodiversity and air and water quality. I would add the following bullets:
  - i) Prioritize park investments to toward the goal of ensuring 100% Portlanders are within 1/4 mile of a public park or natural area.
  - ii) Prioritize green infrastructure investments in neighborhoods with poor access to parks, nature and with limited tree canopy.
  - iii) Consider increasing housing densities near to active recreation parks to increase the percentage of Portlanders living within ¼ of a mile of a park.
- i) **Policy 7.32 - Re-write this policy to be both more explicit and broader:** "Integrate stormwater management and planning: Develop programs, regulations, and design standards to more fully integrate stormwater management and transportation planning and infrastructure in order to improve water quality, safety, access to nature and overall neighborhood livability. Prioritize improvements for unimproved or substandard rights-of-way, accident-prone locations, and neighborhoods with less access to nature or active transportation."

## 2) **Economic Development (Chapter 6)**

In contrast to the weakening of the Watershed Chapter, the Economic Development Chapter appears to have been put on steroids relative to the 2013 draft, especially with regards to industrial lands. For example the Industrial Districts Section has ballooned from half a page to three pages. More importantly, the draft includes numerous new and modified policies that undermine the ability of the city to protect natural resources on industrial sites, which require that the city find new industrial lands regardless of impact on other city goals, and which weaken the city's commitment to focusing development in already built areas before impacting natural resource areas. Again, in contrast with the severe streamlining of the policies in the Watershed Chapter, the policies in the industrial lands section are often repeated several times over. We believe that the Land Development and Industrial Employment District Sections will significantly reduce the city's ability protect and restore natural resources along the Willamette and Columbia River and Columbia Slough below what is possible under the existing Comprehensive Plan. It appears that the City has simply acquiesced to industrial interests who have long advocated for minimal environmental protection on industrial lands. If the city adopts these sections as written, it will ensure that our already degraded waterways will continue to degrade in the coming decades.

There is absolutely no evidence that environmental regulations cost industrial jobs, especially given the non-existent link between industrial land supply and recent industrial job growth in Portland. The City's most recent "Economic Opportunities Analysis" documents the widely recognized trend that "Industrial employment has been dropping at the same time the city is experiencing increases in industrial land development." The study provided no analysis to indicate environment regulations hurt job growth, only a comment in focus group. The argument that environmental regulations hurt job growth or even significantly impact land supply comes directly from industry lobbyists not from any credible evidence or analysis." Meanwhile there continues to be evidence and analysis that environmental quality- especially in our region- attracts a skilled and educated workforce and increases work productivity.

The following are a sample of out specific concerns:

- a. **Brownfield Redevelopment:** The City has reduced the brownfield redevelopment target from the 80% goal which was discussed throughout the PEG process and which was include in the 2013 draft to 60%. This will increase pressure to develop greenfield sites and decrease pressure to clean-up contaminated sites. The City should restore the more ambitious 80% target.
- b. **Policies that require the City to maintain a supply of industrial land without any consideration of how this might impact other city goals:** The Land Development and Industrial and Employment Sections are now replete with redundant policies that require the city to find an ongoing supply or new industrial land regardless of conflicts with other city goals. This includes policies 6.12, 6.15, 6.18, 6.36.d, 6.47. It is important to note that the action verb used in these sections (“provide”) is not discretionary. Given the fact that the city is already converting openspace and natural areas to find new industrial land, these policies can only result in additional losses for the environment.
- c. **Policies which appear to restrict the City’s ability to require natural resource protection or restoration on industrial lands:** Several policies appear to limit or prohibit the city from instituting new protections for natural resources on industrial lands. These include 6.35, 6.36.b, and 6.37. The draft ignores the fact that our industrial lands often overlap with some of our most high value natural resource areas. These policies should be rewritten to ensure that it is clear that the city can implement and update environmental policies on industrial lands.
- d. **Emphasis on incentives to achieve industrial land objectives:** Throughout the industrial land sections, many of the policies now explicitly rely upon an incentive based strategy. While incentives are fine, they are not the only way to achieve city objectives. Policies should clearly allow for a range of mechanisms including regulation to achieve its objectives.
- e. **Policy 6.17 Regulatory Climate:** This policy appears to severely limit the city’s ability to put new regulations on industrial lands by requiring that the city prioritize economic development over all other goals (6.17), requiring that the city’s regulations be competitive with other cities (a “middle of the pack” mentality rather than maintaining Portland as an environmental leader) (6.17a), and potentially eliminating city jurisdiction over areas where the state of federal government have regulatory programs (6.17e) even though the City has long recognized the importance of local regulatory authority over our urban natural resources.
- f. **Policy 6.36 Prime Industrial Land Retention:** This policy appears to prevent the city from updating environmental or community protections on industrial lands if those protections in anyway diminish the capacity of those industrial lands. Policy 6.36b explicitly limits conversion of industrial lands though land use plans, regulations, or non-industrial uses. This policy appears to completely ignore the need to also protect health of the community and the environment. Policy 6.36c requires the city to minimize the impacts of regulations on industrial lands without consideration of any other goals. Policy 6.36d requires the city to strive to offset any loss of industrial land with replacement lands---given the existing deficit, this policy could effectively prevent any new regulations on along the river that protect natural resources. Taken together, these policies appear to us to make it practically impossible to establish new natural programs on these lands and negate the responsibility of industrial landowners to protect and restore the natural environment.

Taken together, these policies appear to move us into an era in which other public values such as protection of natural resources, protection of human health, Goal 15 objectives, etc. appear to have been abandoned on industrial lands. This is inconsistent with our land use planning system, community values, the city's past planning practices, and Policy 10.2b in the draft comp plan. It places the interests of industrial developers above all other city goals.

**3) Green Infrastructure needs to be more robust in the urban design, housing and transportation chapters:**

In order to achieve the city's watershed health objectives, it is critical that all elements of the plan explicitly adopt green infrastructure policies. We would urge the city to make the design with nature/ green infrastructure policies in the housing, transportation and urban design sections much more robust and explicit. For example in the transportation chapter, the design with nature policy (9.16) simply states that the city should "promote street alignments and designs that respond to topography and natural features and, when feasible" protect, streams, habitat and native trees." This says virtually nothing other than avoid harming natural resources when possible. Each of these sections should contain strong proactive policies requiring the city to actively incorporate green infrastructure into their projects. The City's Watershed Management Plan calls for the city to consider green infrastructure opportunities on all public projects and this should be written large throughout the Comp Plan.

**4) We support the proposal to reduce residential density in specific areas with natural hazards and drainage constraints, and where the current Comp Plan and zoning designations would allow significant additional residential development.**

The intent of the proposed "down-designations" in locations such as the West Hills and near Powell Butte is to reduce future risks to public health and safety by reducing future development potential and associated cumulative impacts in these areas. This part of the Comp Plan proposal is notable, and represents the integral "flip-side" of the proposal focus most of the new development in urban centers and along corridors. These proposed down-designation areas are generally characterized by steep slopes with poorly draining soils, and limited stormwater pipes so runoff from new development, roads, etc. must be routed to local streams. These areas have a mix of landslide, wildfire, and earthquake hazards, and can be difficult to access or evacuate during emergencies. We view this as a common sense proposal to protect natural resources and public safety.

Thank you for your consideration of these comments.



Bob Sallinger  
Conservation Director  
Audubon Society of Portland



November 4, 2014

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  - h) **Johnson Creek:** Policy 42.2 in the 1-2-13 draft "to protect and enhance connectivity of natural resources in the East Buttes that provide habitat and natural stormwater management..." has been removed. It should be restored. This is a critical part of the JC Watershed Strategy.
  - i) **Policy 7.3** should mention recovering threatened, endangered sensitive species; it only a reference to "including at-risk" species. More could be in here to continue support for the species recovery planning the City committed to over a decade ago.
  - j) **Policy 7.9 Impact Evaluation** could be stronger: Analyze the potential direct and cumulative impacts of proposed development on significant natural resources, their functions, and the ecosystem services they provide.
  - k) **Policy 7.10 Add:** "Adopt regulations, plans and programs that address cumulative environmental impacts of development on environmental quality."
  - l) **Policy 7.11** - "Require" instead of encourage "mitigation approaches..."
  - m) **Policy 7.12** – This policy should be changed. Local policies do not have to be consistent with State and Federal Policies. While we agree that the City should coordinate with state and federal regulators, the city should also be free to develop its own policies and priorities.
  - n) **Policy 7.14 and 7.16:** We would suggest "with an emphasis on underserved and underrepresented communities most vulnerable to health impacts." The reason to prioritize these communities is because they lag behind in many human health indicators so this policy should be more specific in this respect.
  - o) **Policy 7.24.** "Limit and remove impervious surfaces to reduce impacts on hydrological function air and water quality, habitat connectivity, and tree canopy.
  - p) **Policy 7.22** - "Require and encourage low impact development, habitat-friendly development, bird-friendly design, and green infrastructure into all new and existing development including but not limited to City-owned, managed, and funded facilities.
  - q) **Policy 7.23** - Access to Nature. This policy is focused on access to nature in the macro-landscape and in balancing access and conservation in protected natural areas. In reference to the environmental equity goal, it should also address equitable neighborhood access to nature where people access "nature in their daily lives" there by promoting the interstitial green; we need anyway for biodiversity and air and water quality. I would add the following bullets:

- i) Prioritize park investments to toward the goal of ensuring 100% Portlanders are within 1/4 mile of a public park or natural area.
- ii) Prioritize green infrastructure investments in neighborhoods with poor access to parks, nature and with limited tree canopy.
- iii) Consider increasing housing densities near to active recreation parks to increase the percentage of Portlanders living within ¼ of a mile of a park.
- r) **Policy 7.32 - Re-write this policy to be both more explicit and broader: "Integrate stormwater management and planning: Develop programs, regulations, and design standards to more fully integrate stormwater management and transportation planning and infrastructure in order to improve water quality, safety, access to nature and overall neighborhood livability. Prioritize improvements for unimproved or substandard rights-of-way, accident-prone locations, and neighborhoods with less access to nature or active transportation."**

### 3) **Economic Development (Chapter 6)**

In contrast to the weakening of the Watershed Chapter, the Economic Development Chapter appears to have been put on steroids relative to the 2013 draft, especially with regards to industrial lands. For example the Industrial Districts Section has ballooned from half a page to three pages. More importantly, the draft includes numerous new and modified policies that undermine the ability of the city to protect natural resources on industrial sites, which require that the city find new industrial lands regardless of impact on other city goals, and which weaken the city's commitment to focusing development in already built areas before impacting natural resource areas. Again, in contrast with the severe streamlining of the policies in the Watershed Chapter, the policies in the industrial lands section are often repeated several times over. We believe that the Land Development and Industrial Employment District Sections will significantly reduce the city's ability protect and restore natural resources along the Willamette and Columbia River and Columbia Slough below what is possible under the existing Comprehensive Plan. It appears that the City has simply acquiesced to industrial interests who have long advocated for minimal environmental protection on industrial lands. If the city adopts these sections as written, it will ensure that our already degraded waterways will continue to degrade in the coming decades.

There is absolutely no evidence that environmental regulations cost industrial jobs, especially given the non-existent link between industrial land supply and recent industrial job growth in Portland. The City's most recent "Economic Opportunities Analysis" documents the widely recognized trend that "Industrial employment has been dropping at the same time the city is experiencing increases in industrial land development." The study provided no analysis to indicate environment regulations hurt job growth, only a comment in focus group. The argument that environmental regulations hurt job growth or even significantly impact land supply comes directly from industry lobbyists not from any credible evidence or analysis." Meanwhile there continues to be evidence and analysis that environmental quality- especially in our region- attracts a skilled and educated workforce and increases work productivity.

The following are a sample of out specific concerns:

- a. **Brownfield Redevelopment:** The City has reduced the brownfield redevelopment target from the 80% goal which was discussed throughout the PEG process and which was include in the 2013

draft to 60%. This will increase pressure to develop greenfield sites and decrease pressure to clean-up contaminated sites. The City should restore the more ambitious 80% target.

- b. **Policies that require the City to maintain a supply of industrial land without any consideration of how this might impact other city goals:** The Land Development and Industrial and Employment Sections are now replete with redundant policies that require the city to find an ongoing supply or new industrial land regardless of conflicts with other city goals. This includes policies 6.12, 6.15, 6.18, 6.36.d, 6.47. It is important to note that the action verb used in these sections (“provide”) is not discretionary. Given the fact that the city is already converting openspace and natural areas to find new industrial land, these policies can only result in additional losses for the environment.
- c. **Policies which appear to restrict the City’s ability to require natural resource protection or restoration on industrial lands:** Several policies appear to limit or prohibit the city from instituting new protections for natural resources on industrial lands. These include 6.35, 6.36.b, and 6.37. The draft ignores the fact that our industrial lands often overlap with some of our most high value natural resource areas. These policies should be rewritten to ensure that it is clear that the city can implement and update environmental policies on industrial lands.
- d. **Emphasis on incentives to achieve industrial land objectives:** Throughout the industrial land sections, many of the policies now explicitly rely upon an incentive based strategy. While incentives are fine, they are not the only way to achieve city objectives. Policies should clearly allow for a range of mechanisms including regulation to achieve its objectives.
- e. **Policy 6.17 Regulatory Climate:** This policy appears to severely limit the city’s ability to put new regulations on industrial lands by requiring that the city prioritize economic development over all other goals (6.17), requiring that the city’s regulations be competitive with other cities (a “middle of the pack” mentality rather than maintaining Portland as an environmental leader) (6.17a), and potentially eliminating city jurisdiction over areas where the state or federal government have regulatory programs (6.17e) even though the City has long recognized the importance of local regulatory authority over our urban natural resources.
- f. **Policy 6.36 Prime Industrial Land Retention:** This policy appears to prevent the city from updating environmental or community protections on industrial lands if those protections in anyway diminish the capacity of those industrial lands. Policy 6.36b explicitly limits conversion of industrial lands through land use plans, regulations, or non-industrial uses. This policy appears to completely ignore the need to also protect health of the community and the environment. Policy 6.36c requires the city to minimize the impacts of regulations on industrial lands without consideration of any other goals. Policy 6.36d requires the city to strive to offset any loss of industrial land with replacement lands---given the existing deficit, this policy could effectively prevent any new regulations on along the river that protect natural resources. Taken together, these policies appear to us to make it practically impossible to establish new natural programs on these lands and negate the responsibility of industrial landowners to protect and restore the natural environment.

Taken together, these policies appear to move us into an era in which other public values such as protection of natural resources, protection of human health, Goal 15 objectives, etc. appear to have been abandoned on industrial lands. This is inconsistent with our land use planning system, community values, the city’s past

planning practices, and Policy 10.2b in the draft comp plan. It places the interests of industrial developers above all other city goals.

4) Green Infrastructure needs to be more robust in the urban design, housing and transportation chapters:

In order to achieve the city's watershed health objectives, it is critical that all elements of the plan explicitly adopt green infrastructure policies. We would urge the city to make the design with nature/ green infrastructure policies in the housing, transportation and urban design sections much more robust and explicit. For example in the transportation chapter, the design with nature policy (9.16) simply states that the city should "promote street alignments and designs that respond to topography and natural features and, when feasible" protect, streams, habitat and native trees." This says virtually nothing other than avoid harming natural resources when possible. Each of these sections should contain strong proactive policies requiring the city to actively incorporate green infrastructure into their projects. The City's Watershed Management Plan calls for the city to consider green infrastructure opportunities on all public projects and this should be written large throughout the Comp Plan.

5) We support the proposal to reduce residential density in specific areas with natural hazards and drainage constraints, and where the current Comp Plan and zoning designations would allow significant additional residential development.

The intent of the proposed "down-designations" is to reduce future risks to public health and safety by reducing future development potential and associated cumulative impacts in these areas. This part of the Comp Plan proposal is notable, and represents the integral "flip-side" of the proposal focus most of the new development in urban centers and along corridors. These proposed down-designation areas are generally characterized by steep slopes with poorly draining soils, and limited stormwater pipes so runoff from new development, roads, etc. must be routed to local streams. These areas have a mix of landslide, wildfire, and earthquake hazards, and can be difficult to access or evacuate during emergencies. We view this as a common sense proposal to protect natural resources and public safety.

Thank you for your consideration of these comments.



Bob Sallinger  
Conservation Director  
Audubon Society of Portland

Portland Planning and Sustainability Commission Public Hearing

27 ✓

Date: 10/14/19  
 Name: Bob Sallinger (Please print legibly)  
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 What agenda item do you wish to comment on? Camp Plan  
 Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing

28 ✓

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 What agenda item do you wish to comment on? \_\_\_\_\_  
 Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing

✓  
WLF

Date: 11/4/14

Name: Raihana Ansary (Please print legibly)

Authorized Spokesperson representing: Portland Business Alliance (if applicable)

Address: 200 SW Market

City: Portland, OR Zip: 97202 Phone: (503) 552-6768

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What agenda item do you wish to comment on? TSP/Comp Plan

Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing

WLF

Date: \_\_\_\_\_

Name: Micah Moskel Hoskel (Please print legibly)

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Address: 4927 NE Rodney

City: Port OR Zip: 97211 Phone: \_\_\_\_\_

Email Address and/or Fax No.: \_\_\_\_\_

What agenda item do you wish to comment on? \_\_\_\_\_

Site Address, if different from above: \_\_\_\_\_



**PORTLAND**  
**BUSINESS ALLIANCE**  
*Commerce • Community • Prosperity*

November 4, 2014

Planning and Sustainability Commission  
1900 SW Fourth Avenue, Suite 7100  
Portland, Oregon 97201

Dear Chair Baugh and Commission Members:

The Portland Business Alliance appreciates the opportunity to comment on the city of Portland Transportation System Plan (TSP) and the proposed Comprehensive Plan. The Alliance is committed to improving the region's multi-modal transportation infrastructure, advocating for strong transportation policies and projects that encourage job growth and prosperity. The Alliance has a history of supporting all modes, including freight, auto, bicycle, and transit because each plays an important role in a well functioning transportation system.

We understand that as our population grows the capacity of our city's transportation system will be tested. There will be increased demand for all transportation options including bike/ped, transit, freight and auto. We need to be strategic when crafting transportation policies and investing in projects to ensure a balanced multi-modal system that seeks to accommodate all system users. Projects and policies must be evaluated holistically and trade-offs considered when making investment decisions among a variety of modes.

The proposed criteria to identify Transportation System Plan (TSP) projects do not appear to promote that type of evaluation and instead are unduly biased toward bike/ped and transit. For example, in two of the nine criteria (neighborhood access and health), auto- and freight-oriented projects are not eligible for any points. The transportation system is just that, a system, but the proposed criteria fail to adequately and objectively consider all modes. Furthermore, criteria should be added related to improving the economy, managing congestion and traffic flows, evaluating the number of people benefitted or impacted by a project, and minimizing projects that reduce capacity of the existing system. In the current draft, these issues are not addressed.

It is our understanding that the TSP selection criteria for freight-related projects are to be considered separately under similar but different selection criteria that are yet to be developed. Without the ability to evaluate both sets of criteria simultaneously, it is unclear whether that approach impedes the ability to develop a balanced multi-modal system. Decisions to invest in one mode may undermine another mode, so the criteria should be developed together. There is a significant amount of economic activity and goods movement that occur on all city streets; it is not sufficient to focus only on freight-designated streets and freight-specific projects when determining the impact of transportation projects on goods movement and the economy.

The strong preference for active transportation is also evident in the goals and policies of the proposed Comprehensive Plan, as evidenced by the "green hierarchy." The Alliance supports a multi-modal transportation system, but is concerned about how such a green hierarchy may be

*Greater Portland's Chamber of Commerce*

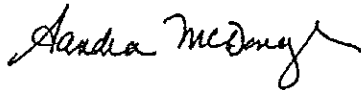
200 SW Market Street, Ste. 150 | Portland, OR 97201 | 503-224-8684 | FAX 503-323-9186 | [www.portlandalliance.com](http://www.portlandalliance.com)



applied. While the policy related to the hierarchy states that "all users' needs are balanced," explicitly prioritizing certain modes over others does not allow all users' needs to be balanced, particularly for the vast majority of Portlanders who use automobiles. This concern is exacerbated by policies that seek to "expand the use of streets beyond their transportation function." As noted, the capacity of the existing system will be tested; reducing the capacity of the system for non-transportation purposes is short sighted given the growth the city is forecasting. At a minimum, current lane capacity should not be compromised as we anticipate growth over the next 20 years.

Thank you for your consideration of these comments. We look forward to working together to refine TSP selection criteria and project lists and comprehensive plan goals and policies.

Sincerely,



Sandra McDonough  
President & CEO

cc: Mayor Charlie Hales  
Commissioner Steve Novick  
Leah Treat, Portland Bureau of Transportation  
Susan Anderson, Bureau of Planning and Sustainability

Submitted by Julie Linschme  
Port of Portland

# Comprehensive Plan Considerations for Development in the Portland Harbor

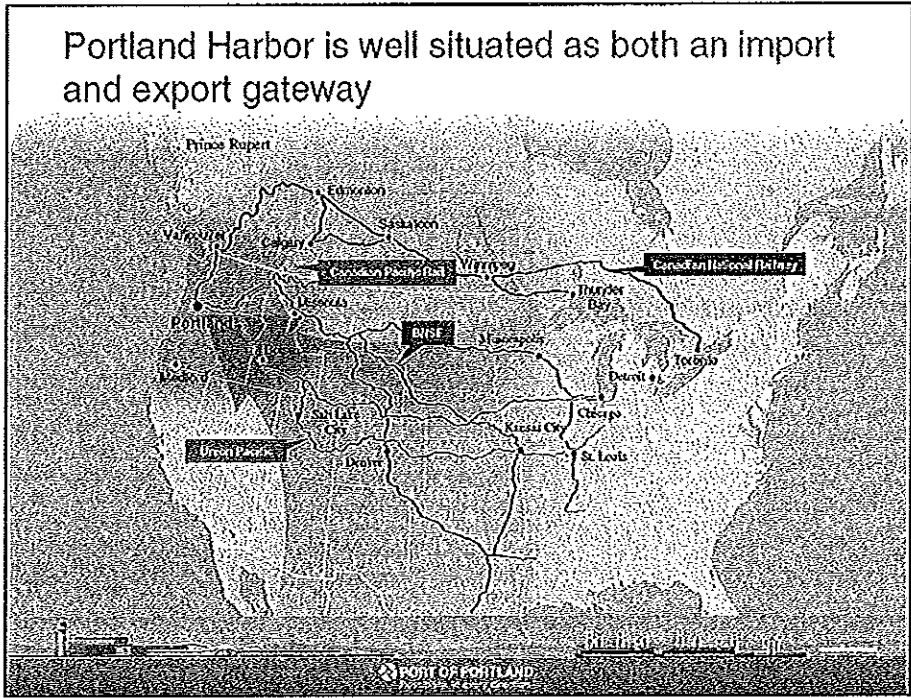
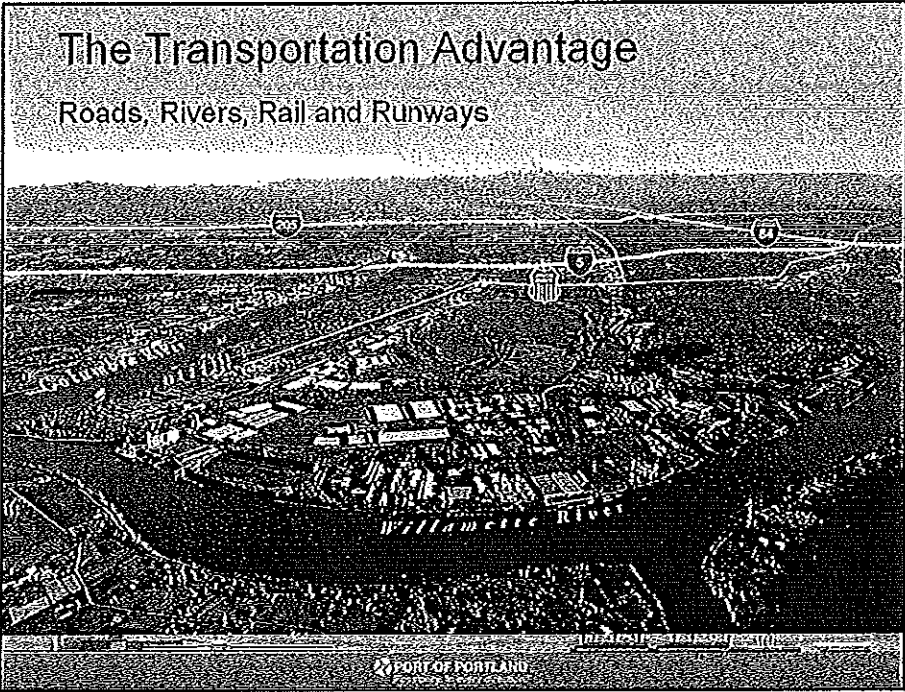
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Portland Planning and Sustainability Commission  
October 28, 2014

Portland's Working  
Waterfront

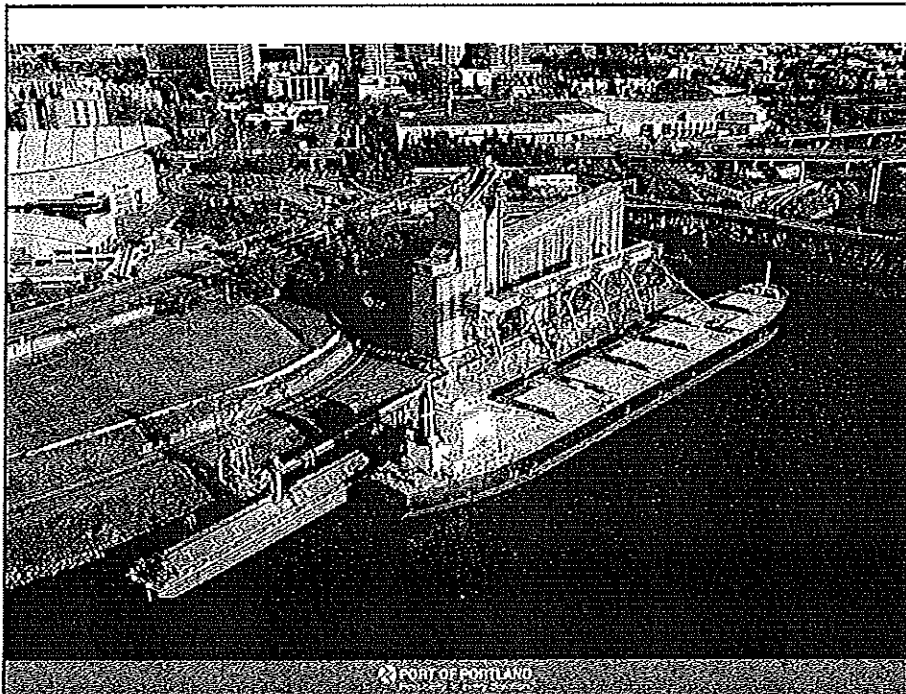
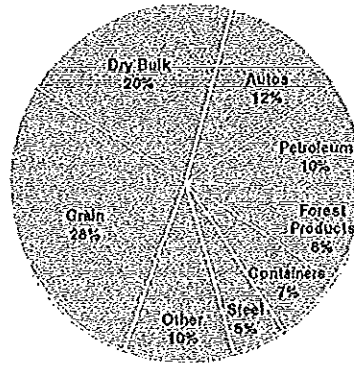


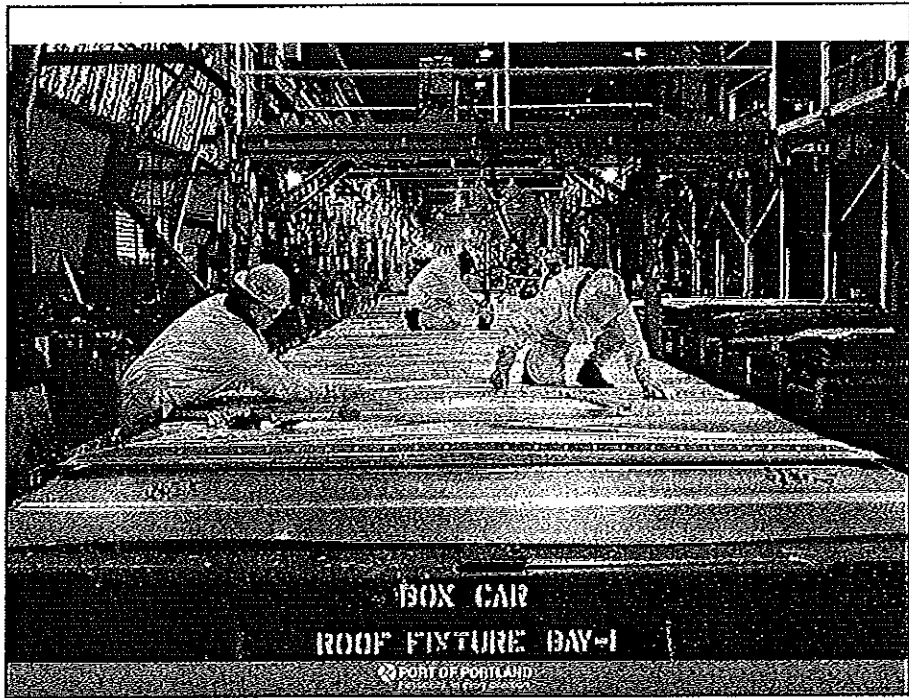
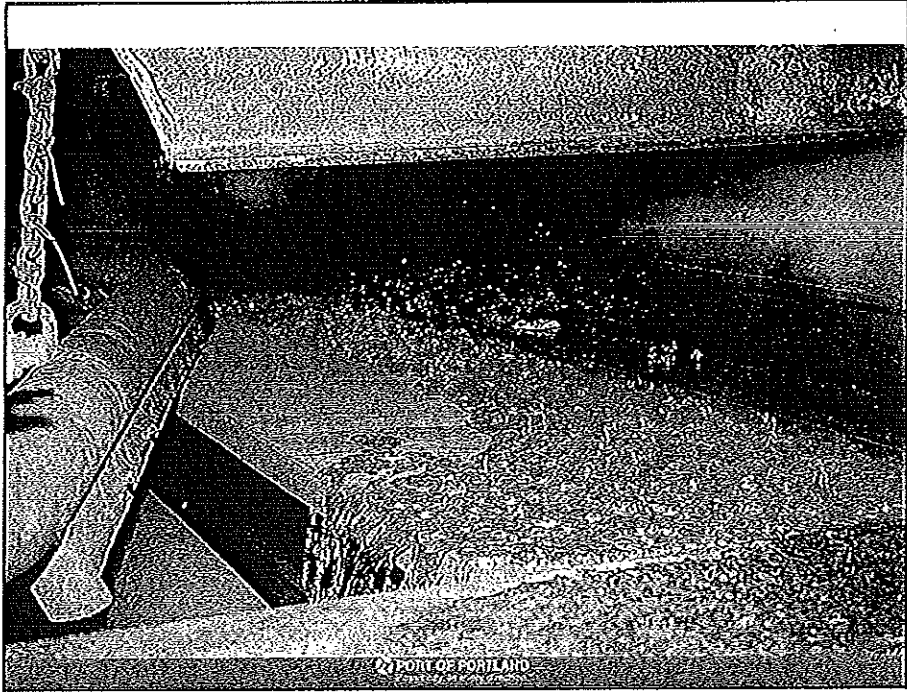
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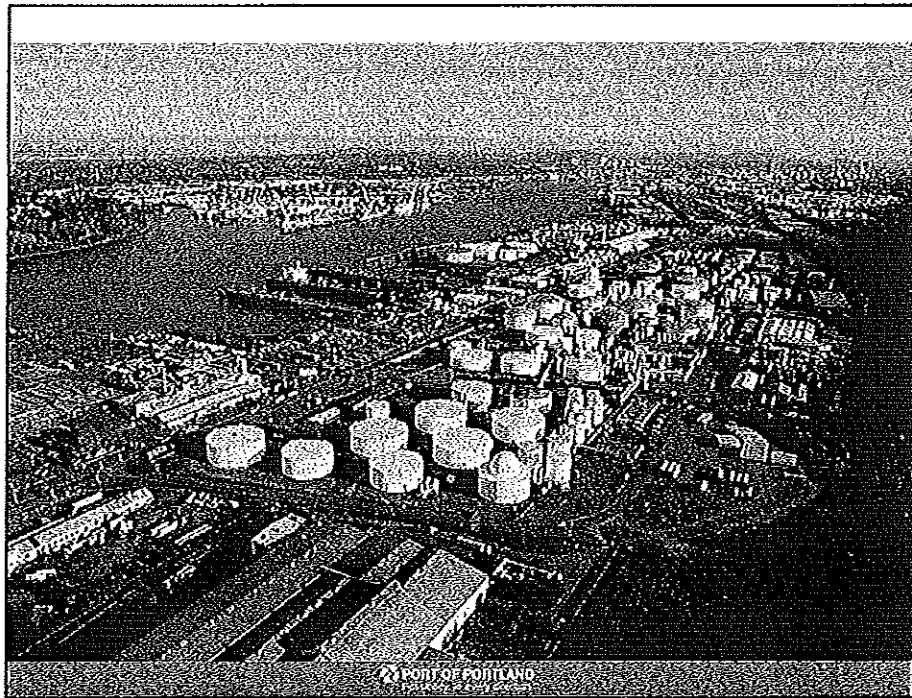
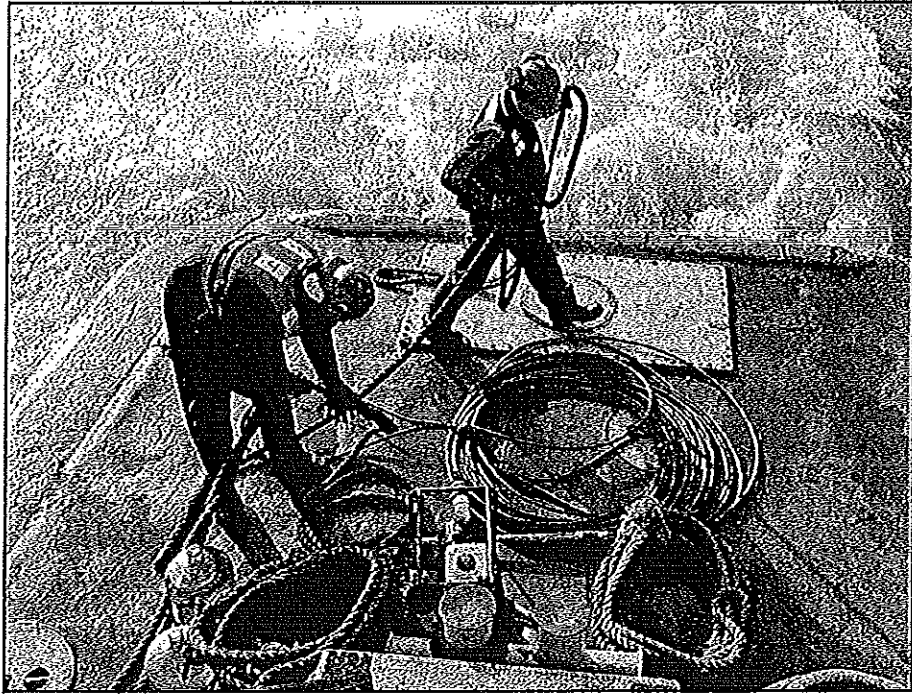


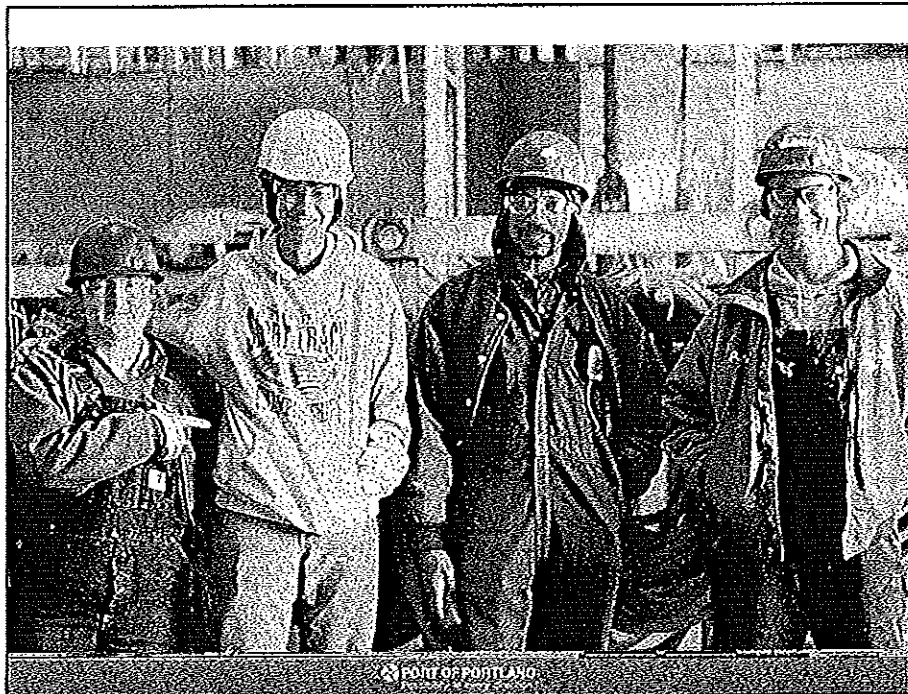
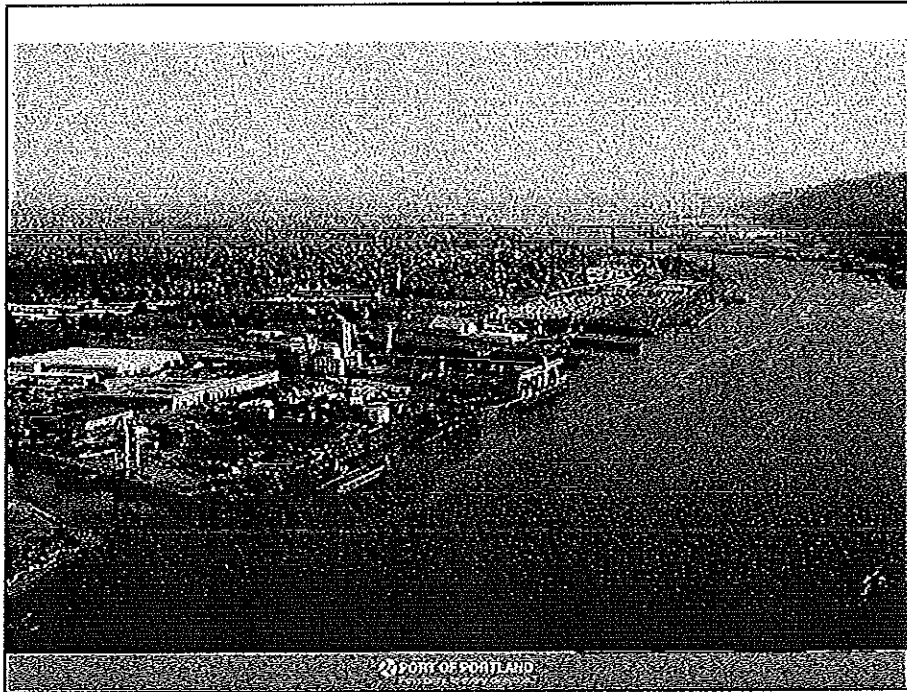
## The numbers: Columbia River Traffic CY 13

- Over 1,500 ocean cargo vessels travel up the Columbia River every year
- River system continues to support diversified cargo base
- Total traffic:
  - 38 million tons (Columbia River)
  - 27 million tons (Portland Harbor)
  - 12.4 million tons (Port of Portland)

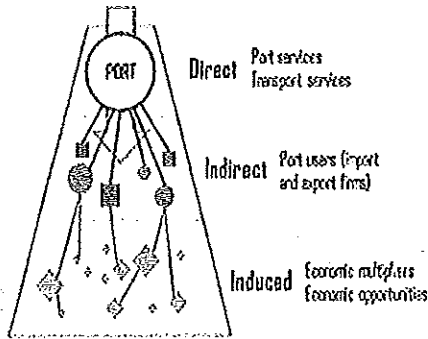








## Portland Harbor as Funnel for Economic Development



## Portland Harbor Economic Impact

- 18,080 jobs created (direct, indirect, induced)
- \$1.46 billion in personal income and consumption expenditures (direct, indirect, induced) annually
- \$1.5 billion in business revenues annually
- \$430 million in local purchases by businesses annually
- \$140 million in state and local taxes annually

Source: Economic Impact of the Port of Portland, 2011, MarIn Associates.

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## Maritime Capital Investment Tax Impact Analysis

- Assume moderate investment of \$100M
  - Expansion of existing facility or development of a new facility
  - Construction will take two years to complete
  - Moderate job creation
- Capital investments benefit property taxes
- Non-property tax benefits include:
  - State of Oregon Income and Corporate Excise Taxes
  - Multnomah County Business Income Tax
  - City of Portland Business License Tax
  - Tri-Met Payroll Tax

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## 10-Year Tax Revenues by Jurisdiction

Jurisdiction	Tax Revenues (\$10,000,000)
State of Oregon - Corporate Excise, Personal Income Tax	\$5,874
City of Portland - Business License, Property Tax	6,514
Portland Public School District - Property Tax	5,474
Multnomah County - Business Income, Property Tax	3,915
Urban Renewal - Property Tax	1,921
Tri-Met - Payroll Tax	647
Portland Community College - Property Tax	482
Metro - Property Tax	310
Multnomah County ESD - Property Tax	301
East/West Soil/Water - Property Tax	68
Port of Portland - Property Tax	47
<b>Total</b>	<b>\$24,554</b>

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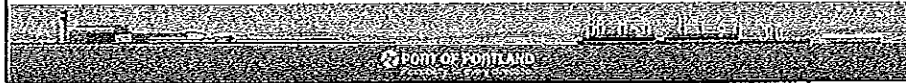
## Annual Tax Revenues Impact in Budget Terms

Annual Tax Revenue Collection (General Fund)	Equivalent
City of Portland (\$650,000)	6 Police Officers or Firefighters (salary and benefits)
Multnomah County (\$450,000)	4.5 Deputy Sheriffs (salary and benefits)
Portland Public Schools (\$600,000)	6 Teachers (salary and benefits)
State of Oregon (\$322,000)	2/3 of Oregon Parks & Recreation Department General Fund budget allocation (2013-15 biennium)
Tri-Met (\$34,000)	1 part-time operator (salary only)

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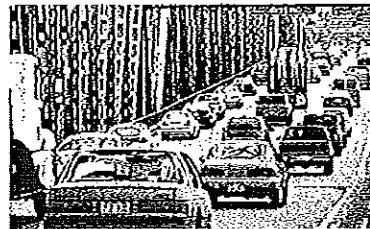
## Opportunities

- Growth of maritime revenues generates taxes-enabling investment in state and local priorities
- Revenue spent from harbor business on materials, capital goods and services largely flows to local small/medium businesses
- Harbor jobs are middle income and offer substantially higher wage than the region average

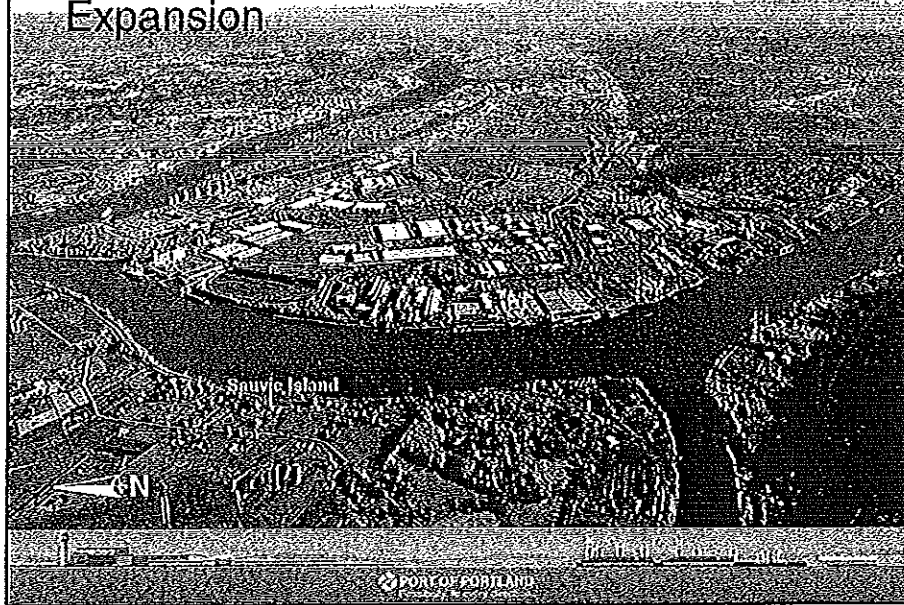


## Challenges: Adequate Transportation Infrastructure

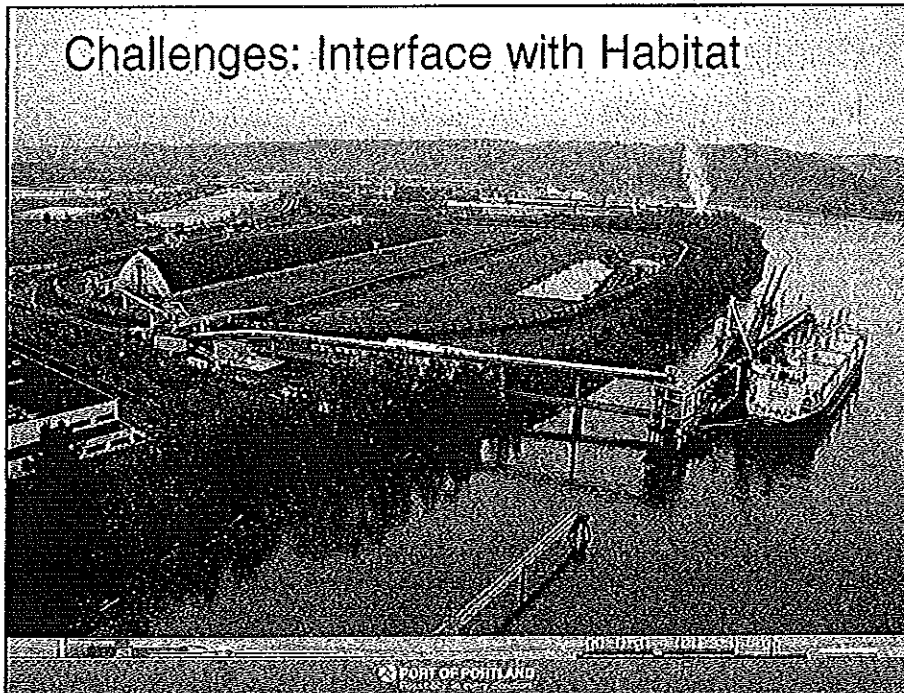
- River Navigation
- Rail Improvements- grade separations
- Roads



## Challenges: Land Availability and Cost of Expansion



## Challenges: Interface with Habitat



# Challenges: Superfund



Portland Planning and Sustainability Commission Public Hearing

02  
70

Date: 10/29/14

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City: Portland Zip: 97030 Phone: \_\_\_\_\_

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What agenda item do you wish to comment on? Comp Plan

Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing

02  
29

Date: 10-28-14

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What agenda item do you wish to comment on? \_\_\_\_\_

Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing

Date: 10-14-14  
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 Authorized Spokesperson representing: MUSA (if applicable)  
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 City: PORTLAND Zip: 97213 Phone: 503 284-8742  
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 What agenda item do you wish to comment on? COMA PLAN  
 Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing

Date: October 14  
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 Authorized Spokesperson representing: AvMbr  
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 City: Portland Zip: 97210 Phone: (03380) 9721  
 Email Address and/or Fax No.: bsalinger  
 What agenda item do you wish to comment on? Comp Plan  
 Site Address, if different from above: \_\_\_\_\_

Using July 2014 Proposed Draft of the 2035 Comprehensive Plan as basis for page numbers and comments.

Ref Pg #	Key Word		
I 28	Responsibility	add #4 in top section	<b><i>Decide what needs to be done and which bureaus or bureaus will be responsible for accomplishing the work.</i></b>
I 31	Fire Risk	Under Develop green infrastructure	<b><i>4. Add adding green infrastructure increases fire risk as the fuel load in the natural areas increases.</i></b>
	Fire Risk	Invest to control risks	<b><i>develop emergency escape routes for cul-de-sacs and other at risk areas</i></b>
	Fire Risk	Invest to control risks	<b><i>Manage fuel loads in natural areas to reduce wildfire risk</i></b>
I 33	Fire Risk	Land use policies....	<b><i>Develop emergency escape route for all existing infrastructure</i></b>
I 37	Trails	Western Neighborhoods	<b><i>and an extensive trail "transportation " system</i></b>
A 7	Fire Risk	under first section	<b><i>add "Everyone has access to emergency escape routes in the event of wild fire "</i></b>
		under Resilience	<b><i>add "connections, the SW Urban Trail System " and parks ...</i></b>
GP1-5	Equity	Equity	<b><i>under-represented populations "throughout the city"</i></b>
	Cooperation	New Category	<b><i>Cooperation among bureaus goals.</i></b>
			<b><i>Develop reward systems to discourage silo thinning and actions.</i></b>
GP1-7	Cooperation	New Policy	<b><i>Interbureau Cooperation "Ensure that the city bureaus work together and cooperate to assure city wide goals are considered in bureau decision making and operations"</i></b>
GP1-8	Policy 1.8 -3	Trails	<b><i>Street ", greenway and trails" polic(ies) and design(s) ...</i></b>
	Policy 1.10	Community Involvement Committee	<b><i>add "Establish area committees to inform the PSC of issue and possible solutions."</i></b>
GP1-9	Policy 1.16	New Policy	<b><i>add "Policy 1.16 Existing Plans All existing plans listed in Appendix xx shall be considered a part of the Comprehensive Plan and have equal standing in all manner.</i></b>
GP2-1	Equity	3rd bullet	<b><i>add "under represented communities "throughout the city" to achieve greater equity</i></b>
GP2-5	Partners	2.1.c.	<b><i>Neighborhood and business associations "and other local organizations " as local experts and channels ....</i></b>

GP2-6	Community	Community Assessment	at end of first paragraph <i>"All community members must be given clear feedback on their comments and suggestions"</i>
GP2-9	Policy 2.21	Historical Understanding	<i>"Review preliminary historical findings with members of the community who have institutional knowledge and historic knowledge.</i>
	Policy 2.25	Outreach	students, <i>"commuters, transit riders, bicyclists, walkers, those with mobility devices,"</i> among others ...
	Policy 2.26	Outreach	<i>Schedule outreach events at a time and place appropriate for the affected audience.</i>
			language, <i>"access to transit"</i> and ....
GP2-10	Policy 2.34	New Policy	<i>"Provide all affected communities with clear information in their language on location, time and transit access to each scheduled meeting"</i>
GP3-1	Why Important	Trails	<i>design of buildings, streets "trails, connections" and other public...</i>
GP3-6	Goal 3.B:	Wild Fire	green infrastructure <i>"active management of forest fuel loads,"</i> and active transportation system...
	Goal 3.E:	Trails	<i>City Greenways, "Urban Trails and connections" and others ...</i>
	Goal 3:H	Wild Fire	<i>Address fire safety, especially green space fuel loads to respond to increased fire risks due to global warming.</i>
GP3-11	Policy 3.29	disabilities	Provide parks <i>"and"</i> or public squares <i>"usable by all ages and abilities"</i> within
GP3-13	Policy 3.42	Underground Utilities	<i>Policy 3.42 "Develop a strategies and a means to encourage the undergrounding utilities in all parts of the city, with emphasis on but not limited to centers and corridors."</i>
			(notes on benefits <i>reduced periods of lost power and communications, permits larger street trees adding to urban canopy, reducing threat of global warming)</i>
GP3-15	City Greenways	Underground Utilities	<i>add "Utilities will be put underground" and add "</i>
		Urban Trails	<i>1. rewrite to "Urban Trails are greenways on distinctive green streets with extensive tree canopy, underground utilities and landscaped stormwater facilities that provide transportation linkage between major centers, employment centers, schools parks natural areas and the rivers.</i>
		Urban Trails	<i>Urban Trails are continuous transportation links, are mapped, and have wayfinding signage.</i>



	City Gr.. 2.	Trail Connections	<i>rivers", through natural areas, or where key marked connections to provide continuous and convenient pedestrian and bicycle transportation linkage."</i>
GP3-16	City Gr.. 4.	Trail Connections	<i>network of streets "and non street transportation connections" with low ....</i>
	Policy 3.50		<i>destinations "Greenways may accomodae bicycles and pedestrians, just perdestrians or just bicycles."</i>
	Policy 3.51		<i>rewrite to: Create an integrated transportation system of city greenways that link activity</i>
	Policy 3.52		<i>Delete, covered in 3.51</i>
	Policy 3.53		<i>rewrite to: Provide green infrastructure throughout the City of Portland through the creative design of the City Greenways combining stormwater management, traffic calming and homeowner landscaping along the routes.</i>
	Urban Habitat Co	Wildfire	<i>reducing the risks from "wildfire, "landslides ....</i>
		Wildfire	<i>Tryon Creek State Park, "Forest Park" the west Hills .....</i>
GP3-17		Wildfire	<i>top of page: and infrastructure, "designed in a manner to minimize the danger of wildfire"</i>
GP3-18	Employment Areas		<i>Comment: Neighborhood Commercial- First, it is not clear what you are talking about, but I suspect it would include Town Centers. I think your view of this area is way too limited. If located near good transit, I wold expect 4-5 story office buildings to be possible.</i>
GP3-22	Policy 3.80	Greenway	<i>Comment: Keep the references to greenways rather than say the same thing using different words. Rewrite to: Designate a city greenway network utilizing the existing street and other rights of ways and easements to connect the Central City via an extensive active transportation system</i>
GP3-23	Policy 3.83	Wildfire	<i>and buttes "managed to minimize the threat of wildfire".</i>
GP3-24	Policy 3.88	Trails	<i>Comment: Keep the references to greenways rather than say the same thing using different words. Rewrite to: Designate a city greenway network utilizing the existing street and other rights of ways and easements to connect the neighborhoods and activity centers via an extensive active transportation system</i>
	Polilcy 3.89	Wildfire	<i>tree canopy "managed to minimize the threat of wildfire".</i>

	Policy 3.90	Trails	<i>distinctive "SW Urban Trails System by classifying it as Neighborhood Greenways and further enhance the connectivity of activity centers, parks schools, access to transit." to expand mobility, access to nature, and active living possibilities.</i>
GkP3-28	Figure 3-4	Transit Stations	<i>Hillsdale should be shown as a potential transit station just like those along Barbur.</i>
GP3-29	Figure 3-5	Greenways	<i>The map of SW Portland does not have the SW Urban Trails System shown as City Greenways as it should, and the City Greenways from the 2030 Bicycle Master Plan are not shown.</i>
GP4-6	Policy 4.10	Wildfire	<i>safety, with special attention paid to the risk of wildfire".</i>
GP4-7	Policy 4.18	Transition	<i>Comment: I think you should consider transition on building heights from high dense to sign family residential.</i>
GP4-8	Policy 4.21	Wildfire	<i>corridors, "Designed and managed to minimize the risk of wildfire."</i>
GP4-9	Policy 4.28 H	Wildfire	<i>add "Wildfire Danger. Manage the fuel loads in natural areas adjacent to structures to minimize the threat of wildfire"</i>
GP4-11	Policy 4.44	Schools	structures, such as "schools," meeting halls
GP4-12	Policy 4.51	Wildfire	<i>add "Materials should be fire resistant in areas deemed at risk of wildfire"</i>
	Policy 4.53		<i>benefits "and risks" from solar...</i>
GP4-13	Designing w/ Nature		<i>while improving environmental health, minimizing wildfire danger"and preparing for the effects of climate change.</i>
	Policy 4.59	Wildfire	<i>sensitive areas " and those of extreme wildfire danger."</i>
GP4-14	Policy 4.65	Grocery Stores	<i>Facilitate the "retention and" development....</i>
	Policy 4.66	N Food Access	<i>food co-ops "farmers markets", food buying....</i>
	Policy 4.68	Community Gardens	<i>add "Allow Community Gardens in all zones if the land is suitable for being used for a community garden".</i>
GP5-5	Goal 5.c:	Healthy connected city	transportation " <i>and an excellent active transportatin network."</i>
	Goal 5.F:	Home Based Business	<i>Portland residents may utilize their homes for hame based businesses.</i>
GP5-8	Policy 5.18	Home Based Business	<i>Encourage a range of housing options and supportive environments and utilities to enable citizens to establish and run home based businesses.</i>
	Policy 5.19	Access to Opportunities	remove the word "High" leaving with concentrations of underserved .... All parts of the city with underserved should be served, not just those reas of high concentrations.

GP5-10	Policy 5.36	Variety in homeownership	<i>add "Support home offices or business in all categories".</i>
GP5-12	Policy 5.46	Wildfire	<i>Encourage site design to minimize the threat of wildfire.</i>
GP6-11	Equitable household prosperity		<i>improve job growth "through out Portland " and coordinate (comment there are pockets of poverty throughout the city, not just east portland. All should be helped)</i>
GP6-15	Policy 6.28 Policy 5.51 Policy 6.53	Job Growth S/B 6.51	<i>rewrite: "Portland Job Growth. Improve opportunities for all communities with pockets of poverty to grow as a business destination and source of living wage jobs.</i>
	Policy 6.59 NH Bus Districts	new policy new policy	<i>Small home based businesses: Encourage small home based businesses</i>
GP7-1	added item	Wildfire	<i>Community Connectivity: Assure 24/7 active transportation connectivity through every campus.</i>
GP7-10	Policy 7.19 h.	Wildfire	<i>Served by resonable cost high speet communications</i>
GP7-14	Policy 7.49	Wildfire	<i>add to bullet 5, "Recognize the inherent wildfire risk this fuel load presents and take measures to mitigae it.</i>
GP8-7	Goal 8.H:	Wildfire	<i>"Manage the urban forest to minimize the wildfire risk"</i>
GP8-9	Policy 8.2	Greenways	<i>Forest Park: Enhance Forest Park as an anchor habitat and recreational resource. "Take steps to protect it from wildfire"</i>
GP8-10	Policy 8.4	Schools Trails	<i>urban habitats, "mimimize the danger of wildfire" and offer....</i>
GP8-14	Policy 8.34	Greenways	<i>Public rights-of-way, including streets, "Greenways" and public trails.</i>
GP8-15	Polilcy 8.41 Polilcy 8.42 Policy 8.43	Coordination undergrounding Right-of-way vacations	<i>9th bullet: ...public education, "pedestrian and bicycle connections" and recreation.....</i>  <i>...street classification "or such overlay as might apply" SWTrails strongly believes an overlay showing the city greenways including the SW Urban Trail system is needed to properly protect the trails from abuse <b>duing development and other activities.</b></i>  <i>Coordinate the "creation, design....</i> <i>"Develop a means to" encourage ...in centers and along corridors "Neighborhood Greenways and any other group that seeks to do s o".</i>  <i>replace first bullet with new first bullet "Vacate rights of way only when there is a documented clearly understood compelling public benefit.</i>
			<i>New last bullet "Maintain the publics right to use all rights of way" Currently staff seems to view the adjacents property owners rights as superior to the publics right to use the right of way.</i>

GP8-18	Policy 8.67	Fire	<i>add "including residences located near sites in the path of possible wildfires".</i>
GP8-19	Policy 8.72	New Policy	<i>Earthquake Preparedness, Take steps to assure the city water supply is assured after an earthquake to the degree possible, provide report to the public on such steps.</i>
	Polichy 8.77	Move to another section	<i>This policy appears to split the transportation planning function for trails, especiall the SW Urban Trail network of 40 miles of trails mostly located on city streets. This is a very important active transportation function and the planning and implementation should all be located in one place. See attached separate note on this important issue.</i>
	CITY WIDE TRAILS MAP		<b>MOVE FIGURE 8-1 TO TRANSPORTATION SECTION</b>
GP8-20	Polilcy 8.82	Enterprize facilities	<i>add "within the city limits."</i>
GP8-21	Policy 8.88	Fire Facilities	<i>Add "Manage the fuel load on public and private property throughout the city of Portland to prevent wildfire"</i>
GP8-22	Policy 8.97	School Facilities	<i>technology, student "and community" needs over time</i>
	Policy 8.xxx	new policy	<i>Provide active transportation connectivity to and through school facilities.</i>
GP8-23	Policy 8.101		<i>...and maintain city operations. "Develop means to encourage the undergrounding of all such facilities."</i>
	Policy 8.103	Energy Efficienty	<i>...zoning, "transportatin systems, and other legislative ...</i>
	Policy 8.104	Coordination	<i>add "Develop a means to underground the wired network."</i>
	Chapter 9		<b>NO COMMENTS UNTIL MORE INFORMATION FROM TSP IS AVAILABLE</b>

Portland Planning and Sustainability Commission Public Hearing

Date: 10/14/14

Name: Cassie Cohen (Please print legibly)

Authorized Spokesperson representing: \_\_\_\_\_

Address: 3802 NE MLK BLVD

City: Portland Zip: 97212 Phone: 503-662-2590

Email Address and/or Fax No.: cassie@groundworkportland.org

What agenda item do you wish to comment on? \_\_\_\_\_

Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing

Date: \_\_\_\_\_

Name: Dow BAACK (Please print legibly)

Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)

Address: 495 SW BURLING AVE PC

City: PDX Zip: 97239 Phone: 246-2088

Email Address and/or Fax No.: BAACK@Q.COM

What agenda item do you wish to comment on? \_\_\_\_\_

Site Address, if different from above: \_\_\_\_\_

Planning and Sustainability Commission  
[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

1900 SW Fourth Ave  
Portland, Oregon 97201-5380

**Re: Request PSC Hearings Extension**

I would like to request that the Bureau of Planning and Sustainability (BPS) provide the definitions for the new mixed-use zoning designations and the new campus institutional zoning designation and either extend the hearings for the Comprehensive Plan or keep the hearings record open for at least 90 days following the release of these definitions. Without the definitions and the deadline extension, the citizens and Neighborhood Associations will not be able to evaluate the impact of the new zoning designations.

Please add this to the record.

Thank you,

*Barbara Kerr & Gary Clifford*  
*Barbara Kerr*  
1150 NE Faloma Rd.  
Portland, OR 97211

cc: Mayor Charlie Hales, [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)

Commissioner Amanda Fritz, [Amanda@portlandoregon.gov](mailto:Amanda@portlandoregon.gov)

Commissioner Nick Fish, [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov)

Commissioner Steve Novick, [novick@portlandoregon.gov](mailto:novick@portlandoregon.gov)

Commissioner Dan Saltzman, [dan@portlandoregon.gov](mailto:dan@portlandoregon.gov)

City Auditor La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)

Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)

Portland Planning and Sustainability Commission Public Hearing

11 ✓

Date: 9-23-14  
 Name: Dixie Johnston (Please print legibly)  
 Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)  
 Address: 0550 SW Palatine Hill Rd  
 City: PDX Zip: 97219 Phone: (503) 636-0959  
 Email Address and/or Fax No.: \_\_\_\_\_  
 What agenda item do you wish to comment on? Comp Plan  
 Site Address, if different from above: \_\_\_\_\_

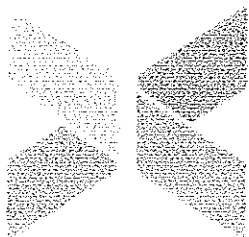
Portland Planning and Sustainability Commission Public Hearing

13 ✓

Date: 9-23-14  
 Name: ELLEN WAX (Please print legibly)  
 Authorized Spokesperson representing: WORKING WATERFRONT COALITION (if applicable)  
 Address: 200 SW MARKET ST. STE 190  
 City: PTLD Zip: 97201 Phone: 503-220-2064  
 Email Address and/or Fax No.: ELLEN.WAX@WORKINGWATERFRONT.ORG  
 What agenda item do you wish to comment on? COMP. PLAN  
 Site Address, if different from above: \_\_\_\_\_

# Economic Linkages from Marine Industrial Businesses

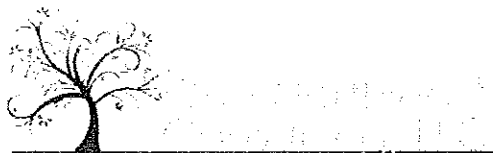
Prepared for:



**PORTLAND**  
**BUSINESS ALLIANCE**

*Commerce • Community • Prosperity*

**August, 2013**





## Executive Summary

The motivation for conducting this analysis is an interest in better understanding the relationships between large local businesses and the small to medium sized businesses who serve as vendors and suppliers to the larger industries, and to quantify this to the extent possible. Five marine industrial firms (firms located in the Portland Harbor area who rely on access to waterborne transportation modes) were interviewed regarding their spending on direct and indirect materials, services, and capital goods during 2011 and 2012. In order to secure complete information, the firms requested anonymity to protect their competitive interests. The data submitted for analysis by these firms was analyzed by these spend categories as well as by where the spending occurred: in the local area, regionally, nationally, or internationally.

Major areas of research interest included aggregate spend by category and geography, however interesting linkages were demonstrated between marine industrial firms and other enterprises in the Portland market through this research and analysis. For the two calendar years under examination, these five firms spent in excess of \$1.29 billion in procuring materials, capital/plant equipment, and services to produce and deliver their final goods and services to markets near and far. Aggregate spending increased by 5% year-over-year and became significantly more localized, from 49% of spending in 2011 falling within the combined local and regional areas, to 56% in 2012, an increase of over \$63 million with nearly all of that deriving from an increase in local spending (regional spending remained nearly constant).

The sampling represents roughly 10% of the approximately 20,000 direct jobs in the Portland Harbor area (Martin Associates, 2006), thus extending these outcomes as representative of the Harbor area on this basis, one might reasonably conclude that aggregate spending by such firms is on the order of \$6 billion to \$7 billion annually. The reader should also bear in mind that this analysis did not examine firm outlays for direct and indirect labor, taxes, debt service, and so forth -- this analysis is limited to examining firm to firm interaction in procurement markets.

Marine industrial firms sampled demonstrated rich, complex connections and economic linkages to a variety of local sectors. Spending occurred in a variety of local markets



as firms procured the services of planning and architecture firms, law firms, engineering firms, trades such as electricians, graphic arts/media production firms, suppliers of advanced manufacturing plant production equipment, transportation companies, suppliers of software and information technology, energy and utilities, and so forth. Many vendors/suppliers of these firms are common among the sample. It is evident that marine industrial firms engaged in a wide array of activities are intrinsically linked to the health of the local and regional economy.

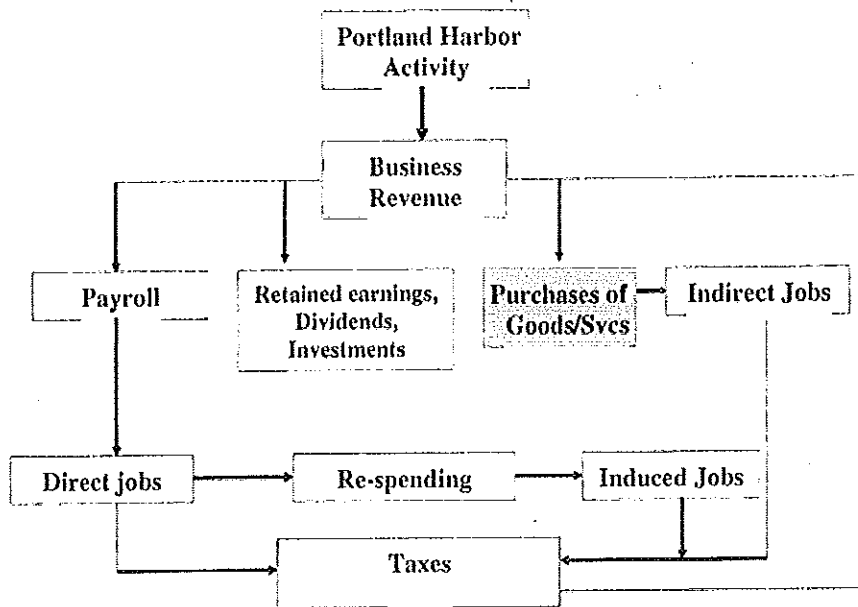
**Marine Industrial Businesses have a significant impact on local business**

Businesses in the Portland harbor earn revenue from the goods and services they sell. These firms then spend this revenue in a number of ways that can be grouped into just a few buckets (see figure below). The recent analysis for the Portland Business Alliance identifies the economic relationships between these businesses and other sectors of the local economy. The results show that those harbor firms surveyed are reliant upon a variety of local businesses for the goods and services they need every day to keep their businesses running.

The Portland Business Alliance Study looked solely at the purchases of goods and services to see how the revenue from harbor activity flows to other local employers. While much of this spending is local (42% in 2012) creating local jobs [indirect jobs in economic terms], some does leave the region.



## FLOW OF PORTLAND HARBOR BUSINESSES' REVENUE THROUGH THE LOCAL ECONOMY



- In 2012 the five firms surveyed spent \$660 million on goods and services, an amount nearly equal to the regional investment in Tri-Met's new orange line (half the total construction cost).
- Of this re-spending by these harbor businesses more than 40 percent of it (\$280 million, the equivalent of 3.5 Rose Festivals) is infused into the local economy.
- More than 80 percent of the re-spending by these harbor firms locally (\$230 million) is in the areas of raw materials and components, and professional services, maintenance, catering and other services.
- Other expenditures include machinery, spare parts, and construction materials.
- Common among the firms surveyed were nearly 300 local employers from whom they purchase goods and services (see Appendix 3 for a sample listing of those firms).

Examples of local employers from whom subject firms purchase goods or services:

- Catering/Food and Lodging: Elephant's Delicatessen, Oxford Inn & Suites
- Construction, Equipment, Maintenance, and Repair: Buckaroo Thermoseal, Christenson Electric, Milwaukie Crane & Equipment, Rodda Paint



- Manufacturing Inputs, Components, and Services: Albina Pipe Bending, Evraz, Swan Island Sandblasting, West Coast Metals,
- Supplies and Parts: Baxter Auto Parts, General Tool & Supply, Parr Lumber, Vancouver Bolt & Supply
- Technology/Communications: Centurylink, Integra Telecom
- Transportation Equipment, Services, and Repair: FedEx, Les Schwab, Oak Harbor Freight Lines, Oregon Tractor, Redmond Heavy Hauling
- Miscellaneous: Elmer's Flag and Banner, Legacy Laboratory Services, Portland Community College

### Introduction

In March, 2012, Martin Associates (Lancaster, PA) prepared a report for the Port of Portland entitled, "The Local and Regional Economic Impacts of the Port of Portland, 2011." That report summarized three separate studies, including:

- The Economic Impacts of the Portland Harbor
- The Economic Impacts of the Real Estate Tenants of the Port's Business and Industrial Parks
- Economic Impacts of PDX and General Aviation Airports

As follow up work, Martin Associates produced a report in July, 2012 entitled, "The Local and Regional Economic Impacts of Portland Working Harbor, 2011." This latter report measured impacts related to industrial land use in the Portland Harbor such as employment (direct, induced, and indirect), personal income, direct business revenue, and tax revenue (state, county, and local).

The Portland Business Alliance retained One Northwest Consulting, LLC (ONWC) to recruit a sample cohort of firms in the Portland Harbor area engaged in marine industrial activity, generally defined as enterprises whose proximity to and connection with marine infrastructure for transportation purposes is "business critical". ONWC was tasked with conducting an analysis of annual procurement spend and performing analysis of the economic links between the sample cohort and local enterprise, including various small and mid-sized businesses



in common among the sampling distribution as vendors. Of interest was the categorization of procurement expenditures by type or purpose, and the geographic location of the associated vendors. Procurement expenditures were categorized into four major areas:

- Direct materials – defined as material inputs to final goods and services; this can be unprocessed raw steel, energy such as electricity and natural gas, power plants/engines and components such as pumps and motors, finished steel and metal alloy products, and propulsion and navigation equipment and related components
- Capital goods – defined as investment on plant, property, and equipment; examples include investments in IT systems (both hardware and software systems), production machinery such as plasma cutting tables and punches, buildings and structures, and mobile machinery for material handling such as forklifts and excavators
- Indirect materials – defined as items indirectly associated with final goods and services, such as supplies not tied to a single specific project or output; this includes fasteners and bolts, bulk paints and coatings, welding supplies, production machinery wear parts, valves and fittings, lumber and pallets used for packing and shipping, and some tools and related parts/components
- Services – which includes professional services, skilled trade services, repairs, and maintenance services; examples of services procured include architecture, planning, engineering, law, environmental consulting and testing, transportation, graphic arts, media production, public affairs/advertising, accounting and financial services, and skilled labor/trades

Procurement expenditure was also segmented geographically into one of four categories:

- Local – comprised of Clackamas, Multnomah, and Washington counties in Oregon, and Clark county in Washington
- Regional – comprised of the remaining areas of Oregon and Washington, excluding the aforementioned local area
- National – comprised of the United States and its territories, excluding Oregon and Washington
- International – comprised of all non-US spend



### Sample Recruitment and Description

Portland Business Alliance suggested a list of firms to participate in the study on the basis of location in Portland's industrial harbor area and related marine industrial land use, as well as likelihood of willingness to share proprietary business information for the purpose of the study effort. Firms expressed a willingness to participate and were generally supportive of this analysis, but willingness for direct attribution and identification as study participants varied significantly among firms, with strong tendency towards anonymity to protect individual company's competitiveness. The data are therefore reported in aggregate, illustrating general procurement tendencies and associated economic impacts across firms without singling out a single participant.

General descriptions of firm business activity include: heavy civil and marine construction; marine vessel repair and construction/manufacture; steel fabrication; metals processing; bulk material handling; general manufacturing; steel/metals products manufacturing; marine terminal operations. Cohort firms are located on large lot, industrial lands characterized as marine and rail transportation dependent, and also relying on freight truck/highway access.

### Data Collection, Processing, and Analysis

The five participant firms were asked to submit their expenditures on procurements (raw materials, utilities, work-in-process, finished goods purchases, professional services, skilled trade services, durables, non-durables, materials, supplies, capital goods, etc.) for calendar years 2011 and 2012. This approach excludes firm expenditure on direct and indirect labor, taxes, depreciation, amortization, and payments to shareholders such as dividends. This is important in examining firm to firm interaction, particularly in establishing the local linkages between firms associated with procurement activities.

In geographically segmenting the data, an issue in determining whether spend qualified as local versus a different category was encountered. Many firms purchase capital goods, services, materials and supplies from national and international firms, remitting payment to a non-local location such as a central accounts receivable processing



center associated with a particular vendor. However, many of these firms provide services to customers via a local presence in the form of a distributor or local warehouse, with local employees and representatives. This is done in order to reduce fulfillment cycle times and provide competitive levels of responsiveness. Where a vendor possessed such a local presence, the associated procurement spend was categorized as local, versus another geographic designation.

Another point to bear in mind is that one firm's direct material is another firm's capital good. For instance, a firm using concrete to construct a structure as a final good for a customer considers the concrete to be a direct material. Spending on concrete by the customer would be considered a capital good or capital expense were they to procure it themselves. Thus, perspective is important, particularly considering the rich complexity of the economic linkages of these firms, as well as the self-organizing, symbiotic relationships which firms have developed with each other over time. Some firms' business is centered on a continuous process such as one might envision in the production of paint in bulk liquid form, whereas other firms employ a job costing approach, such as what one would expect from an engineering and construction firm contracted to build a structure. The nuance between these is significant, as it is much easier to consider job costing formats using discrete boundaries whereas in continuous process production this may be extremely difficult. The emerging level of detail is reflected in the procurement data: job costing format firms' data was substantially more detailed and granular, making the distinction between direct and indirect materials much simpler.

Participant firms submitted data in a variety of formats, primarily submitting raw data in Microsoft Excel, having queried a purchasing system or equivalent to generate the data. At a minimum, firms submitted the vendor legal name and related expenditure amount for calendar years 2011 and 2012. Aggregate results are reported in Appendix 1. Generalizability of these results is limited due to the small sample size, however this sampling represents approximately 10% of the direct employment in the Portland Harbor area (based on the findings of Martin Associates' July, 2012 report).

### Dynamic Structures



When a firm receives revenue, that revenue is employed by the firm in a variety of uses which establish the linkages between the subject firm, firms considered vendors to the subject firm, and other economic sectors. Consider the illustration in Appendix 2. Firm revenues flow to the following categories:

- Cost of goods such as direct and indirect materials, and certain services
- Administrative expenses known as SG&A (selling, general, and administrative) which include payment of wages to management and executives, philanthropic activities, some capital expenditures, and some services which are difficult to tie to the production of specific goods and services (SG&A tends to be a large “bucket” for expense items which do not easily lend themselves to division among units of output)
- Direct and indirect labor
- Interest/debt service
- Transfers to shareholders (known as dividends)
- Retained earnings
- Payment of taxes
- Depreciation and amortization charges

The connection between firm “financial health” and the well-being of the public sector can be demonstrated by examining the flows and linkages (the shaded box on Exhibit II): for this purpose we will call the system of linkages “Cycle of Firm’s Revenue”.

Philanthropy clearly constitutes a public good. Employee wages (direct, indirect, and SG&A) drive personal income, which bears strong linkages to the public sector. Additionally, there is likely a propagation mechanism in financial markets (hypothesized here) connecting a firm’s debt service (interest payments) and distributions to shareholders (dividend payments) to societal well-being. Retirement investment accounts and portfolios such as 401k and 457 plans, and Public Employee Retirement Systems (PERS) investment generally hold shares in publicly-traded firms (which distribute dividends to shareholders and whose stock value growth benefits shareholders) and financial firms (who received debt service payments from firms, both privately-held and publicly-traded). It seems reasonable to conclude that good firm





financial performance is beneficial in this way to retirement systems of both public sector and private sector workers.

Of interest in this research is the connection to other firms, considered vendors or suppliers to the subject firm, from whom the subject firm procures direct and indirect materials, services, and capital goods. A portion of the subject firm's revenue flows to the vendor/supplier firms, whose revenue also flows through the cycle illustrated. This cycle repeats ad infinitum.

The public sector derives revenues through the payment of taxes on corporate income and other things such as real property, personal income, and taxes on dividends and interest. These revenues are used to support public services, fund schools, and build infrastructure. A firm's decision to invest in their capital stock in a given area depends not only on market conditions, but local and regional "business climate" conditions, largely signaled on a community's willingness to invest in infrastructure, education, and the level and efficiency of public services provided. Weak signals in these areas do not inspire confidence in firms' willingness to invest in a particular area, and the variation in the quality and strength of these market signals given by communities largely constitutes the competitive environment in which states and municipalities strive to attract capital investment.

### Discussion

Linkages to smaller enterprises were readily evident through an analysis of the data. Large industrial firms avail themselves of professional services as well as services of skilled trades, primarily locally sourced (except in somewhat rare cases where highly specialized expertise was required). Examples of professional services procured include: technical engineering (information technology, civil, and structural), architecture, environmental consulting/engineering, law, public accounting, human resources/training, occupational health and safety consulting, financial services, and general business consulting/advisory (such as business process engineering). Skilled trade services procured include: plumbing, electrical, general construction (earth-moving and excavating), specialty machining and tooling, sheet metal, HVAC/refrigeration, and mechanical repair and maintenance services.



Firms sampled also availed themselves of the services of local small businesses as varied as: sign and awning businesses; freight transportation services (by water and truck); restaurants, delicatessens, and catering; equipment rental; mail services and printing; florists; and site security.

Examples of Service sector firms commonly engaged by the subject firms include: Bernert Barge Lines, Carlson Testing Inc., Cascade Architectural & Engineering, Integra Telecom, and Morgan Industrial Inc.

Local procurement of raw materials, intermediate production inputs, and capital goods were also evident in the data. Examples include:

- Steel and other metals purchased from local steel service centers, mills, and other local sources
- Concrete purchased from local suppliers for capital projects to construct new plant and equipment, or in the case of the marine-related construction firm surveyed – as an input to delivery of a final good/service
- Fabricated/machined steel parts and components sourced locally for capital projects and as intermediate inputs to final goods and services
- Machinery, plant equipment, power systems, and material handling equipment (all capital goods) purchased from a local manufacturer, dealer, or distributor

Firms commonly engaged as vendors among the sample include: Evraz Oregon Steel Mills Inc., Farwest Steel Corp., LaGrand Industrial Supply Co., Oregon Ironworks Inc., and Pape Material Handling Inc.

Geographic analysis of the spending data revealed that firms demonstrate a preference to working with firms in the local and regional area due to proximity, ease of obtaining ongoing service, and the value of enlarging ties and relationships to the local market and community. Where spending occurred nationally and internationally, this was typically because the goods and services sought were not locally available. A large amount of the international service spending, for example, consisted in payments to foreign flagged marine vessels and companies for export transportation and logistics services. Additionally, certain legal and technical services were procured by the firms in 2011 – 2012 which comprises highly-skilled expertise



not locally available. Some raw material components are highly specialized and not manufactured locally, such as brake systems parts for transportation equipment. Likewise, certain capital goods are produced only in select areas in the national and international geography, such as specialized manufacturing machinery, software systems, technical and navigational components of marine vessels, environmental control systems for storm water treatment and management, and power plant/engine equipment and components.

Roughly 80% of the indirect materials these firms purchased were from local distributors and suppliers. Some examples of these include: safety supplies, paint and coatings, bolts and fasteners, industrial cleaning supplies, fuels and gases (to operate equipment), welding supplies and gases, hardware, hand/power tools, coffee and drinking water service, employee gifts and recognition incentives, auto and equipment parts, restaurant and food services, and office supplies. Expenditures in this area by these five firms alone amounts to tens of millions of dollars annually.

Though only two years of data were provided and analyzed, a notable year over year increase in spending on capital goods, indirect materials, and services stood out. The rate of change in capital goods spending was much lower than that seen in indirect materials and services, an expected result considering the longer time frames involved in planning and executing capital spend. Capital spend is considered less elastic in the short-run (i.e. less than one year), though long run capital spending trends respond, with some lag, to market conditions. This should be an intuitive result: many capital projects in the industrial sector are multi-year projects, and once committed generally follow through to completion. This being the case, it takes a longer period of time for firms to respond to both favorable and unfavorable market conditions as reflected in capital spending. Spending on direct and indirect materials is much more responsive in the short run to business cycle changes and perturbations, regardless of the direction of the change (increase in output or decrease).

An important consideration with respect to direct materials is seen in the proportion sourced outside of the local area. Considering that direct materials (or raw materials) are largely imported into the local market (about two-thirds originates outside of the local area) for the purposes of value-added manufacturing in the production of final goods and



services, this seems to speak to the importance of robust transportation infrastructure and the public investment required to facilitate efficient movement of these goods. Additionally, because they constitute the raw material inputs to final goods and services, they are generally of significantly lower value relative to the final good or service, and thus are highly sensitive to changes in transportation costs, such as are induced by roadway congestion and volatility in energy markets (rapidly rising fuel costs).

### Conclusion

Five marine industrial firms were surveyed, which represent approximately 10% of direct jobs in the Portland Harbor. Wages for employment in Portland's marine industrial areas associated with trade, transportation, and manufacturing tends to be about 5% higher than the average wage level in the Portland region (Port of Portland Columbia Multimodal Corridor Study, 2012). Key findings include:

- Much of the procurement spending of these firms is in the local area (about 42% in 2012), with an additional substantial proportion coming from Oregon and Washington outside of the local area (14% in 2012), helping to drive job creation locally and regionally.
- Businesses in the Portland Harbor area are characterized as having profound, complex long-term economic connections to a variety of local firms including:
  - Planning and architecture firms
  - Law firms
  - Engineering firms
  - Skilled trades such as electricians
  - Graphic arts/media production firms
  - Suppliers of advanced manufacturing plant production equipment
  - Transportation companies
  - Suppliers of software and information technology
  - Energy and utilities



- Firms purchase capital goods, services, materials and supplies from national and international firms, many of whom maintain a local presence such as a distributor, service center, or local warehouse, with local employees and representatives (in many such cases, firms remit payment to a non-local location such as a central accounts receivable processing center).
- Geographic analysis of the spending data revealed that firms demonstrate a preference to working with firms in the local and regional area due to proximity, ease of obtaining ongoing service, and the value of enlarging ties and relationships to the local market and community. In this way, firms form vertically-related clusters of industrial sectors, achieving scale and efficiency through the colocation of services and specialization of related activities.
- The activity of marine industrial firms in Portland in producing final goods and services generates hundreds of millions of dollars of revenue for local businesses annually through economic linkages.

Firms are competing in an increasingly volatile, uncertain global marketplace. Policy stability and certainty results in a public good as beneficiaries of the firms' economic activity. The rate of local spending grew faster than the change in overall spending year-over-year, suggesting that firms find efficiency in proximity and other aspects of local market procurement.

The activity of marine industrial firms in Portland in producing final goods and services generates hundreds of millions of dollars of revenue for local businesses annually through economic linkages. The ability of these key industrial firms to locate in Portland and achieve the necessary scale to compete globally derives from an interactivity of production factors, including land (appropriate sites to conduct business activity, complete with amenities and site characteristics such as water, rail, and highway access), labor (skilled professional and trades), and capital.

Portland (and regional) residents and businesses benefit from the many healthy marine industrial firms located within the harbor. Annually, these firms spend hundreds of millions of dollars on goods and services with local businesses. The study confirmed that there is a strong economic linkage between big and small firms.



This analysis also illustrates the importance of considering indirect effects of public policy, in particular as they apply to the trade-offs between public investment in industrial reinvestment and expansion. The impact of land use or other policies and their specific impact on industrial development decisions have wider, aggregate economic implications which should be given consideration. When the effects of industrial development are considered in terms of procurement linkages, personal income, and employment (direct, induced, and indirect), an understanding of a significantly interlinked, interdependent economy emerges.

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**Appendix 1**  
**Aggregate Procurement Data of Sample**

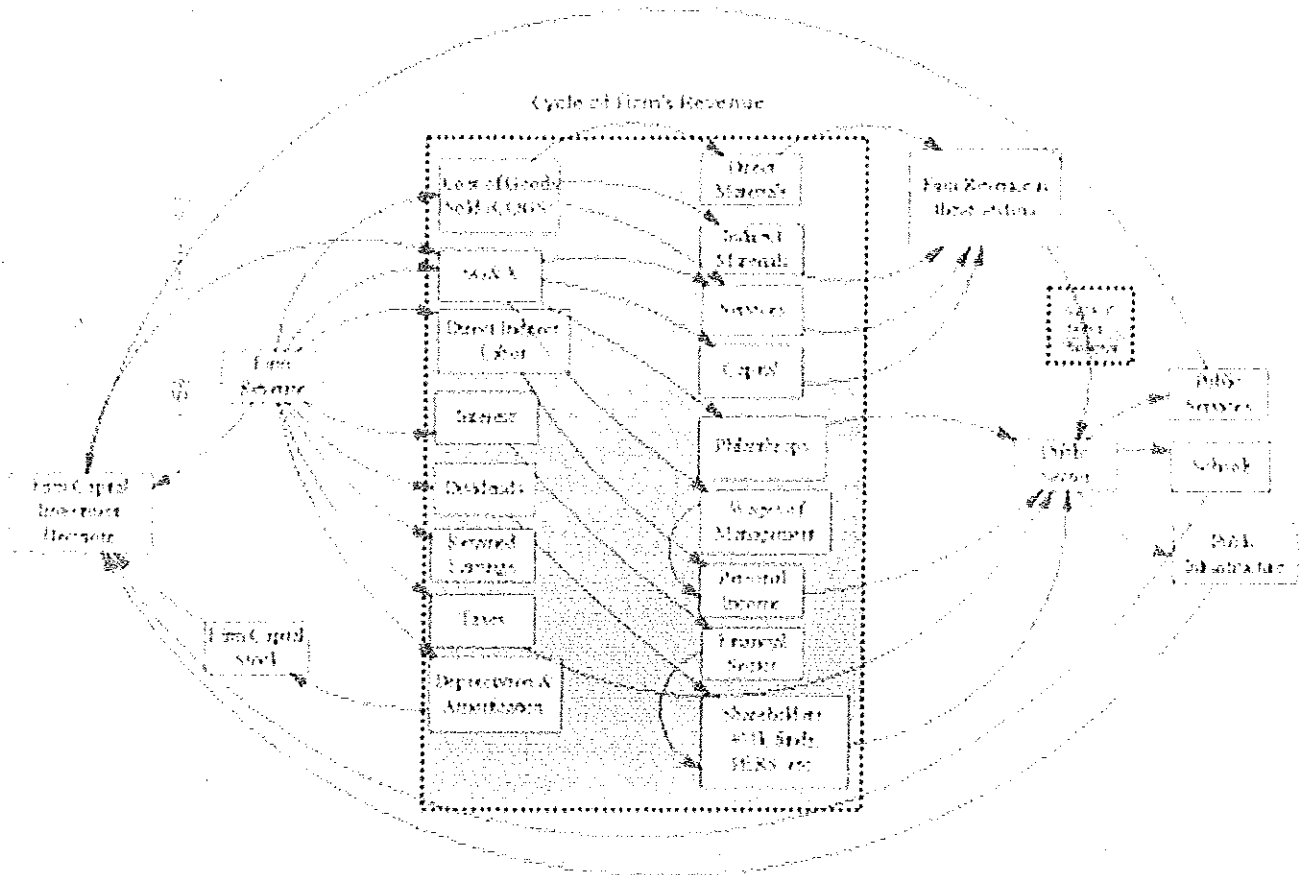
	<u>2012 Spend</u>		<u>2011 Spend</u>	
	Amount	Proportion	Amount	Proportion
<b>Direct Materials</b>				
Local	\$121,676,718.27	31%	\$126,247,855.38	27%
Regional	\$55,540,720.46	14%	\$73,117,590.90	16%
National	\$160,258,221.42	41%	\$201,088,333.52	44%
International	\$56,275,305.72	14%	\$59,991,510.37	13%
<b>TOTAL</b>	<b>\$393,750,965.87</b>	<b>100%</b>	<b>\$460,445,290.17</b>	<b>100%</b>
<b>Capital Goods</b>				
Local	\$8,707,653.10	45%	\$8,673,134.40	60%
Regional	\$2,761,046.06	14%	\$2,531,092.16	18%
National	\$7,205,226.91	37%	\$2,908,180.49	20%
International	\$676,690.29	3%	\$307,011.19	2%
<b>TOTAL</b>	<b>\$19,350,616.36</b>	<b>100%</b>	<b>\$14,419,418.24</b>	<b>100%</b>
<b>Indirect Materials</b>				
Local	\$40,693,241.42	82%	\$21,232,594.02	79%
Regional	\$4,273,852.99	9%	\$2,461,732.39	9%
National	\$4,690,663.32	9%	\$3,166,615.53	12%
International	\$184,311.79	0%	\$77,576.18	0%
<b>TOTAL</b>	<b>\$49,842,069.52</b>	<b>100%</b>	<b>\$26,938,518.12</b>	<b>100%</b>
<b>Services Procured</b>				
Local	\$108,426,986.85	54%	\$60,560,288.04	48%
Regional	\$33,362,383.58	17%	\$17,202,489.93	14%
National	\$35,704,977.60	18%	\$25,079,799.57	20%
International	\$21,573,835.04	11%	\$24,191,778.90	19%
<b>TOTAL</b>	<b>\$199,068,183.07</b>	<b>100%</b>	<b>\$127,034,356.44</b>	<b>100%</b>
<b>AGGREGATE SPEND</b>				
Local	\$279,504,599.64	42%	\$216,713,871.84	34%
Regional	\$95,938,003.09	14%	\$95,312,905.38	15%
National	\$207,859,089.25	31%	\$232,242,929.11	37%
International	\$78,710,142.84	12%	\$84,567,876.64	13%
<b>TOTAL</b>	<b>\$662,011,834.82</b>	<b>100%</b>	<b>\$628,837,582.97</b>	<b>100%</b>

Notes on data processing: The level of data processing performed by ONWC varied based on a respective firm's reporting capability robustness. One firm supplied summary data in the final format, as this was relatively simple for them to generate. In one case, a firm supplied ONWC with annual 1099 tax reporting data in Adobe pdf format, requiring the data to be extracted and re-entered into Excel format. Using internet search engines, each vendor's legal name, line of business, and geographic location(s) were ascertained. Perfect accuracy is not assumed as a result of this data analysis process.



### Appendix 2

### System Dynamics Model of Procurement





## Appendix 3

Table Listing Examples of Local Businesses in Common among Sample

<u>Company Name</u>	<u>Location</u>	<u>Description</u>
ACME Construction Supply	Portland, OR	Headquartered in Portland with multiple locations in different states; Sells power tools and building supplies
Advanced Finishing Systems	Portland, OR	Headquartered in Portland with additional location in Kent, WA; sales and service of equipment and supplies for industrial coating, sealing, and finishing processes; designs and builds custom finishing equipment and systems; general contractor for on site building and installation of systems
Ahern Rentals	Portland, OR	Headquartered in Las Vegas, NV with several branch locations in many states; equipment rental company serving commercial, residential, industrial, and public market segments
Air Liquide	Portland, OR	International supplier of industrial gases headquartered in France with presence in 80 countries; two local branches
Airgas	Portland, OR	Supplier/distributor of industrial gases, machinery, tools, and supplies headquartered in Radnor Township, PA; several local branches
Alaska Copper & Brass	Portland, OR	Headquartered in Kent, WA with local location and other branch locations in CA and BC, Canada; supplier of metal products and fabrication services
Albina Pipe Bending Co	Tualatin, OR	Single location company headquartered in Tualatin, OR; supplier of bent steel, metal tube bending, and pipe bending products and services
Alliance Steel Distributors	Vancouver, WA	Steel distributor/service center with single location/headquarters in Vancouver, WA
Allied Electronics	Beaverton, OR	Distributor of electronic components and electromechanical products with over 50 locations in US and Canada; headquarters in Ft. Worth, TX
AMEC	Portland, OR	Global engineering, project management, and consultancy company headquartered in London, UK with local office
American Equipment Co	Portland, OR	Sales, rental, and service of industrial cleaning equipment such as pressure washers, parts washers, and steam cleaners; single location/headquarters in Portland, OR
American Metal Cleaning	Portland, OR	Single location company headquartered in Portland, OR; provides industrial metal cleaning, stripping, and recovery services
American Steel	Canby, OR	With multiple locations in OR, WA, and CA with headquarters in Canby, OR, company is a metals processor and distributor/service center
Anixter Inc	Portland, OR	Global company in over 50 countries with two local locations headquartered in Glenview, IL; supplier of communications and security products, electrical and electronic wire and cable, fasteners, and components
Apex Laboratories	Portland, OR	Chemical, mechanical, metallurgical, and environmental testing services provider located in Portland, OR



Applied Industrial Technologies	Portland, OR	Global supplier/distributor of industrial products and supplies headquartered in Cleveland, OH
Argo International	Portland, OR	Global supplier/distributor of new units and spare parts for industrial motors, drives, controls, and pumps headquartered in New York, NY with a local office
Arjae Sheet Metal	Portland, OR	Sole proprietorship in Portland, OR; sheet metal fabrication, commercial and industrial installation, HVAC/R service and repair
Associated Hose Products	Portland, OR	Single location distributor of industrial hose, fitting, and assembly products
Atlantic & Pacific Freightways	Vancouver, WA	Locally-based truck transportation and logistics company operating throughout the US and Canada
Atlasta Lock & Safe Co.	Portland, OR	Single location business providing locksmith services
Batteries Plus	Portland, OR	Supplier of batteries and light bulbs with franchise locations in 46 states and Puerto Rico; multiple local locations; headquartered in Hartland, WI
Baxter Auto Parts	Portland, OR	Auto parts supplier with multiple locations in OR, WA, and CA
Beckwith & Kuffel Inc.	Vancouver, WA	Offices in Seattle, WA, Vancouver, WA, and Spokane, WA; sales and service for industrial pumps, compressors, and blowers
Benchmark Industrial Services	Portland, OR	Industrial contractor providing services from equipment maintenance to complex capital projects with offices in Portland, OR, Seattle, WA, and Spokane, WA
Bernert Barge Lines	Oregon City, OR	Provider of inland waterway transportation services (tug and barge) with local history dating back to the late 1800s
BestBuy	Portland, OR	International electronics retailer headquartered in Richfield, MN
Blast Cleaning Services	Sherwood, OR	Single location contractor/manufacturer supplying and constructing blast cleaning systems (blastrooms, shotblast machines, automated airblast machines, shot peening machines, etc.)
BNSF Railway	Portland, OR	Transcontinental railroad transportation and logistics service provider headquartered in Ft. Worth, TX
Brake Systems Inc	Portland, OR	Single location manufacturer, remanufacturer, distributor and engineer of brakes, valves, compressors, and related products and equipment
Branom Instrument Co	Portland, OR	Seattle, WA headquartered supplier/service of products and services for industrial and municipal testing, control, monitoring, and calibration instruments and equipment; locations in multiple states
Buckaroo Thermoseal Inc	Portland, OR	Single location roofing contractor
Cal-Cert Co	Portland, OR	Portland, OR based provider of calibration certification equipment and services
CalPortland	Portland, OR	Glendora, CA headquartered supplier of cement, concrete, aggregates, asphalt, building products, and construction services with multiple local locations
Carlson Testing Inc	Portland, OR	Tigard, OR headquartered construction inspection, materials testing, and geotechnical engineering services company with branch office locations in Oregon



Carson Oil Co	Portland, OR	Portland, OR headquartered supplier of petroleum products and services with branch offices throughout Oregon
Cascade Architectural & Engineering	Portland, OR	Seattle, WA based company providing equipment, supplies, reprographics and related support for the architectural and engineering sectors
Cascade Columbia Distribution	Sherwood, OR	With offices in Sherwood, OR, Seattle, WA, and Spokane, WA, company provides chemicals and related supplies and equipment with expertise in aerospace, compounding, electronics, food manufacturing, metal plating, and water treatment industries
Cascade Controls	Portland, OR	Portland, OR based contract manufacturer of engineered production systems and controls for semiconductor, agriculture, food processing, marine, crane and hoist, municipal, petrochemical, forest products, power generation, solar, wind, recycling, and soil/water reclamation industries
Cascade Pipe & Supply	Portland, OR	Bakersfield, CA based supplier, distributor, and manufacturer of industrial pipe, fittings, and supplies
Centurylink	Portland, OR	Monroe, LA headquartered telecommunications service provider
Cessco Inc	Portland, OR	Single location company providing sales and rental of construction equipment and supplies
Chapel Steel Co	Portland, OR	Steel service center based in Philadelphia, PA with locations in US and Canada
Chas H Day Co Inc	Portland, OR	Single location business providing sales and service of electric and pneumatic tools and supplies
Christenson Electric Inc	Portland, OR	Portland, OR based electrical contractor
Christenson Oil	Portland, OR	Single location supplier of petroleum products and services
City Club of Portland	Portland, OR	Nonprofit education and research based civic organization
Coast Crane & Equipment Co	Portland, OR	Sales, rental, and service of industrial cranes and equipment with locations throughout the Western US, including Alaska and Hawaii
Conrey Electric	Portland, OR	Single location sales and service provider of electric motors
Consolidated Electrical Distributors	Portland, OR	Single location supplier of electrical components and supplies
Continental Western Corp	Portland, OR	San Leandro, CA based distributor of industrial supplies
Contractor Plan Center	Milwaukie, OR	Milwaukie, OR based membership organization connecting contractors, owners, architects, manufacturers, and suppliers to facilitate project bidding
Control Factors Inc	Portland, OR	Manufacturers representative and distributor located in Gresham, OR of process flow and filtration/separation components
Cook Engine Co	Portland, OR	Marine engine repair and service provider
Copiers NW Inc	Portland, OR	Provider of copy and printing equipment, software solutions, and services based in Seattle, WA
Cummins Northwest Inc	Portland, OR	Distributor and supplier of Cummins engine products and services; Portland, OR based with locations throughout the Pacific NW and Alaska
Curran Coil Spring Inc	Wilsonville, OR	Manufacturer of custom industrial torsion springs, extension springs, and compression springs



Daily Journal of Commerce	Portland, OR	Supplier of media services
DEX Media West LLC	Portland, OR	Supplier of media services
DHL	Portland, OR	Worldwide transportation and logistics services provider
Direct Transport Inc	Wilsonville, OR	Provider of regional courier and freight services
Documart	Portland, OR	Supplier of print services
Don Thomas Petroleum Inc	Portland, OR	Petroleum, fuel, oil, and lubricant distributor in the Portland Metro area since
EJ Bartells Co	Portland, OR	Distributor, fabricator, manufacturer and refractory services contractor in the Western U.S., and insulation services contractor in the Pacific NW; based in Renton, WA
Earle M Jorgensen Co	Portland, OR	Supplier/service center of steel and aluminum bar, tubing, and plate; headquartered in Lynwood, CA
EC Powersystems	Portland, OR	Portland, OR based sales, rentals, and service of generators and engines
Elephant's Delicatessen	Portland, OR	Catering and food services
Elmer's Flag & Banner	Portland, OR	Manufacturer and distributor of flags, banners, and related supplies and materials
Emerald Services Inc.	Vancouver, WA	Seattle, WA based supplier of processing and recycling services of wastewater and oil products
Empire Rubber & Supply	Portland, OR	Supplier and installer of conveyor belt and related industrial goods with locations in Portland, OR and Pasco, WA
EOFF Electric Co	Portland, OR	Provider of electrical supplies, components, and equipment based in Portland, OR with locations throughout OR and SW WA
ERM West Inc	Portland, OR	Global provider of environmental, health, safety, risk, and social consulting services
Evrax Inc	Portland, OR	Chicago, IL based international producer of steel products with pipe, tube, and plate rolling mills in Portland, OR
F&F Grinding Inc	Portland, OR	Single location provider of grinding, sawing, burning, and cutting services
FE Bennett	Portland, OR	Portland, OR based vendor of material handling equipment and supplies
Farwest Steel Corp	Vancouver, WA	Eugene, OR based steel service and fabrication/manufacturing center
Fastenal Co	Portland, OR	Winona, MN based supplier of industrial products and services
Fastsigns	Portland, OR	Provider of signs, banners, and vehicle graphics based in Carrollton, TX
Faulkner Automotive Electric	Portland, OR	Single location car parts and accessories manufacturing services provider
FedEx	Portland, OR	Global transportation and logistics provider based in Memphis, TN
Ferguson Enterprises Inc	Portland, OR	Plumbing and building products supplier based in Newport News, VA; subsidiary of UK-based Wolseley
Ferrellgas	Portland, OR	Provider of propane distribution and services headquartered in Overland Park, KS
Finishing Technologies	Portland, OR	Portland, OR based technical finishing equipment distributor and servicer



First Response Systems	Beaverton, OR	Alarm, security, and surveillance services provider based in Beaverton, OR
Fisherman's Marine Supply	Portland, OR	Marine equipment and supplies provider based in the Portland, OR area with three local facilities
Fluid Connector Products Inc	Portland, OR	Portland, OR based provider of hydraulic systems equipment and supplies
Forklift Services of Oregon	Portland, OR	New and used forklift sales, rental, and service
Fred Meyer	Portland, OR	Retail department store chain; subsidiary of Cincinnati, OH based Kroger Co.
Galvanizers Company	Portland, OR	Portland, OR based galvanizing manufacturer
Gasket Technology Inc.	Troutdale, OR	Troutdale, OR based manufacturer of industrial gaskets
General Tool & Supply Co	Portland, OR	Supplier of industrial bearings, hydraulics, material handling, and other related supplies and services
Grabber Construction Products	Clackamas, OR	International distributor and manufacturer of fasteners, tools, equipment, and building materials for construction industry; based in Alpine, UT
Grainger	Portland, OR	Global supplier of maintenance, repair and operating products based in Lake Forest, IL
Graybar Electric Co Inc	Portland, OR	St. Louis, MO based supply chain management services provider and distributor of high-quality components, equipment and materials for the electrical and telecommunications industries
Green Transfer & Storage	Portland, OR	Warehousing, transloading, storage, trucking and logistics provider
Gresham Transfer Inc	Portland, OR	Specialized/heavy haul and dry bulk truck transportation and logistics provider
Gunderson LLC	Portland, OR	Lake Oswego, OR based international manufacturer of railcars, marine barges, and related components and services
Hall Tool Co	Portland, OR	Single location provider of hand tools and industrial supplies
Harbor Freight Tools	Portland, OR	Supplier of hand tools, generators, power tools, air tools, and related hardware and equipment with over 400 retail locations; based in Southern CA
Hardchrome Inc	Estacada, OR	Single location plating and polishing business
Harmer Steel Products Co	Portland, OR	Portland, OR based supplier of rail and track accessories with locations in the US and Canada
Harsco Infrastructure Americas	Vancouver, WA	Provider of construction and industrial maintenance services with operations in 32 countries; headquartered in Camp Hill, PA and Fair Lawn, NJ
Hertz Equipment Rental Corp	Portland, OR	Rental and sales of generators, construction equipment, and material handling equipment
Hilti Inc	Portland, OR	Liechtenstein based supplier of tools and fastening systems; operates in over 120 countries; N. American headquarters in Tulsa, OK
Home Depot	Portland, OR	Atlanta, GA based home improvement retailer
Honey Bucket	Vancouver, WA	Puyallup, WA based supplier of mobile sanitation services
Hydra Power Systems Inc	Portland, OR	Portland, OR headquartered supplier of fluid hydraulic parts and components



Hydraulics Inc	Vancouver, WA	Single location provider of hydraulic supplies and hose manufacturing services, as well as cylinder, pump, and motor repair
IGI Resources Inc	Vancouver, WA	Petroleum bulk stations and terminals provider
IKON Office Solutions	Portland, OR	Global provider of Ricoh copy and printing equipment, software solutions, and services
IMR KHA Portland LLC	Portland, OR	Mechanical, chemical, metallurgical, and corrosion testing and analysis services provider
Industrial Tire	Portland, OR	Industrial tire, wheel, and auto repair services based in Portland, OR with six Pacific Northwest facilities
Integra Telecom	Portland, OR	Portland, OR based telecommunications services provider
Integrated Power Services	Portland, OR	Provider of repair and maintenance services for electric motors, generators, and mechanical power transmission components based in Greenville, SC with locations throughout the US
International Inspection Inc	Portland, OR	Provider of nondestructive testing and examination services
IRC Aluminum & Stainless Inc	Portland, OR	Single location nonferrous metal service center
Iron Horse Group	Fairview, OR	Single location utility and industrial services provider
JJ Calibrations Inc	Portland, OR	Instrument calibration services provider based in Portland, OR
John C. Murdoch Inc	Portland, OR	Marine surveyor located in Portland, OR
Johnstone Supply	Portland, OR	Wholesale distributor to the HVAC/R and property maintenance industries
Jubitz Corp	Portland, OR	Transportation services company offering commercial fueling and travel services to fleets, professional drivers, and the local and traveling public based in Portland, OR
Kaman Industrial Technologies	Portland, OR	Provider of a wide range of products and systems related to bearings, mechanical and electrical power transmission, automation & control, material handling, and fluid power for the MRO and OEM markets based in Bloomfield, CT
Kleen Blast Co	Portland, OR	Provides abrasives, sandblasting equipment and supplies
Koldkist Bottled Water	Portland, OR	Producer, marketer and distributor of high-quality packaged ice
KY-RO Inc	Tigard, OR	Single location provider of profile and plate rolling services
LaGrand Industrial Supply Co	Portland, OR	Single location distributor of foundry supplies, equipment and industrial products
Lampros Steel Inc	Portland, OR	Specialty structural steel service center and warehousing based in Portland, OR
Landa Northwest	Portland, OR	Single location business selling and servicing industrial pressure washers, parts washers, water treatment systems, and heaters
Landmark Equipment	Portland, OR	Single location business providing equipment sales, rentals, parts, and repair and maintenance services
Legacy Laboratory Services	Portland, OR	Laboratory services provider serving physicians, hospitals, employers, IPAs, and patients; based in Portland, OR
Les Schwab	Portland, OR	Provider of tires and automotive repair services based in Prineville, OR
Locates Down Under Inc	Oregon City, OR	Providing underground wire and cable laying contracting services based in Oregon City, OR



Mac's Radiator & Repair	Portland, OR	Cooling system repairs, products, and services provider based in Portland, OR with nine Pacific NW facilities
Magnetic Specialties Inc	Clackamas, OR	Provider of wholesale magnets and magnetic devices based in Clackamas, OR
Marco	Portland, OR	Portland, OR based supplier of promotional products, awards, company apparel, and Incentive items
Marine Lumber Co Inc	Tualatin, OR	Single location wholesale lumber sales and distribution
Mariner's Supply Co Inc	Portland, OR	Supplier of marine parts and products based in Bainbridge Island, WA
Marks Metal Technology	Clackamas, OR	Single location metal and steel processor, specializing in rolling plate and structural profiles, concrete pipe forms and custom fabrication
Mascott Equipment Co Inc	Portland, OR	Sales, service, and installation of petroleum equipment
Mason's Supply Co	Portland, OR	Construction supplies business with locations in OR and WA; based in Portland, OR
Matheson Tri-Gas Inc	Portland, OR	Global supplier of industrial and scientific gases and gas handling equipment; subsidiary of Tokyo, Japan based TNS Corp
McGuire Bearing Co Inc	Portland, OR	Regional distributor of bearings and power transmission products headquartered in Portland, OR
McKinney Trailers & Containers	Portland, OR	Tractor trailer and shipping container rental, leasing, sales and service
Meshor Supply Co	Portland, OR	Wholesale plumbing supply company based in Portland, OR
Metro Overhead Door Inc	Portland, OR	Repair, service and installation of garage doors and gate automation based in Portland, OR
Milwaukie Crane & Equipment Co	Tigard, OR	Designs, manufactures, installs and services complete overhead material handling systems and stocks hoists, trolleys, accessories, replacement parts and provides service based in Portland, OR
Mobile Mini Inc	Portland, OR	Global company providing rental and sales of portable self storage containers, shipping containers, and mobile offices based in Tempe, AZ
Modspace Corp	Portland, OR	Providing modular building and construction trailer rental, leasing, and sales based in Berwyn, PA
Monster Fuses	Portland, OR	Two location company with offices in Portland, OR and Fairfield, NJ; Supplier of new, surplus, and out of production fuses and switchgear components
Morgan Industrial Inc	North Plains, OR	Providing specialized heavy rigging, transportation, machinery moving, millwright, architectural, and process equipment movement services based in the Hillsboro, OR area
Motion Industries Inc	Portland, OR	Distributor of Industrial MRO supplies based in Birmingham, AL; subsidiary of Genuine Parts Company of Atlanta, GA
MSC Industrial Supply Co Inc	Portland, OR	Distributor of MRO supplies, industrial equipment and tools based in Melville, NY
Mt Hood Solutions Co	Portland, OR	Subsidiary of Charlott, NC based Swisher; supplier of industrial hygiene products and services
Napa Auto Parts	Portland, OR	Distributor and retailer of auto parts, tools, and supplies; subsidiary of Atlanta, GA based Genuine Parts Company



NDE Professionals Inc	Portland, OR	Provider of quality control consulting, and nondestructive testing and training services including radiography, ultrasonic, penetrant and magnetic particle based in Portland, OR
Ness & Campbell Crane Inc	Portland, OR	Main division offices in Portland, OR and Seattle, WA with branch offices throughout Western OR and WA; provider of fixed and mobile crane and lift services
Norlift of Oregon Inc	Portland, OR	Supplier of new, used, rental and material handling products and services based in Portland, OR
North Coast Electric Co	Portland, OR	Provider of electrical supplies, components, distribution and related services with locations throughout the Pacific NW and Alaska
Northside Ford	Portland, OR	New and used Ford truck dealership
Northwest Pump & Equipment Co.	Portland, OR	Distributor of petroleum equipment, industrial pumps, and car wash systems and related services with locations throughout the Western US
Northwest Scaffold Service Inc	Portland, OR	Provides services in the estimation, design, supply, erection & dismantling of suspended scaffold (swingstaging), frame scaffold, temporary weather enclosures, and shoring based in Portland, OR
NRC Environmental Services Inc	Portland, OR	Provision of environmental, industrial and emergency solutions; global company based in Great River, NY
NW Natural Gas Co	Portland, OR	Natural gas utilities service provider/supplier based in Portland, OR
Oak Harbor Freight Lines Inc	Portland, OR	Truck transportation and logistics services provider based in Auburn, WA with terminal locations throughout the Western US
Office Depot	Portland, OR	National retail chain/supplier of office products, business machines, computers, computer software and office furniture, and business services including copying, printing, document reproduction; shipping, and computer setup and repair; based in Boca Raton, FL
Oil Filter Service Co	Portland, OR	Single location provider of filters and hose assemblies, and manufacturer of custom fittings and adapters
Olympic Tug & Barge Inc	Portland, OR	Division of Seattle, WA base Harley Marine Services and provider of marine tug, barge, and port assist transportation and logistics services
Oregon Bolt Inc	Tigard, OR	Provider of industrial threaded fasteners and related items based in Tigard, OR
Oregon Breakers Inc	Portland, OR	Single location supplier of electrical components and supplies
Oregon Carbide Saw	Portland, OR	Provides precision sharpening and manufacturing service for saws, cutters, routers, and coldsaws; based in Portland, OR
Oregon Ironworks Inc	Clackamas, OR	Engineering, fabrication, and manufacturing business based in Clackamas, OR
Oregon Sandblasting & Coating Inc	Tualatin, OR	Provider of industrial painting, coating, sandblasting, and finishing services based in Tualatin, OR





Oregon Tractor	Portland, OR	Portland, OR based supplier of new and used heavy equipment sales, rentals, and repair and maintenance services with branch location in Roseburg, OR
OTS Wire & Insulation Inc	Wilsonville, OR	Supplier of electrical supplies & equipment for the motor repair and transformer industry based in Wilsonville, OR
Ott's Friction Supply Inc	Portland, OR	Portland, OR based distributor and supplier of automotive and mechanical friction products such as brakes and clutches; branch location in Eugene, OR
Oxford Inn & Suites	Portland, OR	Local hotel and hospitality provider
Pacific Fence	Clackamas, OR	Supplier of fencing installation and manufacturing services specializing in railings, gates, chain link, and vinyl; single location in Clackamas, OR
Pacific Machinery & Tool Steel	Portland, OR	Portland, OR based specialty metal service center
Pacific Power Products	Ridgefield, WA	Ridgefield, WA based provider of sales and service of diesel engines, transmissions and parts for trucks, buses, coaches, heavy duty construction equipment, marine, rail and power generation; locations throughout OR, WA, AK, and HI
Palm Abrasive & Tool Inc	Portland, OR	Wholesaler of abrasives, tools, and related supplies in Portland, OR
Pape Material Handling Inc	Portland, OR	Provider of sales, rental, and product support of lift trucks and material handling equipment based in Eugene, OR
Paramount Supply Co	Portland, OR	Supplier of pipe, valves, fittings, pumps, filters, gaskets, steam products, and other industrial specialties with branches throughout the Western US and Alaska
Parr Lumber Co	Portland, OR	Supplier/distributor of building products, hardware, and tools based in Hillsboro, OR with 31 locations in OR, WA, and AZ
Peninsula Truck Lines Inc	Portland, OR	Regional less-than-truckload truck transportation and logistics provider based in Auburn, WA with locations throughout the Pacific NW and Vancouver, BC
Performance Contracting Inc	Portland, OR	Specialty contractor providing services to industrial, commercial, and non-residential markets based in Lenexa, KS; services include interiors, insulation, scaffold services, and abatement
Peterson Industrial Products Inc	Portland, OR	Supplier of industrial hoses, fittings, cylinders, pumps, valves, meters, and othe products for use in hydraulics, pneumatics, instrumentation, and sanitary applications based in Portland, OR
Peterson Machinery Co	Portland, OR	Supplier of new and used heavy equipment sales, rentals, and repair and maintenance services headquartered in the San Francisco, CA Bay Area
Petrocard Systems Inc	Clackamas, OR	Supplier of fleet fueling, mobile fueling, cardlock fueling, and lubricant supply services based in Kent, WA
Pinnell Busch Inc	Portland, OR	Project management consultancy for the design and construction industry based in Portland, OR
Pioneer Wiping Cloth	Portland, OR	Supplier of industrial wiping cloth, absorbent products, and recycling services based in Portland, OR



Platt Electric Supply Inc	Portland, OR	Distributor and wholesaler of electrical, industrial, lighting, tools, fuses, control and automation products with locations throughout the Western US
Pope Rigging Loft Inc	Portland, OR	Supplier of marine rigging products and services based in Portland, OR
Port Plastics	Portland, OR	Supplier of plastic materials, components, and related products based in Chino Hills, CA
Port Supply	Portland, OR	Watsonville, CA based wholesale distributor of marine related products
Portland Business Alliance	Portland, OR	Local commerce association
Portland Community College	Portland, OR	Local higher educational institution
Portland Compressor	Portland, OR	Single location distributor, dealer, and service center of compressors, sprayers, pressure washers, and related products and services
Portland Fasteners Inc	Portland, OR	Single location supplier of industrial fasteners and construction supplies
Portland General Electric Corp	Portland, OR	Investor-owned utility engaged in the generation, transmission and distribution of electricity to industrial, commercial and residential customers
Portland Valve & Fitting Co	Portland, OR	Supplier/distributor of hoses, flexible tubing, fittings, filters, regulators, measurement devices and related products and support services; trade name of Portland, OR based Swagelok Northwest US, part of global Solon, OH based Swagelok Company
Potter Webster Co	Portland, OR	Supplier of new and remanufactured truck and trailer parts headquartered in Portland, OR with branch locations throughout the region
Power Serv Inc	Portland, OR	Kansas City, MO based distributor, reconditioner, and remanufacturer of railcar moving equipment
PPI Group	Portland, OR	Portland, OR based supplier of software and hardware solutions to the architecture, engineering, and construction industries
Praxair Distribution	Vancouver, WA	Supplier of industrial gases and related services based in Danbury, CT
Precise Manufacturing & Engineering	Vancouver, WA	Provider of engineering services to operators of blast furnaces and steel mills based in Vancouver, WA
Precision Equipment Inc	Portland, OR	Industrial parts repair and custom manufacturing based in Portland, OR
Precision Hydraulics LLC	Portland, OR	Portland, OR based tooling hydraulic outfitter
Premier Gear & Machine Works	Portland, OR	Portland, OR based manufacturer of machinery, gears, and controls and machine and gear shop services
Premier Rubber & Supply	Portland, OR	Portland, OR based rubber products wholesaler
Proctor Sales Inc	Wilsonville, OR	Sells & services engineered mechanical solutions including boilers, pumps, controls, valves, burners, stack, tanks, hydronic and steam solutions; offices located in OR, WA, and AK
Production Sawing	Tigard, OR	Tigard, OR based metal slitting and shearing business
PSI Inc	Portland, OR	Oakbrook Terrace, IL based company provides engineering, scientific, technical and management solutions to public and private sector clients



Rain for Rent	Portland, OR	Provider of temporary liquid handling solutions including pumps, tanks, filtration and spill containment based in Bakersfield, CA
Red-D-Arc Inc	Vancouver, WA	Subsidiary of Radnor Township, PA based Airgas Inc.; provider of welding and welding-related rental products and services throughout North America
Redmond Heavy Hauling Inc	Portland, OR	Portland, OR based provider of heavy hauling and specialized truck transportation and logistics services
Reed Electric Co	Portland, OR	Single location provider of motor repair and field services, and new motor sales
Rem Steel Sales Inc	Portland, OR	Portland, OR based distributor of prime, excess prime, and secondary flat rolled steel products
Rexel Inc	Tualatin, OR	Subsidiary of Rexel Group based in Paris, France; Distributor of electrical supplies
Rigging Products Inc	Portland, OR	Single location provider of rope, rigging, logging, industrial chain, and related products and services
Rodda Paint Co	Portland, OR	Portland, OR based provider of paint color matching services, spray equipment sales and rentals, and paint sales
Rogers Marine	Portland, OR	Single location provider of sales, service, and installation of boat equipment, marine electronics, radar, GPS, depth sounders, and related marine products
Rogers Machinery	Portland, OR	Portland, OR based industrial equipment supplier, providing technical services, engineering, consultation, and products such as compressed air systems, process and house vacuum systems, and blower and pump systems; branch locations throughout the Western US
Rose City Awning Co	Portland, OR	Portland, OR based sales and service of awnings, tarps, canopies, flags, flagpoles, accessories and custom applications
RSC Equipment Rental	Portland, OR	Part of Stamford, CT based United Rentals Inc.; global equipment rentals company
Ryerson	Portland, OR	Distributor and processor of metals based in Chicago, IL
Safety Kleen Systems Inc	Clackamas, OR	Re-refiner of used oil and provider of parts cleaning services based in Dallas, TX
Safway Services LLC	Troutdale, OR	Full-service scaffold company offering rental, engineering, training and safety; based in Waukesha, WI
Sam A Mesher Tool Co	Portland, OR	Single location supplier of machinery and cutting tools
Sanderson Safety Co	Portland, OR	Supplier of safety systems and products for a variety of industries and applications based in Portland, OR with locations throughout the Western US
Schroeder's Machine Works Inc	Vancouver, WA	Single location machining, fabrication, and manufacturing facility
Seal Source Inc	Portland, OR	Single location supplier of seals and gaskets
Seals Unlimited Inc	Hillsboro, OR	Distributor of rubber molded, rubber extrusion, and gaskets; in-house steel rule die shop with water jet cutting services available; based in Hillsboro, OR
Service Steel Inc	Portland, OR	Steel service and fabrication center based in Portland, OR



Shaver Transportation	Portland, OR	Provider of inland waterway transportation and logistics services (tug and barge services) and port assist services
Sherwin Williams Co	Portland, OR	Global supplier of paints and finishes based in Cleveland, OH
Siemens Building Technologies	Beaverton, OR	Supplier of products and services for building/facility automation, energy efficiency, fire safety, power distribution, and security; part of Munich, Germany based Siemens
Speedometer Service and Instrument Corp	Portland, OR	Single location company selling gauges, cables, and adapters to the truck and automotive industries
Spencer Fluid Power	Portland, OR	Distributor of hydraulic components and systems; subsidiary of Cleveland, OH based Applied Industrial Technologies
Stack Metallurgical Services	Portland, OR	Single location provider of heat treating and metallurgical manufacturing services
Staples	Portland, OR	National retail chain/supplier of office products, business machines, computers, computer software and office furniture, and business services including copying, printing, document reproduction, shipping, and computer setup and repair; headquartered in Framingham, MA
Star Rentals Inc	Portland, OR	Construction equipment rental supplier with locations in OR and WA
State Pipe & Supply	Vancouver, WA	Supplier of pipe, tubing, fittings, and related products to mechanical, plumbing and general contractors, pipe fabricators, petroleum, fire protection and fencing industries, water well and irrigation companies, pipe distributors, and other pipe users; Rialto, CA based subsidiary of Korean company SeAH Steel Corp
Stellar Industrial Supply Inc	Portland, OR	Tacoma, WA based provider of industrial supplies and tools
Stud Welding Supply	Vancouver, WA	Single location wholesale welding equipment and supplies provider
Suburban Grinding Inc	Tualatin, OR	Single location provider of industrial grinding services and engineering
Sunbelt Rentals Inc	Portland, OR	Construction equipment and tool rental company; subsidiary of London, UK based Ashtead Group
Swan Island Sandblasting	Portland, OR	Portland, OR based sandblasting and painting facility with two Portland facilities
Tacoma Screw Products Inc	Portland, OR	Supplier of fasteners, tools, hardware, and related construction supplies and equipment based in Tacoma, WA
Tarr Inc	Portland, OR	West coast distributor of commodity and specialty chemicals, lubricants and fuels headquartered in Portland, OR
Technical Controls	Vancouver, WA	Vancouver, WA based provider of products and services in instrumentation, fluid-handling products, mobile and general hydraulics, pneumatics, process filtration, compressed air and gas filtration markets, and seal applications with locations in WA, ID, and MT
Test Equipment Distributors	Portland, OR	Stone Mountain, GA based distributor of equipment and supplies for the nondestructive testing industry
The Lynch Company Inc	Portland, OR	Single location general steel fabricator
The Steel Yard Inc	Portland, OR	Single location distributor of steel products (plate, tubing, pipe, bars, etc.)

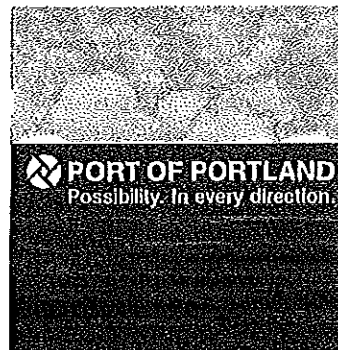


The Western Group	Portland, OR	Portland, OR headquartered supplier of woven wire, rubber screens, polyurethane screens, and perforated plate with locations in the US and Canada
Thermo Fluids Inc	Clackamas, OR	Recycler of used oil, antifreeze, filters, oily water and oily absorbents based in Scottsdale, AZ
Torgerson Forest Products	Beaverton, OR	Single location supplier of forest products and building materials
Total Filtration Services	Portland, OR	Subsidiary of Franklin, TN based Clarcor Inc; provider of filtration management and service
Transco Industries Inc	Portland, OR	Portland, OR headquartered engineering and fabrication business involved in steel fabrication, conveyor repair, and water screening with locations throughout the US
Triad Machinery Co Inc	Portland, OR	Sales, leasing, rental, and service of heavy equipment in forestry, construction, and material handling with locations in OR and WA
Tri-Motor & Machinery Co Inc	Canby, OR	Single location provider of new motor and gear box sales, repair, parts and related services
Tube Service Co	Portland, OR	Santa Fe Springs, CA based tubular product distribution and laser tube processing services with locations throughout the Western US
Union Pacific Railroad	Portland, OR	Transcontinental railroad transportation and logistics service provider headquartered in Omaha, NE
Unisource Mfg Inc	Portland, OR	Supplier of industrial hose, hydraulic hose, connectors and accessories headquartered in Portland, OR
United Battery Inc	Portland, OR	Supplier/distributor of batteries, alternators, starters, generators, and accessories based in Portland, OR with three total area locations
UPS	Portland, OR	Global transportation and logistics provider based in Atlanta, GA
United Rentals	Portland, OR	Global equipment rentals company based in Stamford, CT
United Site Services Inc	Portland, OR	Westborough, MA provider of portable toilet rentals and site sanitation solutions
United Welding Supply Inc	Portland, OR	Single location supplier of welding materials, supplies, and equipment
United Western Supply Co	Portland, OR	Distributor of foundry products, equipment, parts, supplies, abrasive products, blasting media, and abrasive equipment, parts, and supplies with offices in Seattle, WA and Portland, OR
US Distributing	Portland, OR	Distributor of marine parts and accessories to boat dealers, boat repair shops, marine accessory stores, boatyards, boat builders, government agencies and other marine related businesses; locations in Portland, OR, Phoenix, AZ, and Missoula, MT
Valin Corp	Portland, OR	Provider of process control, measurement, heat, filtration, and automation application solutions based in San Jose, CA
Vancouver Bolt & Supply Inc	Vancouver, WA	Single location provider of bolts, fasteners, and industrial supplies
Verizon	Portland, OR	New York City, NY broadband and telecommunications company
Versa Steel Inc	Portland, OR	Supplier of new and used steel beams located in Portland, OR



Viking Automatic Sprinkler Co	Portland, OR	St. Paul, MN based company provides fire sprinkler systems including automatic fire sprinklers for industrial, commercial, residential, and government markets
WC Winks Hardware	Portland, OR	Single location hardware retailer
Walter E Nelson Co	Portland, OR	Portland, OR based distributor of janitorial supplies and paper with locations throughout OR and WA
Washington Crane & Hoist	Vancouver, WA	Seattle, WA based industrial overhead crane and material handling solutions provider
Waste Management	Portland, OR	National supplier of waste/refuse transportation and disposal services based in Houston, TX
West Coast Metals Inc	Portland, OR	Single location supplier of stainless steel, aluminum, and carbon steel
West Coast Wire Rope & Rigging	Portland, OR	Full service rigging fabrication facilities serving the logging, construction, marine, and equipment manufacturing industries with locations in Portland, Seattle, and Oakland
West Rail Construction	Vancouver, WA	Vancouver, WA headquartered railroad construction and services provider involved in projects throughout the US and abroad
Western Integrated Tech Inc	Portland, OR	Bellevue, WA based manufacturer and integrator of fluid power and electronic systems
Western Tool & Supply	Portland, OR	Livermore, CA based supplier of hand tools, cutting tools, power tools, abrasives, and other industrial products and supplies
Working Waterfront Coalition	Portland, OR	Local trade/business association
Xylem Dewatering Solutions Inc	Portland, OR	White Plains, NY based global provider of water handling, transport, distribution, wastewater and process treatment applications across commercial, industrial and municipal market
YRC	Portland, OR	Overland Park, KS based global transportation and logistics provider





## Portland Planning and Sustainability Commission

### Comprehensive Plan Hearing 9/23/2014

#### Commissioners:

Thank you for the opportunity to appear before you today to discuss the draft Comprehensive Plan. My testimony today is specific to West Hayden Island. As a planner for the Port, I am aware of the long tradition of trade on the Willamette and Columbia Rivers. I am concerned that the major policy and direction setting document for the city support and encourage investment in that economic engine. Among the several policies in chapter 6 that do support the maritime future of the city- the policy on West Hayden Island addresses the longer-term future.

Policy 6.41 calls for the future annexation of WHI. Future annexation is supported by City Council resolution 36805 and action taken by this commission in the fall of 2013. Thank you for supporting annexation of this key piece of maritime and riverine land resource.

Future annexation is supported by the Planning and Sustainability Commission and City Council passed Economic Opportunity Analysis, which identified a need for an additional 550 acres of rail yards and marine terminal facilities. The future annexation of WHI is critical to meeting that land demand.

Annexation provides a place where middle income jobs could grow for Portland residents in support of the equity goals for job diversity in the Portland Plan. These types of jobs are characterized by low barriers to entry and are disproportionately held by residents of east Portland.

Future annexation and development would trigger millions of dollars of infrastructure investment. A capital intensive development, of approximately \$100 million, would generate more than \$20m in tax revenue over 10 years. The largest gains would go to the State, the City of Portland and Portland Public Schools. These revenues help pay for the services this community values.

Portland's future hinges on our success of linking to the international market place. Because 95% of the world's consumers live outside of the US, Portland business growth can be achieved with good international access. The harbor is an important link to international markets- as much for the direct access as for "internationalizing" Portland. West Hayden Island is an important element of that future.

Greg Theisen

Planning Commission

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503.415.6000

Portland Planning and Sustainability Commission Public Hearing

26 ✓

Date:

9/23/14

Name:

Tom Bouillion

(Please print legibly)

Authorized Spokesperson representing:

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What agenda item do you wish to comment on?

Comp Plan

Site Address, if different from above:

Portland Planning and Sustainability Commission Public Hearing

29 ✓

Date:

9/23/14

Name:

Greg ~~Therion~~ Theisen

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What agenda item do you wish to comment on?

Comp Plan

Site Address, if different from above:



Portland Planning and Sustainability Commission Public Hearing

21 ✓

Date: 9/23  
 Name: Bob Sallinger (Please print legibly)  
 Authorized Spokesperson representing: Audubon Society of Portland (if applicable)  
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 Email Address and/or Fax No.: bsallinger@audubonportland.org  
 What agenda item do you wish to comment on? \_\_\_\_\_  
 Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing

25

Date: 9/23  
 Name: Robert B Bernstein (Please print legibly) ✓  
 Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)  
 Address: 7415 SE Main St  
 City: PDX Zip: 97215 Phone: 503 233 9671  
 Email Address and/or Fax No.: \_\_\_\_\_  
 What agenda item do you wish to comment on? Comp. Plan  
 Site Address, if different from above: \_\_\_\_\_



September 9, 2014

Dear Chair Baugh and Members of the Planning and Sustainability Commission,

Please accept these preliminary comments from the Audubon Society of Portland regarding the Comprehensive Plan Update.

**West Hayden Island:**

First and foremost, we would like to call your attention to the new urban services service area designation for West Hayden Island described on pages GP10-14 and GP6-14. This new designation appears to lock in 300 acres for industrial zoning and 500 acres as open space, while providing absolutely no assurances in terms of mitigation for impacts on local human communities or the environment. We believe that this designation is completely at odds with the West Hayden Island Public Process that ended in 2013 when the Port chose to withdraw its annexation application. We also believe that it is totally at odds with the position of the PSC outlined in its West Hayden Island Plan transmission letter to council (August 14, 2013) which read in part as follows:

*A unanimous comment expressed by PSC members was that if Council chooses to annex West Hayden Island, it should be done right. That means moving forward with a holistic set of actions that protect and advance the health of the community, environment and economy.*

That letter and the attached documents, including and Intergovernmental Agreement (IGA), laid out an explicit and extensive set of mitigation actions and processes that the PSC felt was necessary to "do it right." The letter also noted that the PSC "could not support adding industrial zoning to Hayden Island without the additional transportation system the CRC would have provided." The Port of Portland chose to explicitly reject this package of mitigation items and the CRC is now officially dead.

We urge the Commission to keep faith with the community and the multiyear West Hayden Island public process and not identify West Hayden Island for future industrial development in the Comp Plan. Unless the Port officially reverses its position and agrees to the IGA and other related documents, West Hayden Island should maintain its status quo. Identifying WHI in the Comp Plan moves it closer to development and creates legal obligations that will make it much more difficult to stop development in the future whether or not the appropriate mitigation actions occur. In short, the draft Comp Plan advances the Port's development aspirations while doing nothing to protect the community or the environment. The PSC got it right in the 8-14-13 transmission letter. Please hold tight to those principles now.

**Industrial Lands in General:**

We remain deeply concerned about the Draft Comp Plan's focus on finding new industrial lands for development. We applaud provisions that focus more heavily on protecting existing industrial lands from conversion such as Policy 6.36a and b (Prime Industrial Land Retention), brownfield clean-up

(Policy 6.39), land efficiency strategies (Policy 6.13) and intensification (Policy 6.38). We believe that intensification, efficiency, brownfield remediation and reducing conversion should be the cornerstones of an industrial land strategy.

We believe that the draft Comprehensive Plan perpetuates an unrealistic and unsustainable assumption that Portland can continue to find significant new acreage of industrial land without seriously compromising the health and livability of our communities and environment. In fact, Portland is a landlocked city with a finite supply of land. Further significant expansion of the industrial land base can only come at the expense of our communities and environment. Our land use planning system treats all of the statewide planning goals as of equal importance. However the new comprehensive plan places the quest for new industrial land above all other considerations. A careful analysis of the verbiage in the plan indicates that where goals are in conflict, industrial land objectives will take priority.

It is time for the City to adopt a new paradigm on industrial lands that acknowledges that the land base is finite and which prioritizes reclamation of brownfields and intensification of the existing industrial land base as the primary tools for increasing industrial capacity in Portland. While new industrial lands may be captured on a case by case basis as land redevelops, identification of new industrial lands should be viewed as no more than an auxiliary strategy for increasing the industrial land supply.

We recognize that this may in fact result in a situation where Portland is not able to meet the 20-year industrial land demands identified in the Economic Opportunities Analysis. However, Goal 9 does not preclude meeting industrial land demands at a regional rather than municipal scale---industrial land deficits within Portland could be reallocated to other parts of the metro region. It is also important to note that Goal 9 explicitly states that achieving industrial land goals should not come at the expense of significant environmental degradation. It reads in part:

*Plans directed toward diversification and improvement of the economy of the planning area should consider as a major determinant, the carrying capacity of the air, land and water resources of the planning area. The land conservation and development actions provided for by such plans should not exceed the carrying capacity of such resources (Goal 9, Section (A)(5))*

In our opinion the environmental carrying capacity of the city has now been exceeded as evidenced by the fact that the City has been unable to institute new environmental programs on industrial lands such as River Plan, Airport Futures and the Citywide Tree Code. These plans, years in development, embodied the best scientific analysis of what the city needs to do to achieve environmental health, but were derailed by concerns that they might impact industrial land supply. It is further evidenced by the current consideration of developing an irreplaceable natural area on West Hayden Island for marine terminals and conversion of golf courses for industrial use, and limiting environmental regulations on industrial lands.

The City mistakenly describes these strategies as "balanced." They are nothing of the sort. The path the city has put itself on represents a steady erosion of the natural resource functions that clean our air and water, protect our wildlife, allow access to nature and provide resiliency in the face of climate change. Perpetually taking a portion of whatever green remains on our landscape in the name of industrial development can only lead to degradation of our natural systems...and this is most acutely true along the City's most valuable natural assets, the Willamette and Columbia Rivers.

It should be noted that this is a self-inflicted crisis. The City lauds itself for the conversion of large tracts of industrial land to mixed use development in the Pearl and South Waterfront and continues to create financial incentives through zoning that ensure that those industrial businesses that remain in these areas will leave and that new industrial development will be priced out in the future. Some of the organizations that are the loudest proponents for the need to find new industrial land were among the first to sellout, for example the Port of Portland at Terminal 1 and Cascade Station. The City should rethink its mixed use developments to ensure that appropriate industrial development remains viable within this zoning category. It is consistent with building communities where people can work within walking distance of their homes. It also makes sense given the fact that the city has a surplus of residential and commercial property.

The City needs to focus its primary attention on reclaiming brownfields and increasing the intensity of use of existing industrial sites. We would call the PSC's attention to two documents:

- "Analyses in the Buildable Land Inventory (2012)(BLI) and Economic Opportunities Analysis (2012)(EOA indicated that infrastructure deficiencies on vacant and underutilized sites reduce the development capacity of those sites by an average of 25%." (Draft Comp Plan at 3-12)
- The City has over 900 acres of brownfields citywide that could generate over \$240 million/ year in revenue statewide and \$42 million/ year for the city if brought into productive use. (City of Portland Comp Plan PAG Presentation)
- 

We urge the City to set a true course for sustainability by doubling down on strategies such as brownfield reclamation, intensification of the existing land base and integration of appropriate industrial development into mixed use zoning areas, while deemphasizing conversion of greenfields and other valuable community assets to industrial use.

#### Other Specific Comments:

1. Page GP1-5: Environmental Health should include mention of fish and wildlife or alternatively native biodiversity
2. Page 2-5: Policy 2.1 should explicitly call out non-profits.
3. GP3-15: City Greenway: The section on trails should note that when they are placed along waterways or natural areas, they should be done in an ecologically responsible manner. This also needs to be reflected on policy
4. 3.51P 3-20-Policy 3.62: I would suggest something more ambitious such as restore the Willamette and Columbia Rivers within Portland to ecological health for native fish and wildlife populations. I would suggest actually stating that the goal is to reach a point where the Lower Willamette and urban area of the Columbia assists in the recovery of listed salmonid species.
5. GP3-20: There should be a floodplain policy embedded somewhere in this section---something like increase protections and restoration activities for floodplains to provide habitat for wildlife, protect water quality and provide resiliency in the face of climate change.
6. GP3-21—Policy 3.68: Does the order of the objectives listed indicate that industry is prioritized in the North Reach? If so we believe this is inappropriate.
7. GP3-20: There should be a policy that directly addresses Superfund and Brownfields

8. GP3-22 Central City: Policy 3.73: Should include something about habitat restoration
9. GP3-22: Central City needs a green infrastructure policy
10. GP 3-22 Inner Neighborhoods: Needs a green infrastructure policy
11. GP 3-23: Eastern Neighborhoods: Should have a policy related to establishing parks and natural areas in underserved areas. Also the natural resource goals should be stronger---change "encourage" to "ensure" and add "restores" in addition to "preserves." The goal is to improve, not simply preserve the status quo
12. GP 3-29 Greenway Map: The greenways appear to be few and far between. The city should be far more ambitious. Greenways should be a regular neighborhood feature, not something that most people would have to travel miles to experience.
13. GP4-5 Goal 4.C: Should include more objectives including protecting wildlife and educing urban heat island effects, limiting hazards associated with landslides and flooding
14. GP 4-6: General principles—should include a general principle about integrating green infrastructure whenever possible including ecoroofs, green streets, street trees. Also should include something about bird friendly building design and limiting light pollution.
15. GP 4-9 pold6 4.28: Should also include something about bird friendly building design (ie reducing open expanse of glass. May need its own goal
16. GP4-10 olicy 4.29: Add buttes
17. GP4-10: The city needs to be careful that these policies do not result in tree cutting or inability to plant trees. I am concerned that this section could support efforts to cut down trees on forested areas of the west hills or prevent tree planting at places such as South Waterfront.
18. GP4-13: The section on Designing with Nature is way too short. There should be policies specifically on trees, ecoroofs, bird friendly building design, protection of night skies, treatment of stormwater, etc.
19. GP 4-14—Hazard Resilient Design: There should be a policy about protecting floodplains
20. GP6-8: Land Development Introduction: We believe that this section needs to be radically revised. It assumes that a landlocked city can continue to find new industrial lands without compromising other values such as natural resource protect outlined in the statewide landuse planning goals (see our introductory comments above for more detail)
21. GP 6-8 poicy 6.12 Land Supply: This policy should be removed. The city cannot find the type of acreage it is projecting for industrial lands without seriously compromising the environment, openspace and neighborhood livability. The use of the term "provide" places the goal of finding industrial land above all other objects---it essentially sets up a paradigm in which the city will find industrial land while it "strives" "encourages" ....to achieve other goals.
22. GP6-9 Policy 6.14: 60% is too low of a target for brownfield reclamation
23. GP 6-9 Policy 6.15: Annexation—this policy should be removed. It locks in annexation of WHI while completely ignoring the public process that occurred over the past six years. It does a complete end run around the WHI public process.
24. GP 6-9 Policy 6.17:
  - a. We urge the city to remove 6.17a. Portland's regulations should be dictated by community values. The way this is written, Portland would not be able to be a leader on

environmental protection if it raised costs above other cities. This policy effectively limits Portland to being in the middle of the pack rather than an environmental leader.

- b. We urge the city to remove sections of 6.17e—specifically the reference to avoiding duplicate review when state and federal review occurs. It is essential that the city retain the ability to regulate natural resource protection at the local level. This allows the community to set local standards that may exceed state and federal mandates, to develop holistic strategies that may differ and be more comprehensive than state and federal mandates, and to ensure that local expertise is brought to bear on natural resource protection.
25. GP6-13 Policy 6.36e: Recommend changing this policy. This policy places minimizing cost over protecting the community and the environment. It needs to be clear that the goal here is to put in place regulations that are cost effective but which are adequate to protect the community and the environment. As currently written, this policy gives priority to minimizing the impacts on business as opposed to protecting our community and environment.
  26. GP 6-13 Policy 6.39: The city should add enforcement to the list of strategies to promote brownfield clean-up.
  27. GP6-14 Policy 6.41: West Hayden Island-- This section should be removed. The City should leave WHI in its current status and respect the six year West Hayden Island process that resulted in the Port's withdrawal of the annexation request.
  28. GP6-15Policy 6.48 Golf Courses: Audubon opposes the conversion of open space at golf courses for use as industrial lands. These sites should be preserved as openspace.
  29. GP 6-15 Campus Institutions: This section should recognize that campus institutions also serve important opportunities to protect natural resources (Reed College, Lewis and Clark)
  30. GP7-6: Goals: There should be a goal associated with healthy native fish and wildlife populations.
  31. GP7-7 Polly 7.2—Should add the word “increase” before resiliency (right now it reed “reduce carbon emissions and resilience....”
  32. GP7-7 Policy 7.4 Add “and improve” after “protect”
  33. GP 7-8 Policy 7.6: Should specify that the goal is to “protect and restore”
  34. GP 7-8 Policy 7.10: Require that mitigation result in a net increase in ecosystem function
  35. GP7-13 Policy 7.23: Remove the line about city owned facilities. Also consider making this goal stronger (require or adopt policies that.....)
  36. GP 7-12 Policy 7.31: Change Soil conservation organizations to “soil and water conservation districts”
  37. General Comment on Environment and Watershed Health Section: This should be much stronger on green infrastructure. There should be very clear goals to
    - a. manage stormwater through green infrastructure approaches that mimic the natural hydrologic cycle including green roofs, street trees, green streets etc
    - b. The plan should set a goal of reducing overall impervious surface within the city
    - c. The plan should require that all city projects incorporate green stormwater strategies
    - d. The plan should highlight the objective of implementing green strategies that achieve multiple objectives whenever possible.

38. Chapter 9: Transportation: Should include policies related to integrating green infrastructure. The transportation grid is arguably the most important aspect of our landscape in terms of integrating green infrastructure.
39. GP 10-13 Institutional: This designation needs to integrate natural resource protection.
40. GP 10-13 Industrial: it needs to be clear that natural resource protection and restoration is consistent with this designation.
41. GP 10-14: West Hayden Island: This designation needs to be removed. West Hayden Island should be designated as open space or left in its current designation. It should not be designated for future development until an IGA that fully mitigates for impacts to the community and the environment is in place. This designation locks in development while providing no protection for the community or the environment.

Thank you for your consideration of these comments.



Bob Sallinger  
Conservation Director  
Audubon Society of Portland

I'm so pleased to see that an extension of the Fanno Creek trail is part of the comprehensive plan. Just recently I rode on the existing Fanno Creek trail from old town Tigard to Garden

Home, and I was thinking how nice it would be to keep the trail going further into town. Connecting to Willamette Park and the rest of the waterfront trail system is a great idea! It is really nice to have these types of trails avoid busy streets if at all possible, so it remains family and kid friendly. It looks like part of this trail would traverse a busy part of Capitol Hwy in the Hillsdale town center, and I would suggest moving that portion of the trail over to Vermont St or another area that isn't so busy with car and bus traffic.

**Comment ID** 301 **MapApp ID** 210 **Commenter** Chadwick Ferguson **Date Received:** 7/25/2014  
**Address:** 10216 NW 108th Ave. **District:** North  
**Comment:**

It would be really nice to re-zone whatever possible here to mixed-use to serve the community in the best way. We need more storefronts and access to services close by.

**Comment ID** 302 **MapApp ID** 211 **Commenter** Tracy Prince **Date Received:** 7/25/2014  
**Address:** 2187 SW Market St. Dr. **District:** West  
**Comment:**

This area of King's Hill is zoned residential and should stay that way. The owner of one of the buildings in this section petitioned for a zone change to commercial to the neighborhood association (Goose Hollow Foothills League). This petition was firmly rejected. GHFL intends that this section of King's Hill should remain residential. I'm shocked that this zone change was snuck into the proposed comprehensive plan when the neighbor has loudly and clearly rejected such a zone change. This section was intended to be residential and should remain so.

**Comment ID** 303 **MapApp ID** 212 **Commenter** Tabor Porter **Date Received:** 7/25/2014  
**Address:** 5830 N Interstate Ave **District:** North  
**Comment:**

It looks like my Zoning will remain EX? I'm right on the corner of Interstate and Simpson, SE corner. Will this mean I can use a part of my home to live in and part of it for business (ie Coffee Shop or Art Gallery)? Thank you Tabor Porter

**Comment ID** 304 **MapApp ID** 272 **Commenter** **Date Received:** 7/29/2014  
**Address:** **District:** North West Central City Southeast  
**Comment:**

**Comment ID** 305 **MapApp ID** 213 **Commenter** Sallinger **Date Received:** 7/26/2014  
**Address:** 4006 NE 9th Ave **District:** North  
**Comment:**

First the map is not accurate. The text says that 500+ acres will be preserved as openspace but the map shows 100% as jobs. Second, the Port has already categorically rejected mitigation options that would protect the community and the environment. It is time to take WHI off the city maps for industrial development. The entire island should be protected and the city should focus its industrial land needs on reclaiming its 900+ acres of brownfields.

**Comment ID** 306 **MapApp ID** 214 **Commenter** Gabe Headrick **Date Received:** 7/26/2014  
**Address:** 3369 SE Raymond Street **District:** Southeast  
**Comment:**





2014

# ECONOMIC IMPACTS OF CONGESTION

on the Portland-metro and Oregon economy

# About this report

In 2005, the Portland Business Alliance, Port of Portland, Oregon Department of Transportation, METRO, and several other public and private sector partners completed a groundbreaking study titled, “The Cost of Congestion to the Economy of the Portland Region.” The study provided key information about the importance of investing in our transportation system, particularly roads and highways, as a critical part of our economy.

The study concluded that geography and past investments have made Portland-metro a sea and air gateway as well as a regional rail and highway hub. As a result, the region’s economic competitiveness is heavily dependent on an efficient and reliable transportation system. The 2005 study found that even with planned improvements, our transportation system would not keep pace with projected increases in freight and general traffic. Failing to adequately invest in our transportation system would result in a potential loss to the regional economy of \$844 million annually by the year 2025 – that’s \$782 per household per year – and 6,500 permanent jobs.

When completed in 2005, the study gained national recognition. As recently as July 2014, the White House issued a report titled, “An Economic Analysis of Transportation Infrastructure Investment,” which referenced the study’s findings and the impact of congestion to businesses.

As we have learned through other research, our region and state are uniquely trade dependent. Between 2004 and 2011, Oregon’s trade-related employment grew 7.5 times faster than total employment. In addition, about 90 percent of Oregon exporters are small- to medium-sized businesses. Today, it remains critical to our economy and our quality of life that we adequately invest in improvements that ensure an efficient and reliable transportation system.

This 2014 study provides a better understanding of how congestion and transportation barriers affect the entire state’s economic competitiveness.

It identifies the current economic foundation of the region and the state. It also shows our reliance on the state’s transportation system to move goods, ensure access to labor and increase productivity, all of which impact revenues accruing to the state for vital public services. The study then compares two scenarios – a congested future based on no additional transportation revenues and an improved future that includes new financial resources. The result quantifies the benefit to the economy and to jobs due to increased investment.

Like the previous study, business interviews were conducted to gain better insight into how businesses are coping with transportation and congestion challenges. Travel models made

available from four metropolitan planning organizations around the state, including Portland, mid-Willamette Valley, Bend and Corvallis, were used to show the results.

The study seeks to answer the following questions:

- ▶ What are the impacts of highway congestion on the economic performance of Oregon and major metropolitan areas of the state?
- ▶ How has congestion affected business transportation decisions and operations in the state?
- ▶ How have the effects of congestion changed since the 2005 Cost of Congestion study?
- ▶ What are the effects of transportation investment on the state’s economy?

“

**Congestion can affect a region’s economy by reducing its competitiveness resulting in significant impacts on employment and economic output.**

”

# Introduction

Oregon's transportation system is the backbone of the state's economy. A well-maintained, resilient, and efficient network of highways, rail, air and waterborne transportation is essential. It supports the businesses that provide the jobs and revenues needed to underpin the resource-based, traditional manufacturing and advanced biotech and computer/electronics technologies that characterize the state's economy.

Oregon's ability to retain its quality of life in an increasingly global economy rests to a great degree on our ability to provide well-paying jobs in the diverse array of industries that trade with the rest of the U.S. and the rest of the world. To maintain its advantage as an attractive location for businesses of all types, including those in the industrial sectors that offer middle-income jobs, Oregon must support, retain and attract workers and businesses best suited to the emerging demands of the domestic and international marketplace.

One of the key business requirements needed to grow and succeed in a highly competitive marketplace is the ability to maintain consistently high levels of productivity. This requires that the costs to move materials needed to produce goods in every sector of the economy, and the costs to move finished products to their final markets, must remain competitive. Transportation congestion increases the cost of business operations and

reduces productivity. Chronic delay linked to congestion can affect the economy by reducing competitiveness resulting in significant impacts on employment and economic output. Oregon, as a West Coast logistical hub, is particularly vulnerable to the impacts of increasing congestion.

Additional investment is needed to maintain Oregon's connections with global and domestic markets and to remain competitive with other states that are planning large investments in their transportation infrastructure. This report finds that:

- ▶ Oregon's competitiveness is largely dependent on efficient transportation. More than **346,400 jobs** are transportation related, or transportation dependent, meaning that system deficiencies threaten the state's economic vitality.
- ▶ Businesses report that traffic congestion and travel delays cost money, forcing changes in business operations and location decisions.
- ▶ Additional investments would generate **8,300 jobs, \$1.1 billion in benefits, and a \$2.40 return** for every \$1 of investment, by 2040.

## BY THE NUMBERS:

### \$300 billion.

Value of all goods moved in Oregon on all modes of transportation in 2012.

### 346,400.

Number of transportation-related and transportation-dependent jobs in Oregon in 2013.

### 36.9 million.

Total annual hours of travel time saved in Oregon if additional transportation investments are made. This equals 27 hours per household.

### 8,300.

Oregon jobs generated as a result of additional transportation investments by 2040.

### \$928 million.

Additional Oregon annual economic output/sales generated by businesses due to an improved transportation system by 2040.

### \$1.1 billion.

Annual income and non-monetary benefits of additional transportation investments to Oregon, or \$788 per household, by year 2040.

### \$2.40.

The potential return for every \$1 invested in the state's transportation system.

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# What the data show

## Role of transportation in Oregon's economy

*The state's economy and job base are transportation dependent, especially on its highways, for the connections they provide to domestic and international markets.*

Oregon's geographic location makes it a key component of U.S. West Coast logistics, serving as a major hub for domestic and international

freight. The state provides key international air and maritime gateways, as well as an important junction of critical transcontinental highways. Oregon is served by 23 port districts, including nine with inter-modal freight terminals; 23 railroads, including high-capacity transcontinental mainlines of both western Class 1 railroads; and 97 public-use airports, including seven with commercial airline service. Portland-metro in particular ranks fifth among western metropolitan regions in international

shipments. However, all of these modes depend on efficient and reliable highway access for freight shipments and business deliveries, as well as passenger travel for business. This is because trucks are the workhorse of the system, linking businesses throughout the state to the global marketplace and providing the "last mile" connection to inter-modal facilities, business operations and end users, as shown in **Figure 1**.

Traded-sector industries – those industries that provide goods and services outside of Oregon and bring money back into the state economy – are particularly reliant on an efficient transportation network. Exports from these industries are shipped through most major ports on the U.S. West Coast. These industries also are critical to statewide economic growth and job creation. In Oregon, the top traded-sector industries include wood product

**Figure 1: Major flows by truck to, from and within Oregon, 2040**



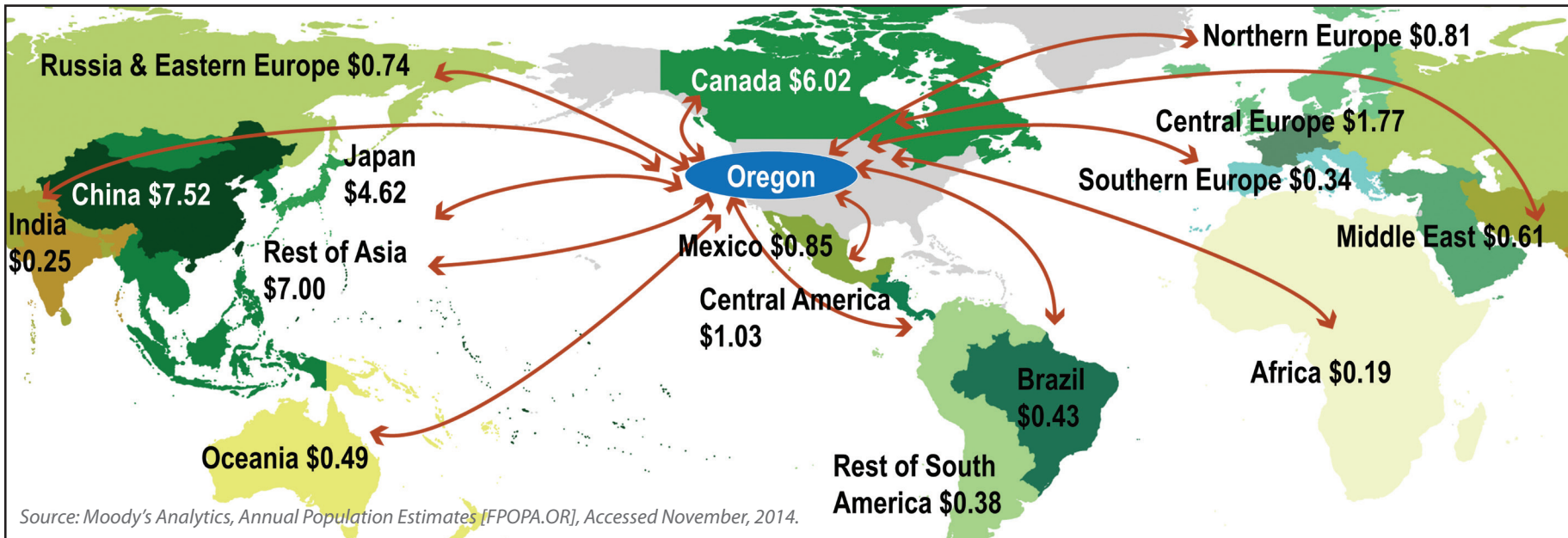
Source: U.S. Federal Highway Administration.

## INTEL CORPORATION

Intel Corp. is one of the world's largest designers and producers of essential technologies that serve as the foundation for the world's computing devices. Hillsboro, Oregon is home to the company's largest site for fabrication, testing and wafer production. Missed flight connections require Intel to reschedule shipments and are costly due to the limited usable life of dies used in production and manufacturing of chip sets.

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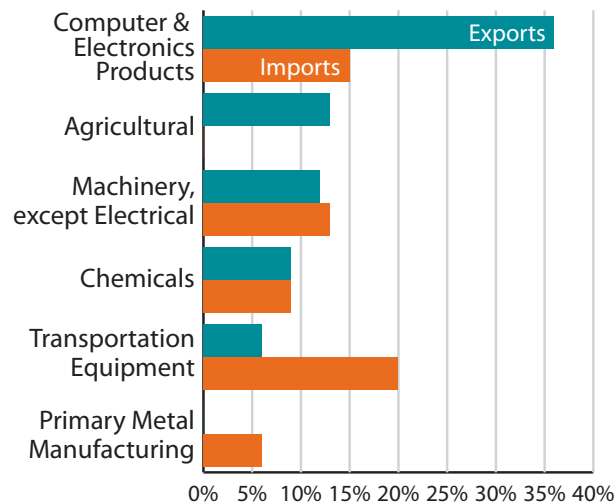
**Figure 2: Oregon import and export trade in billions of dollars by trade market**



manufacturing, forestry, agriculture, computer and electronics manufacturing, beverage manufacturing, and metal manufacturing. See **Figures 2 and 3**.

The statistics clearly indicate how important these traded-sector industries are to the Oregon economy. Overall, the Oregon **transportation system carried \$300 billion** worth of goods in 2012, more than the entire Oregon gross domestic product (GDP) of \$205 billion. About \$215 billion, or 72 percent of total value, is carried by truck. When considering transportation-related and transportation-dependent jobs in the traded industries, more than **346,400 jobs are reliant on an efficient transportation network** – or nearly **20 percent of all statewide jobs**.

**Figure 3: Oregon top five industries' share of international trade, imports & exports**



Source: WiserTrade International Trade Industry Data, accessed October 2014. Federal Highway Administration, Freight Analysis Framework 3, 2012, Values, accessed November 2014.

**CENTRAL OREGON TRUCK CO.**

Central Oregon Truck Company is an over-the-road, irregular route, 48 state carrier located in Redmond, Oregon. The impacts of congestion reduce productivity delivering consumed products that can not be recovered. This cost is ultimately passed back to the consumers of all products. Since the transportation industry has heavily regulated work hours, it makes avoiding peak travel times nearly impossible for all carriers. According to Central Oregon Truck Company, the better the roads are maintained and the more efficient roadway travel is, the greater the payback to consumers of any and all products.

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## Business interviews

For this study, the businesses listed here were asked about congestion and its effects on their business. Companies involved in exports (international and domestic), transportation services and regional distribution were chosen because of their economic importance to the Portland-metro region.

### Agriculture/Natural Resource

- Anderson Hay & Grain Co.
- Boise Cascade Co.
- Hampton Affiliates
- Imperial Stock Ranch
- Pacific Seafood
- Roseburg Forest Products

### Advanced Manufacturing

- Genentech
- Intel Corp.

### Logistics Service Providers

- Central Oregon Truck Co.
- Expeditors International of Washington, Inc.
- Oregon Transfer Co.
- Summit NW

### Manufacturing/Food Production

- Chris King Precision Components
- Craft Brew Alliance
- Oregon Iron Works
- Schnitzer Steel

### Retail Distribution

- Columbia Sportswear Co.
- The Kroger Company (Fred Meyer)

## The transportation system's impact on business competitiveness

*Congestion and travel delay due to deficiencies in the transportation system are already impacting businesses throughout the state, hurting their competitiveness.*

Interviews with statewide business leaders underscore the fact that transportation is critical to business competitiveness and sustained business growth in Oregon. Due to increasing congestion, businesses report that they are drastically altering operations in order to keep a competitive edge.

Although some businesses in the report are not located in the metro areas studied, almost all either distribute products in these areas or need to pass through them to get to ports or other operational centers. See **Figure 4**. As a result, congestion in metropolitan areas, including Portland-metro, can affect operational decisions and in some cases the costs of resource-based companies throughout the state.

Changes in business operations are nearing the limits of what a business can do to overcome transportation congestion before it becomes a severe issue. Many respondents reported that they have implemented staggered shifts, added evening and overnight operations, and are increasing operation during “off-off-peak” hours, with some delivery shifts now starting as early as 2 a.m. However, the businesses are making these operational changes in the face of regulatory limits on driver hours, worries of driver safety and limits to when they can feasibly deliver to customers. For those businesses that

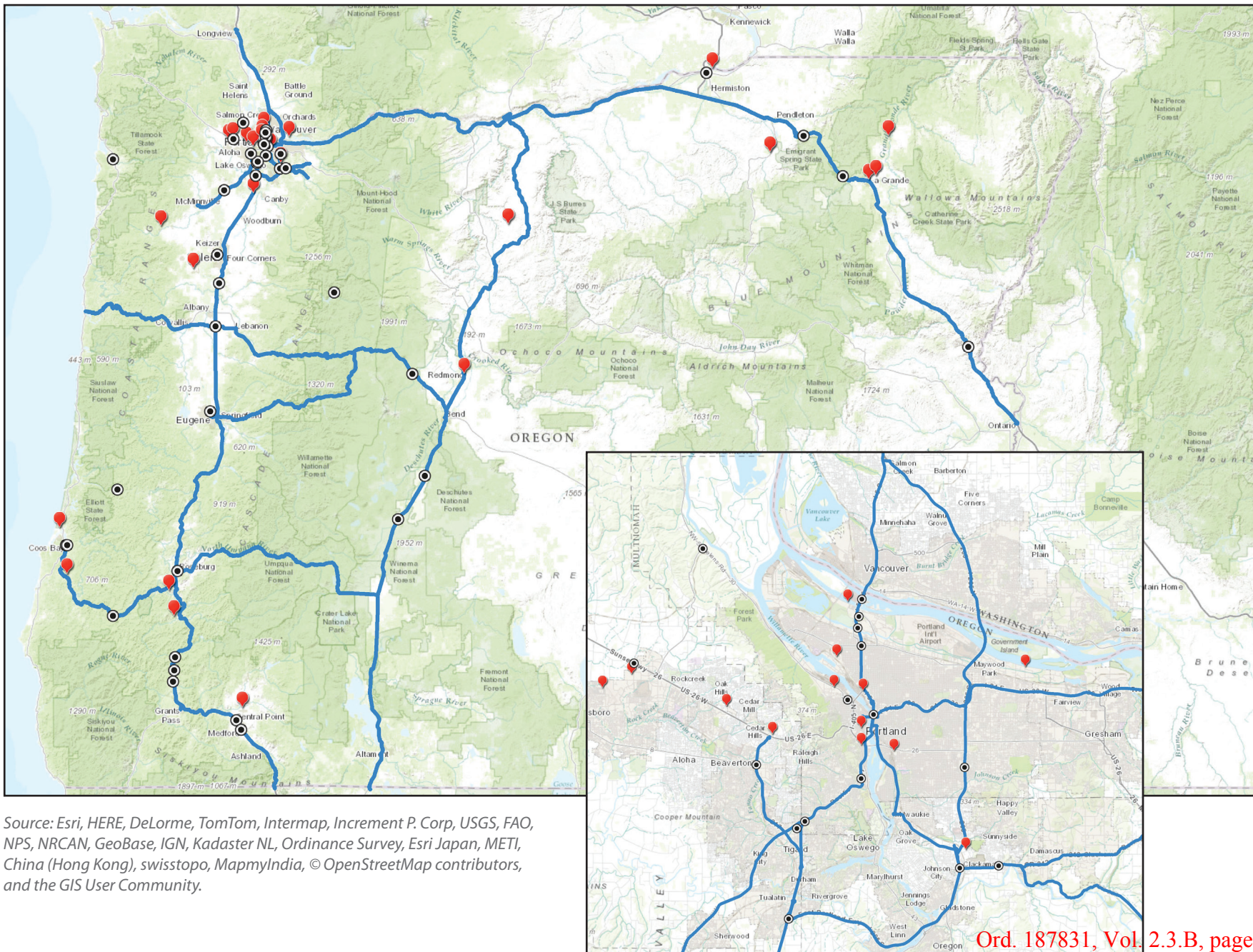
cannot shift to off-off-peak hours, managers report “lost turns” on truck deliveries due to congestion, meaning that a truck can take on fewer delivery routes in a day compared to the recent past when there was not as much congestion. Moreover, businesses reported that increasing congestion result in a competitive disadvantage of operating in Oregon.

New issues emerging for businesses also highlight the importance of transportation infrastructure. Businesses are focusing on exports for business growth, requiring reliable access to all U.S. West Coast international gateways and reliable service at ports and airports both inside and outside of Oregon. Demand for transportation services serving foreign markets is growing faster than the demand for domestic markets. Furthermore, businesses are optimizing costs by relying more on transportation service providers such as third-party logistics companies and for-hire transportation services, thereby minimizing direct operating risks and passing them onto another party.

Businesses were also asked to comment on any concerns or plans they have regarding the resiliency of the transportation system to seismic events. Many businesses reported high vulnerability to a seismic event if major transportation links were disrupted, with some more localized businesses reporting an inability to sustain themselves in the event of long-term transportation system failure. Thus, in addition to the reliability of the transportation network, the resiliency of the network is also of concern to Oregon businesses.

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**Figure 4: Coping with congestion; key routes (blue), bottlenecks (black) and businesses interviewed (red)**

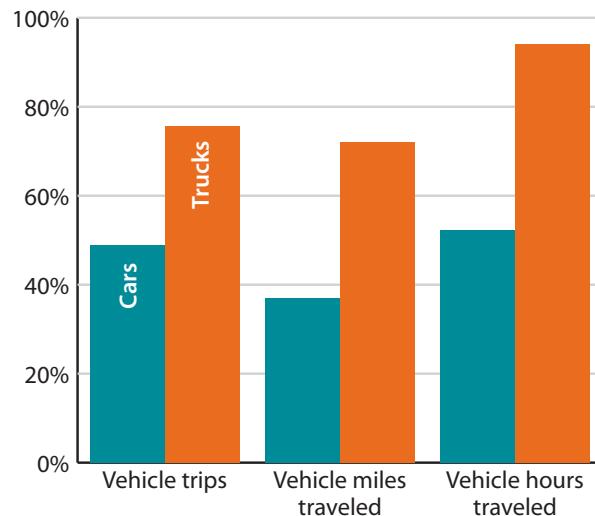


Source: Esri, HERE, DeLorme, TomTom, Intermap, Increment P. Corp, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community.

## HAMPTON AFFILIATES

Hampton Affiliates produces dimensional lumber with six sawmills located throughout the Pacific Northwest. There are three mills in Oregon (Willamina, Tillamook and Warrenton.) They produce about 2 billion board feet of wood products per year with roughly 500 million board feet of exports. They rely extensively on for-hire firms for their outbound shipments that require about 45,000 truckloads per year. Hampton's costs have gone up dramatically in the last five years due to congestion, new driver rules and lack of drivers.

**Figure 5: Portland-metro projected travel increases, 2010-2040**



Source: Portland Metro

## Overall impacts of congestion and travel delay on the economy

*Failure to adequately invest in the transportation system results in significant losses to Oregon's economy, job base and quality of life.*

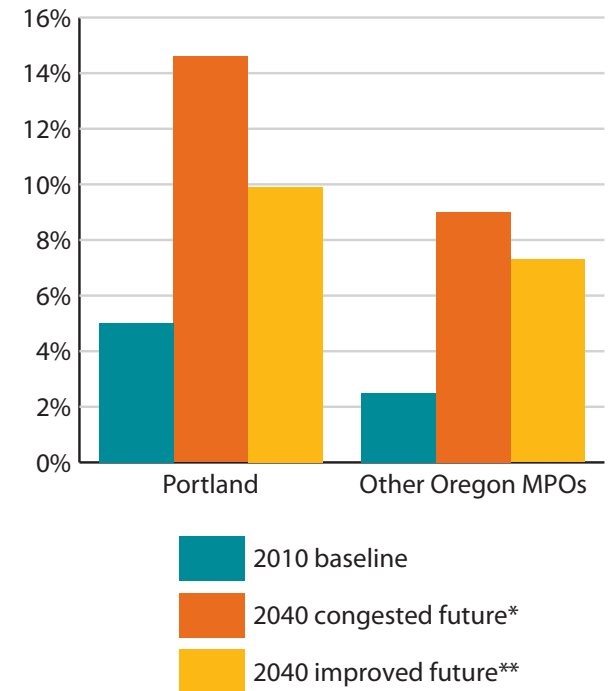
Transportation system assessments for the metropolitan regions included in this study (Portland, Salem/Mid-Willamette Valley, Bend and Corvallis) suggest that congestion is becoming an increasing problem statewide and that investments in infrastructure can strongly mitigate these conditions.

Over time, as more trips are generated in the state, traffic increases cause additional congestion and reduce reliability on the highway network for both passenger cars and trucks. See **Figure 5**. For example, in 2010, 5 percent of all travel time in Portland-metro took place in congested conditions (e.g. in slow, stop-and-go traffic). This is expected to triple to 15 percent of all trips by 2040. Put another way, by 2040, the average Portland-metro household will experience **69 hours of congestion annually**, or nearly two work weeks spent in congested conditions, if only the currently programmed improvements are made, as shown in **Figure 6**. Additional future investments would reduce this amount to 37 hours per household. In other Oregon metropolitan areas, congestion will increase to 18 hours per household by 2040 without new investments. That figure could be reduced by two-thirds, to six hours per household, with additional investments. In total, new transportation investments would **save**

Oregonians **36.9 million hours of travel time** or an average of **27 hours per household**, as shown in **Figure 7**.

These travel time savings from new investments translate to significant economic impacts. With additional transportation investments these savings would generate an additional **8,300 jobs**

**Figure 6: Improved future transportation funding reduces percent of travel time in congestion**



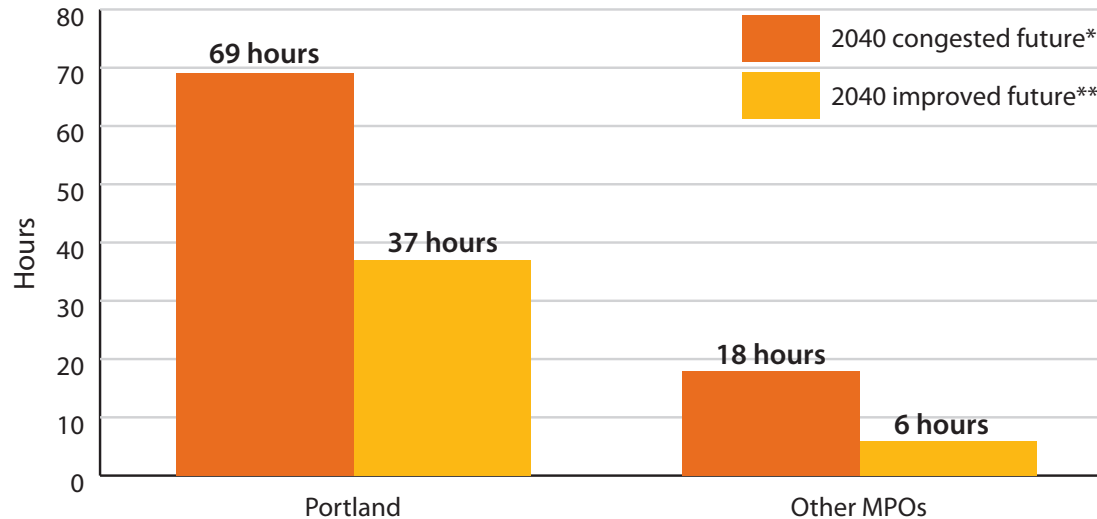
\* Based on no investment beyond current funding.

\*\* Based on fully funded Regional Transportation Plans.

Source: Portland Metro and Oregon DOT Office of Planning. Travel demand model estimates provided directly, October 2014.



**Figure 7: Improved future transportation funding reduces congestion, hours per household in slow, stop-and-go traffic**



\* Based on no investment beyond current funding.

\*\* Based on fully funded Regional Transportation Plans.

Source: Calculations from EDR Group based on travel demand model estimates. Household data from Moody's Analytics, Total Households [FHHOLDA], Accessed October 2014.

by 2040; **\$928 million in output**; **\$530 million in GDP** or value added; and **\$380 million in wages and compensation** to employees.

This study also finds that by 2040, improving the transportation system investment levels specified in current state and metropolitan area long-range Regional Transportation Plans would generate economic benefits for the state growing to nearly **\$1.1 billion per year** by 2040, as shown in **Figure 8**. Cumulatively, Oregon would receive over \$24 billion in benefits from these transportation investments, returning over **\$2.40 for every dollar spent** on improving the transportation system.

**Figure 8: Economic benefits for Oregon per year by 2040**

	Portland-metro	Other study metros	Total
Economic benefits*	\$822,000,000 (\$908 per household)	\$327,000,000 (\$744 per household)	<b>\$1,058,000,000</b> (\$788 per household)
Jobs**	5,897	2,421	<b>8,318</b>

\* Includes GDP, traveler non-monetary benefits and societal benefits.

\*\* Change to average annual employment level.

Source: EDR Group

## GENENTECH

For Genentech, perishability is a key concern and missed air shipments require that products be stored under controlled conditions. When outbound shipments are missed, products must be held in Hillsboro, where the cost of storage, monitoring of tightly controlled conditions and re-dispatching significantly increase overall costs.

“Due to increasing congestion, businesses report that they are drastically altering operations in order to keep a competitive edge.”

# Conclusion

The rewards are high if new investments are made. However, the risks are great for the economy and quality of life in Oregon if additional investments are not undertaken soon. Oregon risks erosion of its competitive position in domestic and international markets as the cost to move goods increases due to congestion. This means thousands of jobs and billions of dollars for the Oregon economy.

Understanding both the benefits and potential risks of transportation infrastructure investment is important. This study is intended to provide useful information to the public, the business community and government decision-makers as they work to reach consensus on transportation policy, prioritize projects and make funding decisions.

Business, civic and government leaders should engage in a discussion about transportation system deficiencies in terms of congestion and resiliency. It impacts costs for businesses, job opportunities, business competitiveness and ultimately state revenue used to fund vital public services. It is critical to continue to invest in the transportation system in order to protect and enhance the state's economy and quality of life.



# Thank you to our funding partners.

A number of companies and organizations contributed to the funding of this report and the Value of Jobs initiative, including:

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- ▶ 2014 Check-up on the Portland-Region's Economic Health
- ▶ Portland-Metro's Health Care
- ▶ International Trade & The Portland Harbor's Impact
- ▶ 2013 Check-up on the Portland-Region's Economic Health
- ▶ Higher Education & Regional Prosperity
- ▶ 2012 Check-up on the Portland-Region's Economic Health
- ▶ Portland-Metro's Manufacturing Sector
- ▶ Land Availability: Limited Options
- ▶ Portland-Metro's Traded Sector
- ▶ 2011 Check-up on the Portland-Region's Economic Health
- ▶ International Trade study
- ▶ 2010 Check-up on the Portland-Region's Economic Health

### **About the Value of Jobs Coalition**

The Value of Jobs Coalition is based on the premise that in order to have a prosperous, healthy Portland region with a good quality of life, we need more private-sector jobs. The coalition began with an economic study in the fall of 2010, which uncovered troubling economic data about the Portland-metro region. A number of other studies have followed that highlight the region's economic opportunities and challenges. Find out more at:

[www.valueofjobs.com](http://www.valueofjobs.com).

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2	Baack, Don (SW Trails PDX)	4/28/2015	<a href="https://www.youtube.com/watch?v=ClBpNYZs4hs">https://www.youtube.com/watch?v=ClBpNYZs4hs</a>	02:18:55
3	Tennant, Byron (NECN)	4/28/2015	<a href="https://www.youtube.com/watch?v=ClBpNYZs4hs">https://www.youtube.com/watch?v=ClBpNYZs4hs</a>	02:25:30
4	Sallinger, Bob (Audubon Society of Portland)	4/28/2015	<a href="https://www.youtube.com/watch?v=ClBpNYZs4hs">https://www.youtube.com/watch?v=ClBpNYZs4hs</a>	02:41:10
5	Wax, Ellen (Working Waterfront Coalition)	4/28/2015	<a href="https://www.youtube.com/watch?v=ClBpNYZs4hs">https://www.youtube.com/watch?v=ClBpNYZs4hs</a>	02:38:30
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8	Kerr, Barbara	4/28/2015	<a href="https://www.youtube.com/watch?v=ClBpNYZs4hs">https://www.youtube.com/watch?v=ClBpNYZs4hs</a>	03:11:50
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33	Ansary, Raihana (Portland Business Alliance)	11/4/2014	<a href="https://www.youtube.com/watch?v=gw14idFCL7M">https://www.youtube.com/watch?v=gw14idFCL7M</a>	04:04:03
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37	Lahsene, Susie (Port of Portland)	10/28/2014	<a href="https://www.youtube.com/watch?v=S-vdeg5BXkQ&amp;feature=youtu.be">https://www.youtube.com/watch?v=S-vdeg5BXkQ&amp;feature=youtu.be</a>	01:33:00
38	Wax, Ellen (Working Waterfront Coalition)	10/28/2014	<a href="https://www.youtube.com/watch?v=S-vdeg5BXkQ&amp;feature=youtu.be">https://www.youtube.com/watch?v=S-vdeg5BXkQ&amp;feature=youtu.be</a>	01:31:39

39	Sallinger, Bob (Audubon Society of Portland)	10/14/2014	<a href="https://www.youtube.com/watch?v=VBQLOCVoHxk&amp;list=UUC5s9BTqEiTSPeiUIO7mvKw">https://www.youtube.com/watch?v=VBQLOCVoHxk&amp;list=UUC5s9BTqEiTSPeiUIO7mvKw</a>	00:23:30
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42	Cohen, Cassie	10/14/2014	<a href="https://www.youtube.com/watch?v=VBQLOCVoHxk&amp;list=UUC5s9BTqEiTSPeiUIO7mvKw">https://www.youtube.com/watch?v=VBQLOCVoHxk&amp;list=UUC5s9BTqEiTSPeiUIO7mvKw</a>	01:16:22
43	Baack, Don (SW Trails PDX)	10/14/2014	<a href="https://www.youtube.com/watch?v=VBQLOCVoHxk&amp;list=UUC5s9BTqEiTSPeiUIO7mvKw">https://www.youtube.com/watch?v=VBQLOCVoHxk&amp;list=UUC5s9BTqEiTSPeiUIO7mvKw</a>	01:22:02
45	Johnston, Dixie	9/23/2014	<a href="https://www.youtube.com/watch?v=gEBkKehYjrc&amp;feature=youtu.be">https://www.youtube.com/watch?v=gEBkKehYjrc&amp;feature=youtu.be</a>	00:47:13
46	Wax, Ellen ( Working Waterfront Coalition)	9/23/2014	<a href="https://www.youtube.com/watch?v=gEBkKehYjrc&amp;feature=youtu.be">https://www.youtube.com/watch?v=gEBkKehYjrc&amp;feature=youtu.be</a>	00:51:26
49	Bullion, Tom (Port of Portland)	9/23/2014	<a href="https://www.youtube.com/watch?v=gEBkKehYjrc&amp;feature=youtu.be">https://www.youtube.com/watch?v=gEBkKehYjrc&amp;feature=youtu.be</a>	01:38:24
50	Theisen, Greg (Port of Portland)	9/23/2014	<a href="https://www.youtube.com/watch?v=gEBkKehYjrc&amp;feature=youtu.be">https://www.youtube.com/watch?v=gEBkKehYjrc&amp;feature=youtu.be</a>	01:41:48
51	Sallinger, Bob (Audubon Society of Portland)	9/23/2014	<a href="https://www.youtube.com/watch?v=gEBkKehYjrc&amp;feature=youtu.be">https://www.youtube.com/watch?v=gEBkKehYjrc&amp;feature=youtu.be</a>	01:22:44
52	Bernstein, Robert	9/23/2014	<a href="https://www.youtube.com/watch?v=gEBkKehYjrc&amp;feature=youtu.be">https://www.youtube.com/watch?v=gEBkKehYjrc&amp;feature=youtu.be</a>	01:26:25