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LaCapra, Fred		11/19/2015	Hearing	1:05:46	https://www.youtube.com/watch?v=kvK0Osey7KM	https://www.youtube.com/watch?v=kvK0Osey7KM&t=65m46s
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Clark, Troy		11/19/2015	Hearing	0:21:42	https://www.youtube.com/watch?v=kvK0Osey7KM	https://www.youtube.com/watch?v=kvK0Osey7KM&t=21m42s

Brooks Tree Farm, Inc
9785 Portland Road NE
Salem, OR 97305

Portland City Council
City Hall
1221 SW 4th Ave.
Portland, OR 97204

January 11, 2015

Dear Mayor Hales and Commissioners,

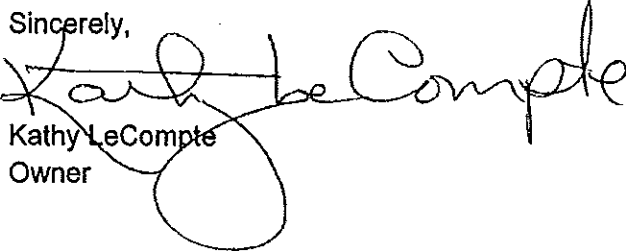
As a member of the agriculture community, I spend most of my time in the fields and rural community than in our urban city of Portland. However, the decisions you make on SW 4th Ave have major implications for the rest of our state. It has come to my attention that the blueprint for the future growth and development of the City of Portland does not assign much of that growth to the Portland Harbor. In fact, the Draft Comprehensive Plan and the supporting Economic Opportunities Analysis shows little future growth in the harbor. For the future of my business, and the ag families of Oregon, this does not make sense.

Brooks Tree Farm is a family held and operated organization specializing in young plants for the Christmas tree, timber, ornamental nursery trades as well as plants native to the Pacific Northwest. We provide bare root seedlings, transplants, plugs and young trees established in pots for the grafting trade. The nursery, which was started on a small farm in Brooks, has grown to seven farms encompassing 225 acres.

Family farmers face constant uncertainty. Volatile weather, disease and fluctuating fuel costs makes running an agricultural operation an ongoing challenge. Oregon's agriculture and farming communities count on the Port to ship our products to overseas markets. We don't need the additional challenge of a port that can't serve our industry and our needs.

I urge you to recognize the impact that this forecast can have on one of the most trade dependent states in the nation and change the Portland harbor forecast back to the "most likely" moderate growth as originally recommended by Bureau of planning and sustainability staff.

Sincerely,


Kathy LeCompte
Owner

Working Waterfront Coalition

Comprehensive Plan Comments

January 7, 2016

Working Waterfront



C O A L I T I O N

City of Portland City Council
Portland City Hall
1221 SW Fourth Avenue
Portland, OR 97204

January 7, 2016

Dear Mayor Hales and Portland City Commissioners:

The Working Waterfront Coalition (WWC) respectfully requests that City Council return to the mid-range growth forecast in the Economic Opportunities Analysis (EOA) -- the forecast that Council adopted in the 2012 EOA and the forecast used by Metro in their urban growth report.

A Medium Growth Forecast Is Supported by Substantial Evidence, Is Consistent with Other Adopted Plans and Is Good Policy

Based upon historic data and future projections, the City must assume a medium-growth cargo forecast for harbor-related tonnage across all cargo types, and not assume a low forecast (Attachment A). A low forecast is not supported by substantial evidence in the record and does not comply with Statewide Planning Goal 2's requirement for consistency among all adopted City plans. A low forecast contradicts historical trends and recent harbor infrastructure improvements that have resulted in substantial private sector investment (Attachment B). The low forecast as proposed by the Planning and Sustainability Commission (PSC) is a policy choice that retreats from historic cargo trends and plan for a decline in harbor business, despite contrary private sector investments and adopted plans. The PSC's recommendation sends the wrong message to Oregon businesses and to the public about the importance and future of the Portland Harbor, and the many businesses and employees who rely upon it.

Harbor Jobs are Middle-Income Jobs that Further the City's Equity and Housing Affordability Goals

The City should support additional middle-income job growth in the Portland Harbor, which will help the City achieve its equity and housing affordability goals. Harbor businesses are major Portland employers that employ more than 31,000 men and women, and support 29,000 more employees, which are largely paid middle-income wages. The harbor is a place of job diversity and predominantly middle-income wages (Attachment C). One harbor employer has more than 19 languages spoken on site. Many harbor businesses work directly with community college programs for job placement and skill development for existing employees. Job growth in the harbor is exactly what our City needs to ensure future work force diversity and middle income wages so more Portland citizens can afford a reasonable standard of living in Portland. Middle income wages are also one way to address Portland's housing affordability gap. Income disparity is part of our community's housing crisis, and that disparity is in part because of the flattening of middle income wages and loss of middle income jobs.

Harbor businesses are also a major source of revenue for the City of Portland's small and medium sized business. More than fifty percent of harbor business procurement of supplies, raw

Working Waterfront



C O A L I T I O N

materials, capital goods and services comes from small local businesses. This relationship is meaningful to the neighborhoods and the people employed as a result (Attachment D). The PSC recommended low forecast assumes one percent or less of annual growth in the harbor – limiting job opportunities and procurements of supplies, raw materials and services from local businesses.

The EOA Overestimates the Supply of Industrial Land and Potential for Additional Capacity -- Brownfields, Transportation Improvements and Shifting of Some Jobs

The WWC strongly supports brownfield redevelopment. However, we are concerned that the City's assumption that 60% of the brownfields in the harbor will be cleaned up and available for industrial use over the planning horizon is unsupported by data and is unrealistic without financial and policy support. Brownfield redevelopment to industrial use is difficult due to time and costs associated with addressing contamination, ownership issues, uncertainty about Superfund liability and market constraints on industrial property (Attachment E). These factors influenced the City Council to assume that only 40 percent of the brownfields in the harbor would be remediated when the Council adopted the 2012 EOA. At that time owners of industrial properties in the Portland Harbor were skeptical about that assumption because it did not account for the uncertainty related to Superfund. The PSC's assumption about brownfield redevelopment is a 20% increase over what Council adopted 2012, but the policy, economic or evidentiary basis for this increase has not been identified.

The City cannot assume that unfunded transportation improvements will create more cargo efficiency and increase industrial land capacity in the Portland Harbor. The PSC recommended a Transportation System Plan (TSP) with 78 percent of city resources targeted to active transportation projects instead of improvements to road and rail that would support harbor businesses (Attachment F). The City Council cannot rely upon improvements to the transportation system to create more cargo efficiency and increase industrial land capacity until improvements to road and rail that support harbor businesses are funded.

There is no evidentiary basis for an assumption that moving some existing office jobs associated with harbor businesses offsite will increase industrial land capacity in the harbor. There are a limited number of jobs with administration functions located on site of harbor businesses and they provide a critical function specific to onsite business operations and industrial activity. Moving office functions would both affect the efficiency of the operation and add cost, and not significantly increase industrial land supply.

WWC's Request and Why the Middle-Range Cargo Forecast Matters

The WWC requests that the City Council assume a more robust harbor forecast consistent with data and trends and support for middle-income jobs growth by:

- Targeting infrastructure and brownfield investment and policies to support harbor business expansion
- Expediting permitting
- Addressing conflicting regulations that hinder harbor business investment

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The Comprehensive Plan is an aspirational document, a document filled with hopes and dreams for Portland, and a document that addresses and plans for expected growth over the next 20 years. Planning for growth, housing, jobs and people is addressed in every part of this policy document - - except for harbor industrial lands. How can we have a document that addresses growth for everything except for Portland harbor industrial lands?

The Planning Commission recommended a low growth forecast as a policy choice that is not based on data. The Working Waterfront Coalition requests that Council base its decision upon the data, and to make a choice that supports Portland's future, our industrial harbor's future, and our middle-income job future.

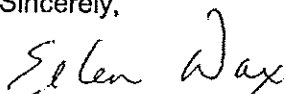
Why does this matter so greatly to harbor businesses? It matters because it sends a negative message, the wrong message about what is happening in the harbor. Substantial investment in the harbor has occurred since the Columbia River channel deepening in 2010. More than \$370 million investment has occurred since 2010 - generating an estimated \$4.5 million annually in tax revenues. The tonnage generated from these facilities is significant. Even with the recent loss of container service at the Port of Portland's Terminal 6 the volume in the Portland harbor is about equal to the volume in either Seattle or Tacoma. Portland Harbor tonnage, coupled with the Columbia River tonnage, creates the second largest gateway on the West Coast behind only Los Angeles /Long Beach (Attachment G).

It matters because it will discourage opportunities for future investment by private and public entities. This low forecast will impact our ability to obtain public or private funding for infrastructure, brownfield re-development and even harbor business expansion. All grant and investment concepts require future forecast information as justification for the requested investment. We will not compete well if our own assessment of our future is not positive and below the growth rate established by the region.

And finally, it matters because the harbor employs more than 31,000 men and women and supports 29,000 more employees. If there is any place in this City that leadership should support job growth, it is the Portland Harbor. If you care about the diverse employment opportunities and middle-income wages for Portland residents, then you should ensure that there is adequate growth in the harbor. The WWC urges you to change the Portland Harbor lands forecast back to the "most likely" moderate growth as originally adopted by City council in 2012.

Making a policy choice to adopt a low growth forecast sends the wrong message - that our City does not support harbor businesses and harbor jobs. We are open for business and with your help would like to continue to be so for years to come.

Sincerely,



Ellen Wax, Executive Director

Working Waterfront



C O A L I T I O N

Attachments:

Attachment A: WWC Issue Matrix and Recommendations

Attachment B: Impacts of Channel Deepening on the Columbia River and Investment Growth and the Continued Impact of the Portland Harbor

Attachment C: Portland Harbor Workforce Demographics

Attachment D: Economic Linkages from Marine Industrial Businesses

Attachment E: Brownfield/Greenfield Development Cost Comparison Study

Attachment F: City Recommended Projects – TSP Summary Chart

Attachment G: West Coast Ports Tonnage

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.

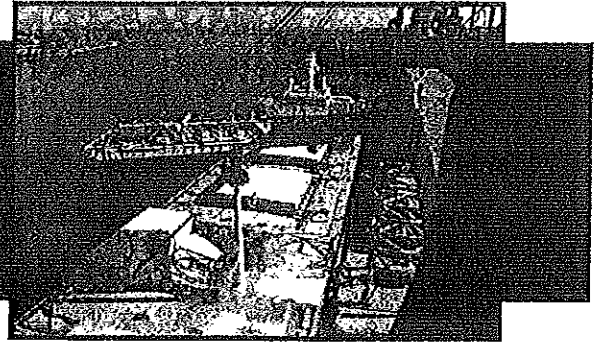
Attachment A

City of Portland EOA / Comprehensive Plan Amendments
WWC Issue Matrix

Issue	WWC's Position	PSC Recommendation	WWC's Response
<p><u>1. Cargo Forecast.</u> Should the City assume a medium-growth cargo forecast for harbor-related tonnage across all cargo types?</p>	<p><u>Yes.</u></p> <ul style="list-style-type: none"> A low-growth cargo forecast is not supported by substantial evidence in the record. A low forecast overlooks historical trends, recent infrastructure improvements and it sends the wrong message to Oregon businesses and the public. A low cargo forecast is inconsistent with region's forecast assumptions 	<p><u>No.</u> PSC adopted a low cargo forecast due to land supply challenges.</p>	<p>The City Council should adopt a medium-growth forecast for harbor-related tonnage across all cargo types.</p>
<p><u>2. Brownfield Redevelopment.</u> Should the City assume that a large amount of brownfield redevelopment to industrial uses will occur in the harbor during the 20 year planning period?</p>	<p><u>No.</u></p> <ul style="list-style-type: none"> Brownfield re-development to industrial is difficult due to time and cost associated with addressing contamination, ownership issues and the market constraints on industrial property (industrial attracts only \$5-7 /foot, regardless of what it costs to bring it to market readiness). 	<p><u>Yes.</u> PSC assumed 60% brownfield re-development in Portland harbor, which is 20% higher than what they assumed in the 2012 adopted EOA.</p>	<p>The City Council should assume a more modest amount of brownfield redevelopment along the harbor during the 20 year planning period, until brownfield redevelopment returns a reasonable amount of land to the industrial supply along the harbor.</p>
<p><u>3. Unfunded Transportation Improvements.</u> Should the City assume that unfunded transportation improvements will create more cargo efficiency and increase industrial land capacity along the harbor?</p>	<p><u>No.</u></p> <ul style="list-style-type: none"> The city should not take credit for the additional through-put that could result from transportation investments and the elimination of bottlenecks if there isn't certainty (funding or other commitments) around specific rail and road projects that support harbor businesses. 	<p><u>Yes.</u> PSC adopted the TSP with 78% of city resources targeted to active transportation projects instead of improvements to road and rail to support harbor businesses.</p>	<p>The City Council should not assume that improvements to the transportation system will create more cargo efficiency and increase industrial land capacity until such improvements are funded.</p>
<p><u>4. Office Job Relocation.</u> Should the City assume that office jobs associated with harbor businesses will move elsewhere and increase industrial land capacity along the harbor?</p>	<p><u>No.</u></p> <ul style="list-style-type: none"> The admin functions for the harbor businesses are limited and intended to serve the business operations. Moving that function would both affect the efficiency of the operation and add cost. 	<p><u>Yes.</u> PSC low forecast assumes a share of harbor businesses' administration functions move to free up more industrial land in the harbor.</p>	<p>The City Council should not assume that office jobs associated with harbor businesses will relocate and increase industrial land capacity along the harbor, until there is substantial evidence over a period of time that job movement is occurring and land capacity is increasing as a result.</p>
<p><u>5. Middle Income Jobs.</u> Should the City support additional middle income job growth in the Portland harbor?</p>	<p><u>Yes</u></p> <ul style="list-style-type: none"> The harbor employs more than 31,000 men and women and supports 29,000 more employees that are largely paid middle income wages. This is a place of job diversity and predominantly middle wages. Job growth here is what our City needs to ensure future work force diversity and wages to afford a reasonable standard of living in Portland. The businesses in the harbor are major employers in this City. More than fifty percent of their procurement of supplies, raw materials, capital goods and services comes from small local businesses. This relationship is meaningful to the neighborhoods and the folks employed as a result. 	<p><u>No.</u> PSC low forecast assumes 1% or less of annual growth in the harbor – limiting job opportunities and procurements of supplies, raw materials and services from local businesses.</p>	<p>The city council should assume a more robust harbor forecast consistent with data and trends and provide support in the Comprehensive Plan for middle income jobs growth by</p> <ul style="list-style-type: none"> Targeting investment and policies to support harbor business expansion Expediting permitting Addressing conflicting regulations that hinder harbor business investment

Attachment B

Investment Growth and the Continued Economic Impact of the Portland Harbor



The deepening of the Columbia River shipping channel in 2010 opened a floodgate of investments at terminals and ports along the river. Nowhere is this more evident than in the Portland Harbor. Columbia Grain and LD Commodities upgraded and expanded their grain terminals. Kinder Morgan increased the capacity of their bulk-commodities terminal. International Raw Materials and Canpotex invested in their fertilizer operations. Servicing the larger ships that carry more cargo requires larger, more powerful tugs. Shaver Transport invested in a new tug that's being fabricated in Portland Harbor at Diversified Marine. Shaver also invested in the first new grain barge on the Columbia River in ten years. Vigor Industrial is now home to the largest drydock in the U.S. The Port of Portland, along with other public and private partners, is investing in road and rail improvements in the Rivergate area, which will help meet the growing demand for transportation services from the expanded terminals. But for the deepening of the Columbia River shipping channel many of these investments either would not have happened, or would not have happened in the Portland Harbor.

\$370 Million

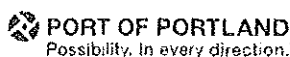
Total Investment at the Portland Harbor
Since 2010

\$4.5 Million

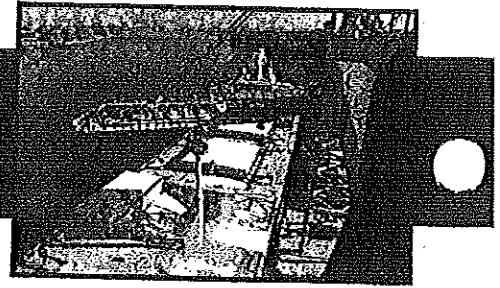
Estimated Increased Annual Tax
Revenue from Investments at the
Portland Harbor

Investments on the Portland Harbor Since the 2010 Deepening of the Columbia River Channel

Project (On-Line Date)	Investment Amount	Description
Columbia Grain (2015)	\$44 million	Upgraded grain storage and handling
Kinder Morgan Bulk Terminal (2013)	\$10 million	New ship loading facilities
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)	\$21 million	New barge, new tug and new engines
Capital Investments to Date	\$370 million	
Pembina (2018) (Proposed)	\$500 million	Propane export terminal
Recent and Proposed Investments	\$870 million	



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 in and out of the Northwest, 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 billion invested in facilities and transportation capabilities that are dependent on river commerce. Much of the investment made by private industry has been as 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. 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 impact jobs.

\$370 Million
Total Investment in the
Portland Harbor

\$1 Billion
Total Investment on the
Columbia River Since 2010

\$5.15 Billion
Additional Investments Planned
for the Columbia River

Port	Project	Investment Amount	Description
Longview	Export Grain Terminal (2012)	\$230 million	New grain terminal
Kalama	Temco LLC (2015)	\$100 million	Increase capacity (grain)
	Port of Kalama (2014-15)	\$7 million	Rail upgrades at the Port
	Kalama Export Grain (2011)	\$36 million	Increase storage capacity
Vancouver	United Grain Corporation (2012)	\$80 million	Enlarge storage and handling capacity
	West Vancouver Freight Rail Access (2016)	\$228 million	Rail expansion, new loop track, and road improvement
	Tidewater Barge Lines (2015)	\$30 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
	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 drydock 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)	\$21 million	New barge, new tug and new engines
Sub Total		\$1.08 Billion	
Proposed Investments			
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 Works (2017-18)	\$1.8 billion	New methanol plant
	Global - Columbia Pacific Bio-Refinery (2018)	\$80 million	Increased storage and rail improvements
St. Helens Port Westward	NW Works (2017-18)	\$1.8 billion	New methanol plant
	Ambre Energy (2018)	\$242 million	Coal transport
Vancouver	Vancouver Energy (2018)	\$100 million	Rail improvements and loading facilities
Portland	Pembina (2018)	\$500 million	Propane export terminal
Total Proposed		\$5.15 Billion	



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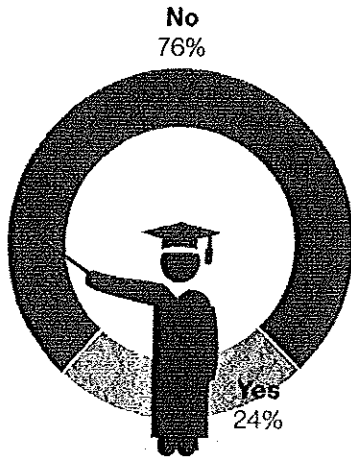
Attachment C

Portland Harbor Workforce Demographics

31,000 jobs

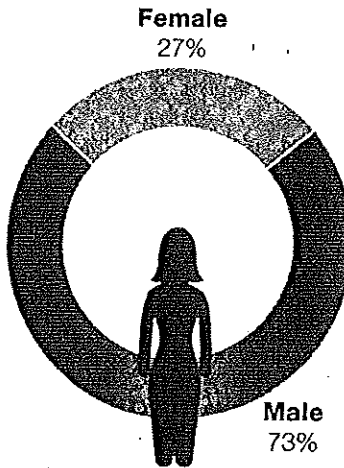
Bachelor's degree or advanced degree

Portland Harbor workforce



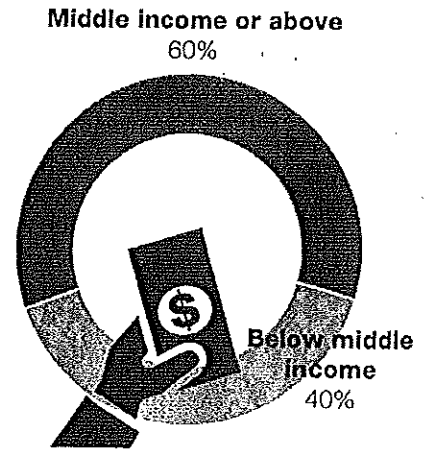
Gender

Portland Harbor workforce

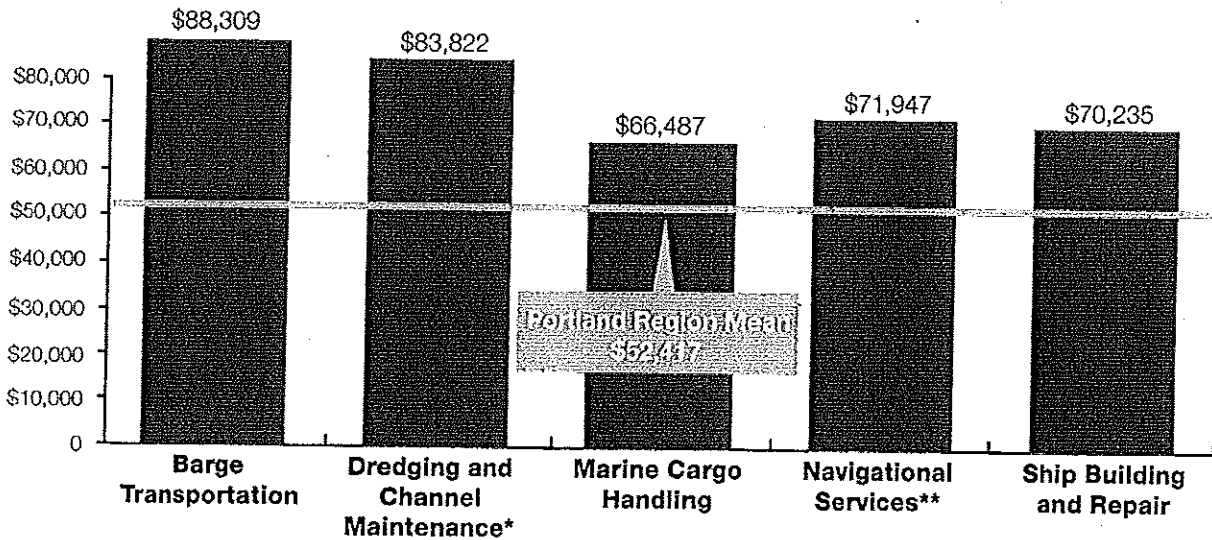


Earnings

Portland Harbor workforce



2014 Portland MSA wage comparison



Sources: U.S. Census Bureau, ECONNorthwest, with data from U.S. BLS 2014

Note: Wages chart based on Average Annual Pay for these NAICS codes (from left to right): 483211 (Inland Water Freight Transportation), 237990 (Other Heavy and Civil Engineering Construction), 488320 (Marine Cargo Handling), 486330 (Navigational Services to Shipping), 336611 (Ship Building and Repairing)

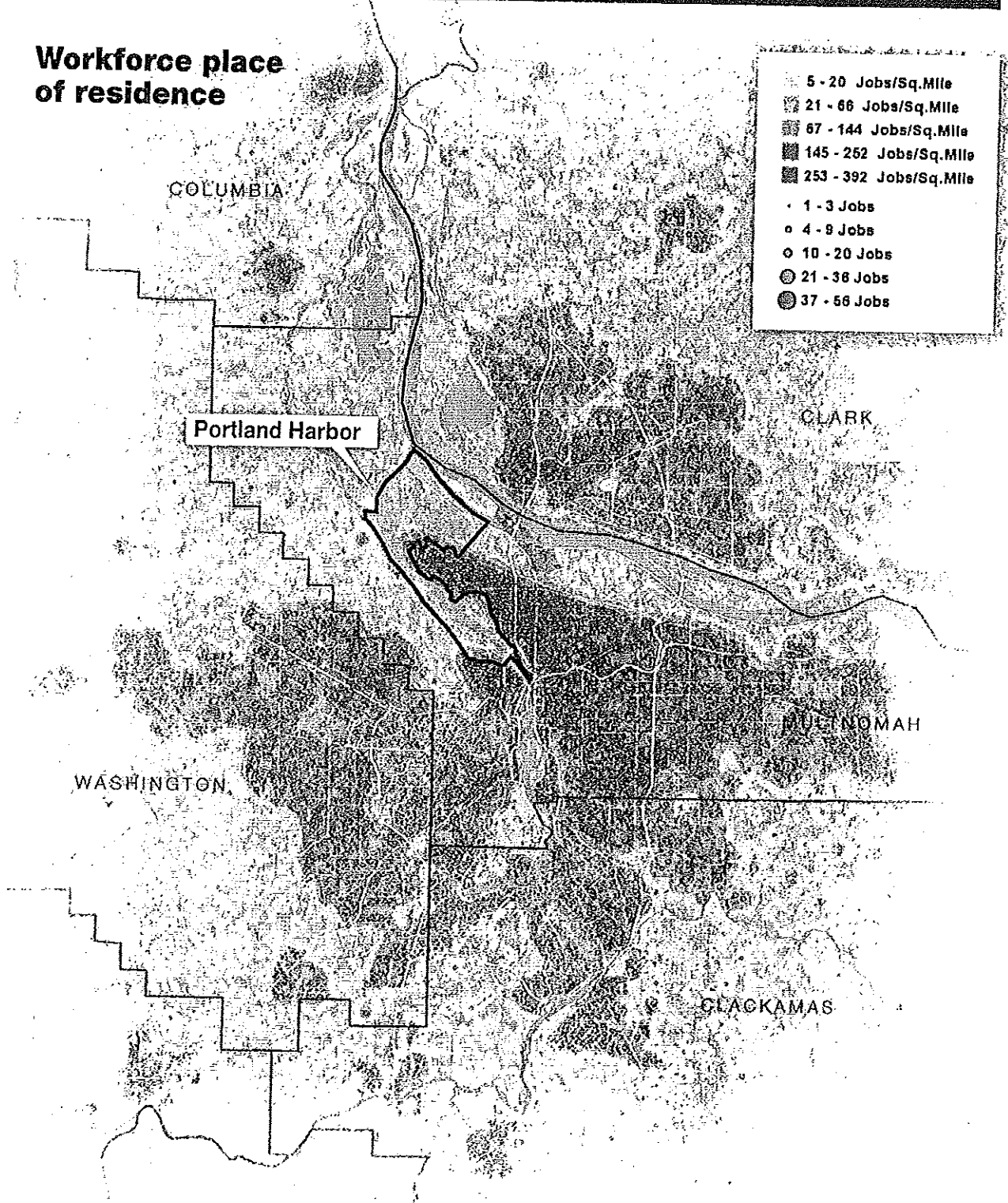
*2013 data used

**2012 data used (current is not disclosed)

Portland Harbor Workforce Demographics

31,000 jobs

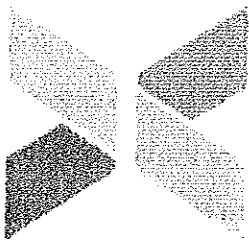
Workforce place of residence



Attachment D

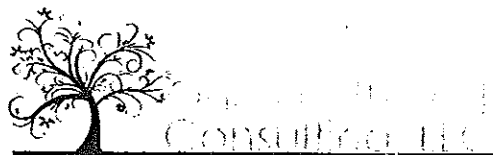
Economic Linkages from Marine Industrial Businesses

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.

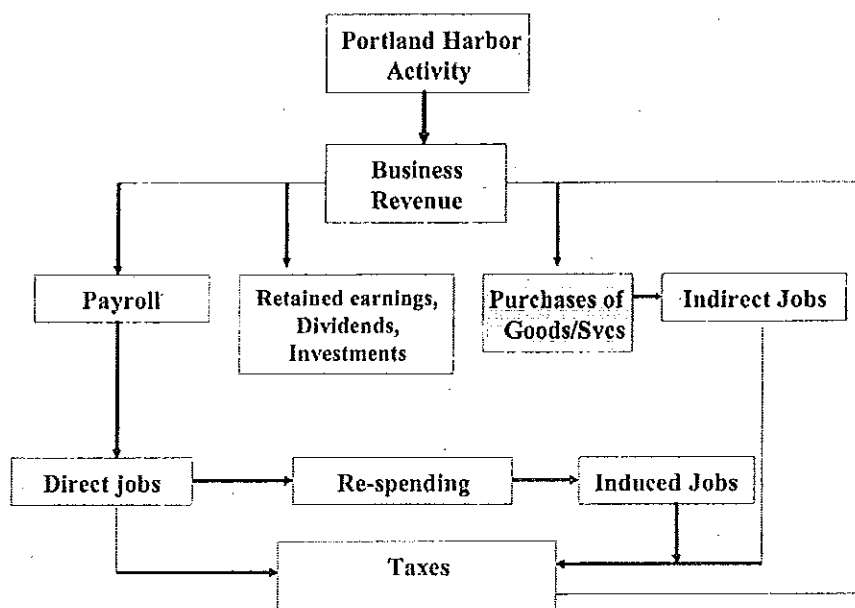
Marine Industrial Businesses have a significant impact on local business

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 288 local employers from whom they purchase goods and services (see Appendix 3 for a sample listing of those firms). Of these, 30 are suppliers of capital goods, 28 are suppliers of direct materials, 115 are suppliers of indirect materials, and 114 are providers of services.

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 collocation 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.



Appendix 1
Aggregate Procurement Data of Sample

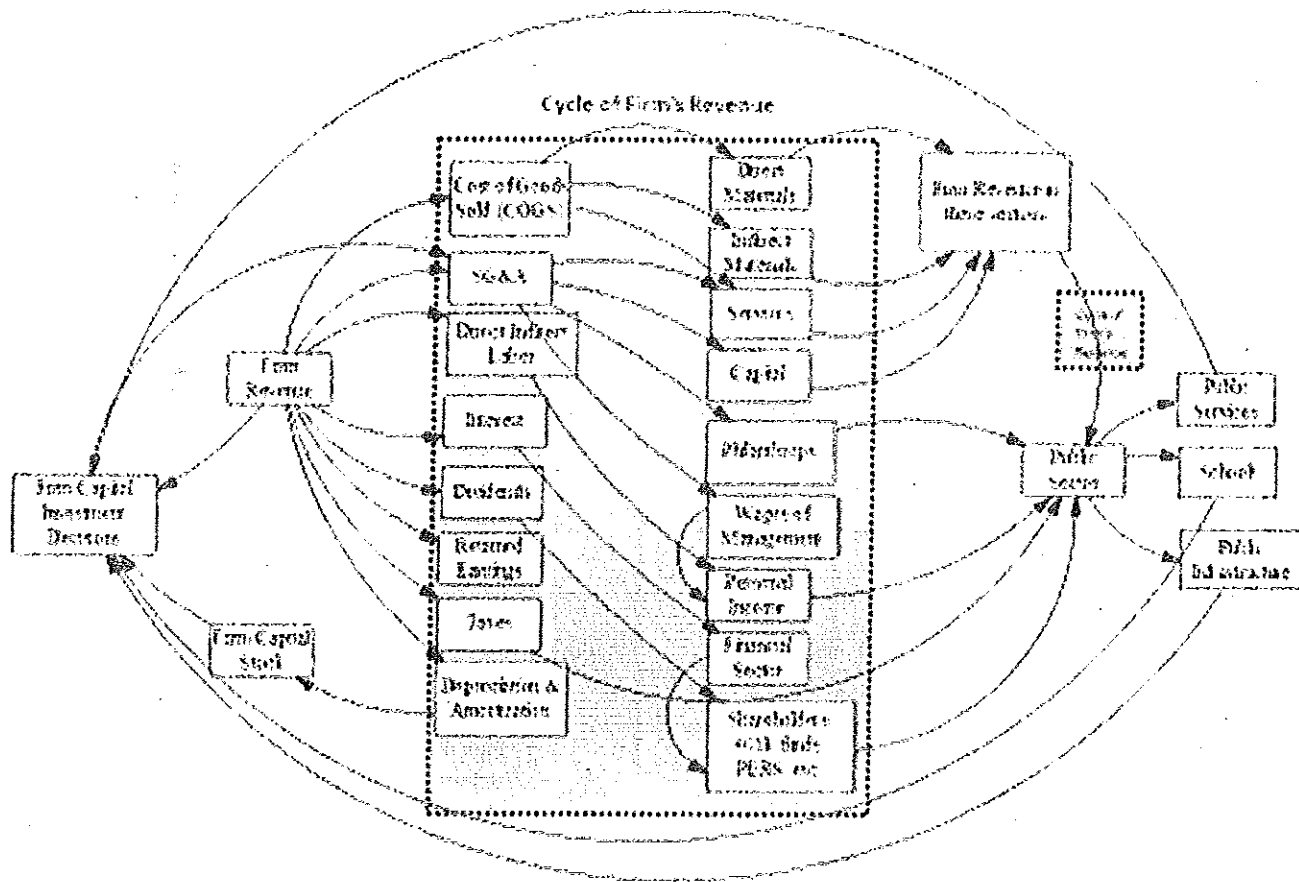
	<u>2012 Spend</u>		<u>2011 Spend</u>	
	Amount	Proportion	Amount	Proportion
Direct Materials				
Local	\$121,676,718.27	31%	\$126,247,855.38	27%
Regional	\$55,540,720.46	14%	\$73,117,590.90	16%
National	\$160,258,221.42	41%	\$201,088,333.52	44%
International	\$56,275,305.72	14%	\$59,991,510.37	13%
TOTAL	\$393,750,965.87	100%	\$460,445,290.17	100%
Capital Goods				
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%
TOTAL	\$19,350,616.36	100%	\$14,419,418.24	100%
Indirect Materials				
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%
TOTAL	\$49,842,069.52	100%	\$26,938,518.12	100%
Services Procured				
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%
TOTAL	\$199,068,183.07	100%	\$127,034,356.44	100%
AGGREGATE SPEND				
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%
TOTAL	\$662,011,834.82	100%	\$628,837,582.97	100%

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>Street</u>	<u>City State</u>	<u>Zip</u>	<u>Description</u>	<u>Category</u>
ACME Construction Supply	330 SE Salmon St	Portland, OR	97214	Headquartered in Portland with multiple locations in different states; Sells power tools and building supplies	Indirect Materials
Advanced Finishing Systems	2304 N Killingsworth St	Portland, OR	97217	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	Capital Goods
Ahern Rentals	3836 NE Columbia Blvd	Portland, OR	97211	Headquartered in Las Vegas, NV with several branch locations in many states; equipment rental company serving commercial, residential, industrial, and public market segments	Services
Air Liquide	6529 NW Front Ave	Portland, OR	97210	International supplier of industrial gases headquartered in France with presence in 80 countries; two local branches	Direct Materials
Airgas	3632 NE Columbia Blvd	Portland, OR		Supplier/distributor of industrial gases, machinery, tools, and supplies headquartered in Radnor Township, PA; several local branches	Indirect Materials
Alaska Copper & Brass	2440 SE Raymond St	Portland, OR	97202	Headquartered in Kent, WA with local location and other branch locations in CA and BC, Canada; supplier of metal products and fabrication services	Direct Materials
Albina Pipe Bending Co	12080 SW Myslony St	Tualatin, OR	97062	Single location company headquartered in Tualatin, OR; supplier of bent steel, metal tube bending, and pipe bending products and services	Services
Alliance Steel Distributors	3000 SE Hidden Way	Vancouver, WA	98661	Steel distributor/service center with single location/headquarters in Vancouver, WA	Direct Materials
Allied Electronics	6700 SW 105th Ave	Beaverton, OR	97008	Distributor of electronic components and electromechanical products with over 50 locations in US and Canada; headquarters in Ft. Worth, TX	Indirect Materials
AMEC	7376 SW Durham Road	Portland, OR	97224	Global engineering, project management, and consultancy company headquartered in London, UK with local office	Services



American Equipment Co	89 NE Columbia Blvd	Portland, OR	97211	Sales, rental, and service of industrial cleaning equipment such as pressure washers, parts washers, and steam cleaners; single location/headquarters in Portland, OR	Indirect Materials
American Metal Cleaning	9940 N Vancouver Way	Portland, OR	97217	Single location company headquartered in Portland, OR; provides industrial metal cleaning, stripping, and recovery services	Services
American Steel	525 S Sequoia Pkwy	Canby, OR	97013	With multiple locations in OR, WA, and CA with headquarters in Canby, OR, company is a metals processor and distributor/service center	Direct Materials
Anixter Inc	5107 NE 158th Ave	Portland, OR	97230	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	Indirect Materials
Apex Laboratories	12232 SW Garden Pl	Portland, OR	97223	Chemical, mechanical, metallurgical, and environmental testing services provider located in Portland, OR	Services
Applied Industrial Technologies	5041 NW Front Ave	Portland, OR	97210	Global supplier/distributor of industrial products and supplies headquartered in Cleveland, OH	Indirect Materials
Argo International	13481 SE Johnson Rd	Portland, OR	97222	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	Indirect Materials
Arjae Sheet Metal	8545 SE McLoughlin Blvd	Portland, OR	97222	Sole proprietorship in Portland, OR; sheet metal fabrication, commercial and industrial installation, HVAC/R service and repair	Direct Materials
Associated Hose Products	6326 NE Columbia Blvd	Portland, OR	97218	Single location distributor of industrial hose, fitting, and assembly products	Indirect Materials
Atlantic & Pacific Freightways	3001 SE Columbia Way	Vancouver, WA	98661	Locally-based truck transportation and logistics company operating throughout the US and Canada	Services
Atlasta Lock & Safe Co.	702 SE Grand Ave	Portland, OR	97214	Single location business providing locksmith services	Services
Batteries Plus	4812 SE 82nd Ave	Portland, OR	97266	Supplier of batteries and light bulbs with franchise locations in 46 states and Puerto Rico; multiple local locations; headquartered in Hartland, WI	Indirect Materials
Baxter Auto Parts	9444 N Whitaker Rd	Portland, OR	97217	Auto parts supplier with multiple locations in OR, WA, and CA	Indirect Materials



Beckwith & Kuffel Inc.	1614 NE 99th St	Vancouver, WA	98665	Offices in Seattle, WA, Vancouver, WA, and Spokane, WA; sales and service for industrial pumps, compressors, and blowers	Capital Goods
Benchmark Industrial Services	2245 NW Suffolk St	Portland, OR	97210	Industrial contractor providing services from equipment maintenance to complex capital projects with offices in Portland, OR, Seattle, WA, and Spokane, WA	Services
Bernert Barge Lines	421 High Street	Oregon City, OR	97045	Provider of inland waterway transportation services (tug and barge) with local history dating back to the late 1800s	Services
BestBuy	1772 Jantzen Beach Center	Portland, OR	97217	International electronics retailer headquartered in Richfield, MN	Indirect Materials
Blast Cleaning Services	21720 SW Oregon St	Sherwood, OR	97140	Single location contractor/manufacturer supplying and constructing blast cleaning systems (blastrooms, shotblast machines, automated airblast machines, shot peening machines, etc.)	Capital Goods
BNSF Railway	3930 NW Yeon Ave	Portland, OR	97210	Transcontinental railroad transportation and logistics service provider headquartered in Ft. Worth, TX	Services
Brake Systems Inc	2221 NE Hoyt St	Portland, OR	97232	Single location manufacturer, remanufacturer, distributor and engineer of brakes, valves, compressors, and related products and equipment	Indirect Materials
Branom Instrument Co	8435 N Interstate Pl	Portland, OR	97217	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	Indirect Materials
Buckaroo Thermosteel Inc	5410 NE 109th Ave	Portland, OR	97220	Single location roofing contractor	Services
Cal-Cert Co	6709 SE Lake Rd	Portland, OR	97222	Portland, OR based provider of calibration certification equipment and services	Services
CalPortland	1050 N River St	Portland, OR	97210	Glendora, CA headquartered supplier of cement, concrete, aggregates, asphalt, building products, and construction services with multiple local locations	Direct Materials
Carlson Testing Inc	8430 SW Hunziker Rd	Portland, OR	97223	Tigard, OR headquartered construction inspection, materials testing, and geotechnical engineering services company with branch office locations in Oregon	Services
Carson Oil Co	3125 NW 35th Ave	Portland, OR	97210	Portland, OR headquartered supplier of petroleum products and services with branch offices throughout Oregon	Indirect Materials



Cascade Architectural & Engineering	8916 NE Alderwood Rd	Portland, OR	97220	Seattle, WA based company providing equipment, supplies, reprographics and related support for the architectural and engineering sectors	Services
Cascade Columbia Distribution	14200 SW Tualatin Sherwood Rd	Sherwood, OR	97140	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	Indirect Materials
Cascade Controls	19785 NE San Rafael St	Portland, OR	97230	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	Services
Cascade Pipe & Supply	2519 N Hayden Island Dr	Portland, OR	97217	Bakersfield, CA based supplier, distributor, and manufacturer of industrial pipe, fittings, and supplies	Direct Materials
Centurylink	2201 NE Lloyd Blvd	Portland, OR	97232	Monroe, LA headquartered telecommunications service provider	Services
Centurylink Inc	4222 NE Columbia Blvd	Portland, OR	97218	Single location company providing sales and rental of construction equipment and supplies	Capital Goods
Chapel Steel Co	4200 NW Yeon Ave	Portland, OR	97210	Steel service center based in Philadelphia, PA with locations in US and Canada	Direct Materials
Chas H Day Co Inc	602 SE 11th Ave	Portland, OR	97214	Single location business providing sales and service of electric and pneumatic tools and supplies	Indirect Materials
Christenson Electric Inc	111 SW Columbia St	Portland, OR	97201	Portland, OR based electrical contractor	Services
Christenson Oil	3865 NW St Helens Rd	Portland, OR	97210	Single location supplier of petroleum products and services	Indirect Materials
City Club of Portland	901 SW Washington St	Portland, OR	97205	Nonprofit education and research based civic organization	Services
Coast Crane & Equipment Co	1601 NE Columbia Blvd	Portland, OR	97218	Sales, rental, and service of industrial cranes and equipment with locations throughout the Western US, including Alaska and Hawaii	Capital Goods
Conrey Electric	1903 SE 7th Ave	Portland, OR	97214	Single location sales and service provider of electric motors	Capital Goods
Consolidated Electrical Distributors	2555 NW Nicolai St	Portland, OR	97210	Single location supplier of electrical components and supplies	Indirect Materials
Continental Western Corp	12021 NE Erin Way	Portland, OR	97220	San Leandro, CA based distributor of industrial supplies	Indirect Materials



Contractor Plan Center	5468 SE International Way	Milwaukie, OR	97222	Milwaukie, OR based membership organization connecting contractors, owners, architects, manufacturers, and suppliers to facilitate project bidding	Services
Control Factors Inc	3271 NE Cleveland Ave	Portland, OR	97030	Manufacturers representative and distributor located in Gresham, OR of process flow and filtration/separation components	Indirect Materials
Cook Engine Co	530 NE Tomahawk Island Dr	Portland, OR	97217	Marine engine repair and service provider	Indirect Materials
Copiers NW Inc	11000 SW 11th St	Portland, OR	97005	Provider of copy and printing equipment, software solutions, and services based in Seattle, WA	Capital Goods
Cummins Northwest Inc	4711 N Basin Ave	Portland, OR	97217	Distributor and supplier of Cummins engine products and services; Portland, OR based with locations throughout the Pacific NW and Alaska	Indirect Materials
Curran Coil Spring Inc	9265 SW 5th St	Wilsonville, OR	97070	Manufacturer of custom industrial torsion springs, extension springs, and compression springs	Direct Materials
Daily Journal of Commerce	921 S.W. Washington St.	Portland, OR	97205	Supplier of media services	Services
DEX Media West LLC	10200 SW Greenburg Rd	Portland, OR	97223	Supplier of media services	Services
DHL	15509 NE Airport Way	Portland, OR	97230	Worldwide transportation and logistics services provider	Services
Direct Transport Inc	27600 SW 95th Ave	Wilsonville, OR	97070	Provider of regional courier and freight services	Services
Documart	3310 NW Yeon Ave	Portland, OR	97210	Supplier of print services	Services
Don Thomas Petroleum Inc	2727 NW St Helens Rd	Portland, OR	97210	Petroleum, fuel, oil, and lubricant distributor in the Portland Metro area since	Indirect Materials
Earle M Jorgensen Co	16440 N.E. Mason Street	Portland, OR	97230	Supplier/service center of steel and aluminum bar, tubing, and plate; headquartered in Lynwood, CA	Direct Materials
EC Powersystems	1805 NW 21st Ave	Portland, OR	97209	Portland, OR based sales, rentals, and service of generators and engines	Capital Goods
EJ Bartells Co.	19039 NE Portal Way	Portland, OR	97230	Distributor, fabricator, manufacturer and refractory services contractor in the Western U.S., and insulation services contractor in the Pacific NW; based in Renton, WA	Services
Elephant's Delicatessen	115 NW 22nd Ave	Portland, OR	97210	Catering and food services	Services
Elmer's Flag & Banner	1332 NE Broadway St	Portland, OR	97232	Manufacturer and distributor of flags, banners, and related supplies and materials	Services



ald Services Inc.	1300 W 12th St	Vancouver, WA	98660	Seattle, WA based supplier of processing and recycling services of wastewater and oil products	Services
Empire Rubber & Supply	80 SE Taylor St	Portland, OR	97214	Supplier and installer of conveyor belt and related industrial goods with locations in Portland, OR and Pasco, WA	Indirect Materials
EOFF Electric Co	1624 SE Grand Ave	Portland, OR	97214	Provider of electrical supplies, components, and equipment based in Portland, OR with locations throughout OR and SW WA	Indirect Materials
ERM West Inc	1001 SW 5th Ave	Portland, OR	972043	Global provider of environmental, health, safety, risk, and social consulting services	Services
Evraz Inc	14400 N Rivergate Blvd	Portland, OR	97203	Chicago, IL based international producer of steel products with pipe, tube, and plate rolling mills in Portland, OR	Direct Materials
F&F Grinding Inc	9442 N Ramsey Blvd	Portland, OR	97203	Single location provider of grinding, sawing, burning, and cutting services	Services
Farwest Steel Corp	3703 NW Gateway Ave	Vancouver, WA	98660	Eugene, OR based steel service and fabrication/manufacturing center	Direct Materials
Fastenal Co	308 SE Taylor St	Portland, OR	97214	Winona, MN based supplier of industrial products and services	Indirect Materials
Fastsigns	10309 SE 82nd Ave	Portland, OR	97086	Provider of signs, banners, and vehicle graphics based in Carrollton, TX	Indirect Materials
Faulkner / motive Electric	1831 NW 28TH Ave	Portland, OR	97210	Single location car parts and accessories manufacturing services provider	Services
FE Bennett	739 NE Broadway St	Portland, OR	97232	Portland, OR based vendor of material handling equipment and supplies	Indirect Materials
FedEx	4344 N Port Center Way	Portland, OR	97217	Global transportation and logistics provider based in Memphis, TN	Services
Ferguson Enterprises Inc	2121 N Columbia Blvd	Portland, OR	97217	Plumbing and building products supplier based in Newport News, VA; subsidiary of UK-based Wolseley	Indirect Materials
Ferrellgas	641 NE Lombard St	Portland, OR	97211	Provider of propane distribution and services headquartered in Overland Park, KS	Indirect Materials
Finishing Technologies	5924 NE 112th Ave	Portland, OR	97220	Portland, OR based technical finishing equipment distributor and servicer	Capital Goods
First Response Systems	4970 SW Griffith Dr	Beaverton, OR	97005	Alarm, security, and surveillance services provider based in Beaverton, OR	Services
Fisherman's Marine Supply	901 N Columbia Blvd	Portland, OR	97217	Marine equipment and supplies provider based in the Portland, OR area with three local facilities	Indirect Materials
Fluid Connector Products Inc	2929 NW 31st Ave	Portland, OR	97210	Portland, OR based provider of hydraulic systems equipment and supplies	Indirect Materials
Forklift Services of Oregon	7001 NE Columbia Blvd	Portland, OR	97218	New and used forklift sales, rental, and service	Capital Goods



Fred Meyer	3800 SE 22nd Ave	Portland, OR	97202	Retail department store chain; subsidiary of Cincinnati, OH based Kroger Co.	Indirect Materials
Galvanizers Company	2406 NW 30th Ave	Portland, OR	97210	Portland, OR based galvanizing manufacturer	Services
Gasket Technology Inc.	23605 NE Halsey St	Troutdale, OR	97060	Troutdale, OR based manufacturer of industrial gaskets	Indirect Materials
General Tool & Supply Co	2705 NW Nicolai St	Portland, OR	97210	Supplier of industrial bearings, hydraulics, material handling, and other related supplies and services	Indirect Materials
Grabber Construction Products	13011 SE Jennifer Street	Clackamas, OR	97015	International distributor and manufacturer of fasteners, tools, equipment, and building materials for construction industry; based in Alpine, UT	Indirect Materials
Grainger	6335 N Basin Ave	Portland, OR	97217	Global supplier of maintenance, repair and operating products based in Lake Forest, IL	Indirect Materials
Graybar Electric Co Inc	901 NE 60th Ave	Portland, OR	97213	St. Louis, MO based supply chain management services provider and distributor of high-quality components, equipment and materials for the electrical and telecommunications industries	Indirect Materials
Green Transfer & Storage	10099 N Portland Rd	Portland, OR	97203	Warehousing, transloading, storage, trucking and logistics provider	Services
Gresham Transfer Inc	24001 NE Sandy Blvd	Wood Village, OR	97060	Specialized/heavy haul and dry bulk truck transportation and logistics provider	Services
Gunderson LLC	4350 NW Front Ave	Portland, OR	97210	Lake Oswego, OR based international manufacturer of railcars, marine barges, and related components and services	Direct Materials
Hall Tool Co	1724 SE Grand Ave	Portland, OR	97214	Single location provider of hand tools and industrial supplies	Indirect Materials
Harbor Freight Tools	1335 N Mason St	Portland, OR	97217	Supplier of hand tools, generators, power tools, air tools, and related hardware and equipment with over 400 retail locations; based in Southern CA	Indirect Materials
Hardchrome Inc	1152 NW Commerce Ct	Estacada, OR	97023	Single location plating and polishing business	Services
Harmer Steel Products Co	9933 NW 107th Ave	Portland, OR	97231	Portland, OR based supplier of rail and track accessories with locations in the US and Canada	Direct Materials
Harsco Infrastructure Americas	3909 Nw Fruit Valley Road	Vancouver, WA	98660	Provider of construction and industrial maintenance services with operations in 32 countries; headquartered in Camp Hill, PA and Fair Lawn, NJ	Services
Hertz Equipment Rental Corp	4939 NE Columbia Blvd	Portland, OR	97218	Rental and sales of generators, construction equipment, and material handling equipment	Services



Hind Inc	316 SE Taylor St	Portland, OR	97214	Liechtenstein based supplier of tools and fastening systems; operates in over 120 countries; N. American headquarters in Tulsa, OK	Capital Goods
Home Depot	1728 N Jantzen Ave	Portland, OR	97217	Atlanta, GA based home improvement retailer	Indirect Materials
Honey Bucket	2301 SE Hidden Way	Vancouver, WA	98661	Puyallup, WA based supplier of mobile sanitation services	Services
Hydra Power Systems Inc	5445 NE 122nd Ave	Portland, OR	97230	Portland, OR headquartered supplier of fluid hydraulic parts and components	Capital Goods
Hydraulics Inc	713 W 11th St	Vancouver, WA	98660	Single location provider of hydraulic supplies and hose manufacturing services, as well as cylinder, pump, and motor repair	Indirect Materials
IGI Resources Inc	415 W 6th St	Vancouver, WA	98660	Petroleum bulk stations and terminals provider	Indirect Materials
IKON Office Solutions	851 SW 6th Ave	Portland, OR	97204	Global provider of Ricoh copy and printing equipment, software solutions, and services	Services
IMR KHA Portland LLC	5687 SE International Way	Portland, OR	97222	Mechanical, chemical, metallurgical, and corrosion testing and analysis services provider	Services
Industrial Tire	7331 NE Killingsworth St	Portland, OR	97218	Industrial tire, wheel, and auto repair services based in Portland, OR with six Pacific Northwest facilities	Indirect Materials
Integra Telecom	825 NE Multnomah St	Portland, OR	97232	Portland, OR based telecommunications services provider	Services
Integrated Power Services	2315 NW 21st Pl	Portland, OR	97210	Provider of repair and maintenance services for electric motors, generators, and mechanical power transmission components based in Greenville, SC with locations throughout the US	Services
International Inspection Inc	10521 N Lombard St	Portland, OR	97203	Provider of nondestructive testing and examination services	Services
IRC Aluminum & Stainless Inc	9038 N Sever Ct	Portland, OR	97203	Single location nonferrous metal service center	Indirect Materials
Iron Horse Group	5501 NE 223rd Ave	Fairview, OR	97024	Single location utility and industrial services provider	Services
JJ Calibrations Inc	7007 SE Lake Rd	Portland, OR	97267	Instrument calibration services provider based in Portland, OR	Services
John C. Murdoch Inc	5555 N Channel Ave	Portland, OR	97217	Marine surveyor located in Portland, OR	Services
Johnstone Supply	11632 NE Ainsworth Circle	Portland, OR	97220	Wholesale distributor to the HVAC/R and property maintenance industries	Indirect Materials
Jubitz Corp	33 NE Middlefield Road	Portland, OR	97211	Transportation services company offering commercial fueling and travel services to fleets, professional drivers, and the local and traveling public based in Portland, OR	Services



Kaman Industrial Technologies	1703 NE Argyle St	Portland, OR	97211	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	Indirect Materials
Kleen Blast Co	3747 North Suttle Road	Portland, OR	97217	Provides abrasives, sandblasting equipment and supplies	Indirect Materials
Koldkist Bottled Water	909 N Columbia Blvd	Portland, OR	97217	Producer, marketer and distributor of high-quality packaged ice	Services
KY-RO Inc	18209 SW Boones Ferry Rd	Tigard, OR	97224	Single location provider of profile and plate rolling services	Direct Materials
LaGrand Industrial Supply Co	2620 SW 1st Ave	Portland, OR	97201	Single location distributor of foundry supplies, equipment and industrial products	Indirect Materials
Lampros Steel Inc	9040 N Burgard Way	Portland, OR	97203	Specialty structural steel service center and warehousing based in Portland, OR	Direct Materials
Landa Northwest	11811 NE Marx St	Portland, OR	97220	Single location business selling and servicing industrial pressure washers, parts washers, water treatment systems, and heaters	Capital Goods
Landmark Equipment	625 NE Killingsworth St	Portland, OR	97218	Single location business providing equipment sales, rentals, parts, and repair and maintenance services	Capital Goods
Legacy Laboratory Services	1225 NE 2nd Ave	Portland, OR	97232	Laboratory services provider serving physicians, hospitals, employers, IPAs, and patients; based in Portland, OR	Services
Les Schwab	2140 NE Columbia Blvd	Portland, OR	97211	Provider of tires and automotive repair services based in Prineville, OR	Indirect Materials
Locates Down Under Inc	16119 S Clackamas River Dr	Oregon City, OR		Providing underground wire and cable laying contracting services based in Oregon City, OR	Services
Mac's Radiator & Repair	6147 SE Foster Rd	Portland, OR	97206	Cooling system repairs, products, and services provider based in Portland, OR with nine Pacific NW facilities	Services
Magnetic Specialties Inc	9812 SE Empire Ct	Clackamas, OR	97015	Provider of wholesale magnets and magnetic devices based in Clackamas, OR	Indirect Materials
Marco	7105 SW Varns Street	Portland, OR	97223	Portland, OR based supplier of promotional products, awards, company apparel, and incentive items	Indirect Materials
Marine Lumber Co Inc	11800 SW Myslony St	Tualatin, OR	97062	Single location wholesale lumber sales and distribution	Indirect Materials
Mariner's Supply Co Inc	4865 N Lagoon Ave	Portland, OR	97217	Supplier of marine parts and products based in Bainbridge Island, WA	Indirect Materials
Marks Metal Technology	10300 SE Jennifer St	Clackamas, OR	97015	Single location metal and steel processor, specializing in rolling plate and structural profiles, concrete pipe forms and custom fabrication	Direct Materials



Mccott Equipment Co	435 NE Hancock St	Portland, OR	97212	Sales, service, and installation of petroleum equipment	Services
Mason's Supply Co	2637 SE 12th Ave	Portland, OR	97202	Construction supplies business with locations in OR and WA; based in Portland, OR	Indirect Materials
Matheson Tri-Gas Inc	13129 NE David Cir	Portland, OR	97230	Global supplier of industrial and scientific gases and gas handling equipment; subsidiary of Tokyo, Japan based TNS Corp	Indirect Materials
McGuire Bearing Co Inc	947 SE Market St	Portland, OR	97214	Regional distributor of bearings and power transmission products headquartered in Portland, OR	Indirect Materials
McKinney Trailers & Containers	12008 NE Inverness Dr	Portland, OR	97220	Tractor trailer and shipping container rental, leasing, sales and service	Capital Goods
Meshier Supply Co	312 SE Stark St	Portland, OR	97214	Wholesale plumbing supply company based in Portland, OR	Indirect Materials
Metro Overhead Door Inc	2525 NE Columbia Blvd	Portland, OR	97211	Repair, service and installation of garage doors and gate automation based in Portland, OR	Services
Milwaukie Crane & Equipment Co	10250 SW North Dakota St	Tigard, OR	97223	Designs, manufactures, installs and services complete overhead material handling systems and stocks hoists, trolleys, accessories, replacement parts and provides service based in Portland, OR	Services
Mobile Mini Inc	5940 NE Cully Blvd	Portland, OR	97218	Global company providing rental and sales of portable self storage containers, shipping containers, and mobile offices based in Tempe, AZ	Capital Goods
Modspace Corp	13132 N. Woodrush Way	Portland, OR	97203	Providing modular building and construction trailer rental, leasing, and sales based in Berwyn, PA	Services
Monster Fuses	5440 SE 26th Ave	Portland, OR	97202	Two location company with offices in Portland, OR and Fairfield, NJ; Supplier of new, surplus, and out of production fuses and switchgear components	Indirect Materials
Morgan Industrial Inc	23810 NW Huffman St	North Plains, OR	97124	Providing specialized heavy rigging, transportation, machinery moving, millwright, architectural, and process equipment movement services based in the Hillsboro, OR area	Services
Motion Industries Inc	940 Northeast 57th Avenue	Portland, OR	97213	Distributor of industrial MRO supplies based in Birmingham, AL; subsidiary of Genuine Parts Company of Atlanta, GA	Indirect Materials
MSC Industrial Supply Co Inc	12207 NE Marx St	Portland, OR	97230	Distributor of MRO supplies, industrial equipment and tools based in Melville, NY	Indirect Materials
Mt Hood Solutions Co	14546 N Lombard Street	Portland, OR	97203	Subsidiary of Charlott, NC based Swisher; supplier of industrial hygiene products and services	Indirect Materials



Napa Auto Parts	10515 N Lombard St	Portland, OR	97203	Distributor and retailer of auto parts, tools, and supplies; subsidiary of Atlanta, GA based Genuine Parts Company	Indirect Materials
NDE Professionals Inc	13339 NE Airport Way	Portland, OR		Provider of quality control consulting, and nondestructive testing and training services including radiography, ultrasonic, penetrant and magnetic particle based in Portland, OR	Services
Ness & Campbell Crane Inc	5730 NE 138th Ave	Portland, OR	97230	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	Services
Norlift of Oregon Inc	7373 SE Milwaukie Expressway	Portland, OR	97222	Supplier of new, used, rental and material handling products and services based in Portland, OR	Services
North Coast Electric Co	625 N Thompson St	Portland, OR	97227	Provider of electrical supplies, components, distribution and related services with locations throughout the Pacific NW and Alaska	Indirect Materials
Northside Ford	6221 NE Columbia Blvd	Portland, OR	97218	New and used Ford truck dealership	Capital Goods
Northwest Pump & Equipment Co.	2800 NW 31st Ave	Portland, OR	97210	Distributor of petroleum equipment, industrial pumps, and car wash systems and related services with locations throughout the Western US	Indirect Materials
Northwest Scaffold Service Inc	11211 SE Foster Rd	Portland, OR	97266	Provides services in the estimation, design, supply, erection & dismantling of suspended scaffold (swingstaging), frame scaffold, temporary weather enclosures, and shoring based in Portland, OR	Services
NRC Environmental Services Inc	6211 N Ensign St	Portland, OR	97217	Provision of environmental, industrial and emergency solutions; global company based in Great River, NY	Services
NW Natural Gas Co	220 NW 2nd Ave.	Portland, OR	97209	Natural gas utilities service provider/supplier based in Portland, OR	Services
Oak Harbor Freight Lines Inc	9026 NE 13th Ave	Portland, OR	97211	Truck transportation and logistics services provider based in Auburn, WA with terminal locations throughout the Western US	Services
Office Depot	323 SE Martin Luther King Jr Blvd	Portland, OR	97214	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	Indirect Materials



Filter Service Co	615 SE Market	Portland, OR	97214	Single location provider of filters and hose assemblies, and manufacturer of custom fittings and adapters	Indirect Materials
Olympic Tug & Barge Inc	7900 NW St Helens Rd	Portland, OR	97210	Division of Seattle, WA base Harley Marine Services and provider of marine tug, barge, and port assist transportation and logistics services	Services
Oregon Bolt Inc	14965 SW 72nd Ave	Tigard, OR	97224	Provider of industrial threaded fasteners and related items based in Tigard, OR	Indirect Materials
Oregon Breakers Inc	3365 SE 17th Ave Portland	Portland, OR	97202	Single location supplier of electrical components and supplies	Capital Goods
Oregon Carbide Saw	1713 SE 7th Ave	Portland, OR	97214	Provides precision sharpening and manufacturing service for saws, cutters, routers, and coldsaws; based in Portland, OR	Services
Oregon Ironworks Inc	9700 SE Lawnfield Rd	Clackamas, OR	97015	Engineering, fabrication, and manufacturing business based in Clackamas, OR	Direct Materials
Oregon Sandblasting & Coating Inc	10000 SW Herman Rd	Tualatin, OR	97062	Provider of industrial painting, coating, sandblasting, and finishing services based in Tualatin, OR	Services
Oregon Tractor	6455 NE Columbia Blvd	Portland, OR	97218	Portland, OR based supplier of new and used heavy equipment sales, rentals, and repair and maintenance services with branch location in Roseburg, OR	Capital Goods
OTS Wire & Insulation Inc	9155 SW Barber St	Wilsonville, OR	97070	Supplier of electrical supplies & equipment for the motor repair and transformer industry based in Wilsonville, OR	Capital Goods
Ott's Friction Supply Inc	201 N Columbia Blvd	Portland, OR	97217	Portland, OR based distributor and supplier of automotive and mechanical friction products such as brakes and clutches; branch location in Eugene, OR	Indirect Materials
Oxford Inn & Suites	12226 N Jantzen Dr	Portland, OR	97217	Local hotel and hospitality provider	Services
Pacific Fence	13770 SE Ambler Rd	Clackamas, OR	97015	Supplier of fencing installation and manufacturing services specializing in railings, gates, chain link, and vinyl; single location in Clackamas, OR	Services
Pacific Machinery & Tool Steel	3445 NW Luzon St	Portland, OR	97210	Portland, OR based specialty metal service center	Indirect Materials
Pacific Power Products	600 S 56th Pl	Ridgefield, WA	98642	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	Services
Palm Abrasive & Tool Inc	905 SE 14th Ave	Portland, OR	97214	Wholesaler of abrasives, tools, and related supplies in Portland, OR	Indirect Materials



Pape Material Handling Inc	7000 SW Sandburg St	Portland, OR	97223	Provider of sales, rental, and product support of lift trucks and material handling equipment based in Eugene, OR	Capital Goods
Paramount Supply Co	816 SE Ash St	Portland, OR	97214	Supplier of pipe, valves, fittings, pumps, filters, gaskets, steam products, and other industrial specialties with branches throughout the Western US and Alaska	Indirect Materials
Parr Lumber Co	6250 NE Martin Luther King Jr Blvd	Portland, OR	97211	Supplier/distributor of building products, hardware, and tools based in Hillsboro, OR with 31 locations in OR, WA, and AZ	Indirect Materials
Peninsula Truck Lines Inc	3182 NW 26th Ave	Portland, OR	97210	Regional less-than-truckload truck transportation and logistics provider based in Auburn, WA with locations throughout the Pacific NW and Vancouver, BC	Services
Performance Contracting Inc	5555 N Channel Avenue,	Portland, OR	97217	Specialty contractor providing services to industrial, commercial, and non-residential markets based in Lenexa, KS; services include interiors, insulation, scaffold services, and abatement	Services
Peterson Industrial Products Inc	2300 NW 29th Ave	Portland, OR	97210	Supplier of industrial hoses, fittings, cylinders, pumps, valves, meters, and other products for use in hydraulics, pneumatics, instrumentation, and sanitary applications based in Portland, OR	Indirect Materials
Peterson Machinery Co	4421 NE Columbia Boulevard	Portland, OR	97218	Supplier of new and used heavy equipment sales, rentals, and repair and maintenance services headquartered in the San Francisco, CA Bay Area	Capital Goods
Petrocard Systems Inc	9885 SE Mather Rd	Clackamas, OR	97015	Supplier of fleet fueling, mobile fueling, cardlock fueling, and lubricant supply services based in Kent, WA	Indirect Materials
Pinnell Busch Inc	6420 SW Macadam Ave	Portland, OR	97239	Project management consultancy for the design and construction industry based in Portland, OR	Services
Pioneer Wiping Cloth	10707 N Lombard St	Portland, OR	97203	Supplier of industrial wiping cloth, absorbent products, and recycling services based in Portland, OR	Indirect Materials
Platt Electric Supply Inc	3053 NW 29th Ave	Portland, OR	97210	Distributor and wholesaler of electrical, industrial, lighting, tools, fuses, control and automation products with locations throughout the Western US	Indirect Materials
Pope Rigging Loft Inc	2355 NW 21st Pl	Portland, OR	97210	Supplier of marine rigging products and services based in Portland, OR	Indirect Materials
Port Plastics	7500 SW Tech Center Dr	Portland, OR	97223	Supplier of plastic materials, components, and related products based in Chino Hills, CA	Indirect Materials



Supply	1176 N Hayden Meadows Dr	Portland, OR	97217	Watsonville, CA based wholesale distributor of marine related products	Indirect Materials
Portland Business Alliance	200 SW Market St	Portland, OR	97201	Local commerce association	Services
Portland Community College	12000 SW 49th Ave	Portland, OR	97219	Local higher educational institution	Services
Portland Compressor	310 SE 12th Ave	Portland, OR	97214	Single location distributor, dealer, and service center of compressors, sprayers, pressure washers, and related products and services	Capital Goods
Portland Fasteners Inc	3103 NW St. Helens Road	Portland, OR	97210	Single location supplier of industrial fasteners and construction supplies	Indirect Materials
Portland General Electric Corp	3700 SE 17th Ave	Portland, OR	97202	Investor-owned utility engaged in the generation, transmission and distribution of electricity to industrial, commercial and residential customers	Services
Portland Valve & Fitting Co	815 SE Sherman St	Portland, OR	97214	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	Indirect Materials
Porter Webster Co	41 NE Walker St	Portland, OR	97211	Supplier of new and remanufactured truck and trailer parts headquartered in Portland, OR with branch locations throughout the region	Indirect Materials
Power Serv Inc	10931 N. Vancouver Way	Portland, OR	97217	Kansas City, MO based distributor, reconditioner, and remanufacturer of railcar moving equipment	Services
PPI Group	6015 NE 80th Ave	Portland, OR	97218	Portland, OR based supplier of software and hardware solutions to the architecture, engineering, and construction industries	Services
Praxair Distribution	603 SE Victory Ave	Vancouver, WA	98661	Supplier of industrial gases and related services based in Danbury, CT	Indirect Materials
Precise Manufacturing & Engineering	12403 Ne 60th Way	Vancouver, WA	98682	Provider of engineering services to operators of blast furnaces and steel mills based in Vancouver, WA	Services
Precision Equipment Inc	8440 N Kerby Ave	Portland, OR	97217	Industrial parts repair and custom manufacturing based in Portland, OR	Services
Precision Hydraulics LLC	2715 NW St Helens Rd	Portland, OR	97210	Portland, OR based tooling hydraulic outfitter	Services
Premier Gear & Machine Works	1700 NW Thurman St	Portland, OR	97209	Portland, OR based manufacturer of machinery, gears, and controls and machine and gear shop services	Services
Premier Rubber & Supply	9841 N Vancouver Way	Portland, OR	97217	Portland, OR based rubber products wholesaler	Indirect Materials



Proctor Sales Inc	27180 SW 95th Ave	Wilsonville, OR	97070	Sells & services engineered mechanical solutions including boilers, pumps, controls, valves, burners, stack, tanks, hydronic and steam solutions; offices located in OR, WA, and AK	Services
Production Sawing	18205 Sw Boones Ferry Rd	Tigard, OR	97224	Tigard, OR based metal slitting and shearing business	Services
PSI Inc	6032 N Cutter Cir	Portland, OR	97217	Oakbrook Terrace, IL based company provides engineering, scientific, technical and management solutions to public and private sector clients	Services
Rain for Rent	11035 NE Marx St	Portland, OR	97220	Provider of temporary liquid handling solutions including pumps, tanks, filtration and spill containment based in Bakersfield, CA	Services
Red-D-Arc Inc	7315 NE 43rd Ave	Vancouver, WA	98661	Subsidiary of Radnor Township, PA based Airgas Inc.; provider of welding and welding-related rental products and services throughout North America	Capital Goods
Redmond Heavy Hauling Inc	613 NE Columbia Blvd	Portland, OR	97211	Portland, OR based provider of heavy hauling and specialized truck transportation and logistics services	Services
Reed Electric Co	2539 NW Vaughn St	Portland, OR	97210	Single location provider of motor repair and field services, and new motor sales	Services
Rem Steel Sales Inc	9109 N Wilbur Ave	Portland, OR	97217	Portland, OR based distributor of prime, excess prime, and secondary flat rolled steel products	Direct Mater.
Rexel Inc	20171 SW 95th Ave	Tualatin, OR	97062	Subsidiary of Rexel Group based in Paris, France; Distributor of electrical supplies	Indirect Materials
Rigging Products Inc	2242 NE Columbia Blvd	Portland, OR	97211	Single location provider of rope, rigging, logging, industrial chain, and related products and services	Direct Materials
Rodda Paint Co	6107 N Marine Dr	Portland, OR		Portland, OR based provider of paint color matching services, spray equipment sales and rentals, and paint sales	Indirect Materials
Rogers Machinery	14600 SW 72nd Ave	Portland, OR	97224	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	Capital Goods
Rogers Marine	3445 NE Marine Dr	Portland, OR	97211	Single location provider of sales, service, and installation of boat equipment, marine electronics, radar, GPS, depth sounders, and related marine products	Capital Goods



City Awning Co	1638 NW Overton St	Portland, OR	97209	Portland, OR based sales and service of awnings, tarps, canopies, flags, flagpoles, accessories and custom applications	Services
RSC Equipment Rental	3133 NW Saint Helens	Portland, OR	97210	Part of Stamford, CT based United Rentals Inc.; global equipment rentals company	Services
Ryerson	6330 N Basin Avenue	Portland, OR	97217	Distributor and processor of metals based in Chicago, IL	Direct Materials
Safety Kleen Systems inc	16540 SE 130th Ave	Clackamas, OR	97015	Re-refiner of used oil and provider of parts cleaning services based in Dallas, TX	Indirect Materials
Safway Services LLC	1960 NW Marine Dr	Troutdale, OR	97060	Full-service scaffold company offering rental, engineering, training and safety; based in Waukesha, WI	Services
Sam A Mesher Tool Co	1704 NW Johnson St	Portland, OR	97209	Single location supplier of machinery and cutting tools	Indirect Materials
Sanderson Safety Co	1101 SE Third Ave	Portland, OR	97214	Supplier of safety systems and products for a variety of industries and applications based in Portland, OR with locations throughout the Western US	Indirect Materials
Schroeder's Machine Works Inc	8010 NE 19th Ct	Vancouver, WA	98665	Single location machining, fabrication, and manufacturing facility	Services
Seal Source Inc	16027 NE Cameron Blvd	Portland, OR	97230	Single location supplier of seals and gaskets	Indirect Materials
Seals Unlimited Inc	23050 NW Jacobson Rd	Hillsboro, OR	97124	Distributor of rubber molded, rubber extrusion, and gaskets; In-house steel rule die shop with water jet cutting services available; based in Hillsboro, OR	Indirect Materials
Service Steel Inc	5555 N Channel Ave	Portland, OR	97217	Steel service and fabrication center based in Portland, OR	Direct Materials
Shaver Transportation	4900 NW Front Ave	Portland, OR	97210	Provider of inland waterway transportation and logistics services (tug and barge services) and port assist services	Services
Sherwin Williams Co	30 NE Broadway St	Portland, OR	97232	Global supplier of paints and finishes based in Cleveland, OH	Indirect Materials
Siemens Building Technologies	15201 NW GREENBRIER PKWY	Beaverton, OR	97006	Supplier of products and services for building/facility automation, energy efficiency, fire safety, power distribution, and security; part of Munich, Germany based Siemens	Capital Goods
Speedometer Service and Instrument Corp	3551 NW Front Ave	Portland, OR	97210	Single location company selling gauges, cables, and adapters to the truck and automotive industries	Services
Spencer Fluid Power	2230 NE Columbia Blvd	Portland, OR	97211	Distributor of hydraulic components and systems; subsidiary of Cleveland, OH based Applied Industrial Technologies	Indirect Materials
Stack Metallurgical Services	5938 N Basin Ave	Portland, OR	97217	Single location provider of heat treating and metallurgical manufacturing services	Services



Staples	1760 Jantzen Beach Center	Portland, OR	97217	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	Indirect Materials
Star Rentals Inc	1735 SE Martin Luther King Jr Blvd	Portland, OR	97214	Construction equipment rental supplier with locations in OR and WA	Services
State Pipe & Supply	3508 NE 68th St	Vancouver, WA	98661	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	Indirect Materials
Stellar Industrial Supply Inc	12831 NE Whitaker Way	Portland, OR	97230	Tacoma, WA based provider of industrial supplies and tools	Indirect Materials
Stud Welding Supply	2119 SE Columbia Way	Vancouver, WA	98661	Single location wholesale welding equipment and supplies provider	Indirect Materials
Suburban Grinding Inc	13025 SW Herman Rd	Tualatin, OR	97062	Single location provider of industrial grinding services and engineering	Services
Sunbelt Rentals Inc	7626 NE Killingsworth St	Portland, OR	97218	Construction equipment and tool rental company; subsidiary of London, UK based Ashtead Group	Services
Swan Island Sandblasting	5555 N Channel Ave	Portland, OR	97217	Portland, OR based sandblasting and painting facility with two Portland facilities	Services
Tacoma Screw Products Inc	2797 NE Columbia Blvd	Portland, OR	97211	Supplier of fasteners, tools, hardware, and related construction supplies and equipment based in Tacoma, WA	Indirect Materials
Tarr Inc	2429 N Borthwick Ave	Portland, OR	97227	West coast distributor of commodity and specialty chemicals, lubricants and fuels headquartered in Portland, OR	Indirect Materials
Technical Controls	12119 NE 99th	Vancouver, WA	98682	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	Indirect Materials
Test Equipment Distributors	5476 S.E. International Way	Portland, OR	97222	Stone Mountain, GA based distributor of equipment and supplies for the nondestructive testing industry	Indirect Materials
The Lynch Company Inc	4706 SE 18th Ave	Portland, OR	97202	Single location general steel fabricator	Direct Materials



Steel Yard Inc	6880 NE Columbia Blvd P	Portland, OR	97218	Single location distributor of steel products (plate, tubing, pipe, bars, etc.)	Direct Materials
The Western Group	4025 NW Express Ave	Portland, OR	97210	Portland, OR headquartered supplier of woven wire, rubber screens, polyurethane screens, and perforated plate with locations in the US and Canada	Direct Materials
Thermo Fluids Inc	12533 SE Carpenter Dr	Clackamas, OR	97015	Recycler of used oil, antifreeze, filters, oily water and oily absorbents based in Scottsdale, AZ	Indirect Materials
Torgerson Forest Products	16055 SW Walker Rd	Beaverton, OR	97006	Single location supplier of forest products and building materials	Direct Materials
Total Filtration Services	1015 SE Grant St	Portland, OR	97214	Subsidiary of Franklin, TN based Clarcor Inc; provider of filtration management and service	Indirect Materials
Transco Industries Inc	5534 NE 122nd Ave	Portland, OR	97230	Portland, OR headquartered engineering and fabrication business involved in steel fabrication, conveyor repair, and water screening with locations throughout the US	Services
Triad Machinery Co Inc	4530 NE 148th Ave	Portland, OR	97230	Sales, leasing, rental, and service of heavy equipment in forestry, construction, and material handling with locations in OR and WA	Services
Tri-Motor & Machinery Co Inc	24460 Pacific Hwy E	Canby, OR	97013	Single location provider of new motor and gear box sales, repair, parts and related services	Services
Tube Service Co	6650 N Ensign St	Portland, OR	97217	Santa Fe Springs, CA based tubular product distribution and laser tube processing services with locations throughout the Western US	Indirect Materials
Union Pacific Railroad	1525 N River St	Portland, OR	97227	Transcontinental railroad transportation and logistics service provider headquartered in Omaha, NE	Services
Unisource Mfg Inc	8040 NE 33rd Dr	Portland, OR	97211	Supplier of industrial hose, hydraulic hose, connectors and accessories headquartered in Portland, OR	Indirect Materials
United Battery Inc	109 NE Columbia Blvd	Portland, OR	97211	Supplier/distributor of batteries, alternators, starters, generators, and accessories based in Portland, OR with three total area locations	Indirect Materials
United Rentals	4621 NW St Helens Rd	Portland, OR	97210	Global equipment rentals company based in Stamford, CT	Services
United Site Services Inc	12215 SE 122nd Ave	Portland, OR	97015	Westborough, MA provider of portable toilet rentals and site sanitation solutions	Services
United Welding Supply Inc	2313 NE Martin Luther King Jr Blvd	Portland, OR	97212	Single location supplier of welding materials, supplies, and equipment	Indirect Materials



United Western Supply Co	15540 N Lombard St	Portland, OR	97203	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	Indirect Materials
UPS	6235 N Basin Ave	Portland, OR	97217	Global transportation and logistics provider based in Atlanta, GA	Services
US Distributing	7750 NE 17th Ave	Portland, OR	97211	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	Indirect Materials
Valin Corp	18977 NE Portal Way	Portland, OR	97230	Provider of process control, measurement, heat, filtration, and automation application solutions based in San Jose, CA	Capital Goods
Vancouver Bolt & Supply Inc	805 W 11th St	Vancouver, WA	98660	Single location provider of bolts, fasteners, and industrial supplies	Indirect Materials
Verizon	616 SW Broadway	Portland, OR	97205	New York City, NY broadband and telecommunications company	Services
Versa Steel Inc	1618 NE 1st Ave	Portland, OR	97232	Supplier of new and used steel beams located in Portland, OR	Indirect Materials
Viking Automatic Sprinkler Co	3245 NW Front Ave	Portland, OR	97210	St. Paul, MN based company provides fire sprinkler systems including automatic fire sprinklers for industrial, commercial, residential, and government markets	Services
Walter E Nelson Co	5937 N Cutter Cir	Portland, OR	97217	Portland, OR based distributor of janitorial supplies and paper with locations throughout OR and WA	Indirect Materials
Washington Crane & Hoist	4707 NE Minnehaha St	Vancouver, WA	98661	Seattle, WA based industrial overhead crane and material handling solutions provider	Services
Waste Management	7227 NE 55th Ave	Portland, OR	97218	National supplier of waste/refuse transportation and disposal services based in Houston, TX	Services
WC Winks Hardware	200 SE Stark St	Portland, OR	97214	Single location hardware retailer	Indirect Materials
West Coast Metals Inc	2555 NW Nicolai St	Portland, OR	97210	Single location supplier of stainless steel, aluminum, and carbon steel	Direct Materials
West Coast Wire Rope & Rigging	2900 NW 29th	Portland, OR	97210	Full service rigging fabrication facilities serving the logging, construction, marine, and equipment manufacturing industries with locations in Portland, Seattle, and Oakland	Direct Materials



...t Rail Construction	504 NE 192nd Ave	Vancouver, WA	98684	Vancouver, WA headquartered railroad construction and services provider involved in projects throughout the US and abroad	Services
Western Integrated Tech Inc	8900 N Ramsey Blvd	Portland, OR	97203	Bellevue, WA based manufacturer and integrator of fluid power and electronic systems	Capital Goods
Western Tool & Supply	12518 NE Airport Way	Portland, OR	97230	Livermore, CA based supplier of hand tools, cutting tools, power tools, abrasives, and other industrial products and supplies	Indirect Materials
Working Waterfront Coalition	200 SW Market St	Portland, OR	97201	Local trade/business association	Services
Xylem Dewatering Solutions Inc	2630 N Marine Dr	Portland, OR	97217	White Plains, NY based global provider of water handling, transport, distribution, wastewater and process treatment applications across commercial, industrial and municipal market	Capital Goods
YRC	6845 N Cutter Cir	Portland, OR	97217	Overland Park, KS based global transportation and logistics provider	Services



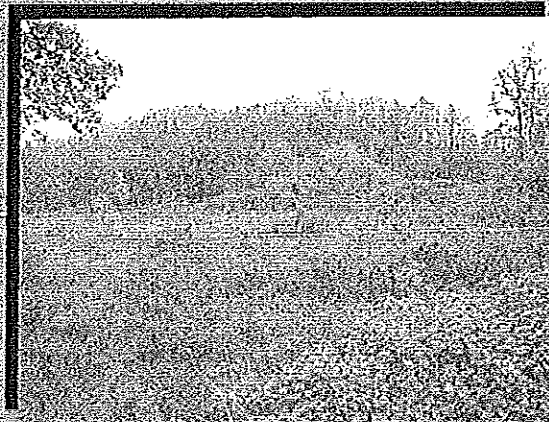
Attachment E

Brownfield/Greenfield Development Cost Comparison Study EXECUTIVE SUMMARY

December 2004



Prepared for:
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Portland Development Commission
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1. EXECUTIVE SUMMARY

PROJECT OVERVIEW

The availability and location of industrial land as a resource for the creation of new employment is a major economic and policy issue throughout the State of Oregon and the Portland metropolitan area. A number of efforts have occurred or are currently underway to understand and address this issue.

As part of this ongoing regional discussion on industrial land, a consortium of public agencies (the Port of Portland, Portland Development Commission, METRO and the Portland Bureau of Planning) sponsored this Brownfield/Greenfield Development Cost Comparison Study. The goal of the project is to provide the project sponsors with a better understanding of costs and issues associated with industrial development of greenfield sites and the redevelopment of brownfield sites. In addition, a methodology was developed that calculates and compares brownfield and greenfield development costs. The challenge was to develop a model that could be replicated in future studies. Therefore, the uses could change and the sites could change, but the methodology would remain constant.

Using a case-study approach, the project compared the public and private development costs associated with specific industrial projects between brownfield sites and greenfield sites. Four types of industrial development projects were identified: general manufacturing, high tech, warehouse and distribution, and industrial park. A specific profile and site plan for each use was completed. Four greenfield sites and three brownfield sites were also identified. The site plan for one of the uses was then tested on one greenfield and one brownfield site. An analysis of costs was then prepared for each project on the two sites.

METHODOLOGY

Uses

Four industrial uses that were appropriate for the Portland metropolitan area were identified.

- *High Tech Manufacturing* includes high technology industries that are primarily related to manufacturing and processing. In this study, a 350,000 SF high-tech facility is tested that includes two 125,000 SF fabrication plants, one 40,000 SF central utility building, one 60,000 SF office building and 725 parking spaces.
- *Industrial Park* is a series of larger individual buildings whose uses could include light industrial manufacturing, distribution or industrial services. For this project, 630,000 SF of industrial park space, divided into multiple buildings, was tested on both sites.
- *Warehouse / Distribution* includes industries primarily engaged in the warehousing, storage and distribution of goods. For this project, 400,000 SF of distribution space in a single building with 200 parking spaces and 300 trailer spaces was tested on both sites.

- *General Manufacturing* includes industries utilizing manufacturing processes. For this project, three single-user general manufacturing facilities were tested on each site. These facilities totaled 450,000 SF in three buildings – a 100,000 SF user, a 150,000 SF user, and a 200,000 SF user – and 1,100 parking stalls to serve all three facilities.

Site Selection

Since the goal of the study was to compare costs for industrial projects, it was necessary to identify sites appropriate for the user profiles based on size, zoning and location. Additional issues considered in choosing the sites included distribution around the region, extent of brownfield contamination, adjacency to the Urban Growth Boundary, surrounding industrial uses, level of existing infrastructure, and specific needs of the identified uses.

Brownfield

For this study, appropriate sites needed to be over 25 acres and zoned industrial. While the overall inventory of brownfield sites in the region is significant, with over 1,100 acres of vacant land listed in the City of Portland's Brownfield Site Inventory; the availability of large, viable brownfield sites in industrial areas in the region is limited. In addition, certain sites were identified and eventually discarded for reasons of concern about the market impacts of inclusion in the study and for potential liability issues¹. While the goal was to identify four brownfield sites to include in the study, at the end only three sites were used. To compensate and still meet the original goals of the study, two different uses were put on one of the brownfield sites.

Greenfield

Four sites were selected in the Portland metropolitan region. Three of the sites are in areas where land was recently brought into the Urban Growth Boundary (UGB). One site is located within the existing UGB. The sites range between 70 and 350 total acres. Therefore, only portions of each of the greenfield sites were used for each conceptual site plan.

The following table provides site overviews, and the uses proposed on each:

Use	Site Type	Site Size (acres)	Building Area (SF)	Parking Stalls
High – Tech Manufacturing	Brownfield	35.75	350,000	725
	Greenfield	53.20	350,000	725
Industrial Park	Brownfield	45.50	630,000	1,130
	Greenfield	44.50	630,000	1,130
Warehouse / Distribution	Brownfield	37.95	400,000	200
	Greenfield	23.85	400,000	200
General Manufacturing	Brownfield	35.75	450,000	1,100
	Greenfield	37.95	450,000	1,100

As the study progressed, issues relating to liability and publicity were raised and concerns were expressed regarding the identification of actual brownfield sites in the report. It was determined that the brownfield sites should be generic in the final report. To make all the

¹ Some sites that were initially considered for inclusion in the study are currently being actively marketed for sale. The site owners indicated that they were not comfortable including their properties in this study due to potential stigma and negative sale price impacts to their properties, regardless of the author's intentions to conceal the identities of individual sites.

sites equal, it was then decided that the greenfield sites would also be made generic. Therefore, while actual sites were utilized, for the purposes of this study, all geographic identifying features have been removed.

Costs

The primary focus of this study was on quantifiable costs, including hard and soft costs both on-site as well as off-site. The cost information was classified into four major categories:

On-Site Construction Costs

On-site construction costs include all building costs and on-site infrastructure and parking costs, plus additional on-site costs, including site grading, lift stations, tank removal and pilings associated with several of the brownfield and greenfield sites.

System Development Charges (SDC's) and Credits

Large, one-time user fees paid with the development of the site were included in this category. This includes System Development Charges (SDC's) for sanitary sewer, water, storm drainage, street improvements and parks. SDC credits were based on the extent of existing development on the site.

Off-Site Construction Costs

These are the costs associated with the public utilities, including sanitary sewer, water and storm drain mains, necessary to accommodate the build-out of each concept. The delivery of private utility (electric, natural gas, telecommunications) costs were not identified separately, and were assumed as part of the estimated street costs. Major utility upgrades, such as substations, transformers, water reservoirs, and treatment facility expansions were not included (the presumption is that SDC fees are intended to finance these public facility expansions).

Environmental Remediation Costs (Brownfield Sites Only)

The potential environmental remediation requirements for each site were based on publicly available information and the project team's experience with similar properties. The estimated costs represent the minimum estimated effort required to obtain a No Further Action (NFA) letter from the Oregon Department of Environmental Quality (DEQ) for the properties. Environmental remediation costs were divided into two categories: Hard Costs and Other Costs. Hard Costs included remediation costs associated with soil and groundwater; compliance with state and local stormwater regulations; ongoing operation and maintenance of remediation efforts and remedies; and costs associated with the coordination and processing of the remediation plan, application and follow-up with DEQ and management of the remediation.

Other Costs included soft costs for insurance, environmental studies, planning and legal expenses, figured at 20% of the hard costs. Of these soft costs, 20% is insurance. The second component of Other Costs is carrying cost interest, which is the interest cost accrued during remediation, for an assumed 24-month timeline at a 30% cost of equity and 8.50% for debt. The third component of Other Costs is a risk premium, assumed to be 0.5% of total development costs based on the perceived additional risk associated with the brownfield contamination.

Financial Analysis

The financial characteristics of individual development concepts were evaluated, with a focus on determining the residual property value associated with these concepts. The residual value represented the maximum value that the development concept yields for the property (land and improvements), and equates to the maximum price that a developer would be willing to pay for the property based on the study's assumptions. If the residual value is below the market value of the property, or what the owner perceives to be market value, then the development is not considered to be viable. In some cases in this analysis, the residual land value was negative, implying that the development program yields a property value of less than zero under the assumptions used (i.e., upside-down).

Public costs and benefits

A comparison of public costs and benefits was conducted for the specific brownfield and greenfield development concepts. To the maximum extent possible within the scope, public costs and revenue streams resulting from development were estimated. The comparisons were informed by a literature review of national trends and experiences.

CASE STUDIES

The case studies provided the means to compare the four uses on both brownfield and greenfield sites. The following provides a summary of the findings of these studies.

Site Development Overviews

High Tech Manufacturing

With the proposed development, the brownfield site had an estimated negative residual land value of (\$7.80) per square foot. This reflects a site that would be considered "upside-down" under the case study assumptions, with a value well below zero. In contrast, the greenfield site had a positive residual land value of \$6.42 per square foot.

Industrial Park

With the proposed development, the brownfield site had a positive residual land value of \$0.80 per square foot and the greenfield site had a positive residual land value of \$1.33 per square foot.

Warehouse / Distribution

With the proposed development, the brownfield site had a negative residual land value of (\$0.85) per square foot, while the greenfield site has a positive residual land value of \$6.88 per square foot.

General Manufacturing

With the proposed development, the brownfield site had a negative residual land value of (\$6.47) per square foot. The greenfield site has a positive residual land value of \$6.96 per square foot.

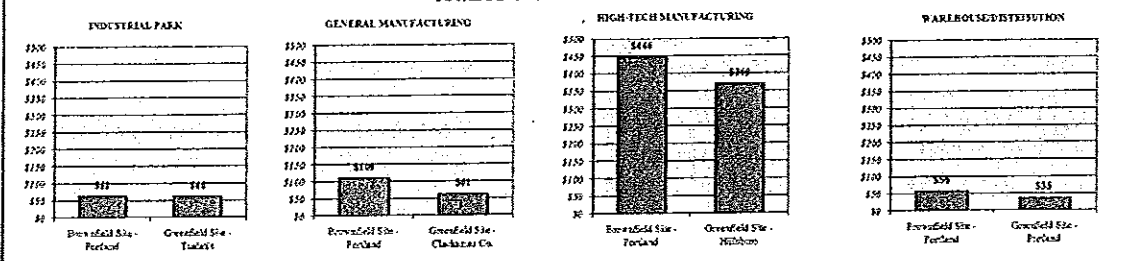
Financial Findings

The case studies evaluated revealed the general findings that greenfield sites have an overall lower development cost than brownfield sites, and brownfield sites require lower marginal infrastructure investment than greenfield sites. The following table provides a summary of the financial comparison between the case studies.

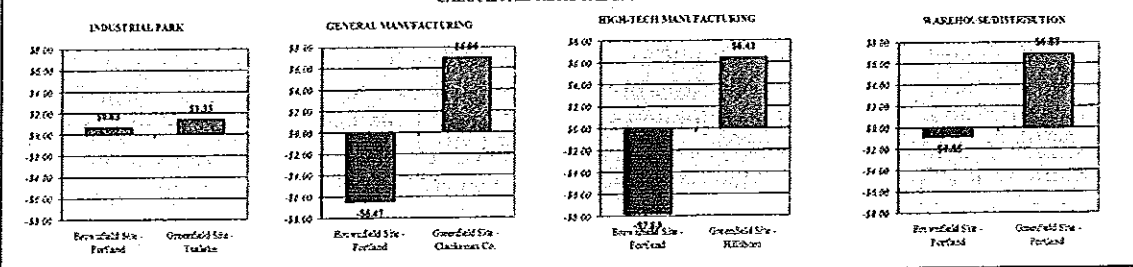
SUMMARY OF SCENARIOS EVALUATED

Site/Concept	Net Site Size/Acres	Building S.F.	Environmental Remediation U	Construction Cost		SDCs		Infrastructure Costs	Total Cost/Leas Land		
				Hard	Soft	Calculated	Credits		Total	PSF	
Industrial Park											
Brownfield Site - Portland	45.50	630,000	\$3,748,587	\$23,666,500	\$4,617,300	\$1,346,243	(\$25,268)	\$1,820,875	\$558,000	\$38,831,562	\$61.64
Greenfield Site - Tualatin	44.50	630,000	\$0	\$25,050,000	\$5,010,000	\$1,713,209	\$0	\$1,713,209	\$5,739,167	\$37,512,376	\$59.54
General Manufacturing											
Brownfield Site - Portland	15.75	450,000	\$22,590,475	\$29,857,500	\$4,171,500	\$1,212,343	(\$249,062)	\$963,281	\$24,000	\$48,956,756	\$109.88
Greenfield Site - Clackamas Co.	17.95	450,000	\$0	\$21,000,000	\$4,200,000	\$568,675	\$0	\$568,675	\$1,147,000	\$27,415,675	\$60.92
High-Tech Manufacturing											
Brownfield Site - Portland	15.75	350,000	\$28,027,455	\$105,900,000	\$21,180,000	\$1,283,121	(\$249,062)	\$1,134,059	\$24,000	\$135,265,524	\$445.47
Greenfield Site - Hillsboro	53.20	350,000	\$0	\$105,000,000	\$21,000,000	\$1,782,663	\$0	\$1,782,663	\$1,452,500	\$129,235,163	\$369.24
Warehouse/Distribution											
Brownfield Site - Portland	17.90	400,000	\$7,821,799	\$11,154,000	\$1,230,800	\$715,507	(\$75,858)	\$540,049	\$735,000	\$22,581,648	\$55.45
Greenfield Site - Portland	23.85	400,000	\$0	\$10,840,000	\$2,168,000	\$730,069	\$0	\$730,069	\$290,500	\$14,028,569	\$35.07

TOTAL DEVELOPMENT COST/LESS LAND



CALCULATED RESIDUAL LAND VALUES



1) Includes direct land and soft costs associated with remediation, as well as additional carrying costs, developer risk premium and lender risk premium

Key financial findings include:

- Under each of the scenarios, the greenfield site delivered the lowest development cost per square foot, as well as the highest residual land value. The differential was least in the Industrial Park scenarios; with the \$8.7 million cost of environmental remediation on the Portland brownfield site offset by a \$3.0 million cut and fill requirement on the greenfield site and a \$5.2 million differential in infrastructure costs.
- Infrastructure costs, as defined in this analysis, were substantially higher on three of the greenfield sites, with the exception being the Warehouse/Distribution program sites.
- The brownfield site used in the General and High-Tech Manufacturing scenarios has extremely high clean-up costs, related to soil and groundwater contamination. These add \$11.1 million in hard costs, which also dictates

higher insurance costs, which are \$1.9 million. As a result, the overall environmental remediation cost under these scenarios is estimated at \$22.0 for the General Manufacturing program and \$28.0 million for the High-Tech program. Higher remediation costs were assumed under the High-Tech scenario, with the higher overall costs of development increasing the impact of the risk premium.

PUBLIC COST BENEFIT ANALYSIS

Public benefits and costs were evaluated and compared for the brownfield and greenfield sites, based on a review of existing published studies and estimated public costs and revenue streams for the case study jurisdictions. For each of the sites, public benefits and costs were identified as Quantifiable – Direct or Qualitative and Other Quantifiable. Quantifiable – Direct public benefits that were similar across jurisdictions included SDC income, property tax revenue, Tri-Met payroll revenue and jobs. Annual tax revenues are greater for all of the case study examples that occur on sites located in the City of Portland and/or Multnomah County. This is due to the greater array of revenue streams within these jurisdictions compared to sites outside of Portland/Multnomah County.

Qualitative and Other Quantifiable benefits that were shared between brownfield and greenfield jurisdictions include state business tax revenue, state and local income tax revenue, utility tax revenues and achievement of economic development goals. Additional public benefits realized by the redevelopment of the brownfield sites include efficiencies realized through the utilization of existing infrastructure and the enhancement of surrounding property values.

In regard to Quantifiable – Direct public costs, standard public service infrastructure needs like fire, police, schools, public transportation and roads can generally be expected to incur costs due to increased development and population from brownfield redevelopment or greenfield development. However, the brownfield and greenfield case study development concepts in this analysis are, relatively speaking, of insufficient size to warrant significant marginal cost increases.

Marginal System Development Charges (SDC's) would be one Quantifiable- Direct public cost. While SDC's are intended to recover public costs associated with a development, they are typically set at a level below full marginal cost. The proportion of costs that are not recovered represent a public cost associated with the project.

Qualitative and Other Quantifiable costs shared between brownfield and greenfield jurisdictions include state, regional and local administrative costs. Legal costs can also be assumed for both types of sites. Public legal costs for brownfield sites, related to the risk of remediation activities, can be significant among other legal costs. Alternatively, greenfield sites can be expected to also incur significant legal and administrative costs related to UGB inclusion, site planning and other related issues unique to the Oregon land use system.

CONCLUSIONS AND IMPLICATIONS

Site Development Costs

Under each of the scenarios, the greenfield site delivered the lowest development cost per square foot, as well as the highest residual land value. And while infrastructure costs, as defined in this analysis, are generally higher on the greenfield sites, they do not exceed the brownfield remediation costs, therefore resulting in an overall cost advantage for the greenfield sites. The infrastructure costs are internalized into the development pro forma, reflecting an assumption that the development would be required to bear these costs as a condition of approval. While these costs could be defined as public costs, in this study they are the responsibility of the developer as opposed to being borne by the public.

Major off-site infrastructure and utility system upgrades, such as electrical substations and transformers, water reservoirs, waste water treatment facility expansions, state highway expansions, etc., are not required as a result of the development programs placed on the greenfield sites. While these types of major system upgrades may, and often would, be required as part of large acreage expansions of the Urban Growth Boundary, this is not the case for these sites.

The following table summarizes the estimated remediation costs of the brownfield sites, and the cost differential to produce an equivalent product relative to the greenfield option. As shown, the cost of remediation in these instances outpaces the savings in infrastructure costs.

Use	Brownfield Remediation Costs		Greenfield Infrastructure Costs		Overall Cost Differential	
	Total	PSF-Bldg.	Total	PSF-Bldg.	Total	PSF-Bldg.
Industrial Park	\$8,471,756	\$13.45	(\$5,181,167)	(\$8.22)	\$982,055	\$1.56
General Manufacturing	\$22,980,475	\$51.07	(\$1,323,000)	(\$2.94)	\$21,581,081	\$47.96
High-Tech Manufacturing	\$28,027,465	\$80.08	(\$1,428,500)	(\$4.08)	\$27,030,361	\$77.23
Warehouse/Distribution	\$7,821,799	\$19.55	\$444,500	\$1.11	\$8,553,079	\$21.38

The general findings of this study do not support the hypothesis that the costs associated with the remediation and redevelopment of brownfield sites can be on par with the costs to develop new greenfield sites; however, it would be unreasonable to draw any final conclusions based on the limited number of comparisons completed as part of this contract. A variety of issues can affect site development costs and these vary between sites. The methodology developed as part of this study does provide a foundation from which to look at a variety of sites and development scenarios to aid in addressing this policy question.

Brownfield Remediation Costs

Brownfield remediation costs, in all of the case studies, were greater than the infrastructure costs associated with development of the greenfield sites. It is important to understand however, what makes up the site development costs and how the assumptions can influence costs. The total brownfield development costs are composed of hard and soft construction costs, hard and soft remediation costs, carrying costs during cleanup, and the risk premium. These latter three remediation costs (soft, carrying and risk premium) have a significant impact on the overall redevelopment costs.

Methodologically, the analysis in this study approaches the development scenarios from the perspective of a private sector developer doing a speculative development. This assumption limits the direct applicability of the findings to this type of development. Alternative development approaches under a different scenario could include remediation by an end user, or remediation by a public sector entity. Under both approaches, remediation costs would be considerably less, particularly under a public sector remediation scenario.

No Two Sites Are the Same – The Difficulty of Generalizations

Generalizations are difficult to make because each site, whether brownfield or greenfield, has its own unique characteristics. No two sites are the same, whether they are brownfield or greenfield. Each has unique issues and characteristics that affect costs and development issues; e.g. the types of constituents that make up the contamination, adjacency to a body of water, the potential for migration of the contamination, the location of the site in relation to existing infrastructure, location in relation to specialized infrastructure, the size of the site, etc.

The study showed that there is a continuum of site preparation costs for both brownfield and greenfield sites. Taking remediation and infrastructure factors into account it would be possible to categorize the sites in this study by their intensity of color – a continuum of brownness or greenness. For the brownfield sites, a light brownfield site would be one that has minimal contamination issues and low cost clean-up requirements. A dark brownfield site would have major contamination issues, and high cleanup costs. A moderate brownfield site would be in the middle.

The same type of continuum of color could be created for the greenfield sites in the study, only focusing on availability of infrastructure and site development costs. A light greenfield site would have readily available infrastructure and be "shovel ready" with few additional requirements. A dark greenfield site would have major infrastructure needs and require substantial site preparation work. A moderate greenfield site would be in the middle.

These continuums, as applied to the case studies, are shown in the following table:

Use	Brownfield site	Greenfield site	PSF Differential	Conclusion
High Tech Manufacturing	Dark	Light	\$77.23	Same site as General Manufacturing site – more expensive use
Industrial Park	Moderate	Dark	\$1.56	Difficult greenfield site
Warehouse/Distribution	Moderate	Light	\$21.38	Greenfield site is better served than brown
General Manufacturing	Dark	Moderate	\$47.96	Very difficult brownfield site

Public Sector Costs

The case study development concepts in this analysis were not of sufficient size to pose significant, measurable public costs for affected jurisdictions. By design of the study, these costs are borne by the private sector. Internalization of brownfield remediation and infrastructure costs by the developer, rather than incurred by the affected jurisdiction(s), clear the public sector of the largest potential public cost disadvantage of brownfield redevelopment compared to greenfield development. To the extent that a jurisdiction assumes remediation costs, which may be a favorable policy option to enhance financial

feasibility of clean up and crystallize actual site remediation and redevelopment, public cost streams would increase by the magnitude of remediation costs estimated for each brownfield concept.

Public Sector Benefits

Benefits to the public sector, particularly in terms of revenue enhancement, were substantially greater for brownfield redevelopment concepts compared to greenfield development for the case studies considered in this analysis. By location of the case study sites, the revenue differential is largely due to the greater array of revenue streams within Multnomah County and the City of Portland compared to suburban jurisdictions. The following table provides a comparison of annual revenue stream differences for each development concept.

	Brownfield Public Benefits	Greenfield Public Benefits	Public Benefit Differential
Use	Annual	Annual	Annual
Industrial Park	\$1,400,000	\$977,000	\$423,000
General Manufacturing	\$1,300,000	\$465,000	\$835,000
High-Tech Manufacturing	\$3,430,000	\$2,100,000	\$1,330,000
Warehouse/Distribution	\$482,000	\$308,000	\$174,000

In addition to the quantifiable public benefits cited above, a wide variety of benefits would also accrue to affected jurisdictions that are not quantifiable due to the limitations of the case study approach and sizes of sites considered in this analysis. The scope of these benefits is broader for brownfield remediation and redevelopment, also due in part to the location of case study sites in Multnomah County. In general, however, brownfield redevelopment poses the following public benefits not accrued by greenfield development:

- Local income tax revenues;
- Public land conservation and environmental policy goals;
- Social benefits of contaminated site remediation and economic revitalization; and
- Enhancement of surrounding property values.

It is a Challenge to Keep Brownfield Sites Industrial

There is an economic challenge to maintaining industrial zoned brownfields as industrial properties after they are cleaned up. The remediation costs of bringing an “upside down” brownfield site “right side up” often cannot be recovered when the site can be developed only for industrial land values. Industrial land values in the Portland metropolitan area tend to range from \$3.50 to \$6.50 per square foot, the lowest value of any major land use. For comparison, office and residential land ranges from \$7.50 to \$10.00 per square foot, while commercially zoned land is valued at significantly higher levels. As remediation costs must be deducted from land value, industrially zoned property has the most limited ability to absorb clean up costs while still maintaining a positive residual land value.

It's “Easier” to Develop Greenfield Sites

Brownfield sites come with stigmas. For many developers, the unknowns and the difficulties of developing a brownfield site are too great. It is perceived that suburban greenfield sites are easier to develop and less constrained than urban brownfields. This

perception is also shared by site selectors, who are under contract for users to find them a location for a new industrial investment. Issues of liability, cost and risk are all part of this challenge. This dilemma can make it difficult for brownfield sites to get full exposure in the market and make it difficult for sites to be considered for redevelopment. The result of this is that most difficult brownfield sites require experienced developers who have extensive knowledge with redeveloping these sites. Traditional developers tend to shy away from these sites. It is therefore necessary for outside parties, such as public agencies with a desire to have brownfield sites redeveloped, to create relationships with experienced brownfield developers.

An Inventory of Sites is Required to Meet a Variety of Industry Needs

Physical site issues can play a role in a specific type of user choosing between or having the ability to locate on a brownfield or a greenfield site. However, the physical site that a company chooses is only one issue in a diverse mix of criteria that they use in deciding investment locations. Some users are very specific about the location of the property they are interested in using. Factors that can influence this include: access to transportation infrastructure (i.e., rail, water); proximity to other firms, either suppliers or customers (agglomeration or cluster effects); zoning, for example heavy industrial vs. light industrial, business park or high tech. These locational factors may outweigh or at least mitigate the brownfield vs. greenfield site issues.

Matching the locational needs of different types of industries and the market opportunities of different geographic locations will enhance brownfield redevelopment. It is critical to understand which types of companies can go where. Some industries and development types will be able to take on the brownfield challenges, others will not, and will focus their development decisions on greenfield sites. Each type of land, brownfield and greenfield, has a role to play in a regional economic development strategy.

Focus on the Brownfield Sites that have a Demand in the Market

The old saying of "location, location, location" in real estate is as valid in brownfields as it is in greenfields. As this study shows, different brownfield sites have different remediation cost profiles. However, brownfield sites located in areas of high market demand are better able to remain viable real estate investment opportunities if there is likely to be a high residual land value. The public sector should focus available assistance dollars to those sites that have the highest remediation costs and that are located in an industrial area that has market demand.

The Public Sector's Role in Brownfield Redevelopment

There is a role for public incentives that support the goal of keeping industrial brownfields for industrial uses because the private marketplace will be less likely to do this, due to the lower market value of industrial land.

Risk Reduction

First, the data provided in this study shows clearly that the cost of high risk capital to conduct site study and clean-up is a significant factor. The rate of return required by equity investors and the lack of debt capital are factors to which many states and municipalities have turned their attention. The creation of state revolving loan funds, tax-free bonds, private debt funds and participating grant money are all mechanisms that are being used to reduce the cost of capital.

One of the major issues associated with brownfield sites is the uncertainty created by unknown liability ("inflated risk assumptions"). Environmental insurance is a way to mitigate this risk. The cost and quality of environmental insurance is not only a direct cost factor but also an indirect cost. Comprehensive environmental insurance policies for these projects eliminate or lessen reduction in residual land value associated with stigma (the risk factor). Several states have created pooled, state-subsidized environmental insurance. These programs have reduced the direct cost of insurance policies and provided for broader coverage and longer terms than insurance that is available for individual projects.

Site Characterization Assistance

Another potential area for public involvement is in site characterization. The cost for preliminary, investigative studies to characterize contamination conditions at a site are not only a significant project expense, but frequently becomes a barrier to entry. Few private entities are willing to spend thousands, often hundreds of thousands of dollars to characterize a site that may or may not turn out to be suitable for redevelopment. Direct subsidy of characterization costs will create an expanded market of brownfield sites. The sites in this study have been sufficiently characterized for remediation estimating and insurance. However if that were not the case, it is unlikely that a third party developer could have supported those costs. State and municipal brownfield initiatives can provide forgivable loans for characterization. If the investigative results support development, the loan is repayable. If not, the loan becomes a forgivable grant.

Study Methodology Limitations

The purpose of this study was to determine the development costs for a specific development use, compared between a specific brownfield site and a specific greenfield site. The methodology used in the study is a case study approach, using a specific development project of a certain size and then preparing a pro forma analysis that is based on a private developer doing a speculative development. The study shows that the approach and the model function, and can be replicated with other uses and on different sites. It is also the case that the output of the model, in terms of costs and therefore residual land value, would change if different assumptions were used.

The actual development characteristics of each of the sites in this study are unique and site specific. Each has a cost structure for either remediation or new infrastructure services that are different from each other and from any other site in the Portland region. And the number of sites, only seven, provides a limited number of case studies from which to draw generalizations. So while the study found that it was more costly to remediate a brownfield site than to provide infrastructure to a greenfield site, the study's analysis should be considered as proposing a general theoretical construct for appropriately evaluating specific sites, as opposed to generating rules of thumb that can be consistently applied across all brownfields and greenfields in the region.

Attachment F

Breakdown of City of Portland Major Projects and Citywide Programs List								
Type of Project	Number of Projects	% of Total Projects	Total Cost (both Financially Constrained and Non FC)	% of Total Cost	Number of Projects in City FC	% of project category in FC	Cost in FC	Share of FC Dollars
Active Transportation	219	75%	\$ 1,293,097,793	69%	163	74%	\$ 976,915,666	78%
Motor vehicle	35	12%	\$ 271,082,218	14%	19	54%	\$ 100,461,305	8%
Multi Modal	19	6%	\$ 251,379,529	13%	12	63%	\$ 125,868,476	10%
ITS/Other	20	7%	\$ 54,710,717	3%	17	85%	\$ 53,077,428	4%
	293	100%	\$ 1,870,270,257	100%	211		\$ 1,256,322,875	100%

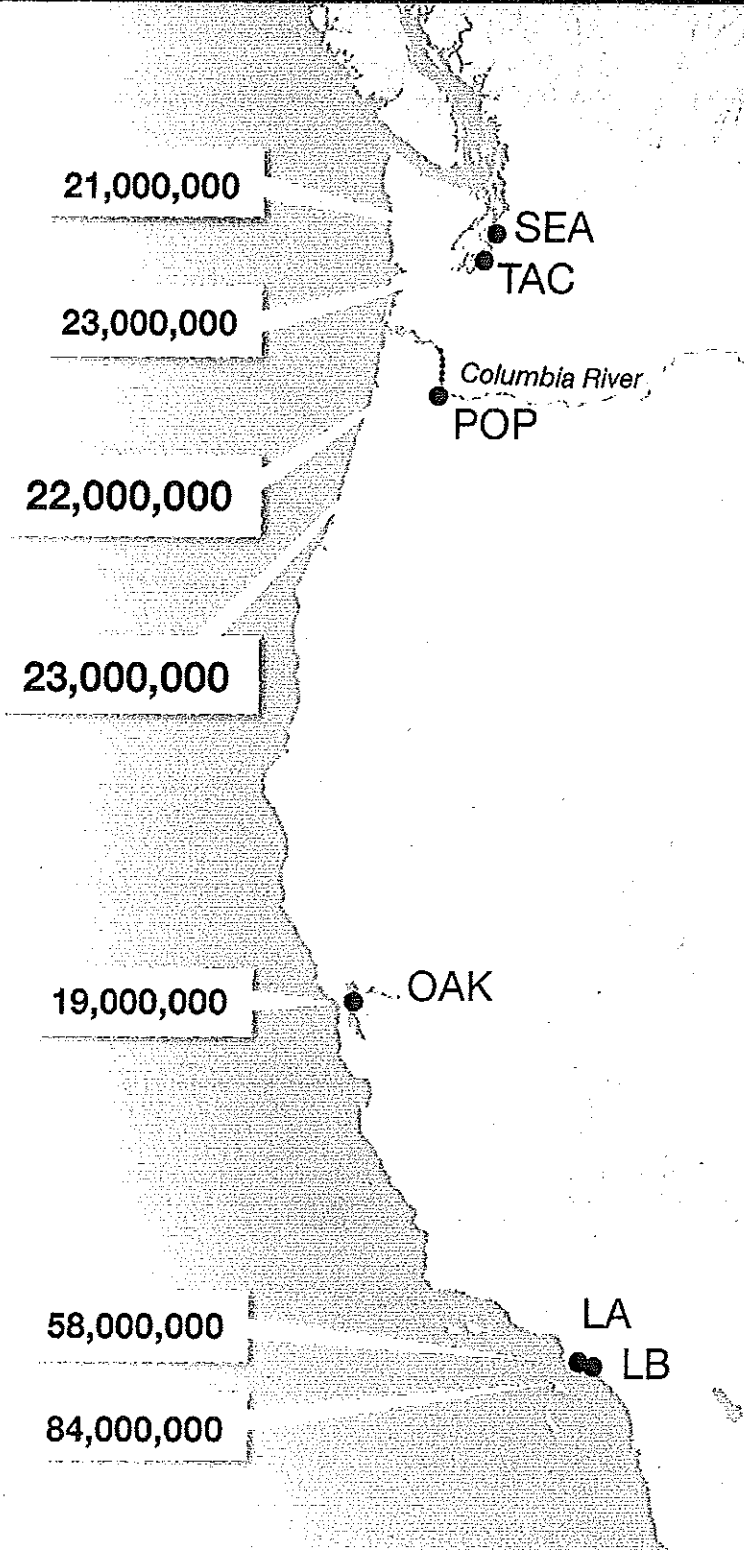
Attachment G

West Coast Ports Tonnage

- **23 million tons** moved through Portland Harbor

- **22 million tons** moved through other lower Columbia River ports (international only)

- **\$13 billion** value of tonnage trade in Portland Harbor



The Portland Harbor tonnage includes both public and private terminals. The Port of Portland terminals represent about half of the total. The loss of container service that occurred in 2015 would reduce the overall tonnage by about 1.8 million tons.

2013 total tonnage

01/01/2015

\$22 million film in queue film Commission 100%

see Deborah Stein with? questions?? supports

(503) 236-3522

Katherine Wilson
was here, the God-
mother of film in
Oregon - drove 3 hours
to testify from a film
edit, and wants to
remind you ~~that~~ to
~~look~~ @

look 7 generations
into the future for
Portland - and put
Terminal 1 in a
land bank so that
filmmakers can bring
Jobs! (she still has a
film studio
builder wanting)

1/7/2015

My name is Chris Fountain, and I reside in a floating home on Marine Drive, just West of the railroad bridge to Hayden Island. My home looks out over the undeveloped part of the island. I've been a taxpaying resident of Portland for over 10 years, and one of the reasons that I love living in Portland is that places like my home exist in our city. I live just minutes from the city center, yet my neighborhood remains a refuge for fish, birds, animals, and last (but not least) me.

My 23 neighbors and I have been riding the West Hayden Island development roller coaster for many years. Yes, we are financially invested in seeing this land removed from the City's Industrial Lands Inventory - our property values would take a beating if this land were to be developed. But we are also heavily invested in the preservation of this critical natural area.

As has been clearly presented by City Planner Tom Armstrong, the Comp Plan provides for an amount of developable acreage that is above and beyond the demand that is forecasted for the next 20 years, while also accommodating tens of thousands of jobs. A portion of this inventory will come from the accelerated cleanup and redevelopment of polluted industrial brownfields.

This underutilized, contaminated land needs to be repurposed and put back into productive use. Reclamation of this land will not get less expensive with time. The economic, environmental, and social benefits to be derived from brownfield redevelopment compare favorably with greenfield development. Benefits include significant job creation, tax revenue potential, greenhouse gas emission reduction, and savings in public infrastructure investment. Perhaps brownfield reclamation doesn't "pencil out" to industry's satisfaction, but **for the sake of future generations, we are morally obligated** to care for and protect our land and natural resources. Please remove this land from the City's Industrial Lands Inventory - permanently.

Thank you,

Christine Fountain
3939 N Marine Drive #5
Portland, OR 97217

Phone 503-285-4322
Email cfount@earthlink.net

Arevalo, Nora

From: Hales, Mayor
Sent: Tuesday, January 12, 2016 9:38 AM
To: Hall, Stacie
Cc: BPS Comprehensive Plan Testimony
Subject: RE: Support for the Draft Comp Plan to clean up contaminated sites and use them for natural areas for wildlife

Follow Up Flag: Follow up
Flag Status: Completed

Dear Stacie,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard your concerns and appreciates your feedback. Your email has been forwarded to the comprehensive plan testimony email inbox. They will review your testimony.

Again, thank you for contacting the Mayor's office.

Sincerely,

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: Hall, Stacie [mailto:stacie.hall@intel.com]
Sent: Wednesday, December 09, 2015 8:55 AM
To: Commissioner Fish <nick@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Cc: Hall, Stacie <stacie.hall@intel.com>
Subject: Support for the Draft Comp Plan to clean up contaminated sites and use them for natural areas for wildlife

To Whom It May Concern:

I highly support the approach taken on industrial lands in the recommended draft of the Comprehensive Plan that focuses on cleaning up the contaminated sites to use as natural areas for wildlife.

- Portland has over 900 acres of contaminated sites. The Draft Comp Plan takes the right approach in focusing on cleaning up contaminated sites and restoring them to productive use rather than converting natural areas to meet industrial land demand;
- The Draft Comp Plan takes the right approach in focusing on intensification of use of the existing industrial land base rather than converting natural areas to meet industrial land demand;

- The Draft Comp Plan takes the right approach in limiting conversion of industrial lands for non-industrial uses rather than destroying the last remaining natural areas along our rivers. Industrial interests should not be allowed to cash out their industrial land holdings and then turn around and demand cheap new industrial acres in critical natural areas.
- West Hayden Island should not be included in the industrial lands inventory;
- Environmental regulations on industrial lands should not be restricted or rolled back. Industrial lands along our rivers are also some of our most important and degraded natural resource lands and industrial landowners should not be exempted from protecting our rivers.

We MUST protect precious natural areas like West Hayden Island from industrial development. Thanks so much for your efforts and striving to balance industry with natural areas.

Sincerely,

Stacie Hall

stacie.hall@intel.com

927 Clearbrook Dr.

Oregon City, OR 97045

Phone: 503-557-1697

Re: West Hayden Island

T. Helzer Testimony before Portland City Council on Draft Comprehensive Plan, 1.7.16

First of three points this evening: In last month's CP hearing, Working Waterfront Coalition said City Planning Staff's analysis of Industrial Land Inventory "was not based on any data." The Planning and Sustainability Commission received several reports from Tom Armstrong in 2014-15 on this subject, extensively documenting staff's recommendation for far less inventory than previously lobbied for by the Port, Working Waterfront, Portland Business Alliance, Columbia Corridor Association and others. Bottom line: none of West Hayden Island is needed as industrial land to support the City's economic development for at least the next twenty years.

Second, in the 30-month combined study by the PSC of West Hayden Island as an industrial park and as a contributor to economic development in the Comprehensive Plan, the PSC attached many basic but vital mitigations for any development of WHI to be included in this Plan. As both an unfeasible and unsustainable development site, and as a high-value regional urban natural wildlife habitat, now is the time in the Comprehensive Plan to a) permanently exclude WHI from the Industrial Lands Inventory, and b) memorialize the very sound research the PSC has done in recommending essential mitigation to be required for any future industrial development on West Hayden Island.

Third, from that combined study by PSC, it is now abundantly clear that a) any industrial development of the proposed 300 acres on WHI will be very threatening to the environmental health of the entire 837 acres there, b) Multnomah County studies confirm serious negative impacts will occur on the human health of the entire Hayden Island community, and some of North Portland, and c) for these and many other reasons, we residents, business owners, and recreationists do not want any development at that site.

Public Testimony for PCC Comprehensive Plan Hearing January 7, 6-9pm

The industrial development of WHI has been revisited many times over the past 20 years. Each time the Port of Portland (POP) and many of Portland's major business interests have failed to bring forward a viable proposal for this site. Indeed, in Jan 2014, the POP famously walked away from four years of WHI development planning, which included a very reasonable mitigation requirement from the City (POP said it was too expensive). Since then the POP also found Terminal 6 to be too expensive to continue in operation. The sky did not fall!

Let's take a quick look at some attributes of WHI's 825 acres:

- WHI provides vital *web-of-life* wetland area for the Columbia river.
- The POP has told us that WHI is too expensive to develop.
- WHI is not suitable for the "new" white-collar software & tech industries.
- WHI is in the highest seismic liquefaction risk bracket for our region.
- WHI includes 300 acres of brownfield due to dumping of toxic spoils.
- WHI is poorly connected by rail & road (Vancouver land is better placed).

Yet, the POP refuses to clean up useful and already available and well-connected brownfields that it currently holds, for future industrial development. Worse still, despite the less than suitable attributes of WHI for industrial development, the POP preferred plan is apparently still to pave it over, and turn it into something as mundane and useless as a new car parking lot!

Portland cannot allow WHI, it's last major untouched urban natural wildlife habitat and wetlands area, to be forever destroyed. WHI is already working hard for our city by helping protect the health of our river environment. We should not deter it from that mission by further interference and disruption to its present state.

Therefore, we ask that the City's Comprehensive Plan permanently omit WHI from the Industrial Lands Inventory as not needed to achieve Portland's economic development goals over the next 30 years.

Alastair Roxburgh, 1503 N Hayden Island Dr, Portland, OR 97217. aroxburgh@ieee.org

Public Testimony for PCC Comprehensive Plan Hearing January 7, 6-9pm

Dear Mayor Hales and Commissioners Amanda Fritz, Nick Fish, Steve Novick, and Dan Satzman, and also the PSC Commissioners,

I sincerely thank you for recognizing the importance of protecting West Hayden Island from further industrial development, for the next 20 years. It means such a lot to residents on the island like me, and to so many others who care about retaining what remains of our precious and endangered natural areas in the Portland area.

I would like to suggest that having extra protections in place would be a good idea, such as giving a qualified organization, such as Audubon of Portland, the authority and responsibility of systematically monitoring the condition of the land and wildlife at regular intervals. This organization could be required to write a report on their findings which they then submitted to the Portland City Council. I suggest this because of my concerns of how West Hayden Island is already carrying a burden of huge piles of toxic river dredgings that have been placed by the Port of Portland, and according to SB412, the Port intends to continue to dump dredgings there. I am also concerned that activity by the Port of Portland and others may have disrupted the nesting of Bald Eagles so that they left last year.

Thank you for your time and consideration.

Sincerely,
Jan Roxburgh
1503 N. Hayden Island Drive,
Portland, OR 97217

Arevalo, Nora

From: Hales, Mayor
Sent: Friday, January 08, 2016 2:14 PM
To: Jan Roxburgh
Cc: BPS Comprehensive Plan Testimony
Subject: RE: Public Testimony for PCC Comprehensive Plan Hearing January 7, 2016

Follow Up Flag: Follow up
Flag Status: Completed

Dear Jan,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard your concerns and appreciates your feedback. Your email has been forwarded to the comp plan email inbox. They will review your testimony and reply to you.

Again, thank you for contacting the Mayor's office.

Sincerely,

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: Jan Roxburgh [mailto:hummingbirdzoo@yahoo.com]
Sent: Friday, January 08, 2016 1:47 PM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov.onmicrosoft.com>
Subject: Public Testimony for PCC Comprehensive Plan Hearing January 7, 2016

**Public Testimony for PCC Comprehensive Plan Hearing on January 7, 2016,
6-9pm**

Dear Mayor Hales and Commissioners Amanda Fritz, Nick Fish, Steve Novick, and Dan Satzman, and also the PSC Commissioners,

I sincerely thank you for recognizing the importance of protecting West Hayden Island from further industrial development, for the next 20 years. It means such a lot to residents on the island like me, and to so many others who care about retaining what remains of our precious and endangered natural areas in the Portland area.

I would like to suggest that having extra protections in place would be a good idea, such as giving a qualified organization, such as Audubon of Portland, the authority and responsibility of systematically monitoring the condition of the land and wildlife at regular intervals. This organization could be required to

write a report on their findings which they then submitted to the Portland City Council. I suggest this because of my concerns of how West Hayden Island is already carrying a burden of huge piles of toxic river dredgings that have been placed by the Port of Portland, and according to SB412, the Port intends to continue to dump dredgings there. I am also concerned that activity by the Port of Portland and others may have disrupted the nesting of Bald Eagles so that they left last year.

Thank you for your time and consideration.

Sincerely,

Jan Roxburgh
1503 N. Hayden Island Drive,
Portland, OR 97217



This email has been sent from a virus-free computer protected by Avast.
www.avast.com

Arevalo, Nora

From: Hales, Mayor
Sent: Friday, January 08, 2016 9:17 AM
To: Katherine Wilson
Cc: BPS Comprehensive Plan Testimony
Subject: RE: BPS Testimony for Tonight's Hearing January 7, 2016

Follow Up Flag: Follow up
Flag Status: Completed

Dear Katherine,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard you concerns and appreciates your feedback. Your email has been forwarded to the comp plan email inbox. They will review your testimony and reply to you.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: Katherine Wilson [mailto:katherinewil@gmail.com]
Sent: Thursday, January 07, 2016 11:50 PM
To: BPS Mailbox <BPSMBX@portlandoregon.gov>; Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Cc: Commissioner Fish <nick@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov.onmicrosoft.com>; Commissioner Novick <novick@portlandoregon.gov>; Frost, Liam <Liam.Frost@portlandoregon.gov>
Subject: BPS Testimony for Tonight's Hearing January 7, 2016

Dear Esteemed Mayor and City Council,

My name is Katherine Wilson. I was once nicknamed "The Godmother of Film in Oregon." My Nez Perce Elders gave me my Indian name of Redhawk.

I am also a 6th generation Oregonian on my Mother's side. My husband and I have commuted to work in Portland for 40-some years. We have worked on over 45 films in Portland alone. My husband has recently been working on "Grimm" for the last 5 years.

I am a screenplay writer and Producer. I worked on all 3 of Oregon's biggest Academy Award winners and it's largest grossing films. <http://imdb.me/katherinewilson>. My husband's credits are linked to mine under 'spouse': Philip Krysl.

I took the day off of editing my current film to drive 3 hours to Portland today to first visit with the Governor's Office of Film's Project Manager, and then with the Film Commissioner; as I was coming to testify at your hearing.

An elderly friend went at 4:30 to sign up for me while I drove there. But they wouldn't allow her to put my name on the list. **I didn't get to testify.**

I just got back. It's 10:30 pm. Mayor Charlie said we could write to you if we couldn't testify due to time limits. I hope I can get this to you before midnight!

But my heart was filled hearing this incredible community speak their hearts while I was there.

This is what I would have said: "I have something to offer all of you!" And it will meet almost every single goal in your Plan! (See below)

What's my plan? It's a vision I have had since 1973 when I started growing this industry:

SAVE TERMINAL ONE! Put it in a land bank. Lease it to the film industry! Why? Oregon's Film Industry needs a home, a studio, a central gathering place.

- Grimm tried to rent it. It's perfect AS IS for our INDUSTRY.
 - Perfect for the Semi's who need access to the Freeways
 - Perfect for the various 12 separate film departments with its Garage doors for loading and unloading
 - Perfect for building sets in.
 - Will foster low carbon footprint with its proximity to the train station and Trimet.
 - Enough space for parking for cast, crew, trucks AND Semi's!

- Near filmmakers' favorite restaurants and shopping!
 - Space for moving vintage structures onto to create a back lot!
 - A place big enough to intern young people into the business
 - An eventual Tourism destination
 - A green industry,
 - But in an industrial area where we can use special effects
 - A place with open sky for shooting, especially period pictures that need no modern telephone wires and cables.
 - Great light, clear fir, and non toxic building materials for sensitive artists
- Besides all that:
 - Keep this last piece of Portland land for the next 7 generations!
 - It is just a few hundred feet from a residential area.
 - It could support bringing jobs by having space for large budget features

It meets the Zoning requirements with out being a typical industrial pollutant!

Here is how it meets the outcomes of YOUR plan (in italics), and I quote:

"Vision

Portland is a prosperous, healthy, equitable and resilient city where everyone has access to opportunity and is

engaged in shaping decisions that affect their lives. Guiding principles

Not just where but HOW Portland will grow. The Comprehensive Plan includes five Guiding Principles to recognize that implementation of this Plan must be balanced, integrated and multi-disciplinary. The influence of the

Guiding Principles is seen throughout the Plan as they shape many of the individual policies and projects.

Economic Prosperity

Support a low-carbon economy and foster employment growth, competitiveness and equitably distributed household prosperity.

My husband makes \$100,000 a year driving a Set Dec truck with out a diploma!

Human Health

***Avoid or minimize negative health impacts** and improve opportunities for Portlanders to lead

healthy, active lives.

***Environmental Health**

Weave nature into the city and foster a healthy environment that sustains people, neighborhoods,

and fish and wildlife. Recognize the intrinsic value of nature and sustain the ecosystem services of

Portland's air, water and land.

****DON'T LET A TOXIC INDUSTRY BE THE HIGHEST BIDDER! Keep it off the market!***

Equity

Promote equity and environmental justice by reducing disparities, minimizing burdens, extending

community benefits, increasing the amount of affordable housing, affirmatively furthering fair

housing, proactively fighting displacement, and **improving socio-economic opportunities for**

under-served and under-represented populations. *ARTISTS and people of color.*

Intentionally engage under-served and underrepresented populations in decisions that affect them. Specifically recognize, address and prevent repetition of the injustices suffered by communities of color throughout Portland's history.

Resilience

Reduce risk and improve the ability of individuals, communities, economic systems, and the natural and built environments to withstand, recover from, and adapt to changes from natural hazards, human-made disasters, climate change, and economic shifts. “

The Film Industry is one of Portland's fastest growing industries! Grimm alone brought \$250 MILLION into the Portland Metro's economy!

But, please, don't just do it for me, even though I need it for my next feature film, but because Portland needs it for its next feature film, tv series, the Film Industry Community needs it, and our Children and Grandchildren may eventually need it for other even more important reasons!

Thank you so much for your time. Please call me if I can answer any questions.

My Very Best,

Katherine Wilson

PO Box 398

Walterville, Oregon 97489

(541) 521-3378

Arevalo, Nora

From: Ellen Wax <ellen.wax@workingwaterfrontportland.org>
Sent: Thursday, January 07, 2016 3:49 PM
To: BPS Comprehensive Plan Testimony
Subject: [User Approved] Comprehensive Plan Testimony
Attachments: final WWC Comp Plan ltr 1_7_16.doc; Attachment A - WWC Issue Matrix final.docx

Follow Up Flag: Follow up
Flag Status: Completed

Included with this email are two attachments, the first is a letter of testimony from the Working Waterfront Coalition, and the second is Attachment A – WWC Issue Matrix. Paper copies of the letter that includes seven attachments will be delivered in a packet to the Council hearing this evening.

Thank you.

Ellen M. Wax
Executive Director
Working Waterfront Coalition

503.220.2064 | 503.295.3660 fax
200 SW Market Street, Suite 190
Portland, OR 97201
ellen.wax@workingwaterfrontportland.org
www.workingwaterfrontportland.org



City of Portland City Council
Portland City Hall
1221 SW Fourth Avenue
Portland, OR 97204

January 7, 2016

Dear Mayor Hales and Portland City Commissioners:

The Working Waterfront Coalition (WWC) respectfully requests that City Council return to the mid-range growth forecast in the Economic Opportunities Analysis (EOA) -- the forecast that Council adopted in the 2012 EOA and the forecast used by Metro in their urban growth report.

A Medium Growth Forecast Is Supported by Substantial Evidence, Is Consistent with Other Adopted Plans and Is Good Policy

Based upon historic data and future projections, the City must assume a medium-growth cargo forecast for harbor-related tonnage across all cargo types, and not assume a low forecast (Attachment A). A low forecast is not supported by substantial evidence in the record and does not comply with Statewide Planning Goal 2's requirement for consistency among all adopted City plans. A low forecast contradicts historical trends and recent harbor infrastructure improvements that have resulted in substantial private sector investment (Attachment B). The low forecast as proposed by the Planning and Sustainability Commission (PSC) is a policy choice that retreats from historic cargo trends and plan for a decline in harbor business, despite contrary private sector investments and adopted plans. The PSC's recommendation sends the wrong message to Oregon businesses and to the public about the importance and future of the Portland Harbor, and the many businesses and employees who rely upon it.

Harbor Jobs are Middle-Income Jobs that Further the City's Equity and Housing Affordability Goals

The City should support additional middle-income job growth in the Portland Harbor, which will help the City achieve its equity and housing affordability goals. Harbor businesses are major Portland employers that employ more than 31,000 men and women, and support 29,000 more employees, which are largely paid middle-income wages. The harbor is a place of job diversity and predominantly middle-income wages (Attachment C). One harbor employer has more than 19 languages spoken on site. Many harbor businesses work directly with community college programs for job placement and skill development for existing employees. Job growth in the harbor is exactly what our City needs to ensure future work force diversity and middle income wages so more Portland citizens can afford a reasonable standard of living in Portland. Middle income wages are also one way to address Portland's housing affordability gap. Income disparity is part of our community's housing crisis, and that disparity is in part because of the flattening of middle income wages and loss of middle income jobs.

Harbor businesses are also a major source of revenue for the City of Portland's small and medium sized business. More than fifty percent of harbor business procurement of supplies, raw

Working Waterfront



C O A L I T I O N

materials, capital goods and services comes from small local businesses. This relationship is meaningful to the neighborhoods and the people employed as a result (Attachment D). The PSC recommended low forecast assumes one percent or less of annual growth in the harbor – limiting job opportunities and procurements of supplies, raw materials and services from local businesses.

The EOA Overestimates the Supply of Industrial Land and Potential for Additional Capacity -- Brownfields, Transportation Improvements and Shifting of Some Jobs

The WWC strongly supports brownfield redevelopment. However, we are concerned that the City's assumption that 60% of the brownfields in the harbor will be cleaned up and available for industrial use over the planning horizon is unsupported by data and is unrealistic without financial and policy support. Brownfield redevelopment to industrial use is difficult due to time and costs associated with addressing contamination, ownership issues, uncertainty about Superfund liability and market constraints on industrial property (Attachment E). These factors influenced the City Council to assume that only 40 percent of the brownfields in the harbor would be remediated when the Council adopted the 2012 EOA. At that time owners of industrial properties in the Portland Harbor were skeptical about that assumption because it did not account for the uncertainty related to Superfund. The PSC's assumption about brownfield redevelopment is a 20% increase over what Council adopted 2012, but the policy, economic or evidentiary basis for this increase has not been identified.

The City cannot assume that unfunded transportation improvements will create more cargo efficiency and increase industrial land capacity in the Portland Harbor. The PSC recommended a Transportation System Plan (TSP) with 78 percent of city resources targeted to active transportation projects instead of improvements to road and rail that would support harbor businesses (Attachment F). The City Council cannot rely upon improvements to the transportation system to create more cargo efficiency and increase industrial land capacity until improvements to road and rail that support harbor businesses are funded.

There is no evidentiary basis for an assumption that moving some existing office jobs associated with harbor businesses offsite will increase industrial land capacity in the harbor. There are a limited number of jobs with administration functions located on site of harbor businesses and they provide a critical function specific to onsite business operations and industrial activity. Moving office functions would both affect the efficiency of the operation and add cost, and not significantly increase industrial land supply.

WWC's Request and Why the Middle-Range Cargo Forecast Matters

The WWC requests that the City Council assume a more robust harbor forecast consistent with data and trends and support for middle-income jobs growth by:

- Targeting infrastructure and brownfield investment and polices to support harbor business expansion
- Expediting permitting
- Addressing conflicting regulations that hinder harbor business investment

Working Waterfront



C O A L I T I O N

The Comprehensive Plan is an aspirational document, a document filled with hopes and dreams for Portland, and a document that addresses and plans for expected growth over the next 20 years. Planning for growth, housing, jobs and people is addressed in every part of this policy document - - except for harbor industrial lands. How can we have a document that addresses growth for everything except for Portland harbor industrial lands?

The Planning Commission recommended a low growth forecast as a policy choice that is not based on data. The Working Waterfront Coalition requests that Council base its decision upon the data, and to make a choice that supports Portland's future, our industrial harbor's future, and our middle-income job future.

Why does this matter so greatly to harbor businesses? It matters because it sends a negative message, the wrong message about what is happening in the harbor. Substantial investment in the harbor has occurred since the Columbia River channel deepening in 2010. More than \$370 million investment has occurred since 2010 - generating an estimated \$4.5 million annually in tax revenues. The tonnage generated from these facilities is significant. Even with the recent loss of container service at the Port of Portland's Terminal 6 the volume in the Portland harbor is about equal to the volume in either Seattle or Tacoma. Portland Harbor tonnage, coupled with the Columbia River tonnage, creates the second largest gateway on the West Coast behind only Los Angeles /Long Beach (Attachment G).

It matters because it will discourage opportunities for future investment by private and public entities. This low forecast will impact our ability to obtain public or private funding for infrastructure, brownfield re-development and even harbor business expansion. All grant and investment concepts require future forecast information as justification for the requested investment. We will not compete well if our own assessment of our future is not positive and below the growth rate established by the region.

And finally, it matters because the harbor employs more than 31,000 men and women and supports 29,000 more employees. If there is any place in this City that leadership should support job growth, it is the Portland Harbor. If you care about the diverse employment opportunities and middle-income wages for Portland residents, then you should ensure that there is adequate growth in the harbor. The WWC urges you to change the Portland Harbor lands forecast back to the "most likely" moderate growth as originally adopted by City council in 2012.

Making a policy choice to adopt a low growth forecast sends the wrong message – that our City does not support harbor businesses and harbor jobs. We are open for business and with your help would like to continue to be so for years to come.

Sincerely,

Ellen Wax, Executive Director



Attachments:

Attachment A: WWC Issue Matrix and Recommendations

Attachment B: Impacts of Channel Deepening on the Columbia River and Investment Growth and the Continued Impact of the Portland Harbor

Attachment C: Portland Harbor Workforce Demographics

Attachment D: Economic Linkages from Marine Industrial Businesses

Attachment E: Brownfield/Greenfield Development Cost Comparison Study

Attachment F: City Recommended Projects – TSP Summary Chart

Attachment G: West Coast Ports Tonnage

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.

**City of Portland EOA / Comprehensive Plan Amendments
WWC Issue Matrix**

Issue	WWC's Position	PSC Recommendation	WWC's Response
<p><u>1. Cargo Forecast.</u> Should the City assume a medium-growth cargo forecast for harbor-related tonnage across all cargo types?</p>	<p><u>Yes.</u></p> <ul style="list-style-type: none"> A low-growth cargo forecast is not supported by substantial evidence in the record. A low forecast overlooks historical trends, recent infrastructure improvements and it sends the wrong message to Oregon businesses and the public. A low cargo forecast is inconsistent with region's forecast assumptions 	<p><u>No.</u> PSC adopted a low cargo forecast due to land supply challenges.</p>	<p>The City Council should adopt a medium-growth forecast for harbor-related tonnage across all cargo types.</p>
<p><u>2. Brownfield Redevelopment.</u> Should the City assume that a large amount of brownfield redevelopment to industrial uses will occur in the harbor during the 20 year planning period?</p>	<p><u>No.</u></p> <ul style="list-style-type: none"> Brownfield re-development to industrial is difficult due to time and cost associated with addressing contamination, ownership issues and the market constraints on industrial property (industrial attracts only \$5-7 /foot, regardless of what it costs to bring it to market readiness). 	<p><u>Yes.</u> PSC assumed 60% brownfield re-development in Portland harbor, which is 20% higher than what they assumed in the 2012 adopted EOA.</p>	<p>The City Council should assume a more modest amount of brownfield redevelopment along the harbor during the 20 year planning period, until brownfield redevelopment returns a reasonable amount of land to the industrial supply along the harbor.</p>
<p><u>3. Unfunded Transportation Improvements.</u> Should the City assume that unfunded transportation improvements will create more cargo efficiency and increase industrial land capacity along the harbor?</p>	<p><u>No.</u></p> <ul style="list-style-type: none"> The city should not take credit for the additional through-put that could result from transportation investments and the elimination of bottlenecks if there isn't certainty (funding or other commitments) around specific rail and road projects that support harbor businesses. 	<p><u>Yes.</u> PSC adopted the TSP with 78% of city resources targeted to active transportation projects instead of improvements to road and rail to support harbor businesses.</p>	<p>The City Council should not assume that improvements to the transportation system will create more cargo efficiency and increase industrial land capacity until such improvements are funded.</p>
<p><u>4. Office Job Relocation.</u> Should the City assume that office jobs associated with harbor businesses will move elsewhere and increase industrial land capacity along the harbor?</p>	<p><u>No.</u></p> <ul style="list-style-type: none"> The admin functions for the harbor businesses are limited and intended to serve the business operations. Moving that function would both affect the efficiency of the operation and add cost. 	<p><u>Yes.</u> PSC low forecast assumes a share of harbor businesses' administration functions move to free up more industrial land in the harbor.</p>	<p>The City Council should not assume that office jobs associated with harbor businesses will relocate and increase industrial land capacity along the harbor, until there is substantial evidence over a period of time that job movement is occurring and land capacity is increasing as a result.</p>
<p><u>5. Middle Income Jobs.</u> Should the City support additional middle income job growth in the Portland harbor?</p>	<p><u>Yes</u></p> <ul style="list-style-type: none"> The harbor employs more than 31,000 men and women and supports 29,000 more employees that are largely paid middle income wages. This is a place of job diversity and predominantly middle wages. Job growth here is what our City needs to ensure future work force diversity and wages to afford a reasonable standard of living in Portland. The businesses in the harbor are major employers in this City. More than fifty percent of their procurement of supplies, raw materials, capital goods and services comes from small local businesses. This relationship is meaningful to the neighborhoods and the folks employed as a result. 	<p><u>No.</u> PSC low forecast assumes 1% or less of annual growth in the harbor -- limiting job opportunities and procurements of supplies, raw materials and services from local businesses.</p>	<p>The city council should assume a more robust harbor forecast consistent with data and trends and provide support in the Comprehensive Plan for middle income jobs growth by</p> <ul style="list-style-type: none"> Targeting investment and policies to support harbor business expansion Expediting permitting Addressing conflicting regulations that hinder harbor business investment

Arevalo, Nora

From: Hales, Mayor
Sent: Wednesday, January 20, 2016 4:30 PM
To: BPS Comprehensive Plan Testimony
Subject: FW: Please support the Draft Comprehensive Plan's Approach to Industrial Lands

Follow Up Flag: Follow up
Flag Status: Completed

-----Original Message-----

From: Dianne Ensign [mailto:ensign@lclark.edu]
Sent: Thursday, January 07, 2016 12:30 PM
To: Commissioner Fish <nick@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov.onmicrosoft.com>; Commissioner Fritz <amanda@portlandoregon.gov>; Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: Please support the Draft Comprehensive Plan's Approach to Industrial Lands

Dear Mayor Hales and City Commissioners,

Protecting our region's remaining natural areas is an issue of the utmost importance to me. I support the approach to industrial lands outlined in the current draft of the Comprehensive Plan, which focuses on:

- cleaning up more than 900 acres of contaminated sites;
- intensifying use of the existing industrial land base; and
- limiting conversions of industrial land to other uses, rather than converting irreplaceable natural areas to industrial use.

The Draft Comp Plan takes the right approach in limiting conversion of industrial lands rather than destroying the last remaining natural areas along our rivers. Industrial interests should not be allowed to cash out their industrial land holdings and then turn around and demand cheap new industrial acres in critical natural areas. Also,

-- West Hayden Island, one of our most valuable natural areas, should not be included in the industrial lands inventory; and

-- Environmental regulations on industrial lands should not be restricted or rolled back—industrial lands along our rivers are also some of our most important and degraded natural resource lands and industrial landowners should not be exempted from protecting our rivers.

I strongly support these approaches to preventing industrial development in wildlife habitat, and I urge your support of them, too.

Thank you for your consideration.

Sincerely,

Dianne Ensign
11600 SW Lancaster Rd
Portland, OR 97219

I



Home Builders Association
of Metropolitan Portland

January 7, 2016

The Hon. Charlie Hales, Mayor
Portland City Hall
1221 SW Fourth Avenue
Portland, OR 97204

Re: Comprehensive Plan Update

Dear Mayor Hales and Commissioners:

On behalf of the Home Builders Association of Metro Portland (HBA), the association hereby submits the following written comments regarding the draft 2035 Comprehensive Plan.

In particular, there are a series of fundamental assumptions that are problematic when looking at the long-term growth projections for the City, as well as for the region as a whole. A primary concern centers around the Comprehensive Plan's assumptions for redevelopment expected to occur within Portland over the next 20 years – the future, projected redevelopment and underlying zoned densities are unprecedented in nature and far exceed historical experience and evidence.

Moreover, the Comprehensive Plan discounts the demand and preferences for single-family housing within Portland. The assumptions relied upon in the draft Comprehensive Plan fail to provide a balance of housing options for current and future residents of the City.

Lastly, there are outstanding issues with the proposed redevelopment and zoning designations that highlight uncertainties around their financial feasibility over the 20-year period, as well as the underlying risks to housing affordability and equity for those vulnerable populations impacted by the acceleration of redevelopment in geographic regions of Portland.

The HBA values our relationship with the City and looks forward to working together on these important issues for Portland. We appreciate your attention to the above-noted concerns.

Respectfully,

Paul Grove
Director of Government Relations
Home Builders Association of Metro Portland

Home Builders Association of Metro Portland
15555 SW Bangy Rd., Ste. 301
Lake Oswego, OR97035
503-684-1880 • Fax 503-684-0588

January 7, 2016

Mayor Charlie Hales
Commissioner Nick Fish
Commissioner Amanda Fritz
Commissioner Steve Novick
Commissioner Dan Saltzman
1221 SW 4th Avenue, Room 110
Portland, OR 97204

Portland Comprehensive Plan

Riverside Golf and Country Club would like to offer additional comments on the Draft Portland Comprehensive Plan. We are including with this letter a report entitled "U.S. Golf and Riverside's Prospects" which provides a more detailed look at golf.

To restate our position, Riverside plans on continuing to operate as a golf course for a very long time. We don't have any desire to change our great facility and we are operating successfully. We oppose an industrial designation on our property. It will hurt our business operation and creates a false impression.

We believe the Economic Opportunities Analysis (EOA) characterization of Metro area golf courses is inaccurate; and its prediction of Riverside's demise in the next twenty years is wrong.

The specific EOA language we refer to is (March 15 Proposed Draft, Section 4- Community Choices, p 23):

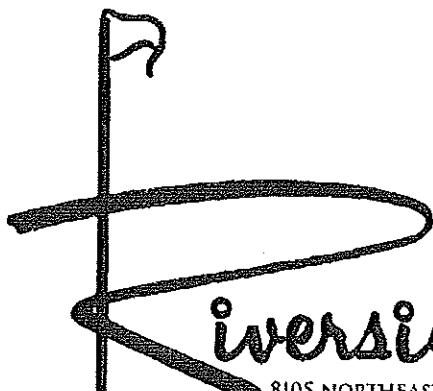
...While the Broadmoor and Riverside golf courses could potentially remain in operation indefinitely, national market trends indicate an oversupply of golf courses in the coming years relative to population demographics, particularly in inner city locations. Given these trends and continuing intensification of industrial development in the surrounding area, it is reasonable to expect potential reuse of these sites in the 2035 planning horizon and the proposed Comprehensive Plan proposal would accommodate that change..."

We take issue with the explicit statement targeting Riverside as ceasing operations by 2035. It's rather unusual for a City approved document to make such a statement targeting an existing area business based on limited information.

The golf industry has, of course, undergone changes and a "correction" as a result of the Recession and demographic changes. However, the industry has stabilized and Riverside is experiencing strong growth. Golf courses are closing, but they were greatly overbuilt. However, since 2006, only 4% of the total courses have closed, 90% of which are public.

The attached report takes a more detailed look at the industry. It examines our operating model compared to other courses. In looking at the data, one can be assured that the golf industry is here to stay.

If Riverside had been experiencing declining membership and severe financial hardship, I could understand the conclusion. On the contrary, we weathered the recession and are doing quite well. We are planning for the future and continue to make improvements to our facility.



Riverside

GOLF & COUNTRY CLUB

8105 NORTHEAST 33RD DRIVE PORTLAND, OR 97211-2095 PHONE: (503) 288-6468 FAX: (503) 282-1383

Ord. 187831, Vol. 1.3.A, page 1136

We thus don't see Riverside as a viable candidate for many years and staff should look for other opportunities that have more potential. Broadmoor is embracing the City's proposal, and the City should look at additional Broadmoor property over and above the currently identified 15 acres for additional industrial land.

We would request that:

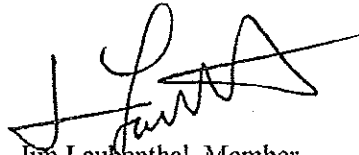
1. The EOA be revised to remove the speculative language specifically calling out Riverside's eventual demise.
2. That the City removes the map designation of industrial from Riverside.

In closing, to paraphrase Mark Twain, "Rumors of our demise are greatly exaggerated."

Sincerely,



Lucas Miller, General Manager



Jim Laubenthal, Member



Riverside GOLF & COUNTRY CLUB

8105 NORTHEAST 33RD DRIVE PORTLAND, OR 97211-2095 PHONE: (503) 288-6468 FAX: (503) 282-1383

Ord. 187831, Vol. 1.3.A, page 1137

U.S. Golf and Riverside's Prospects

Prepared by: Lucas Miller, RGCC General Manager
Jim Laubenthal, Member

January 7, 2016

Summary

The City of Portland has concluded that Riverside Golf and Country Club is unlikely to continue operating after twenty years. The evidence does not support this conclusion.

Some key points:

- Riverside's membership has rebounded from the economic recession.
- Riverside operates on a member-based model and not pay-per-use.
- Riverside has no intention of closing.
- The golf industry has rebounded to a fairly stable number of golfers. The industry is not going away.
- Golf course supply was overbuilt and grew by 40% in the twenty years through 2005. There has been a 4% reduction in courses since then. 90% of these were public use courses.
- Millennial participation is down but rebounds as they reach into their 30's.
- A growing metro-area population, and our close-in location gives Riverside a marketing advantage..

Introduction

This report looks at the current state of the golf industry and discrete trends to provide a more detailed perspective on Riverside Golf and Country Club's (Riverside) long-term future. This is prompted by the City of Portland's Economic Opportunities analysis regarding the future of golf. The City's report states that:

March 15 Proposed Draft, Section 4, Community Choices (p.23)

Airport Area Golf Courses "The Trust for Public Land and property owners of the 138-acre Colwood golf course obtained conditional approval of a quasi-judicial plan map and zoning amendment in 2014 to rezone 49 acres for industrial uses with the remainder as public open space and natural area. The proposed Comprehensive Plan includes this map change at the Colwood site and similar land use proposals at two nearby golf courses, designating approximately 90 additional acres at Riverside and 15 acres at Broadmoor as Industrial and retaining the Open Space designation on 215 acres.

...While the Broadmoor and Riverside golf courses could potentially remain in operation indefinitely, national market trends indicate an oversupply of golf courses in the coming years relative to population demographics, particularly in inner city locations. Given these trends and continuing intensification of industrial development in the surrounding area, it is reasonable to expect potential reuse of these sites in the 2035 planning horizon and the proposed Comprehensive Plan proposal would accommodate that change...."

We believe that this analysis over-simplifies a rather dynamic picture, and is inaccurate. The conclusion statement that "national market trends indicate an oversupply of golf courses in the coming years relative to population demographics, particularly in inner city locations" is misleading and we believe an examination of data suggests other conclusions.

There are a number of factors that differentiate Riverside from Broadmoor and Colwood, and there are market trends that paint a different picture.

Riverside vs Broadmoor's Operating Model

A golf course such as Broadmoor operates on a pay per use basis. This is the typical model for most public use courses. Riverside is a privately operated membership-based course with a steady monthly income stream. Thus, its revenue is more buffered from weather disruptions.

Overall Goals of Riverside

While the privately owned Broadmoor (and previously Colwood) have decided to consider other uses, Riverside has no intention of changing or seeking higher returns. Riverside is operated under IRS regulations as a not for profit entity. Thus, increasing nearby land values are not a relevant factor. Riverside has been in operation for 90 years and plans to continue operations for another 90 years. Riverside has survived the depression, a fire, a foreclosure, World War II, the Great Flood of 1948 when it was under 18 feet of water, the Columbus Day storm and countless economic ups and downs. This is because of its strong membership base from throughout the Portland metropolitan area and a consistent commitment of its members.

Riverside's Membership

The following graph shows Riverside's membership over the last 16 years.



Figure 1. Riverside Membership

What this shows is clearly the impact of the recession 2007-2012 with a drop of 19% from the 2004-2006 peaks. However, it also shows a good recovery back within 3% of our peak. This most recent fiscal year just ended for 2015 was a good year for Riverside in spite of major unanticipated capital repairs on our building.

The State of the Golf Industry

The golf industry has changed over the last 20 years and certainly faced significant declines in 2006-2007 as a result of the Recession. There have been course closures and changes in the number of rounds played. Media stories also have made portrayals of golf falling off a cliff. However, a closer examination of industry

information paints a more discerning picture. The National Golf Foundation (NGF), the leading industry trade group, publishes annual statistics and periodic research reports. We will use this material to describe the current state of the industry.

The following illustrates US Golfers (mill.)

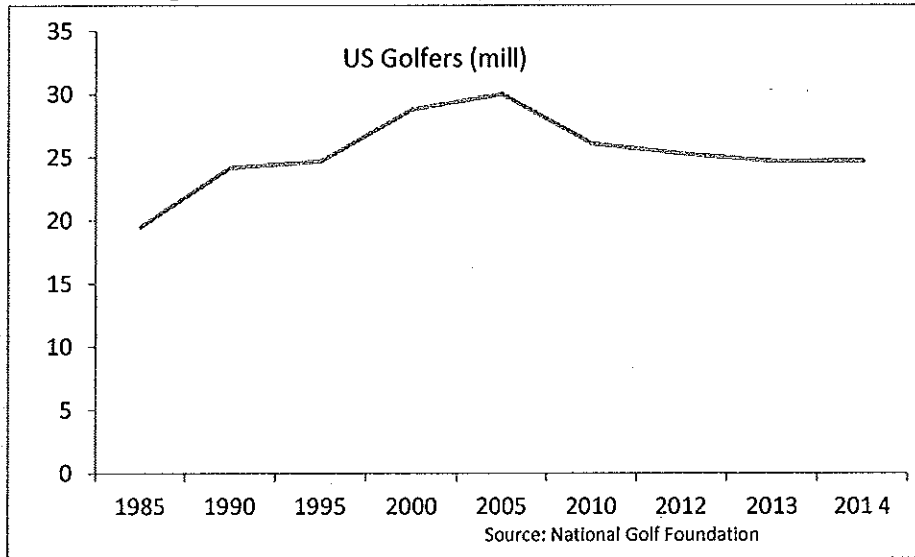


Figure 2. US Golfers

What this shows is that from a peak of 30 million golfers the annual number is leveled off at 25 million. This is contrary to the “falling off a cliff” media narrative. Also, the many of the golfers who have left the game are the more infrequent players. Thus the average rounds per player has increased as the following chart shows:

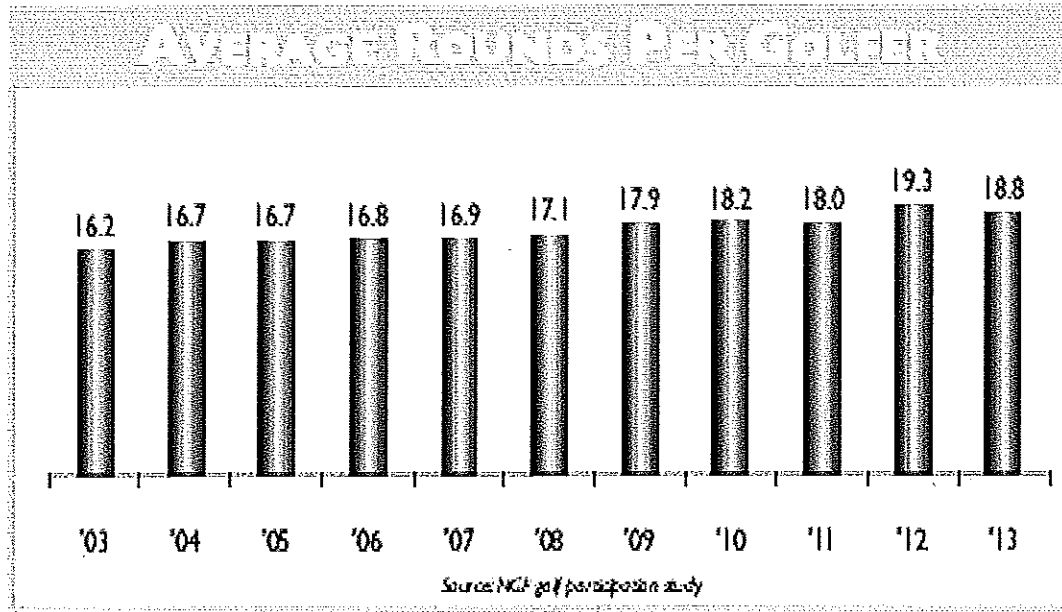


Figure 3. Rounds per Golfer

Golf Course Closures

The National Golf Foundation, in their 2015 Golf Industry Overview, looked at the issue of Golf course supply. They note that "Since the beginning of 2006, the healthy reduction in golf courses amounts to less than 4% of the total supply. For perspective, golf supply grew by 40% in the previous 20 years (1986-2005)." They saw this adjustment as a healthy shake-up given the 17% decline in the number of golfers. The following shows the supply of US courses and illustrates the overbuilding they cite:

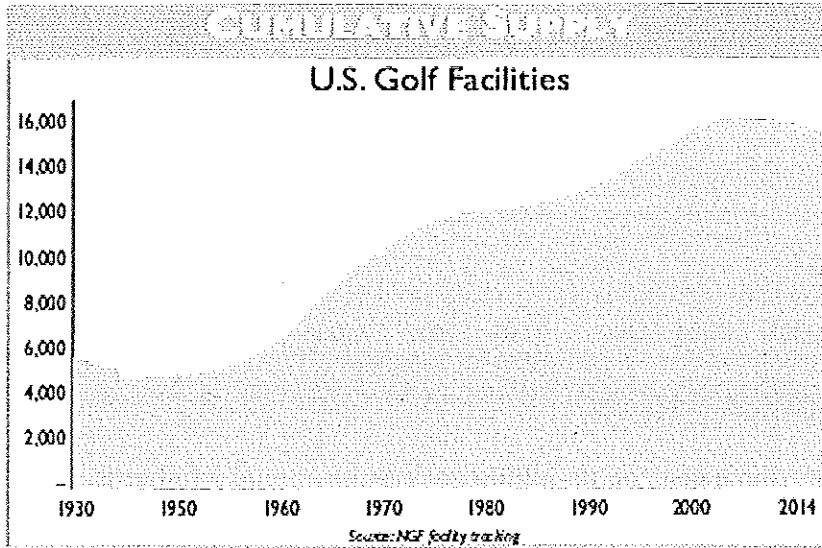


Figure 4. US Golf Facilities

Another interesting illustration is to look at a breakout of course closures over time. What this shows is that only 10% of the closures over the 12-year period through 2012 were private and 90% were public courses (either daily fee or municipal).

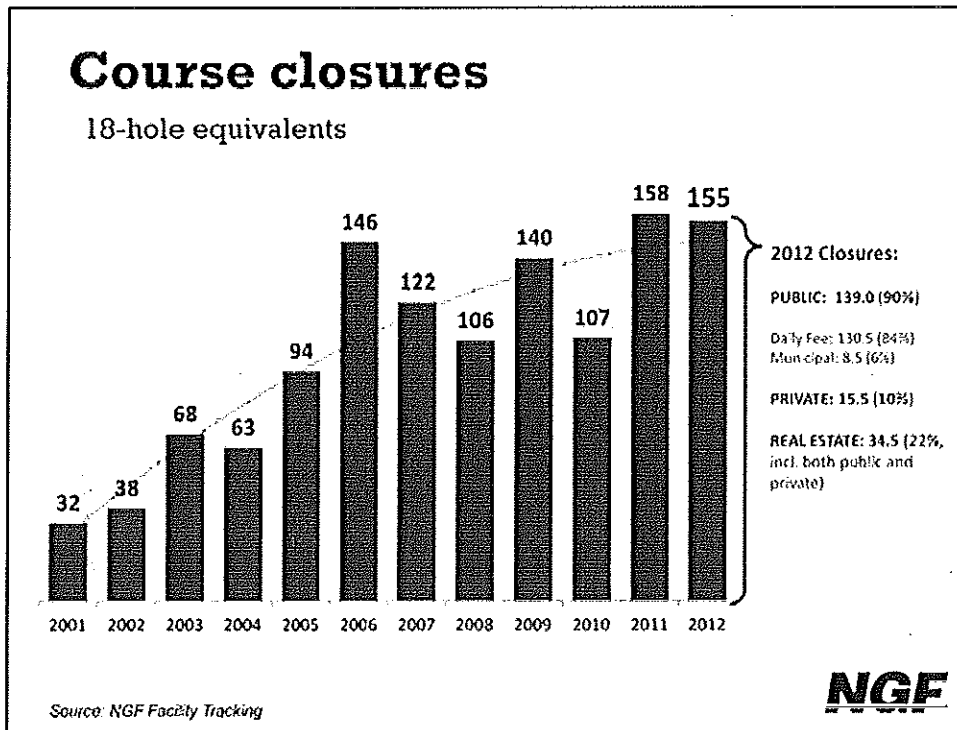


Figure 5. Golf Course Closures

What this suggests is that a public use course would be nine times more likely to close than a private, member-owned course like Riverside.

Demographics

There are certainly demographic changes underway in the industry. The NGF several years ago identified a drop in the golf participation rate among 18-34 year old Millennials. This led to additional research to better understand this segment. This research confirmed that 26% of all golfers, approximately 6.4 million, are Millennials. There are also another "12 million non-golfers among the generation that are 'very or somewhat interested' in playing golf now."

In looking at a more detailed breakdown of age stratification participation by Millennials we see the following:

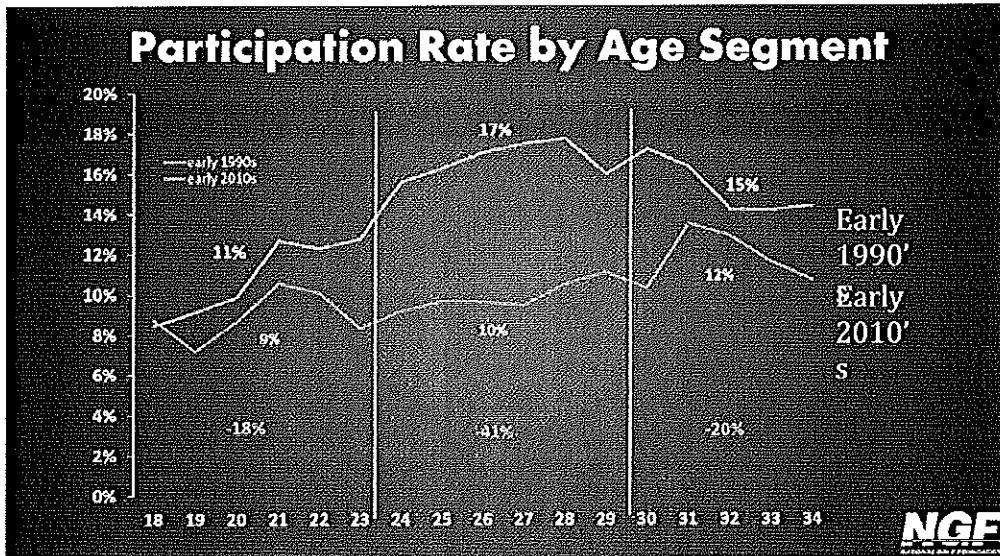


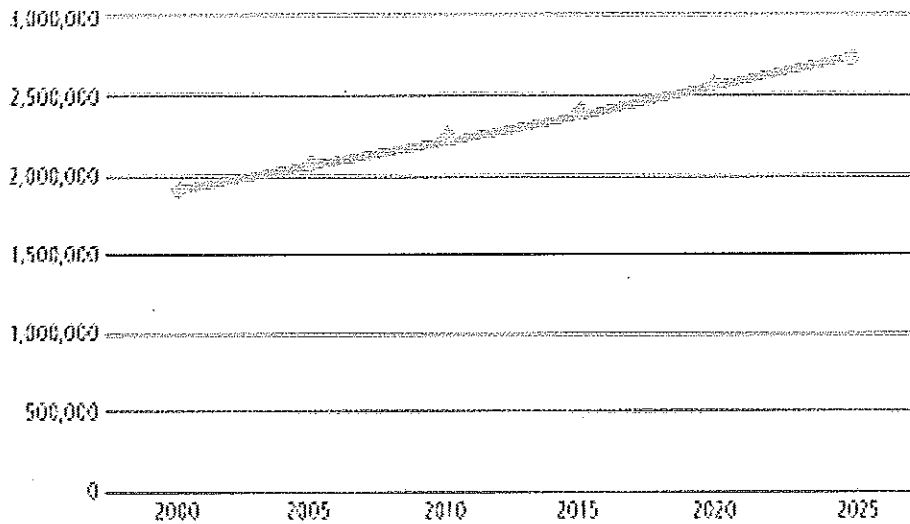
Figure 6. Millennial Participation by Age

This graph shows a large drop in the 24-29 year old category. This is the group just starting out after school with lower salaries and underemployment. NGF sees a narrowing of the gap in the 30-34 year olds resulting from individuals being more established in their careers with better incomes. As Millennials earn more they play more golf. NGF expects this trend to continue and that as they age golf participation will increase. At Riverside the 30+ Millennials category is one of our strongest new member categories.

Junior golf has seen an increase from 2012-2014 of 19% to 3.2 million golfers. This is a result of the golf industry focus on junior golf with programs like The First Tee, PGA Junior League Golf, the LPGA-USGA Girls-Golf and the Drive-Chip-Putt Championships. Female golfers in this same 2012-2014 period increased 14% to 5.7 million golfers.

The participation rate of the population six and above who have played at least one round per year varies from 8.5 %-11% and is holding steady at 8.5%-8.8% from 2012-2014 (NGF). In a robust metropolitan area like Portland, population is projected to increase to 2.7 million by 2025. This is a 40% increase from 2000 (City of Portland 2030 Vision for the Future). The chart below illustrates this trend.

Portland Metropolitan Population Forecast



Sources: Oregon Department of Economic Analysis; Washington State Office of Financial Management
* Data for Clackamas, Columbia, Multnomah, Washington and Yamhill counties in Oregon and Clark County in Washington.

Figure 7. Metro Area Population Forecast

What this translates to is that even with a leveling off of the participation rate, a strongly growing population base will be seeking golfing opportunities, both public and private.

The City's conclusion that Riverside is likely to convert because of its inner-city location is wrong. Accessibility and livability are key reasons that Portland's inner-city residential neighborhoods have strengthened and thrived over the last thirty years. The same rationale applies to Riverside. Nearby neighborhoods in Portland and Vancouver are prime customers for us. Increasing traffic congestion leads people to seek closer recreation opportunities.

Conclusions

Riverside is well positioned to thrive into the future. It has a stable loyal membership, and demographics will continue to drive potential customers. The golf industry, while going through some changes and corrections, is not going away and has not by any means "fallen off a cliff." It has rebounded from the recession and stabilized.

LINNTON NEIGHBORHOOD ASSOCIATION

10614 NW St. Helens Rd.
Portland Oregon 97231

January 6, 2016

Mayor Charlie Hales
Commissioner Amanda Fritz
Commissioner Steve Novick
Commissioner Nick Fish
Commissioner Dan Saltzman

Re: Comprehensive Plan comments

Dear Commissioners:

The Linnton Neighborhood Association has previously submitted written and oral testimony regarding the proposed new Comprehensive Plan to the Department of Planning and Sustainability. This document summarizes the key issues raised in that testimony.

Industrial zoning in Linnton's central business district

The LNA has raised a variety of issues about the plan's provisions regarding land which falls within the Industrial Sanctuary. As a concept the LNA supports the idea of a sanctuary, but finds the implementation problematic. The plan paints with too broad a brush, and imposes unjustifiable constraints on many parcels that are included in the sanctuary for merely historical reasons unrelated to current industrial needs. Examples exist in Linnton. After discussions between Linntonites and Bureau staff, including the director, regarding three specific properties, the staff has agreed to recommend those three sites be excluded from the Prime Industrial Overlay. A copy of a map provided to the LNA by Bureau staff is attached to this document as Exhibit A. The three sites are Kingsley Park, at the north end of the town center, off NW 114th, where a community garden will be established, the riverfront property along Front Ave., which fronts onto the last remaining sandy beach on the west side of the Willamette River north of downtown., and a thin stretch of Linnton Mill site along St. Helens Rd. south of the Community Center. Unlike the rest of the mill site, this narrow strip of land between the railroad and the highway will not be part of the planned habitat project. In addition to excluding these three sites from the Prime Industrial Overlay, the last of these, the land along the highway, will be zoned ME.

The LNA lobbied for and supports these changes, and appreciates the Bureau's thoughtful attention to the concerns of the neighborhood.

The LNA also lobbied for, but was unable to achieve, an exclusion from the Prime Industrial Overlay for the central section of the mill site. The LNA believes it is in the best interest of the city and the neighborhood to rezone the mill site to ME. This would have no effect in the short term, since the property is currently owned and occupied by an active business, but would become critical when the owner decided to sell and an opportunity arose to create a much needed riverfront park for NW Portland. The existing business is not river dependent or even river related.

Earthquakes and other hazards

Linnton is at the heart of Oregon's energy industry. We have pipelines and tank farms. We also have concerns about the ability of the energy industry to function safely when the expected earthquake occurs. The comprehensive plan is not reassuring. In regard to "energy infrastructure" the plan, in policy 8.104, speaks of coordination with energy providers to encourage investments that ensure reliable, equitable, efficient, and affordable energy for Portland's residents and businesses. Safety ought to be on that list. It ought to be listed first. But, instead of providing a long term vision of moving Oregon's fuel storage and pipelines out of the high earthquake danger zone, the plan ignores safety issues. Transitioning the tank farms out of their current risky locations before liquefaction dissolves the ground beneath them ought to be a comprehensive plan goal.

Hillside density

We have supported the draft designation of Linnton as a "Stormwater Management Challenge Area" as one tool to control hillside development through management tools such as storm water, landslide and habitat regulations. The plan acknowledges the constraints facing Linnton including soil types and steep slopes that limit storm water infiltration into the ground, lots that cannot easily connect to existing storm water pipes, and landslide and wildfire hazards.

This position follows the neighborhood position adopted almost ten years ago in the Council approved Linnton Hillside Plan which began to address these challenges by rejecting higher density zoning. Nonetheless, the potential for future increased density still remains as Linnton has many "buildable" lots even though it does not have the infrastructure to support the added population.

Given the city's commitment to increased density the LNA expects there will be growing interest in the available land in Linnton, particularly since most Linnton lots come with a great view. It would be easy for new construction to overwhelm services. Managing growth is the prime justification for a comprehensive plan, but this plan doesn't provide the management that our neighborhood needs.

The role in the plan of the Neighborhood Associations

The current draft regarding community engagement is an improvement over earlier drafts. But there is still concern the draft does not adequately acknowledge the contribution neighborhood associations can make to the achievement of the Community Involvement Goals. Many of those goals could best be achieved by enhancing the role neighborhood associations starting with an explicit commitment to neighborhood participation in planning process.

For example, the plan needs to set realistic timelines for participation in the planning process by the neighborhood associations. The LNA has general membership meetings every other month, timelines which call for comments or appeals within 10 or 30 days are unworkable; they send a strong message that the city doesn't value what the neighborhoods bring to the process or care what the neighborhood associations think about land use issues.

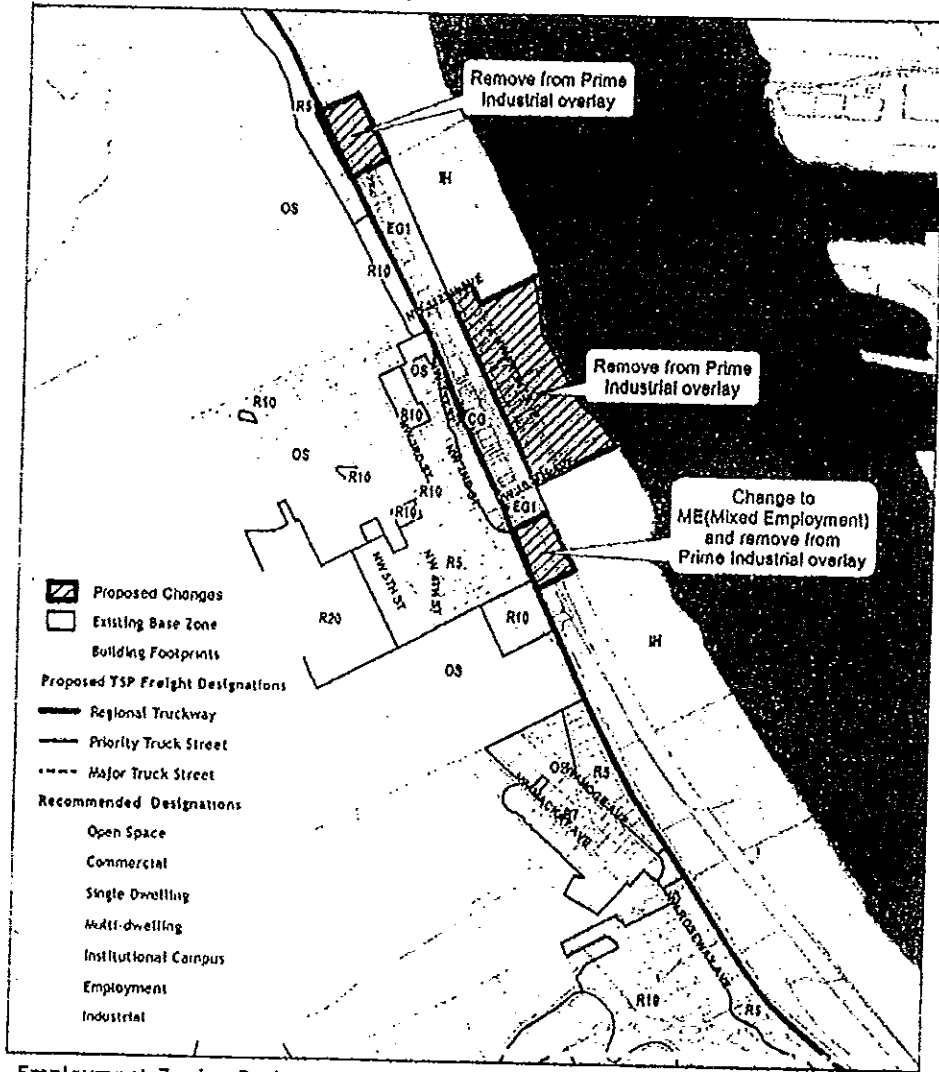
These issues and others were discussed in the Comments on Community Engagement in the Comp Plan sent to the council on December 14, 2015. A copy of those comments is attached as Exhibit B. The LNA endorses those comments.

Health Overlay Zones

The LNA has seen a proposal for a Health Overlay Zone in North Portland. The LNA supports the creation of such zones and would like to see Linnton included in one. The attached document, Exhibit C, sets out the goals and strategies of the proposed zones.

Shawn Looney
Chair
Linnton Neighborhood Association

Linnton Employment Area Zoning



Employment Zoning Project

August 31, 2015

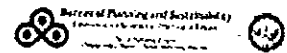
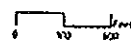


EXHIBIT A

DATE: December 14, 2015

TO: Portland City Council

FROM: Neighborhood Coalition Leaders and Staff

RE: **COMMENTS ON COMMUNITY ENGAGEMENT IN THE COMP PLAN**

Neighborhood coalition leaders and staff, from all seven of Portland's neighborhood coalitions, want to share with you some important concerns about the community engagement in the update of Portland's Comprehensive Plan (Comp Plan).

Our group held a special three-hour meeting on November 12, 2015 to discuss community concerns about how BPS engaged the community in the update of the Comp Plan.

We recognize that lots of process took place, but we also are hearing strong concerns in the community about the quality of these processes, who was heard, and what impact community member input has had on the development of the recommended draft.

A key message is that both planning staff and community members need more time, and that the process needs to have enough resources and realistic timelines to ensure that the community effectively is involved in shaping the final products.

As leaders and staff for Portland's seven neighborhood coalitions, we want to share with you below what we are hearing.

SUMMARY OF KEY THEMES

Process did not follow Proposed "Chapter 2—Community Engagement" goals and policies

- We recognize that the recommended "Chapter 2: Community Engagement" language includes goals and policies that set strong expectations for good community engagement. We find it ironic and disturbing that the process used to engage the community in the Comp Plan Update did not follow these recommended goals and policies.

Community input appears to have had little effect

- We found many instances in which community members and neighborhood and community organizations provided extensive and detailed input but did not see that their input had any effect on the final product.
- Neighborhood and community groups and community members often did not receive a formal acknowledgement that their input was received, and often received no feedback on what was done with their input.

- In some cases, more savvy neighborhood and community activists who really understood the system and had good inside relationships were able to move some of their priorities forward. However, community members, in general, appear to have had little effect on the outcomes.

Decision making processes were not transparent

- Rather than a transparent, “additive,” process by which community members could see how different products and documents evolved, community input seemed to go into a BPS “black box” in which decisions were made without any explanation of how community input was or was not used and why. Community members complain that they are not able to “reverse engineer” BPS decisions to understand how these decisions were made.
- Community members want to know: What was the decision making logic? Were decisions just made by senior planners? What criteria did they use and what level of understanding of the prior community input and existing plans did they bring to their decisions?
- Recommendations in this process often appear to have gone forward without support of the groups that had been involved in helping develop the recommendations.

Lack of Community Access to Planning Commission

- Many community members feel that the Planning and Sustainability Commission (PSC) was not accessible to the community during the process. Community input to the PSC was filtered through the staff. Community members do not feel confident that PSC members adequately were aware of and understood community concerns and recommendations.

Disconnect with prior, existing plans and earlier products

- The Comp Plan Recommended Draft proposals and recommendations do not appear to reflect earlier aspirational goal and policy language—e.g. visionPDX, Portland Plan, earlier Comp Plan aspirations, goals for specific zoning, Zoning Code density standards, existing plan districts, etc. For instance, the Comp Plan map and zoning updates and changes being proposed do not seem to correlate with the aspirational language in the Comp Plan goals and policies.
- The Comp Plan Recommended Draft does not appear to incorporate and reflect other existing plans that often were developed with significant community input: e.g. District Plans, Parks Vision 2020, Climate Action Plan, Age-Friendly City Plan, etc.

Community engagement processes were not designed to be appropriate to different audiences

- Community engagement should focus on helping community members understand how a project or proposed policies will affect them and their community and how they can have an effect on the issues that are most relevant to them.
- Many community members and organizations did not have the capacity to get themselves up to the level at which planning staff were working.
- Much of the community outreach and engagement was done in language and formats that many community people could not understand. Outreach and engagement also was not designed to be accessible to many different groups of people in our community and often was not tailored adequately to the needs and context and communication styles of different cultural communities.
- Outreach also was not tailored adequately to different areas of the city. Too many presentations had a general city-wide focus and were not relevant or useful to community members—community members could not see how the issues and processes would affect them and what they could do to affect outcomes that mattered to them.
- Outreach also needed to be staged and tailored to audiences with different levels of interest and expertise. Too much of the information came all at once. Processes needed to make sure that the right people were in the room for the content being presented—e.g. “101” sessions for people who are very new to planning, and more advanced sessions for more experienced people.

Multiple Projects were underway in parallel without being clearly integrated

- Too many different planning projects were underway at the same time. It was not clear to most community members how they all fit together. Even the most savvy and experienced neighborhood and community activists had trouble following and understanding what was happening.
- BPS staff also often were overwhelmed and said they did not understand how all the pieces fit together. This made it difficult for them to help the community engage effectively.
- The Comp Plan is about much more than just land use, including transportation, bikes, parks, etc. This process affects so many different areas important to the community that it was easy for community members to lose track. Many felt that the whole picture was not being looked at.

Projects were not pursued in a logical sequence with adequate time

- Projects at different levels of the planning process were happening all at the same time, rather than a logical progression from the most broad to the most specific. Implementation projects were started before goals and policies were finished, and often shared the same deadlines.

- The process also was marked by a feeling that BPS staff were rushing to get everything done to meet what appeared to be artificial deadlines. This appeared to sacrifice the goals of producing a quality product and ensuring that the community understood and was able to provide meaningful input and have an effect on the outcomes.
- In some cases, staff reports were released to the community with only a week for the community to review and respond. This was completely inadequate given the complexity and importance of many of these products.
- Many community members feel overwhelmed and exhausted trying to follow, understand, and participate in all the different processes that were happening at the same time.
- Both planning staff and community members need more time.

Inadequate Resources

- BPS staff were overwhelmed by the scope and complexity of the processes and products they needed to deliver. While some planning staff tried hard to engage the community, BPS did not have enough people and resources to adequately involve the community in all the different projects.
- BPS staff did not have the resources to acknowledge, consider, and respond adequately and effectively to all the community input. This resulted in many community members and organizations feeling that their input was not heard or considered.

"One-size fits all policies" do not work for many parts of Portland

- The Mixed Use Zoning project proposes a one-size fits all approach at the general level that amplifies the drive toward greater density and other effects that often contradict the goals of existing plan districts and disregard existing plans and public input. The more fine grain levels and impacts of these proposed policies are not clear.
- The "five Portlands" approach does not describe the Portland community members see. We need zoning and planning that reflects the neighborhoods in question.
- No mechanisms exist for neighborhood associations to have a say in design and development in their neighborhoods.
- Neighborhood livability is being sacrificed for regulatory simplicity.

Lack of adequate analysis and modeling—identification of unintended consequences

- BPS generally has not analyzed adequately the different proposed policies to identify their likely, real-world outcomes in the community.
- Analysis has been limited primarily to static studies. Finer grained studies of the likely impacts on local areas have not been done. Analysis tools have not been responsive to the questions that the community is asking.
- BPS also does not track the actual impact of adopted policies on different neighborhoods in Portland.

- Community members already are seeing unintended consequences of this process. It's important to daylight these consequences earlier rather than later. Some additional mechanism is needed to identify and respond to these unintended consequences as the many elements of the Comp Plan are implemented.

Subject: Health Overlay Zone

Introduction

North Portland is a vibrant, diverse community of single and multi-family homes, commercial centers, and industrial preserves situated at the confluence of the Columbia and Willamette rivers. Our eleven neighborhoods face increasing growth and density in the coming years. The City of Portland Comprehensive Plan identifies inner neighborhood areas such as North Portland as ideal for increased density. The plan recognizes, however, that increased density carries with it the challenge of maintaining a healthy, connected city where residents have access to clean air, accessible green space, and vibrant employment centers.

In order to meet the coming growth in our community without compromising the health and well being of our residents, North Portland's neighborhood representatives recommend a health overlay zone. This zone applies specific land use, design, and monitoring requirements on new development in North Portland to mitigate negative health and safety impacts. The health overlay zone supports a vision along with goals and strategies outlined below that together preserve and enhance our way of life while accommodating new development in our community.

Our community draws inspiration for our recommendations from two key sources. 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.

Vision

A North Portland community that preserves and enhances the health and well being of its residents while accommodating growth and density needs.

Goals

To achieve our vision, North Portland's neighborhoods propose the following three goals:

- *Better Air and Water Quality:* Land use, design, and monitoring requirements that reduce or minimize the negative impact of future development on energy demand, air conditioning use, air pollution and greenhouse gas emissions, heat-related illness and mortality, and water quality.
- *Reduced Noise Pollution:* Land use, design, and monitoring requirements that reduce or minimize the negative impact of future development on unwanted or distressing sound.
- *Increased Safety:* Land use, design, and monitoring requirements that reduce or minimize the negative impact of future development on criminal activity and emergency preparedness.

EXHIBIT C-1

Strategies

Goals provide benchmarks by which to measure progress towards our vision. Each goal, however, is supported by specific, actionable strategies that residents, community leaders, and City of Portland staff can use to better our community. We provide an illustrative list of strategies below based on NPLUG discussions, but we expect individual neighborhood association meetings to generate and refine strategies to best fit our community vision.

Better Air and Water Quality

- Improve storm water management design standards for new developments
- Require air filtration in all new residential developments
- Improve ventilation requirements for new residential developments
- Require building features that facilitate less energy use
- Require moisture-infiltration and ventilation features that reduce mold formation
- Eliminate exposure to harmful asbestos materials
- Install traffic-calming, pedestrian, and bicycle features to minimize the use of single-occupancy vehicles (SOVs)
- Install more and better transit infrastructure to encourage more energy-efficient transportation modes
- Require low-emissions freight vehicles
- Preserve and build connections between existing green spaces
- Plant trees that will help filter the air of carbon dioxide, harmful particulates, and other atmospheric contaminants in all new housing developments
- Install air-monitoring stations in North Portland neighborhoods¹

Reduced Noise Pollution

- Improve noise abatement design standards for new developments
- Install noise abatement walls or similar constructs between residential areas and freight corridors

Increased Safety

- Educate residents on emergency preparedness procedures
- Improve coordination between neighborhood organizations and Portland Police Bureau North Precinct services
- Improve coordination between neighborhood organizations and Portland Fire and Rescue
- Improve coordination with other neighborhood, city, county, and state emergency and safety preparedness groups

Conclusion

These goals and strategies support our community vision of a North Portland that accommodates future growth and density without compromising our health, safety, or well being. By incorporating these elements into the City of Portland comprehensive plan update, we may ensure our community is ready and capable of meeting future growth needs while guaranteeing existing and future residents enjoy a healthy, safe, and vibrant North Portland.

¹ Monitoring stations do not directly affect air quality, but do allow for on-going evaluation of air quality mitigation efforts.



PORTLAND
BUSINESS ALLIANCE
Commerce • Community • Prosperity

January 7, 2016

The Honorable Mayor Charlie Hales
1221 SW Fourth Avenue, Suite 340
Portland, Oregon 97201

Dear Mayor Hales:

The Portland Business Alliance (Alliance) appreciates the opportunity to comment on the Recommended 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 city staff for their hard work over the last two years conducting extensive research and technical analysis to inform the proposed goals and policies to guide the future growth of our city.

The Alliance has participated in the planning process for over two years now and appreciates the attempt to emphasize the importance of economic development. However, there are still opportunities to strengthen the goal of creating a prosperous economy and promoting middle-income jobs. We have commented on a number of ways to better achieve a "prosperous, healthy, equitable and resilient city" over the last two years including the assumption of a mid-cargo marine forecast, the need for market ready industrial lands and investments in transportation infrastructure including improved access to middle-income jobs on industrial lands. The comments that we have submitted over the last two years remain a high priority, however the intent of this letter is to focus on the transportation elements of the Recommended Draft 2035 Comprehensive Plan.

First, we commend planning staff for inclusion of several significant transportation policies that, if fully implemented, would go a long way towards ensuring Portland's economic prosperity over the next 20 years. These policies include 9.29 – 9.35 and are critical to maintaining an efficient and complete freight system including air, marine, rail and truck capacity and promoting our traded-sector economy and quality middle-income jobs.

We understand that as our population grows that there are capacity concerns about our city's transportation system and that there will be more people and increased demand on all modes. We also understand that our existing system will fail if current mode ratio levels remain the same in the face of anticipated population growth. That said, it is *the degree* to which those mode ratio levels need to change that we seek to better understand and review as part of the upcoming transportation demand management program and transportation system plan to be developed later this year.

Meantime, there is a pervasive bias for active transportation in the Recommended Draft 2035 Comprehensive Plan and while we understand there will be increased demand for these travel options there will also be increased demand for vehicular movement. We need to be strategic when crafting policies to ensure a balance of modal options. While there are many transportation policies

Greater Portland's Chamber of Commerce

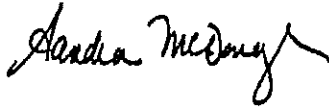
200 SW Market Street, Ste. 150 | Portland, OR 97201 | 503-224-8684 | FAX 503-323-9186 | www.portlandalliance.com

Ord. 187831, Vol. 1.3.A, page 1157

that promote economic prosperity and that we support, we have focused our attached comments on specific areas where we do have concerns.

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,



Sandra McDonough
President & CEO

cc: Susan Anderson
Bureau of Planning and Sustainability
Portland City Council

APPENDIX OF COMMENTS

Transportation

Design and Planning

Policy 9.6 Transportation strategy for people movement. Design the system to accommodate the most vulnerable users, including those that need special accommodation under the Americans with Disabilities Act (ADA). Implement a prioritization of modes for people movement by making transportation system decisions according to the following ordered list:

1. Walking
2. Bicycling
3. Transit
4. Taxi / commercial transit / shared vehicles
5. Zero emission vehicles
6. Other private vehicles

We appreciate that city staff have adopted the Vancouver, British Columbia model of differentiating between the movement of people and the movement of goods. While this "green hierarchy" of modes applies only to the movement of people, it should be made clear that it does not apply to freight corridors and the movement of goods. This hierarchy should not be applied to freight districts, regional truck ways, priority truck streets, and major truck streets as designated in the city's Transportation System Plan (TSP).

For facilities not identified as freight facilities in the TSP, we suggest that, in cases where there is overlap between the "movement of people" and the "movement of goods and services," that freight be prioritized and the green and active transportation hierarchy not applied.

Streets as Public Spaces

Policy 9.13 Streets for transportation and public spaces. Integrate both parking, place-making and transportation functions when designing and managing streets. ~~by encouraging design, development, and operation of streets to enhance opportunities for them to serve as places for community interaction, environmental function, open space, tree canopy, recreation, and other community purposes.~~

Policy 9.14 Repurposing street space. Encourage repurposing street segments that are not critical for transportation connectivity to other community purposes.

Commercial arterials and freight corridors should not be considered for other community uses and on-street parking should not be compromised under this policy.

Modal Policies

Policy 9.34 Sustainable freight system. Support the efficient delivery of goods and services to businesses and neighborhoods, while also reducing environmental and neighborhood impacts. Encourage the use of energy efficient and clean delivery vehicles, and manage on - and off -street

loading spaces to ensure adequate access for deliveries to businesses, while maintaining access to homes and businesses.

To further ensure a sustainable freight system, in addition to current policy, consider including policies such as:

- Limit the number of housing units on freight routes.
- Maintain capacity for vehicular movement (auto and freight) on arterials and place bike lanes on parallel low traffic streets to avoid modal conflicts and traffic diversion into neighborhoods while ensuring that "vision zero" safety goals are met.
- Freight has few alternative routes and should be prioritized on arterials as a result.

Policy 9.37 Automobile transportation. Maintain acceptable levels of mobility and access for private automobiles while reducing overall vehicle miles traveled (VMT) and negative impacts of private automobiles on the environment and human health.

The need to ensure portal capacity for vehicular movement (auto and freight) at freeway on-ramps and off-ramps and at bridgeheads should be called out in policy currently absent from this section. It is essential that we maintain existing portal capacity on central city freeway interchanges and bridgeheads to ensure the efficient movement of people and goods and to help mitigate congestion at these regionally-significant areas.

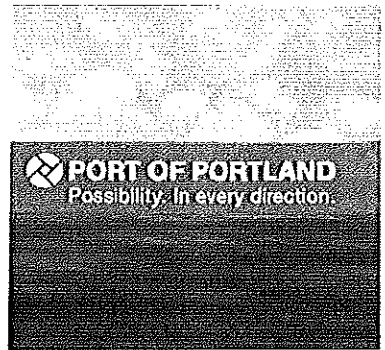
Parking Management

Policy 9.56 On-street parking. Manage parking and loading demand, supply, and operations in the public right of way to encourage safety, economic vitality, and livability. Use transportation demand management and pricing of parking in areas with high parking demand.

Our economic vitality is dependent on existing on-street parking and loading and unloading zones. Public right of way must be reserved for these uses that support adjacent businesses. Strongly encourage rapid turnover of on-street parking and discourage the long-term storage of cars in on-street parking spaces and minimize street swale systems that displace on-street parking.

Policy 9.57 Off-street parking. Limit the development of new parking spaces to achieve land use, transportation, and environmental goals, especially in locations with frequent transit service. Regulate off-street parking to achieve mode share objectives, promote compact and walkable urban form, encourage lower rates of car ownership, and promote the vitality of commercial and employment areas. Use transportation demand management and pricing of parking in areas with high parking demand.

Parking promotes the economic vitality of businesses located in centers and corridors. On-street and in some cases off-street parking (i.e. Smart Park Garages) is also a critical revenue source for the city of Portland's own Bureau of Transportation. Reducing the number of parking spots would further decrease the city's revenue at a time when it seeks more funding from taxpayers. Policies that limit new parking opportunities or regulate parking for the purpose of encouraging lower rates of car ownership should not be included.



January 7, 2016

Mayor Hales
Commissioner Nick Fish
Commissioner Amanda Fritz
Commissioner Steve Novick
Commissioner Dan Saltzman
1221 SW 4th Avenue
Portland, Oregon 97204

Dear Mayor Hales and Commissioners:

Thank you for the opportunity to comment on the 2035 Comprehensive Plan Recommended Draft (August 2015). The Port of Portland (Port) has been an active participant in this process, providing written testimony on earlier versions of this document and supporting materials in May and December 2013, May and June 2015 as well as additional oral testimony before the Planning and Sustainability Commission (PSC). We propose the following changes in the current draft:

- The Economic Opportunity Analysis should utilize the medium forecast to support equitable job growth.
- Brownfield redevelopment should be funded to support efficient use of Portland's industrial land base.
- Freight transportation investment should be prioritized to support Portland's growing service sector economy.
- West Hayden Island should be treated consistent with City Council direction and with Metro's planning policy direction. Meaning, it should be available for annexation for a combination of open space and deep-water marine industrial uses at some time in the future.
- The need for consistency and balance should be reinforced to avoid conflict between countervailing policy objectives.

We commend staff for inclusion of several significant policies that, if fully implemented, would go a long way towards ensuring Portland's economic prosperity over the next 20+ years.

For example, Policy 6.34 Industrial Land, encourages Portland's growth as a trade and freight hub and center for manufacturing. This should serve to provide a widely accessible base of living wage jobs that will assist in implementing other policies in the plan (6.28 Income self-sufficiency, 6.29 East Portland job growth. Policies 6.14, 6.39 and 6.40 all relate to brownfield or Harbor Superfund clean-up, including the ambitious goal of cleanup of 60% of brownfield acres in the City by 2035.

Mission: To enhance the region's economy and quality of life	7200 NE Airport Way Portland OR 97218
by providing efficient cargo and air passenger access	Box 3529 Portland OR 97208
to national and global markets, and by promoting industrial development.	503 415 6000

Manufacturing jobs, as noted on page 33 of the City-wide systems plan, offer opportunities for living-wage careers for residents, often without requiring a four-year college degree. These policies support middle income jobs, often with low barriers to entry. Manufacturing jobs also have a high "employment multiplier" effect – one manufacturing job supports 3.69 total jobs in the region.

Beyond jobs, all forms of industrial development tend to result in high levels of capital investment, resulting in an ongoing revenue stream of property taxes and other fees used to fund schools, public safety and other essential City and County services.

However, in order for these policies to be successfully implemented, there are a number of key issues requiring resolution, as outlined below:

ISSUES FOR RESOLUTION

1. Economic Opportunities Analysis (EOA)

The Economic Opportunity Analysis is a critical input to the Comprehensive Plan. In particular, without an accurate and consistent marine cargo forecast and supportive land inventory, the Comprehensive Plan will fail to foster growth and reinvestment in Portland's industrial harbor lands. The outcome will be disinvestment in the harbor with a deleterious effect on Willamette Superfund cleanup, brownfield redevelopment, natural resource recovery and middle-wage jobs.

As mentioned in our letter and testimony to Council on November 18, 2015, the Planning and Sustainability Commission's (PSC) recommended EOA changed the forecast of the Portland Harbor's economic activity from medium, as originally recommended by staff, to a low-growth future. The recommendation is not only a change from the 2012 City Council adopted EOA; it is contrary to historical trend data, recent investment activity and projections reflected in Metro's urban growth report.

The change proposed by the PSC from a medium forecast to a low forecast for the Portland Harbor is neither objective nor reflective of the data on trends and investment in the harbor. Additionally, it is inconsistent with the typical approach used by the PSC of selecting the mid-range of a low and high forecast. We believe that staff and the PSC did not consider the amount of marine cargo handling capacity created by private investment in the Portland Harbor since 2010 through the current date. Specific investments and capacity gains are detailed in a memo attached as Exhibit A.

In this case, we believe substantial private investment in Portland Harbor facilities has been triggered by investment in public infrastructure, in particular the Columbia River Channel Deepening project, as well as critical road and rail bottlenecks serving the marine facilities in the harbor. At the same time, capacity gains on existing facilities cannot continue indefinitely. However, we believe that if our proposals related to brownfields, freight transportation and consistency and balance are adopted, the data supports a conclusion that the current supply of marine industrial land is likely adequate to accommodate a mid-range cargo forecast over the planning period.

However, future demand for harbor industrial land must include development ready sites and not rely solely, or even primarily, on only the intensification of existing sites. We also believe it is appropriate for staff to revisit the underlying cargo demand forecasts within the next five years, in light of the dynamic global marketplace and demand for harbor ready land.

2. Brownfields

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 60% redevelopment of industrial brownfields by 2035 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 at the present time does not include brownfields redevelopment as a priority action. Reaching 60% redevelopment of brownfields by 2035 seems that much more insurmountable without a stronger commitment from all bureaus in the City.

In addition to the challenges of cost and lack of focus, there is also the challenge of unintended regulatory hurdles. For brownfields such as Time Oil, the second largest identified site in the Portland Harbor, new regulatory burdens described below would make the proposed City goal of 60% brownfield redevelopment virtually impossible in the marketplace. City and community support of Policies 6.14, 6.39 and 6.40 land re-use policies are critical to the success of industrial and harbor economic development. The Port's on-going support of adoption of this Recommended Comprehensive Plan assumes the City shows measurable financial and policy support of a brownfield development initiative in the budget process.

3. Freight Investment

As noted in our comments on the significance of transportation investment to realize land intensification opportunities at the marine terminals, funding for freight system needs is integral to gaining more through-put through existing facilities. The City Transportation System Plan (TSP), an implementing document for the Comprehensive Plan, has few City resources focused on freight improvements. The intensification of Portland Harbor depends upon the transportation system limitations being addressed through investments. We understand the limitations with existing transportation resources and, therefore, urge the City Council to focus new transportation resources, including grants, toward improved freight infrastructure.

4. West Hayden Island (WHI)

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." This is consistent with City Council Resolution 36805 and action taken by the PSC in the fall of 2013. This does not mean that WHI should be counted in the current land supply or is expected to be necessary to accommodate the mid-range cargo forecast over the planning horizon. Instead, it is a reflection of the most recently adopted policy direction on WHI, and acknowledges that future annexation is not foreclosed.

In addition, policy language in the Comprehensive Plan as suggested above would also be consistent with Metro's designations and requirements for WHI. Metro's current 2040 Growth Concept Map designates WHI as Employment land and as a Regionally Significant Industrial Area (RSIA) on the current Title 4 map. In addition, Section 3.07.1330(B)(4)(b) of Metro's Urban Growth Management Functional Plan requires that "The City of Portland shall develop a District Plan that complies with Metro Code Section 3.07.1330(B)(4)(a), in cooperation with the Port of Portland, that applies to West Hayden Island."

As required by Statewide Planning Goal 2 and noted on page HTU-9 of the August 2015 Comprehensive Plan Update Recommended Draft, "Portland's Comprehensive Plan must be consistent with three regional plans and implementing regulations established by Metro." These plans and regulations include the Urban Growth Management Functional Plan, the Metro Regional Framework Plan and 2040 Urban Growth Concept.

5. Consistency, Conflicting Policies & Balance

We urge Council to address policy conflicts and lack of consistency found in the August 2015 Comprehensive Plan Update Recommended Draft in part by adding back Policy 1.3 from the Summer 2014 Comprehensive Plan Update Discussion Draft, which stated "Internal consistency: Ensure that the components of the Comprehensive Plan are internally consistent." We also understand that the City intends to provide itself the discretion to balance Comprehensive Plan policies in the future, on a case-by-case basis.

Without internal consistency, the Comprehensive Plan will be difficult, if not impossible, to implement and many of the positive attributes of the document will likely be negated. In particular, many beneficial policies contained in Chapter 6: Economic Development could be contradicted and/or undone by countervailing policies contained in Chapter 7: Environment and Watershed Health.

As an example, Policy 7.38 suggests that grasslands and floodplains must be protected and enhanced within the Willamette River watershed. "Grasslands" as shown on the current City NRI map includes many fallow areas consisting of barren weedy fill not currently regulated. Floodplains are currently regulated from a flood hazard perspective, but not as a habitat feature in and of themselves.

Mayor Hales and City Commissioners
January 7, 2016
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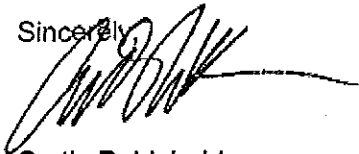
Since the definition of "protect" is defined to include "regulations to prohibit or limit an action," redevelopment of brownfields in the Willamette River watershed, such as the Time Oil site, would become even more difficult, if not impossible, in direct contradiction of several Chapter 6 policies including 6.14 Brownfield redevelopment; 6.13 Land supply and 6.46 Industrial brownfield redevelopment; in addition to policies in Chapter 7, including 7.15 Brownfield remediation.

On a similar note, there is great disparity in the verb choice between Chapters 6 and 7, particularly those that are mandatory (such as "protect") vs. those that are aspirational (such as "encourage"). Specifically, "protect" or "protecting" is used 15 times in Chapter 7 policies while only being used 8 times in Chapter 6 policies. In contrast, "encourage" is used only 8 times in Chapter 7 policies, while being used 29 times in Chapter 6 policies. These verb choices matter because terms such as "prohibit" or "protect" cannot be balanced, which means the City is depriving itself of the ability to exercise discretion and make policy choices in the future.

In addition to these broader issues, we have a number of specific recommendations related to policies, attached as Exhibit B. In addition, Port written testimony on previous drafts of the Comprehensive Plan and supporting documents dating back to 2013 are submitted to the record and are attached as Exhibit C.

Thank you again for the opportunity to comment. We commit to working with staff to help address resolution of these issues over the next several months.

Sincerely,



Curtis Robinhold
Deputy Executive Director

Attachments:

- Exhibit A (Memo on Private Investment in the Portland Harbor)
- Exhibit B (Comments on Specific Policies)
- Exhibit C (Previous Written Testimony on the Comprehensive Plan)
 - May 1, 2013 Letter to BPS staff
 - December 31, 2013 Letter to BPS staff
 - March 13, 2015 Letter to PSC
 - June 22, 2015 Letter to PSC

Exhibit A (Memo on Private Investment in the Portland Harbor)



PORT OF PORTLAND

7200 NE Airport Way, Portland, Oregon 97218
(503) 415-6522

MEMORANDUM from Policy and Planning

Date: January 5, 2016
To: Susan Anderson, Director, Bureau of Planning and Sustainability
From: Greg Theisen, Senior Planner, Port of Portland
Re: Portland Harbor Capacity Improvements: analysis in support of a mid-range forecast in the Economic Opportunity Analysis

This memo addresses the issue of capacity improvements achieved in the Portland Harbor as they relate to the more efficient use of existing harbor industrial lands and the demand for additional lands based on the City's Economic Opportunity Analysis and the EcoNorthwest harbor forecast.

The Port has participated in discussions with Planning Bureau staff to assess recent investments in marine facilities and found that an increase in volume handled per facility has occurred since the forecast was completed in 2012. These volume increases have occurred in two cargo types, bulks and automobile handling. They are the result of private and public investment in existing facilities, sparked by Columbia River channel deepening and road and rail infrastructure improvements. The volume increases are illustrated in Table 1. For bulk terminals the increase is in the range of 4 - 6.5 million metric tons per year in handling capacity. The additional annual volume capacity for autos is 90,000 units per year.

Research completed by EcoNorthwest in 2015 identified an additional \$1.3 billion in investment completed on the Columbia River marine transportation system since 2010, \$370 million of which occurred in the Portland Harbor. This investment reinforces the critical connection between Portland, Oregon, and the world economy. Our role as an international transportation hub at the confluence of the Columbia, Willamette and Pacific Ocean continues to grow, with billions of additional dollars planned to be invested in Columbia River marine facilities.

GRAIN

In the case of two sizable investments, \$44m at Columbia Grain and \$21m at LD Commodities, we estimate that the handling equipment improvements, storage changes and cleaning methods that improve efficiency, and rail capacity improvements increase the capabilities of the two terminals. The investments at Columbia Grain and LD Commodities position these facilities to be competitive in current and future markets by responding to the demand for cleaner product and demand for a greater diversity of grain products.

While these investments better position Columbia Grain and LD Commodities to compete on a product basis with new hyper-efficient and high volume EGT facility in Longview, and are on par with recent investments made at grain terminals in Kalama and Vancouver, WA, CG

Attachment A

and LD Commodities cannot compete with the volumetric efficiency at the heart of EGT's modern layout and ability to handle four unit trains on site. The demand for additional EGT type terminals remains and the Port of Portland is committed to providing internationally competitive marine facilities.

DRY BULKS

The greatest gains in volume capacity came about through investments at the Kinder Morgan soda ash facility at Terminal 4 (1m metric tons) and the Portland Bulk Terminals/Canpotex potash facility at Terminal 5 (3m metric tons). These gains were supported by private and public investments made in adjacent rail yards.

AUTOMOBILES

With the additional use of 28 acres of non-harbor industrial land, the Port of Portland is increasing its capacity for automobile handling by an additional 90,000 vehicles per year. Unlike our traditional import activities with Toyota, Honda and Hyundai, this new capacity is for export of Ford vehicles. Increasing throughput at automobile facilities like Terminal 6 or Terminal 4 is highly dependent on local market conditions, land values, rail service, ship calls, manufacturer's inventory management and distribution patterns, and other variables.

While we have increased handling capacity at Terminal 6 Berth 601 by at least 90,000 vehicles, we hesitate to make additional assumptions about Portland's potential for more intense land use for auto terminals without understanding how known variables, such as those mentioned above, respond to Portland market characteristics. We believe additional shovel ready industrial land will be necessary in order to meet the demand for marine auto imports and exports.

SUMMARY

The commodity handling port investments in the Portland Harbor and the lower Columbia river reinforce the continuing demand for bulk and RO/RO (automobile) port lands in Portland and the region. The 2012 forecast range still applies to the Portland Harbor, with the very high level of demand being distributed across a greater geography. Updated information (a new forecast and market review) will be needed within the next 2-4 years to understand how the constraints of the EOA correlate with market conditions.

The marine commodities market is dynamic in the short term, a fact apparent in the 50 year trend graph from the EcoNorthwest forecast and EOA. More importantly the volume trend continues on an upward trajectory. This is reinforced by investments made and increased import/export volumes in Portland Harbor and lower Columbia marine facilities. Type, size and location matter greatly in the marine marketplace so while investment in existing facilities has occurred and will continue, it is only a partial substitute for newly built and fully modern marine terminals.

Table 1. Portland Harbor Capacity Improvements

Terminal/Year	Operator	Commodity	Cost	Tons/hour	Prior Capacity (annual)	Current Capacity (annual)
T-4/2013	Kinder Morgan	Soda Ash	\$9.5m	3000	2.5m MT	3.5m MT
T-5/2015	Canpotex	Potash	\$140m facility enhancement, \$25m loader	6000	3-3.5m MT	5-6m MT
T-5/2014	Columbia Grain	Grains (wheat, corn, soy)	\$44m	Unknown. Probably 2000mt	4.5m MT	6m MT*
Louis Dreyfus – Steel Bridge/2015	LD Commodities	Wheat	\$21m	Unknown	1m MT**	1.5 - 2m MT**

Terminal/Year	Operator	Commodity	Cost	Additional acreage	Prior Capacity (annual)	Current Capacity (annual)
T6, AWC – Ford 2014, 2016	Auto Warehousing Corporation	Automobiles	\$2.8m \$6.7m	9 19 (marine reserve)	0	90,000 units per year

*Recent improvements are for cleaning and storage systems. The improvements expand the type of products that can be handled and thus the market for terminal products.

**Estimate based on internal Port assessment completed in 2010 (Jim Daly) and personal conversations with sources at Louis Dreyfus; Sebastian Degens, Port of Portland; Dick van Sickle, grain facility consultant.

Exhibit B (Comments on Specific Policies)

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Figure 1-1. Comprehensive Plan Package	While not cited in a policy, Figure 1-1 illustrates the Comprehensive Plan Package.	Modal plans, such as the Freight Mobility Plan, will not be adopted as a part of the Comprehensive Plan. How much weight then is given to those plans that are not a part of the Comp Plan?
1.19.c Area-specific plans.	Community, area, neighborhood, and other area-specific plans that were adopted by ordinance prior to [effective date of this 2035 Comp Plan] are still in effect. However, the elements of this Comprehensive Plan supersede any goals or policies of a community, area, or neighborhood plan that are inconsistent with this Plan. <i>See Figure 1-2 – Area-Specific Plans Adopted by Ordinance Prior to [effective date of this 2035 Comp Plan], and Figure 7-2 – Adopted Environmental Plans.</i>	It is unclear which, if any, elements of the area-specific plans (e.g., Airport Futures City Land Use Plan, Guild's Lake Industrial Sanctuary Plan and Amendments to the Cascade Station/Portland International Center Plan District) will be superseded by the Comp Plan. This seems to reverse the current order wherein a specific plan supersedes a more general plan and is therefore of considerable concern.
General comment	2.32 Inclusive participation in Central City planning. Design public processes for the Central City that recognizes its unique role as the region's center. Engage a wide range of stakeholders from the Central City and throughout the region including employees, employers, social service providers, students, and visitors, as well as regional tourism, institutional, recreation, transportation, and local/regional government representatives, as appropriate.	Very little is said about the role of agencies and employers in the community involvement chapter. A policy similar to 2.32 should apply to other areas of the City as well (e.g., industrial districts), not only for the Central City.
3.10 Rural, urbanizable, and urban land.	Preserve the rural character of rural land outside the Regional Urban Growth Boundary. Limit urban development of urbanizable land beyond the City Limits until it is annexed and full urban services are extended.	It's unclear how the City would implement the first part of this policy as it appears to be solely within the County's jurisdiction.
3.52 Freight. (formerly Policy 5.24 Civic Corridors)	Maintain freight mobility and access on Civic Corridors that are also Major or Priority Truck Streets.	Current draft includes a policy that recognizes the overlap between civic corridors and freight routes. A similar policy should also apply to City Greenways.
3.65 Urban habitat corridors	Establish a system of connected, well-functioning,	WHI is designated as an Urban Habitat Corridor on Figure 3-6. As land not currently

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	<p>and diverse habitat corridors that link habitats in Portland and the region, facilitate safe fish and wildlife access and movement through and between habitat areas, enhance the quality and connectivity of existing habitat corridors, and establish new habitat corridors in developed areas.</p>	<p>within the City of Portland, either delete this reference or change additional maps (such as Figure 3-7) to reflect Metro and City Council designation for employment and habitat.</p>
<p>Employment Areas (formerly Policy 5.16 Industrial and River)</p>	<p>Narrative Industrial Districts: Industrial districts are in the low, flat areas along Portland Harbor and the Columbia Corridor, Oregon's freight infrastructure hub. Manufacturing and distribution sectors concentrate here. They typically need one-story buildings, medium to large sites, and locations buffered from housing. There is also an industrial district in the Central Eastside and smaller industrial areas scattered around the city, mostly adjacent to major transportation hubs.</p> <p>Regional Truck Corridors: Maintaining the primary truck routes into and through the city supports Portland's role as an important West Coast hub and a gateway for international and domestic trade. These streets are integral to the growth of traded sector businesses such as manufacturing, warehousing and distribution industries.</p>	<p>Revise to say "<u>Existing</u> industrial districts..." in recognition that future industrial districts could be located in other parts of the city.</p>
<p>3.69 Regional Truck Corridors. (formerly Policy 5.23 Corridors and connections.)</p>	<p>Enhance designated streets to accommodate forecast freight growth and support intensified industrial use in nearby freight districts. <i>See Figure 3-7 — Employment Areas.</i> Designated regional truckways and priority truck streets (Transportation System Plan classifications are shown to illustrate this network).</p>	<p>Current draft policy appears to do a better job of recognizing the importance of freight routes.</p>
<p>3.73 Industry and port facilities (formerly Policy 5.19 Focused investments)</p>	<p>Enhance the regionally significant economic infrastructure that includes Oregon's largest seaport and largest airport, unique multimodal freight, rail, and harbor access; the region's critical</p>	<p>Revised policy does a better job of recognizing the investment in infrastructure.</p>

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	energy hub; and proximity to anchor manufacturing and distribution facilities.	
Figure 3-1 Policy 5.26 Greenways	Figure 3-1 Hayden Island is still shown as "Habitat Corridor" on Figure 3-1 and as "Existing/Enhanced Habitat Corridor" on Figure 3-6. WHI is not identified as an "Employment Area" on Figure 3-7.	The issues raised in the attached May 1, 2013 letter have not been addressed.
Figure 3-5 City Greenways (formerly Policy 5.16.c. (Enhance and complete the area's system of riverside trails and strengthen active transportation connections to Portland's neighborhoods))	A trail along the river adjacent to the Albina Yard is shown on Figure 3-5.	While the trail continues to show up on maps and in planning documents hasn't the UP pursued an alternative that the city is also interested in pursuing?
4.21 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.	Policy 3.52 recognizes the need to maintain freight mobility and access on Civic Corridors that are also Major or Priority Truck Streets. However, this issue is not carried forward into Chapter 4.
4.31 Industrial edge (Formerly Policies 5.33.c and 5.33.d.)	Protect non-industrially zoned parcels from the adverse impacts of facilities and uses on industrially zoned parcels through the use of a variety of tools, including but not limited to vegetation, physical separation, land acquisition, and insulation to establish buffers between industrial sanctuaries and adjacent residential or mixed use areas to protect both the viability of long-term industrial operations and the livability of adjacent areas.	Former 5.33.d. (Ensure that new residential and high-density development adjacent to industrial sanctuaries incorporates design elements that soften the transition in land use and protects the viability of long-term industrial operations) was more balanced. The revised policy seems to imply that all of the protective measures should be provided by the industrial uses to protect non-industrially zoned land. Need to clarify that adverse impacts can be addressed on non-industrial zoned property.
4.73 Natural hazards and climate change risks and impacts. (formerly Policy 5.42 Hydrologic function and Policy 5.47.a.)	Limit development in or near areas prone to natural hazards, using the most current hazard and climate change-related information and maps.	Policy formerly read: Limit development in or near areas prone to natural hazards, where practicable, using the most current hazard information and maps available. The current version, which does not say "where practicable" is even more restrictive regarding development in floodplains.

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5.11 Impact analysis.	Evaluate plans and investments, significant new infrastructure, and significant new development to identify potential disparate impacts on housing choice, access, and affordability for protected classes and low-income households. Identify and implement strategies to mitigate the anticipated impacts.	What is the meaning of "significant" in this context? Ensure that this policy is applied consistently for all types of development. Specifically, clarify that new housing development will have the same impact analysis applied to mitigate for impacts from locating in proximity to preexisting non-residential uses.
6.39.e. Prime industrial land retention	6.39.e. Protect prime industrial land for siting of parks, schools, large-format places of assembly, and large-format retail sales.	Policy has been rewritten; however, "for" should now be changed to "from".
6.41 West Hayden Island	There is no policy regarding West Hayden Island; however policy 6.15 Annexation addresses some related issues. <i>Facilitate a predictable, equitable process for annexation of employment lands within the urban services area as needed to meet the City's forecasted land needs.</i>	See letter to Council regarding inclusion of WHI policy that is in conformance with Metro policy and planning guidance.
6.54 Neighborhood buffers. (formerly Policy 3.43)	Maintain and enhance major natural areas, open spaces, and constructed features as boundaries and buffers for the Portland Harbor and Columbia Corridor industrial areas.	Issue remains the same as in the attached May 1, 2013 letter.
7.15 Brownfield remediation.	Improve environmental quality and watershed health by promoting and facilitating brownfield remediation and redevelopment that incorporates ecological site design and resource enhancement.	Brownfield remediation by its very nature improves environmental quality and watershed health. Additional requirements will only add to cost and complexity, making brownfield remediation less likely to occur.
7.19 Natural resource protection. (formerly Policy 4.5 At-risk habitats and Policy 4.15 Efficient use of land)	Policy 7.19 Natural resource protection. Protect the quantity, quality, and function of significant natural resources identified in the City's natural resource inventory, including:... grassland habitat	A number of the significant natural resources listed in this policy (including grassland habitat) are not well defined. If this policy is meant to apply only to significant Goal 5 resources, then it should clearly say so. The decision to protect significant resources identified in a Goal 5 inventory is the result of an ESEE analysis or safe harbor. The policy assumes protection is a forgone conclusion for all inventoried

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		resources. This is more clearly stated in Policy 7.21.
7.23 – 7.26 Protecting natural resources in development situations	The following policies provide guidance for land use regulations that address significant natural resources where new development is proposed. They will help ensure that the potential adverse impacts of development are well understood, and avoided where practicable. These policies also call for an evaluation of design alternatives to minimize negative impacts, and the use of mitigation approaches that fully mitigate unavoidable impacts....	The policies in this section treat the ESEE process as a foregone conclusion that will result in the protection of the resource regardless of the other factors. This conflicts with the OAR and with Policy 7.21. It should clarify that these policies apply only to those significant Goal 5 resources for which an ESEE analysis resulted in a determination to “limit” or “prohibit” conflicting uses
7.25 Mitigation effectiveness, (Formerly Policy 4.12 Impact mitigation.)	Require that mitigation approaches compensate fully for adverse impacts on locally and regionally significant natural resources and functions. Require mitigation to be located as close to the impact as possible. Mitigation must also take place within the same watershed or portion of the watershed that is within the Portland Urban Services Boundary, unless mitigating outside of these areas will provide a greater local ecological benefit. Mitigation will be subject to the following preference hierarchy: 1. On the site of the resource subject to impact with the same kind of resource; if that is not possible, then 2. Off-site with the same kind of resource; if that is not possible, then 3. On-site with a different kind of resource; if that is not possible, then 4. Off-site with a different kind of resource.	The current draft policy is too focused on the local impact when assessing for functionality and potential mitigation. The proposed mitigation hierarchy gives more weight to an on-site location rather than greater environmental function elsewhere in the same watershed.
7.38 Sensitive Habitat - Willamette River Watershed: Policy 4.24.f. (Protect and enhance grasslands, beaches, wetlands, and other critical habitats for shorebirds and waterfowl, including	Policy 7.38 Sensitive habitats. Protect and enhance grasslands, beaches, floodplains, wetlands, remnant native oak, bottomland hardwood forest, and other key habitats for native wildlife including shorebirds, waterfowl, and species that migrate along the Pacific Flyway and the Willamette River corridor.	This policy treats the ESEE process as a foregone conclusion that will result in the protection of the resource regardless of the other factors. Sensitive habitat will only be protected if resources are or have been deemed significant and the conclusions of the ESEE find that conflicting uses must be limited or prohibited. Add reference to consistent with

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species that migrate along the Pacific flyway and Columbia River corridor.)		Goal 5 inventory and ESEE analysis.
7.39 Riparian Corridors- Willamette River Watershed. (Formerly 4.24.e. (Promote rehabilitation of riverbank sections that have been significantly altered because of development to create more natural riverbank conditions.))	Policy 7.39 Riparian corridors. Increase the width and quality of vegetated riparian buffers along the Willamette River.	This policy treats the ESEE process as a foregone conclusion that will result in the protection of the resource or expansion of the riparian area regardless of the other factors. Riparian corridors cannot be increased in width without going through a Goal 5 process.
7.45 Riparian corridors.	Increase the width, quality, and native plant diversity of vegetated riparian buffers along Columbia Slough channels and other drainageways within the watershed, while also managing the slough for flood control.	This policy treats the ESEE process as a foregone conclusion that will result in the protection of the resource or expansion of the riparian area regardless of the other factors. Riparian corridors cannot be increased in width without going through a Goal 5 process.
7.46 Sensitive habitats- Columbia Slough Watershed. (Formerly Policy 4.25 Columbia Slough Watershed Policy 4.25.d. (Protect and enhance grasslands, beaches, wetlands, and other critical habitats for shorebirds and waterfowl, including species that migrate along the Pacific flyway and Columbia River corridor.))	No change	This policy treats the ESEE process as a foregone conclusion that will result in the protection of the resource regardless of the other factors. Sensitive habitat will only be protected if resources are or have been deemed significant and the conclusions of the ESEE find that conflicting uses must be limited or prohibited. Add reference to consistent with Goal 5 inventory and ESEE analysis.
7.49 Portland International	Protect, restore, and enhance natural resources and functions in the Portland	Are all natural resources identified in the Portland International Airport/Middle

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<p>Airport - Columbia Slough Watershed.</p>	<p>International Airport plan district, as identified in Portland International Airport/Middle Columbia Slough Natural Resources Inventory. Accomplish this through regulations, voluntary strategies, and the implementation of special development standards.</p>	<p>Columbia Slough Natural Resources inventory intended to be protected, restored and enhanced as implied by this policy?</p> <p>It would be less confusing if the policy simply stated that natural resource protection within the plan district is subject to the environmental policies, regulations and strategies outlined in the plan district, consistent with Policy 9.41.</p>
<p>7.31 Sensitive habitats - Columbia River Watershed (Formerly 4.26.b. (Enhance grassland, beach, and wetland habitats and improve other ecological functions, while continuing to provide flood control.)</p>	<p>Enhance grassland, beach, riverbanks, wetlands, bottomland forests, shallow water habitats, and other key habitats for wildlife traveling along the Columbia River migratory corridor, while continuing to manage the levees and floodplain for flood control.</p>	<p>This policy treats the ESEE process as a foregone conclusion that will result in the protection of the resource regardless of the other factors.</p> <p>Sensitive habitat will only be protected if resources are or have been deemed significant and the conclusions of the ESEE find that conflicting uses must be limited or prohibited. Add reference to consistent with Goal 5 inventory and ESEE analysis.</p> <p>The reference to "floodplain" habitat has been resolved in the current policy.</p>
<p>7.32 River-dependent and river-related uses.</p>	<p>Maintain plans and regulations that recognize the needs of river-dependent and river-related uses while also supporting ecologically-sensitive site design and practices.</p>	<p>This is a relatively helpful policy. A similar policy in the section on the Willamette River and Columbia Slough would be beneficial.</p>
<p>8.73 and 8.74 Flood management. Floodplain management. (Formerly 6.20.a. Prevent or limit further impacts from infrastructure on natural hydrologic cycles, especially in areas with poorly infiltrating soils and limited public stormwater discharge points.)</p>	<p>Policy 8.73 Flood management. Improve and maintain the functions of natural and managed drainageways, wetlands, and floodplains to protect health, safety, and property, provide water conveyance and storage, improve water quality, and maintain and enhance fish and wildlife habitat.</p> <p>Policy 8.74 Floodplain management. Manage floodplains to protect and restore associated natural resources and functions and to minimize the risks to life and property from flooding.</p>	<p>By their very nature, Port and other river-dependent facilities must be located in the floodplain. Special recognition of this requirement should be factored into policy regarding floodplain management and function.</p>
<p>Policy 10.1 Land use designations.</p>	<p>This designation is intended for lands that serve a recreational, public open</p>	<p>This is an expansion of the definition of Open Space to include areas along freeway</p>

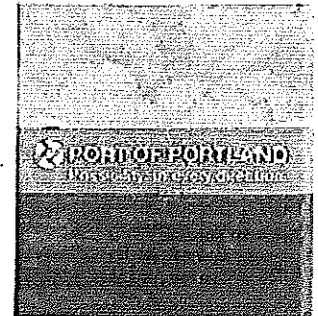
Summary Port Comments on PC Recommended Draft
 January 2016

City	Recommended Draft August 2015	Port Comments
1. Open Space	space, or ecological function, or provide visual relief. Lands in this designation are primarily publicly-owned but can be in private ownership. Lands intended for the Open Space designation include parks, public plazas, natural areas, scenic lands, golf courses, cemeteries, open space buffers along freeway margins, railroads or abutting industrial areas, and large water bodies. The corresponding zone is OS.	margins, railroads, abutting industrial areas, or large water bodies such as the Willamette and Columbia Rivers. This seems to be an over reach and will result in additional complexity when developing, maintaining or managing these areas. The stated intent, "for lands that serve a recreational, public open space, or ecological function or, provide visual relief" is not consistent with the expanded definition.

Exhibit C (Previous Written Testimony on the Comprehensive Plan)

- May 1, 2013 Letter to BPS staff
- December 31, 2013 Letter to BPS staff
- March 13, 2015 Letter to PSC
- June 22, 2015 Letter to PSC
- June 23, 2015 Letter to PSC

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



May 1, 2013

Eric Engstrom, Principal Planner
City of Portland Bureau of Planning & Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, Oregon 97201

Re: City of Portland Comprehensive Plan Update Working Draft - Part 1

Dear Eric:

Thank you for the opportunity to comment on the *City of Portland Comprehensive Plan Update Working Draft - Part 1*, dated January 2013 (Draft Comprehensive Plan). The Port of Portland (Port) has been a partner in this process with the Bureau of Planning and Sustainability and appreciates the challenge of creating focus around the diverse interests in our city.

As reflected in our written testimony to the Planning & Sustainability Commission in November 2011, the primary area of focus in the Portland Plan for the Port was centered on the Economic Prosperity and Affordability strategy. This strategy addresses the lack of jobs, relative decline in personal income, decline in tax and other public revenue and the lack of business investment in Portland. Unless these issues are addressed, the City's aspirations cannot be successfully implemented.

With that same focus in mind applied to the Draft Comprehensive Plan, we describe five key issues, followed by a table with section-specific comments.

KEY ISSUES

Trade and Freight Hub. As noted in the Introduction, the Comprehensive Plan is intended to codify the priorities outlined in the Portland Plan. However, the Portland Plan's recognition of the importance of Portland as a trade and freight hub and its competitive market access could be more specifically identified in the Draft Comprehensive Plan policies. As an example, the City of Portland, the Brookings Institution and other local partners developed the Greater Portland Export Plan to double the Portland region's exports in five years, adding \$21 billion in foreign sales and potentially 100,000 jobs. This also dovetails with the current U.S. National Export Initiative goal to double national exports between 2009 and 2014.

Economic Development Integration. The Port is very supportive of the inclusion of an Economic Development Element which recognizes the importance of job growth for the health of the City; however, to be consistent with the Portland Plan, there should be better integration of these economic policies in the other elements of the Comprehensive Plan as well.

Industrial Smart Growth. The Port supports "Industrial Smart Growth", which emphasizes the importance of focusing industrial development in proximity to essential infrastructure. This approach relies on maintaining facilities for freight movement and ensuring sufficient industrial land adjacent to critical infrastructure investments. The Draft Urban Design Framework does not identify a "freight" or "Industrial" corridor type. The Port is concerned that the Civic Corridors and Greenways designations will conflict with the modal designations for freight identified in the City of Portland Transportation System Plan and Freight Master Plan.

Transportation Hierarchy. The new policies in support of a green and active transportation hierarchy in Chapter 7 of the Working Draft were borrowed in part from the City of Vancouver, B.C. Transportation 2040 Plan. However, unlike the Vancouver Plan, the movement of goods and the movement of people are combined in a single hierarchy in the Working Draft. This has the effect of relegating freight to a lower level than walking, cycling and transit. It also fails to acknowledge the value of the efficient movement of goods to the city's economy and quality of life. The Vancouver Plan establishes a hierarchy for "Moving People", but provides a separate set of policies for "Moving Goods and Delivering Services". Vancouver's overall goal for Moving Goods and Delivering Services states that "The efficient movement of goods and services is critical to city, regional, and national well-being." This goal is followed by policies related to Long-Distance Goods Movement, Local Goods and Services and Emergency Services. The Port recommends the Working Draft be amended to reflect the approach taken in the City of Vancouver's Transportation 2040 Plan.

Previously Adopted Plans. While the commentary notes that some plans are being updated as a part of the Comprehensive Plan (e.g., the Transportation System Plan), the status of a number of other adopted plans, including Airport Futures and the Freight Master Plan, is unclear. The Port recommends the Working Draft be amended to reflect the policies adopted from Airport Futures with broad community support two years ago. Specific adopted policies from Airport Futures are described in the subsequent table.

The Port looks forward to continuing to work with the City to resolve these issues and the issues outlined in the attached table prior to adoption of Comprehensive Plan Update.

Sincerely,



Susie Lahsene,
Regional Transportation & Land Use Policy Manager

c: Tom Armstrong, Portland Bureau of Planning and Sustainability
Tom Bouillion
Lise Glancy

A. DRAFT ECONOMIC DEVELOPMENT GOALS AND POLICIES (CHAPTER 3)

<i>Draft Goals and Policies</i>	<i>Comments</i>
Goal 3.A Prosperity	The Port recognizes the importance of this goal and appreciates the acknowledgement of the region and the state as part of the diverse population served by the City. The commentary to this goal states that "In addition, Goal 3.A creates a multidisciplinary framework for economic development that incorporates land use and infrastructure with business development, workforce development, seaport and airport services, affordable housing, and social services." This important concept should be better reflected in the goals themselves.
Policy 3.3 Economic center.	The Port appreciates the recognition of the important role of the multimodal transportation infrastructure in the economic health of the City.
Policy 3.5 Economic role of livability and ecosystem services.	While ecosystem services do have an economic value, this policy would be more appropriately located in Chapter 4.
Policy 3.9 Land efficiency.	The linkage between industrial land efficiency and viable multi-modal freight infrastructure is key to economic development. The suggested modification below is intended to address that concern. Modify the draft policy language to state (w/new language underlined): "Encourage infill, redevelopment, and intensification <u>and throughput of on</u> scarce urban land."
Policy 3.10 Brownfield redevelopment.	The Port strongly supports this policy and the City's goals for brownfield redevelopment.
Policy 3.18 Trade and freight hub.	Given the importance of Portland's role as a trade and freight hub, and the emphasis put on this role in the Portland Plan, the proposed "maintain and plan" language should be further strengthened as suggested below. Modify the draft policy language to state (w/new language underlined): " <u>Maintain and plan for</u> <u>improve</u> transportation systems and services that will retain and expand Portland's competitive market access as a West Coast trade gateway and freight distribution hub <u>and realize the Greater Portland Export Plan to double the Portland region's exports in five years.</u> "

<i>Draft Goals and Policies</i>	<i>Comments</i>
Policy 3.28 Freight-oriented development.	<p>As noted above, given the importance of Portland's role as a trade and freight hub and the emphasis put on this role in the Portland Plan, there is a need to prioritize investments in industrial areas. This policy should be modified as suggested below.</p> <p>Modify the draft policy language to state (w/new language underlined): "Coordinate land use planning and <u>prioritize</u> transportation investments in industrial districts to encourage freight mobility and industrial development."</p>
Policy 3.29 Marine, rail, and airport facilities.	<p>The Port strongly supports this policy which reflects the Portland Plan's emphasis on maintaining and expanding Portland's role as a West Coast trade gateway and freight distribution hub.</p>
Policy 3.34 Prime industrial land and freight hub.	<p>While the Port supports this policy, freight hubs by definition cannot function without viable freight infrastructure serving the hubs. This policy should be modified as suggested below to better acknowledge that relationship.</p> <p>Modify the draft policy language to state (w/new language underlined): "Protect the multimodal freight-hub industrial districts, <u>as well as the freight infrastructure to serve the freight hubs</u>, at Portland Harbor, Columbia Corridor, and Brooklyn Yard as prime industrial land."</p>
Policy 3.35 Industrial land retention.	<p>The Port strongly supports this policy and the City's goals for the retention of industrial land. However, it is unclear under this policy what (if any) protection "non-prime" industrial land would receive.</p>
Policy 3.36 Harbor access.	<p>The Port strongly supports this policy and the City's intention to prioritize river-dependent and river-related uses on harbor access lands. However, some clarification may be needed with regard to the definition of "harbor access lands". Presumably this is meant to refer to those lands with direct access to marine facilities.</p>
Policy 3.39 Dispersed industrial areas. Provide for small, dispersed industrial areas.	<p>The purpose of this policy is unclear. Large, concentrated industrial areas tend to have fewer neighbors (and therefore fewer conflicts) and more efficiently provide transportation and other infrastructure. Are "dispersed industrial areas" intended to be an alternative to the "prime industrial lands" cited earlier?</p>
Policy 3.40 Brownfield	<p>As noted in Policy 3.10, there is a need to prioritize investments in these areas. The proposed</p>

<i>Draft Goals and Policies</i>	<i>Comments</i>
redevelopment.	<p>modification below is intended to clarify this point.</p> <p>Modify the draft policy language to state (w/new language underlined): “Prioritize <u>investment in brownfield sites</u> redevelopment resources and approaches to encourage remediation and redevelopment for industrial use and accommodate industrial growth.”</p>
Policy 3.41 Industrial land intensification.	<p>As noted previously, the linkage between industrial land efficiency and viable freight infrastructure is key to economic development. Intensification should therefore include greater “throughput” and should be tied to transportation infrastructure investments referred to in Chapter 7.</p> <p>Modify the draft policy language to state (w/new language underlined): “Promote public investments and business climate enhancements that encourage industrial reinvestment and increase land efficiency for industrial output <u>and throughput</u>.”</p>
Policy 3.42 District expansion.	<p>While the Port supports the expansion of industrial areas where appropriate, this policy might benefit from some further clarification of when and where this expansion should occur.</p> <p>Modify the draft policy language to state (w/new language underlined): “Provide opportunities for expansion of industrial areas <u>through voluntary conversion of underutilized non-industrial land</u>.”</p>
Policy 3.43 Neighborhood buffers.	<p>While the Port recognizes the benefits of using major natural areas and open spaces as buffers, this policy should clarify that these are not within the industrial areas themselves, but are typically designated as Open Space.</p> <p>Modify the draft policy language to state (w/new language underlined): “Maintain and enhance major natural areas, <u>or open spaces outside of prime industrial areas</u>, or constructed features as boundaries and buffers for the Portland Harbor and Columbia Corridor industrial areas.”</p>

B. DRAFT WATERSHED HEALTH AND THE ENVIRONMENT GOALS AND POLICIES (CHAPTER 4)

<i>Draft Goals and Policies</i>	<i>Comments</i>
Policies 4.1 through 4.6	These policies use the phrase, “protect, enhance and restore....” While this may reflect a desired outcome, within an urban setting, these policies should address the need to balance environmental protection with conflicting land uses and policies. .
Policy 4.5 At-risk habitats.	In addition to the broader comment above, because “grassland” is not well defined habitat type (e.g., grassland could include a golf course, play field, or barren weedy fill), categorizing it as an “at-risk habitat” that presumably would become a regulated feature is problematic. The addition of the word “ <u>native</u> ” grassland would help address this concern.
Policy 4.6 Biodiversity.	In addition to the broader comment above, as written, this policy suggests protecting bridges, man-made detention pond or other similar feature as a habitat for wildlife. This would be problematic and could compromise the primary function of the structure (for transportation, stormwater retention, etc.). Some clarification is needed regarding the intent of this policy as it relates to manmade structures.
Policy 4.7 Habitat corridors.	The Conceptual map of potential habitat corridors appears to identify West Hayden Island as a Habitat Corridor. While a portion of West Hayden Island functions as a habitat patch, in this location the Columbia River functions as the primary corridor for wildlife movement. In addition, the definition of Habitat Corridor is so broad that it could potentially apply to the entire City, but appears to have been applied selectively based on other criteria that are not explicit in the definition. For example, a portion of the narrative suggests corridors could be established by “...incorporating naturesscaping into yards and landscaped areas...”. Further clarification of this designation is needed.
Policy 4.11a (Consider the condition of, and potential cumulative impacts on, natural resources when creating land use and infrastructure plans.)	This policy suggests considering cumulative impacts when creating land use and infrastructure plans. However, the term “cumulative impacts” is not defined and it’s unclear how this would work in the context of balancing statewide planning goals.

<i>Draft Goals and Policies</i>	<i>Comments</i>
<p>Policy 4.11.b. (Strive to sustain the carrying capacity of air, land, and water resources by enhancing natural resource quality and function.)</p>	<p>The term "carrying capacity" is not defined, so it is unclear how this policy would be implemented. It would be helpful to provide additional guidance as to the intent.</p>
<p>Policy 4.12 Impact mitigation.</p>	<p>The commentary associated with this policy notes that the City "allows for different approaches where appropriate." However, this concept is not made clear in the policy itself. The proposed modification is intended to clarify this point. Further, the Port would recommend putting the emphasis on the quality of the mitigation rather than its location. If better mitigation can be accomplished off-site then that should be encouraged over lower quality opportunities available onsite.</p> <p>Modify the draft policy language to state (w/new language underlined): "Require that negative impacts from development impacts that cannot be avoided be minimized and fully mitigated. <u>Generally, prioritize onsite mitigation or mitigation in the same watershed within the city over mitigation in another watershed or outside of the city, but encourage alternative approaches which will provide better mitigation opportunities.</u>"</p>
<p>Policy 4.15 Efficient use of land.</p>	<p>The term "natural resources" is not defined and is not listed in the "Special Habitat" designation protocol used in the City natural resource inventory. Given this, as written, this policy would appear to suggest that any location could be considered a regulated "natural resource" requiring review, alternatives analysis, mitigation, etc. Further, the portion of the policy which states "...when doing so does not negatively affect historically underserved communities" is unclear. For example, what is the intention if historically underserved communities are negatively impacted? Is it then appropriate to disturb "natural resources"? Finally, this policy should be better aligned with other policies in Chapter 3 related to land efficiency (policy 3.9 for example).</p>
<p>Policy 4.24 Willamette River Watershed.</p>	<p>The relationship between this policy and those in Chapter 3 should be better defined. The proposed modification below is intended to address that issue.</p>

<i>Draft Goals and Policies</i>	<i>Comments</i>
	<p>Modify the draft policy language to state (w/new language underlined): “Manage the riverfront and uplands areas to enhance the corridor’s habitat quality and connectivity for migratory species and integrate nature and natural hydrologic function into urban environments <u>consistent with draft policy 3.36 which prioritizes river-dependent and river-related industrial use over other land uses on harbor access lands</u>”.</p>
<p>4.24.e. (Promote rehabilitation of riverbank sections that have been significantly altered because of development to create more natural riverbank conditions.)</p>	<p>While more a natural river bank condition is desirable, it may not be consistent with high intensity urban development (e.g., the Central City) or some marine industrial activities. The proposed modification below is intended to address that issue.</p> <p>Modify the draft policy language to state (w/new language underlined): “Promote rehabilitation of riverbank sections that have been significantly altered because of development to create more natural riverbank conditions <u>where appropriate given adjacent land uses</u>.”</p>
<p>Policy 4.24.f. (Protect and enhance grasslands, beaches, wetlands, and other critical habitats for shorebirds and waterfowl, including species that migrate along the Pacific flyway and Columbia River corridor.)</p>	<p>As noted above, while the phrase, “protect and enhance...” may reflect a desired outcome, within an urban setting, environmental policies should address the need to balance environmental protection with conflicting land uses and policies.</p> <p>Also, as noted previously, the Port is concerned about the use of the term “grasslands”. This should be clarified as “<u>native grasslands</u>”.</p>
<p>Policy 4.25 Columbia Slough Watershed</p> <p>Policy 4.25.d. (Protect and enhance grasslands, beaches, wetlands, and other critical habitats for shorebirds and waterfowl, including species that migrate along the Pacific flyway and Columbia River corridor.)</p>	<p>As noted above, while the phrase, “protect, enhance and restore....” may reflect a desired outcome within an urban setting, environmental policies should address the need to balance environmental protection with conflicting land uses and policies.</p> <p>Also, as noted previously, the Port is concerned about the use of the term “grasslands”. This should be clarified as “<u>native grasslands</u>”.</p>
<p>Comment: Policy 4.25.f. (Protect and maintain the functions of remaining open</p>	<p>As written, this policy could be understood to limit development on all remaining vacant (i.e., “open”) parcels. Presumably, the intention is to protect designated significant Goal 5 resources rather than all</p>

<i>Draft Goals and Policies</i>	<i>Comments</i>
spaces and anchor upland habitats).	<p>remaining open spaces. The suggested modifications are intended to clarify this point.</p> <p>Modify the draft policy language to state (w/new language underlined): "Protect and maintain the functions of <u>remaining designated open spaces</u> and anchor upland habitats <u>outside of prime industrial areas</u>."</p>
4.26 Columbia River Watershed	<p>The commentary for this section states that "However, West Hayden Island and the northern portion of Portland Harbor provide some of the best shoreline, shallow-water, wetland, and floodplain habitat in Portland's urban services boundary." The Port is concerned about the scientific basis for this claim especially given the hydrologic controls (dams) on the Columbia River. Also, the term "floodplain habitat" appears to be used inappropriately since floodplain is a river function across a range of habitat types. "Floodplain" is not a habitat in and of itself.</p>
4.26.b. (Enhance grassland, beach, and wetland habitats and improve other ecological functions, while continuing to provide flood control.)	<p>It is unclear what is intended by "improve other ecological functions". Some further clarification should be provided.</p> <p>Also as noted previously, the Port is concerned about the use of the term "grasslands". This should be clarified as "<u>native grasslands</u>".</p>

C. DRAFT URBAN DESIGN AND DEVELOPMENT GOALS AND POLICIES (CHAPTER 5)

<i>Draft Goals and Policies</i>	<i>Comments</i>
Commentary (p. 5-3)	The Portland Plan recognizes the importance of a strong economy and job creation to a healthy city and individual well-being. While this is acknowledged in Chapter 3, the linkage is not made in the other chapters. The commentary addresses wildlife habitat connections and environmental health, but does not address the economy or industry. Metro 2040 Design types such as employment and RSIA are not mentioned. While the identification of the Industrial and River area as a discrete geography is helpful, more should be done to recognize the importance of those areas outside of centers.
GOAL 5.A. A city designed for people	This goal should include a reference to a built environment that promotes economic development and job creation as well as health, resilience and equity. In addition, the importance of the City as a regional and statewide hub is not addressed. Alternatively, a new goal named "A City designed to work", as well as a corresponding policy emphasizing Industrial Smart Growth, could be added to address these concerns.
Goal 5.B. Context-sensitive design and development	The Port supports identification of the Industrial and River area as a discrete geography.
GOAL 5.C. Portland's system of centers	As noted above, while the identification of the Industrial and River area as a discrete geography is helpful, more should be done to recognize the importance of those areas outside of centers.
Policy 5.16 Industrial and River	While combining the industrial and river areas together results in a rather inconsistent set of policies, there are several issues which could be addressed by additional sub policies: <ul style="list-style-type: none"> ▫ The need to design and construct new residential to be compatible with existing industrial uses and freight infrastructure (such as found in proposed Policy 5.33 d). ▫ The need to prioritize public investment in freight infrastructure in this geography, consistent with Policy 5.16a.
5.16.a. (Maintain and enhance the area's	The Port supports this policy which recognizes the importance of the air port and marine facilities and

<i>Draft Goals and Policies</i>	<i>Comments</i>
regionally significant nexus of Oregon's largest seaport and largest airport; unique multimodal freight, rail, and harbor access; and proximity to anchor manufacturing and distribution facilities.)	related uses.
Policy 5.16.c. (Enhance and complete the area's system of riverside trails and strengthen active transportation connections to Portland's neighborhoods)	This policy appears to be contradictory to the broader policy contained in Policy 5.16 to support the area's prime industrial lands. As an example, completing a trail along the river through Albina Yard would likely diminish the ability of that key freight hub to operate.
5.16.d. (Enhance the strong river orientation of the area's residential areas.)	<p>Because river frontage should be reserved for river-related and dependent uses, this policy should be modified to limit enhancement to existing residential areas only.</p> <p>Modify the draft policy language to state (w/new language underlined): "Enhance the strong river orientation of the area's <u>existing</u> residential areas."</p>
Policy 5.19 Focused investments	The Portland Plan recognizes that Portland's advantages as a trade and freight hub warrant strategic investments to maintain and grow our competitive position. This policy prioritizes investment in centers, but fails to consider other "pattern areas", in particular Policy 5.16 Industrial and River.
Policy 5.23 Corridors and connections.	The City's Transportation System Plan and Freight Master Plan designate freight routes. These routes are critical for Portland to retain its competitive market access as a West Coast trade gateway as outlined in the Portland Plan. Freight routes, which are not mentioned in the discussion of corridors and connections, should be explicitly mentioned as a key organizing element in the design and structure of the city.
Policy 5.24 Civic Corridors	The conceptual map of potential Civic Corridors coincides with several designated priority freight routes (such as I-5 and US Highway 30, both not owned by the City of Portland). The description of Civic Corridors under this policy does not seem to be compatible with freight or other modal designations.

<i>Draft Goals and Policies</i>	<i>Comments</i>
Policy 5.26 Greenways	<p>The conceptual map of potential Greenways coincides with several designated priority freight routes. The description of Greenways under this policy does not seem to be compatible with freight or other modal designations. In addition, West Hayden Island is shown as designated as Habitat Corridor. As mentioned previously, West Hayden Island functions as a habitat patch within the larger context of the Columbia River corridor. Also, West Hayden Island should be shown as unincorporated Multnomah County.</p> <p>Finally, the term "Greenways", although adopted in the Portland Plan, is confusing since it sounds similar to the "Willamette River Greenway" identified in Statewide Planning Goal 15 and in some cases is identified in the same physical location as the Willamette River Greenway Trail alignment</p>
Policy 5.27.b. (Consider both the place and transportation functions when designing and programming each street)	The Port supports the policy approach of considering both the place and transportation functions when designing and programming each street.
5.29.b. Encourage development to be designed to enhance the pedestrian experience, with windows, entrances, pathways, and other features that provide connections to the street environment.	In some circumstances, such as industrial campuses, privacy and security may be of critical importance. This policy should recognize that connections to the street may not be appropriate in all situations.
Proposed Policy 5.33.c. (Protect non-industrial lands from the potential adverse impacts of industrial activities and development)	<p>This policy should be modified in order to be more consistent with Policy 5.33 d.</p> <p>Modify the draft policy language to state (w/new language underlined): "Protect <u>existing</u> non-industrial <u>lands</u> <u>development</u> from potential <u>demonstrated</u> adverse impacts of <u>new</u> industrial activities and development"</p>
5.33.d. (Ensure that new residential and high-density development adjacent to industrial sanctuaries incorporates design elements that soften the transition in land	The Port supports this policy which is intended to protect the viability of industrial operations from new adjacent development.

<i>Draft Goals and Policies</i>	<i>Comments</i>
use and protects the viability of long-term industrial operations.)	
Policy 5.37 Resource-efficient development.	This policy should be further expanded to include sub policies that relate to brownfield clean-up and that encourage access to industrial sites with energy efficient transportation modes including rail, barge and ship.
Policy 5.42 Hydrologic function.	As worded this policy would appear to prevent or limit development within the floodplain. While impacts can be mitigated, most water dependent uses must be located within the floodplain.
Policy 5.47.a. (Limit development in or near areas prone to natural hazards, where practicable, using the most current hazard information and maps available.)	<p>This policy suggests limiting development in areas subject to natural hazards, including the floodplain. This is inconsistent with the current policy approach provided by Metro's Title 3 which calls in part for hazard minimization in the floodplain through techniques such as balanced cut and fill, but not limiting development per se.</p> <p>As an example, this policy could limit development on one of the largest brownfield sites in the City of Portland, the Time Oil site, contrary to other policies encouraging redevelopment of brownfields.</p>
Policy 5.51 Offsite impacts.	As written, this policy primarily addresses impacts to residential areas; however, similar to proposed policy 5.33.d, new residential and high-density development adjacent to industrial areas should incorporate design elements that soften the transition in land use and protects the viability of long-term industrial operations. A good example of this are proposed changes to the St. Johns/Lombard Plan contained in the River Plan North Reach.
Policy 5.51.a - Aircraft noise impacts [NEW]	<p>A new section is appropriate to reflect the policy adopted as a part of Airport Futures to creatively address aircraft noise impacts.</p> <p>Add language as follows: <u>"Require compatible land use designations and development within the noise-affected area of Portland International Airport while providing public notice of the level of aircraft noise and mitigating the potential impact of that noise within the area. Partner with the Port of Portland to explore creative new ways to address noise impacts."</u></p>

D. DRAFT PUBLIC FACILITIES AND SERVICES GOALS AND POLICIES (CHAPTER 6)

<i>Draft Goals and Policies</i>	<i>Comments</i>
<p>Commentary (p. 6-12)</p>	<p>There are several factual errors in the commentary section:</p> <ul style="list-style-type: none"> • (2nd bullet) It seems likely that the Port of Portland should be included under the list of local “transportation facilities and services” providers. • (4th bullet) This item suggests that rail facilities are provided by “the Burlington Northern Railroad”. The official name for this company is BNSF Railway. In addition, there are several other railroads operating in Portland including the Union Pacific Railroad, Portland and Western Railroad, Portland Terminal Railroad and Peninsula Terminal Railroad. • (10th bullet) As noted later in this chapter, the Port of Portland provides both police and fire services, in addition to other non-City of Portland agencies. • (12th bullet) Qwest has not existed since 2011 and is now called Century Link. Also, the last sentence seems to suggest that “various small fuel companies” provide gas and electricity. This sentence should be reworded for clarity.
<p>Policy 6.3 Interagency coordination.</p>	<p>While the Port fully supports the need for interagency coordination, this policy describes a list of services as “public facilities and services”. Later in this chapter the terms “urban services”, “urban public services”, “community services”, “City services”, “capital improvements” and “infrastructure” are used. Only the term “infrastructure” appears to be defined in the Glossary. Some clarity and consistency in the use of terms would be helpful in order to better understand which policies apply, especially in cases where the public facilities and services or infrastructure are not provided by the City.</p>
<p>Policy 6.4 Orderly service extension</p>	<p>In order to support Policy 3.7 (Land development) which emphasizes the need for an adequate supply of land, this proposed policy should be amended (or possibly a new policy created) to address the City’s interest in annexation. The proposed language below is intended to address this issue.</p> <p>Add draft policy language to state (w/new language underlined): <u>“The City should encourage annexation of lands within its urban services boundary in order to meet an identified need in the City</u></p>

<i>Draft Goals and Policies</i>	<i>Comments</i>
	<u>buildable lands inventory and other adopted documents.”</u>
6.4.b. Coordinate provision of urban public services so that provision of services does not significantly precede the City's ability to provide other urban services.	It is unclear what is meant by “other urban services” in this policy.
Policy 6.20 Environmental carrying capacity.	“Carrying Capacity” is not defined. In addition, if non-City owned facilities are defined as “public facilities and services”, then it is unclear (and potentially concerning) what requirements might result from this policy which requires that the carrying capacity of air, land, and water resources be considered when developing plans.
6.20.a. Prevent or limit further impacts from infrastructure on natural hydrologic cycles, especially in areas with poorly infiltrating soils and limited public stormwater discharge points.	The phrase “natural hydrologic cycles” is broad. As written, this policy could be interpreted as limiting infrastructure in the floodplain. Port infrastructure by necessity must be located within the floodplain as do bridges and other essential infrastructure. If the intent of this policy is to address stormwater management, it should be revised to be more specific.
Policy 6.26 Civic corridors and Greenways	As also noted in the Chapter 5 comments above, proposed Civic Corridors and Greenways have not considered modal designations such as priority freight routes. This policy should explicitly note that modal designations should dictate the infrastructure for those rights of way.
Policy 6.39 Rates.	As written, this policy would appear to allow for rate increases without consideration of the cost to users. The proposed modification below is intended to address this concern. Modify the draft policy language to state (w/new language underlined): “Establish and collect rates and charges for sewer service to recover the cost of developing and maintaining the system <u>while limiting the rates and charges to the minimum necessary to meet permit requirements, to minimize impact to cost burdened households, small businesses and other users.</u> ”
Policy 6.48 Rates.	As written, this policy would appear to allow for rate increases without consideration of the cost to

<i>Draft Goals and Policies</i>	<i>Comments</i>
	<p>users. The proposed modification below is intended to address this concern.</p> <p>Modify the draft policy language to state (w/new language underlined): “Establish and collect rates and charges for stormwater services to recover the cost of developing and maintaining the system <u>while limiting the rates and charges to the minimum necessary to meet permit requirements, to minimize impact to cost burdened households, small businesses and other users.</u>”</p>
<p>Policy 6.66 Natural areas</p>	<p>The term “natural areas” is not defined. As written, this policy could be understood to apply to a wide range of land within the City. The proposed modification is intended to clarify that this policy only applies to City-owned natural areas.</p> <p>Modify the draft policy language to state (w/new language underlined): “Preserve and manage <u>City owned</u> natural areas to protect their ecological health and provide appropriate public access, in accordance with the natural area acquisition and restoration strategies.”</p>
<p>Policies 6.71 through 6.83 Public safety and emergency response</p>	<p>The Port of Portland provides both police and fire services within the City of Portland as do other agencies. An acknowledgement of these agencies within the commentary and an additional policy under Policy 6.82 Coordination, which addresses partnerships and coordination with other police and fire agencies within the City, as well as existing mutual aid agreements allowing fire departments from adjoining jurisdictions to respond to emergencies in the City of Portland in certain cases, should be added.</p>
<p>Policies 6.99 through 6.102 PDX Airport Futures [NEW]</p>	<p>New sections are appropriate to reflect the policies agreed to by the City, Port and community and adopted as a part of Airport Futures:</p> <p><u>Portland International Airport</u></p> <p><u>6.99 Promote a sustainable airport (PDX) by meeting the region’s air transportation needs without compromising livability and quality of life for future generations.</u></p> <p><u>6.100 Regulations</u> <u>Implement the Airport Futures Plan through the implementation of the Portland International Airport Plan District and by including the Airport Futures Plan as part of this Comprehensive Plan.</u></p>

<i>Draft Goals and Policies</i>	<i>Comments</i>
	<p><u>A. Prohibit the development of a potential third parallel runway at PDX. Ensure a transparent, thorough, and regional planning process if the Port of Portland demonstrates a need for its construction.</u></p> <p><u>B. Support implementation of the Aircraft Landing Zone to provide safer operating conditions for aircraft in the vicinity of Portland International Airport by limiting the height of structures, vegetation, and construction equipment.</u></p> <p><u>C. Support the Port of Portland's Wildlife Hazard Management Plan by implementing airport specific landscaping requirements in the Portland International Airport Plan District to reduce conflicts between wildlife and aircraft.</u></p> <p><u>6.101 Partnerships</u> <u>Partner with the Port of Portland and the regional community to address the critical interconnection between economic development, environmental stewardship, and social responsibility.</u></p> <p><u>A. Support an ongoing public advisory committee for Portland International Airport (PDX) to:</u></p> <ol style="list-style-type: none"> <u>1. Support meaningful and collaborative public dialogue and engagement on airport related planning and development;</u> <u>2. Provide an opportunity for the community to inform the decision-making related to the airport of the Port, the City of Portland and other jurisdictions/organizations in the region; and</u> <u>3. Raise public knowledge about the airport and impacted communities.</u> <p><u>6.102 Investments</u> <u>Ensure that new development and redevelopment of airport facilities supports the City's</u></p>

<i>Draft Goals and Policies</i>	<i>Comments</i>
	<p><u>and the Port's sustainability goals and policies and is in accordance with Map 11.64.1.</u></p> <p>A. <u>Allow the Port flexibility in configuring airport facilities to preserve future development options, minimize environmental impacts, use land resources efficiently, maximize operational efficiency, ensure development can be effectively phased, and address Federal Aviation Administration's airport design criteria.</u></p>

E. DRAFT TRANSPORTATION GOALS AND POLICIES (CHAPTER 7)

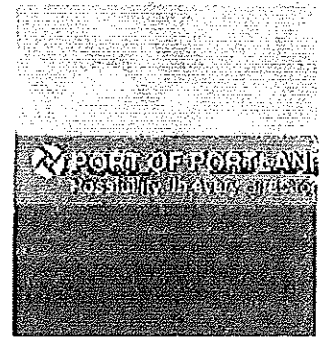
<i>Draft Goals and Policies</i>	<i>Comments</i>
Commentary (p. 7-3)	The relationship of this element of the Comprehensive Plan to other existing Plan documents such as the Airport Futures and Freight Master Plan would be helpful. In addition, as noted earlier, the Comprehensive Plan was amended only two years ago to reflect Airport Futures. These goals and policies, which were the result of a significant planning effort, are included in Airport Futures as proposed amendments to the Comprehensive Plan. If they are no longer included in the Comprehensive Plan itself it is unclear what their status would be in terms of adopted policy.
GOAL 7.B	The Portland Plan recognizes the importance of Portland's advantages as a trade and freight hub and West Coast trade gateway. While Goal 7.A does refer to "economic prosperity" as a benefit of the transportation system, Goal 7.B does not include prosperity as an important factor in "quality of life". This seems to be inconsistent with the Portland Plan.
GOAL 7.E	As noted above, while the Portland Plan recognizes the importance of freight movement to Portland's economy, this is the only overall transportation goal that acknowledges freight. However, the current wording ("by providing efficient multimodal access to employment areas, educational institutions, and enhanced freight access to industrial areas.") is too limited in scope. Freight mobility should address Portland's role as a West Coast trade gateway and should recognize need for robust multi-modal freight (air, marine, rail) as well as the role that the transportation system plays in supporting prosperity.
Policy 7.1 Street design	The Port supports the overall policy which states that street design will be based on street classification (e.g., freight). However, the sub-policies could conflict with the general policy. For example, sub-policy 7.1.a. implies that all streets be made comfortable for all users; however, it may not be possible to design a major freight route to be a "comfortable" bicycle route for all cyclists
Policy 7.4 Classifications for Civic Corridors and Greenways.	As noted in the comments on Chapter 5, the conceptual maps of potential Civic Corridors and Greenways coincide with several designated priority freight routes. The description of Civic Corridors and Greenways do not seem to be compatible with freight or other modal designations. These freight routes are critical for Portland to retain its competitive market access as a West Coast trade gateway as outlined in the Portland Plan.

<i>Draft Goals and Policies</i>	<i>Comments</i>
Policy 7.6 Green and active transportation hierarchy	This policy was excerpted from the City of Vancouver, B.C. Transportation 2040 Plan and then modified. However, proposed modifications are problematic because they require a trade-off between the movement of goods and the movement of people. The Vancouver Plan establishes a hierarchy for "Moving People", but provides a separate set of policies for "Moving Goods and Delivering Services". The overall goal for Moving Goods and Delivering Services states that "The efficient movement of goods and services is critical to city, regional, and national well-being." This goal is followed by policies related to Long-Distance Goods Movement, Local Goods and Services and Emergency Services. The Port supports the approach taken in the City of Vancouver's Transportation 2040 Plan. However, as currently written, policy 7.6 would appear to conflict with the need to preserve freight mobility.
Policy 7.10 Public transportation.	The use of the term "public transportation" may be overly broad as it can include air travel. These policies are clearly intended for bus, street car and light rail, so some clarification or use of a different term may be appropriate. In addition, there is no mention of services for visitors and the benefits to the tourist sector of Portland's economy. In addition, rather than simply emphasizing the current policy of enhancing access to the Central City, consider enhancing access to employment areas as well.
Policy 7.11 Multimodal passenger service.	The Portland Plan notes that "...only 12 U.S. cities have direct air service to both Europe and Asia, and Portland is the smallest among them. The region must continue to support these direct services or risk seeing them disappear...." However, these policies do not mention air travel as a mode.
Policy 7.13 Multimodal freight system.	<p>While the Port supports this policy which addresses the freight system; overall, these policies should be stronger and more consistent with policies and actions in Portland Plan which speak to "...strengthening our freight transportation network, which connects us to global markets..."</p> <p>The Port supports Portland's Sustainable Freight Strategy; however, it is also unclear what is intended by "sustainable global and regional freight movement" in this context. Portland Plan Objective #13 does not use this modifier when describing the importance of maintaining Portland as a hub. Finally, there is no mention of air freight which is essential to important traded sectors.</p>
7.34.a. Truck Mobility	Numbering appears to be mislabeled, in keeping w/ the sequence, should be labeled "7.13.a".

<i>Draft Goals and Policies</i>	<i>Comments</i>
7.13.b. Truck Accessibility.	The Port supports improving truck access to and from intermodal freight facilities, industrial and commercial districts, and the regional freight system.
7.13.c. Freight Rail	<p>The proposed language is too passive and does not ask the City to take any action beyond coordination. By comparison, Vancouver BC focuses on protecting rail corridors and prioritizing grade separation projects. The proposed language is intended to address this issue.</p> <p>Modify the draft policy language to state (w/new language underlined): “Coordinate with private stakeholders and regional partners to support continued reinvestment in and modernization of the freight rail network. <u>Prioritize public investment in grade separation and whistle free zone projects to promote freight rail throughput, public safety and neighborhood livability.</u>”</p>
7.13.d. Marine Terminals.	<p>While the Port supports this policy, as worded, marine facilities on the Columbia River are not included. The proposed modification is intended to address this concern.</p> <p>Modify the draft policy language to state (w/new language underlined): “Coordinate with the Port of Portland, private stakeholders, and regional partners to support continued reinvestment in and modernization of marine terminals in Portland Harbor <u>and the Columbia River</u>. Ensure access to marine terminals and related river-dependant uses in Portland Harbor <u>and the Columbia River</u>.”</p>
7.13.e Shipping Channels.	<p>The Port supports coordination and continued maintenance of the shipping channels in Portland Harbor and the Columbia River. However, the title be changed to “<u>Navigation Channels</u>” to reflect the federal designation and to acknowledge the variety of watercraft that use the river. In addition, as proposed, the language is too passive and does not ask the City to take any action beyond coordination. The proposed language is intended to address this issue.</p> <p>Modify the draft policy language to state (w/new language underlined): “<u>Shipping-Navigation Channels</u>. Coordinate with the Port of Portland, private stakeholders, and regional partners to facilitate continued maintenance of the navigation channels in Portland Harbor and the Columbia River. <u>Facilltate the establishment of upland dredge material management sites and encourage the in-water placement of clean dredge material in sediment -starved rivers including the Willamette and Columbia</u>. Encourage maintenance of ship berths to match the</p>

<i>Draft Goals and Policies</i>	<i>Comments</i>
	<u>approved depth of the navigation channels.”</u>
7.13.f.Air Cargo [NEW]	<p>A new section is appropriate given the importance of high value air cargo to the local and regional economy.</p> <p>Add the new policy language to state (w/new language underlined): <u>“Coordinate with the Port of Portland, private stakeholders, and regional partners to support expanded domestic and international air cargo service at Portland International Airport (PDX). Prioritize local road access to air cargo facilities and provide adequate land suitable for projected air cargo need in and around PDX.”</u></p>
Policy 7.15 Performance measures/level of service.	The Portland Plan Guiding Policy P-13 states “Prioritize freight movement over single-occupancy vehicle travel on truck routes. Increase the freight movement share of our limited transportation system capacity.” While multimodal levels of service may be appropriate in the Central City and other Centers, the resulting increase in vehicle congestion would impact freight mobility as well as private automobiles. Ensuring a reasonable level of service on freight routes is important to the economy and consistent with the Portland Plan.
Policy 7.21 System management.	This policy suggests giving preference to transportation improvements that use existing roadway capacity efficiently and improve the safety of the system. However, not all “transportation improvements” will use “roadway capacity”. Comprehensive Plan policies should be more consistent with the Portland Plan, which emphasizes the importance of Portland role as a trade and freight hub.
Policy 7.24 Project prioritization.	As written, freight system improvements would not be prioritized in the capital improvement program. This is inconsistent with the guidance provided in the Portland Plan which recognizes the need for investments in Portland’s multi-modal freight hub infrastructure. It is unclear why all priority projects must reduce vehicle miles traveled per capita or increase active transportation mode share versus other metrics stemming from the Portland Plan such as increasing exports or providing access to employment.
Policy 7.30 Portland International Airport.	This is the only policy addressing Portland International Airport. There is no mention of the economic benefits of the airport. For example, to air freight (especially to the traded sectors) or to tourism. As the Portland Plan notes “...Only 12 U.S. cities have direct air service to both Europe and Asia, and Portland is the smallest among them. The region must continue to support these direct services or risk

<i>Draft Goals and Policies</i>	<i>Comments</i>
	seeing them disappear..." Overall, this policy should be strengthened and sub-policies addressing the importance of the airport should be included. Also, as noted earlier, the Comprehensive Plan was amended only two years ago to reflect Airport Futures. These policies need to be included.



December 31, 2013

Susan Anderson, Director
City of Portland Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, Oregon 97201

Re: City of Portland Comprehensive Plan Update Working Draft - Part 2

Dear Susan:

Thank you for the opportunity to comment on the *City of Portland Comprehensive Plan Update Working Draft - Part 2*, posted on-line in October 2013. The Port of Portland (Port) has been a partner in this process with the Bureau of Planning and Sustainability and appreciates the challenge of creating focus around the diverse interests in our city.

Building from our written comments on the Working Draft – Part 1 dated May 1, 2013, there are three themes we would like to emphasize in our comments on the Working Draft – Part 2: The role of freight in the transportation hierarchy; conformity with previously adopted plans and the importance of trade and jobs, including the linkage to equity. In addition, given that the Working Draft – Part 2 is focused on Maps and Infrastructure, specific comments from the Port refer to both the “Map App”, as well as the Citywide Systems Plan.

Role of Freight in the Transportation Hierarchy. The Working Draft – Phase 1 proposed a green and active transportation hierarchy, borrowed in part from the City of Vancouver, B.C. Transportation 2040 Plan. However, unlike the Vancouver Plan, the movement of goods and the movement of people are combined in a single hierarchy in the Working Draft. This has the effect of relegating freight to a lower level than walking, cycling and transit. It also fails to acknowledge the value of the efficient movement of goods to the city's economy and quality of life. The Vancouver Plan establishes a hierarchy for “Moving People”, but provides a separate set of policies for “Moving Goods and Delivering Services”. Vancouver's overall goal for Moving Goods and Delivering Services states that “The efficient movement of goods and services is critical to city, regional, and national well-being.” This goal is followed by policies related to Long-Distance Goods Movement, Local Goods and Services and Emergency Services. The Port recommends the Working Draft be amended to reflect the approach taken in the City of Vancouver's Transportation 2040 Plan.

In the context of the Working Draft – Phase 2, while Corridor designations from the “Map App” have been removed within proposed prime industrial areas, many key freight routes are still proposed as Civic Corridors, including the St. Johns Bridge, Sandy Boulevard, Powell Boulevard and 82nd Avenue, to name a few. It is unclear how these arterial streets will continue to perform a freight function efficiently if the Civic Corridor concept is adopted in the same location.

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Susan Anderson
December 31, 2013
Page 2

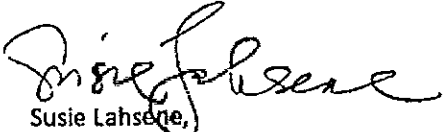
Previously Adopted Plans. While we understand that some plans are being updated as a part of the Comprehensive Plan (e.g., the Transportation System Plan), the status of a number of other adopted plans, including Airport Futures and the Freight Master Plan, is unclear. As mentioned in our previous comments on the Working Draft – Part 1, the Port requests that the Working Draft – Part 2 also be amended to reflect the maps and policies adopted from Airport Futures with broad community support two years ago.

Importance of Trade and Jobs. As mentioned in our Working Draft – Phase 1, the Greater Portland Export Initiative, led by the Office of the Mayor of Portland and the Portland Development Commission, with a broad regional task force and the Brookings Institution, proposed to double the Portland region's exports in five years; adding \$21 billion in foreign sales and potentially 100,000 jobs.

In the context of the Working Draft – Phase 2, acknowledging and facilitating the growth of these jobs, particularly in the manufacturing and distribution sectors, provides a living wage career path for the majority of Portland residents without a four year college degree.

The Port looks forward to continuing to work with the City to resolve these issues and the issues outlined in the subsequent pages prior to adoption of Comprehensive Plan Update.

Sincerely,



Susie Lahtonen,
Senior Manager Transportation and Land Use Policy

c: Josh Alpert, Office of the Mayor
Tom Armstrong, Portland Bureau of Planning and Sustainability
Eric Engstrom, Portland Bureau of Planning and Sustainability
Deborah Stein, Portland Bureau of Planning and Sustainability
Andre Baugh, Portland Planning and Sustainability Commission
Leah Treat, Portland Bureau of Transportation
Patrick Quinton, Portland Development Commission
Tom Bouillion, Port of Portland
Lise Glancy, Port of Portland

DISCUSSION LAYERS

City Greenways: Key Questions

- *What do you think of this proposal?*

Consistent with the approach taken for Corridors, the Port recommends that no Greenways be located within proposed prime industrial areas. Greenways are not well defined and it is not clear how compatible they would be with existing freight routes. In particular, the designation of NE 33rd Avenue north of Columbia Boulevard as a Greenway seems inconsistent with the current freight function. In addition, NE 33rd serves existing industrial uses, as well as future industrial uses identified at the SW Quad and NE 33rd/Marine Drive sites as a part of the adopted Airport Plan District.

Corridors: Key Questions

- *Are the Civic and Neighborhood Corridors in the right places? Would you add or remove any?*
- *In the next 20 years, it is possible that only a few centers and corridors will see major change. Do you think the City should mainly invest in areas with both high population growth and high levels of need? Which ones do you think should develop first?*

While Corridor designations have been removed within proposed prime Industrial areas, many key freight routes are still proposed as Civic Corridors, including the St. Johns Bridge, Sandy Boulevard, Powell Boulevard and 82nd Avenue, to name a few. It is unclear how these arterial streets will continue to perform a freight function if the Civic Corridor concept is adopted in the same location. In evaluating treatments for particular road segments, the Port recommends the approach taken in the City of Vancouver's Transportation 2040 Plan, with a separate set of policies for "Moving Goods and Delivering Services" distinct from a hierarchy for "Moving People". We believe this approach will protect critical freight routes throughout the city rather than allowing them to be cannibalized with overlapping and sometimes contradictory policies.

Employment: Key Questions

- *Of the strategies presented to increase industrial capacity, which would you support most strongly? Least strongly? Why?*
 - Create additional industrial land by converting private golf courses to a mix of industrial development, natural areas and open space.*
 - Support intensification and expansion of existing businesses by prioritizing freight infrastructure projects*
 - Create public incentives to clean-up brownfields*
 - Convert vacant and underutilized commercial or residential land to employment uses in East Portland*
- *Are there other strategies or implementation approaches (legislation, incentives, funding, partnerships) the City should explore?*
- *Are there specific equity issues the City should consider in addressing these challenges*

Two strategies strongly supported by the Port not specifically mentioned include City annexation and zoning of 300 acres on West Hayden Island for industrial use at a reasonable cost and a final clean up remedy for the Portland Harbor Superfund at reasonable cost for harbor businesses and City rate payers while still being protective of human health and the environment.

Other strategies mentioned above strongly supported by the Port include creation of public incentives to clean up brownfield sites, as well as prioritization of freight infrastructure projects to support intensification and expansion of existing businesses.

While the Port is supportive of changes to City policy that would allow owners of golf courses in the vicinity of PDX to voluntarily convert to industrial use, there is a great deal of uncertainty if any conversion would occur in the next 20 years and if so, the net amount of resulting industrial acreage vs. natural resource or open space acreage.

Specific Comments

- While it is positive that 300 acres are shown as potential prime industrial land on West Hayden Island, the area shown for three of the golf courses around PDX (Edgewater, Riverside and Broadmoor) are unlikely to be realized due to lack of dimensional suitability for industrial uses, as well as various environmental constraints. In addition, these same golf courses either need to be shown as potential industrial land or potential habitat corridors, but not both. Colwood golf course should be shown with the northern third industrial and the southern two thirds open space based on the recent City Council decision.

Public Transit: Key Questions

- *Are frequent service lines missing in areas that would provide access to large numbers of people? Or in areas that would improve access to jobs, schools and other opportunities?*
- *The City's limited financial resources mean only a few street car corridors can be developed in the next 25 years. With this limitation in mind, which corridors should be prioritized? Why?*

The Port believes transit service providing workforce access to industrial areas in the Portland Harbor and the Columbia Corridor should be prioritized. New street car corridors are unlikely to provide this needed access. A key public transit service question not asked above relates to the substantial funding of TriMet's operational budget through the regional payroll tax. In order to improve transit access generally and workforce access specifically, the City should focus on providing industrial land and freight access to industrial land in order to grow jobs and support TriMet at the same time.

Specific Comments

- **Portland International Airport Station Area:** The informational tab suggests station is within a half mile of one bus line, when there are actually none. The informational tab also indicates "Considerations include signage to the transit station and increased hours for transit service for employees." The Port continues to work with TriMet to maximize service hours for employees and passengers as well as to optimize signage for LRT including departure times on flight information displays within the PDX Terminal. Finally, the informational tab suggests that in 2010 this area was home to 5,504 jobs, while in 2035 this area may grow to 5,504 jobs. Instead of zero growth over 25 years, the Port forecasts passenger volumes to increase to 26.8 million annual passengers from the current volume of approximately 14 million annual passengers, with a corresponding increase in employment.

- Mt. Hood Avenue Station Area: The informational tab suggests station is within a half mile of one bus line, when there are actually none. The informational tab also indicates that this area was home to 1,890 households in 2010 and may grow to 1,890 households by 2035. Note that although Cascade Station has a substantial number of hotel rooms, households are not permitted under the Cascade Station/PIC Plan District.

Transportation: Key Questions

- *With limited transportation funding, what criteria should be used to prioritize projects?*
- *How should investments be balanced to accommodate expected growth, support growth in centers and corridors, and address existing deficiencies?*

The Port believes that transportation criteria should be focused on economic return on investment; promotion of the economic development, in particular advancing freight mobility and the Greater Portland Export Initiative; improving safety and providing work force access. In an income tax dependent state and a city with a need for family wage jobs, a keen focus on transportation investments that either support job growth or result in a tangible financial return for Portland citizens should be a priority.

Specific Comments

Under the Potential Transportation Projects layer, add the South Rivergate Overcrossing Project at South Rivergate Boulevard. This project would provide critical relief for a number of South Rivergate businesses suffering from regular train blockage.

The freight network should be added to this layer rather than the employment layer and should be "clickable" to provide the viewer with additional information.

Urban Habitat (Habitat Corridors): Key Questions

- *Are the Habitat Corridors and Areas in the right places? Which would you move, add or remove and where?*
- *What are your ideas for how to preserve enhance or create habitat areas and corridors?*
- *How do you suggest increasing nature in developed areas, like industrial districts, while also supporting job growth?*

Expanded corridors should be limited to willing seller or voluntary enhancements like tree planting, invasive removal and native plantings. Habitat corridors should acknowledge previously adopted plans, such as Airport Futures. Finally, Habitat corridors as proposed don't seem to be compatible with the proposal to convert golf courses around PDX to industrial land. Golf courses can serve one purpose or the other, but not both at the same time.

Several habitat corridors are not compatible with prime industrial land at facilities including Terminal 6, PDX and portions of Rivergate. More broadly, this designation doesn't seem to acknowledge the current built environment. Any "expanded" corridors should be limited to willing seller or voluntary enhancements like tree planting, invasive removal and native plantings. Like other land uses constrained within the Urban Growth Boundary, we should be striving to get more habitat value out of a smaller footprint rather than expanding the footprint to the detriment of other uses.

BACKGROUND LAYERS

Flood Hazard: This layer appears to map areas permanently covered by water, such as slips at Terminal 4, Swan Island Lagoon and Ross Island Lagoon, and as a result should be corrected.

Parks: This layer needs to distinguish between "park" vs. "natural park" vs. "natural area". In the latter case, portions of Smith & Bybee Lakes owned by the Port and Vanport Wetlands are not accessible to the public due to their status as mitigation sites.

Natural Resources: This layer does not accurately reflect the adopted City of Portland Natural Resource Inventory (NRI) in the vicinity of Rivergate, Terminal 5 and Terminal 6. Specifically, this layer shows these areas as having a "high" ranking when for the most part they have a "low" ranking in the NRI. In addition, this layer needs to be consistent with the Airport Futures planning process in the vicinity of PDX.

Employment Areas: All of Terminal 6 (including berth 607) should be shown in blue as harbor access subarea. Colwood Golf Course should be updated to reflect current zoning. Cascade Station is shown as a "Neighborhood Commercial" designation when in reality it functions more as a regional shopping destination.

Economic Development: This layer should also show State of Oregon E-Zones (Enterprise Zones).

CITYWIDE SYSTEMS PLAN

Chapter 1-Infrastructure Planning and Coordination

- On page 3, note that in addition to City of Portland anticipated growth by approximately 280,000 people, the region is expected to grow by approximately one million people according to Metro's most recent forecast. This is important context, as Portland still functions as the center for the region.
- On page 3, the list of City priorities does not include any priorities related to the economy or prosperity, even though there are several examples that could be cited. Specifically, Resolution 36918 adopting the Portland Plan in April 2012 acknowledges one of the three integrated strategies as "Economic Prosperity and Affordability". Another example includes the Greater Portland Export Initiative. The Office of the Mayor of Portland and the Portland Development Commission led the process, with a broad regional task force. As a result, Export initiatives appears as a priority in the adopted City of Portland 2013 Federal Legislative Agenda.
- On pages 6-7, Under Regional Plans and Requirements, add regional plans beyond those developed by Metro. While some Metro plans are requirements, others such as the Community Investment Strategy are advisory. As a result, it is appropriate to include other regional strategy plans not developed by Metro such as the Greater Portland Export Initiative.

Chapter 2-Asset Management

- On page 12, under the heading *Accommodating growth*, the problem is defined as "The ability of the City's infrastructure to accommodate current growth depends primarily on the City's ability to resolve current deficiencies-to serve underserved areas and to maintain the condition of existing infrastructure." However, a key strategy missing from this discussion relates to

brownfields. If the City can focus new development on brownfield sites, existing infrastructure can be used to its full capacity without having to extend infrastructure to new areas. Brownfield redevelopment is mentioned as a priority in the adopted City of Portland 2013 Federal Legislative Agenda, as well as draft Policy 3.40 in the Comprehensive Plan Working Draft-Part 1.

- On page 13, under heading *Growth forecasts and locations*, as previously mentioned note that in addition to City of Portland anticipated growth by approximately 280,000 people, the region is expected to grow by approximately one million people according to Metro's most recent forecast. This is important context, as Portland still functions as the center for the region.
- On page 14, under the heading *Growth scenarios*, there is a lack of discussion under performance goals about economic development and the importance of freight mobility (goods movement). In addition, there is no discussion about the critical role that brownfield redevelopment can play in providing development capacity. Without a focus on these elements, the Portland Plan performance measure "by 2035, Portland has 27 percent of the region's new jobs, more of which provide a living wage, and contributes to serve as the largest job center in Oregon" is unlikely to be realized.
- On page 16, under the *Transportation* heading, there is only a discussion of the challenges of providing "complete, safe, and accessible pedestrian, bicycle and transit systems." There is no discussion about the importance and challenges to Freight Mobility (Goods movement), despite draft Policy 3.18 (Trade and freight hub) in the Comprehensive Plan Working Draft-Part 1 as well as the City prioritization of the Greater Portland Export Initiative.

Chapter 3-Integrated Goals

- On page 19, under the *Investing to reduce disparities* heading, there is no discussion about work force access in the PBOT paragraph. Under the BES paragraph, there is no discussion about the importance of bringing brownfields back into productive reuse, nor any thing about the need to expedite clean-up of the Portland Harbor Superfund in a cost effective manner while still being protective of human health and the environment. Finally, there is no discussion about the escalating cost of City water, sewer and stormwater utility fees and the disproportional financial impact to medium and low income households.
- On page 20, under the *Using an equity lens* heading, there is no "lens" that focuses on the importance of employment to Portland residents. Equity is defined on page 17 as "Portlanders of all cultures, ethnicities, abilities and economic backgrounds have access to opportunities necessary to satisfy their essential needs, advance their wellbeing and achieve their full potential." Acknowledging and facilitating the growth of industrial jobs, in particular manufacturing and distribution, provides a living wage career path for the majority of Portland residents without a four year college degree.
- On page 21, under the *Economic Shifts and Employment Forecasts* heading, there is a good description of manufacturing jobs "...with above average wages and high employment multiplier effects-one manufacturing jobs supports 3.69 total jobs in the region. It is also worth noting that manufacturing provides a living wage career path for the majority of Portland residents without a four year college degree.
- On page 22, under the *Competitiveness* heading, there is the suggestion that "In the coming decades, the City may see a continued shift in primary industries, as the importance of high-tech and creative industries grows." None of the terms in this sentence, such as "primary industries" or "high tech" are defined and the conclusion is contrary to the Portland Economic Development Strategy which identifies the Advanced Manufacturing sector as one of Portland's strengths and areas of economic focus.

- On page 22, also under the *Competitiveness* heading, is a statement that the City “strives” to provide adequate industrial and employment lands. In addition to the requirement to comply with Statewide Planning Goal 9 20 year employment land need, the City must actually provide adequate industrial and employment lands to be competitive, not simply strive to do so.
- On page 23, under the *Transportation and Freight Movement* heading, the Greater Portland Export Initiative, led by the Office of the Mayor of Portland and the Portland Development Commission, with a broad regional task force, should also be cited as a source document for this section. One of the policy recommendations is to “Develop a shared state, regional, and city freight policy: a) Prioritize arterial roads for getting freight to market, b) Support the region’s gateway role with international air and marine links and c) Help prevent leakage to other ports and promote growth and value add opportunities for agriculture/forestry exports”.
- On page 25, under the *Connecting people and places* heading, there is no discussion about workforce access or about the need to provide adequate employment land within the City of Portland to provide a jobs/housing balance for the approximate 280,000 new residents forecast for Portland by 2035, as well as to minimize the increase in vehicle miles traveled.

Chapter 4-Infrastructure and Service Delivery

- On page 33, there appears to be a typo in Table 4.1 under Environmental Services, sixth bullet: “1,6701,900 green stormwater facilities”.

Chapter 6-Bureau of Environmental Services

- On page 46, note that the City is a co-permittee with the Port of Portland on the MS4 NPDES Discharge Permit.
- On page 51, under the *Sanitary Sewer and Stormwater Rates* heading, there is no discussion about the Portland Harbor Superfund Charge as a portion of current residents’ and businesses’ sewer rates, which has been assessed since 2001. While this current charge as a portion of the overall sewer rate is relatively small, the bill for the final clean up remedy may pose a crushing ongoing cost for low to moderate income households as well as small businesses. Given the equity focus of the Portland Plan, the City should seek a final clean up remedy that is a reasonable cost for rate payers while still being protective of human health and the environment.
- On page 55, under the *Comprehensive Environmental Response, Compensation and Liability Act (CERCLA-Superfund) and Portland Harbor Cleanup* section, there is no specific reference to the fact that the City of Portland is a potentially responsible party (PRP) which may result in substantial costs to Portland sewer rate payers depending on the final clean up remedy selected. Given the equity focus of the Portland Plan, the City should seek a final clean up remedy that is a reasonable cost for rate payers while still being protective of human health and the environment. This section also implies that City involvement in the Portland Harbor Cleanup is limited to City operated outfalls and combined sewer overflow outfalls. The City is also involved based on current and historic property ownership abutting the north reach of the Willamette River.
- On page 62, the last paragraph under the *Columbia Slough and Columbia River Watersheds* heading suggests that “While development on Hayden Island is concentrated on the eastern side, the western portion is outside the City’s service area and remains undeveloped.” In fact, West Hayden Island is developed with many different uses, including a 104 acre federally designated dredge material disposal site consisting of levees and weirs; BPA and PGE high voltage electric lines and towers; a PGE substation; access roads; a BES dechlorination facility,

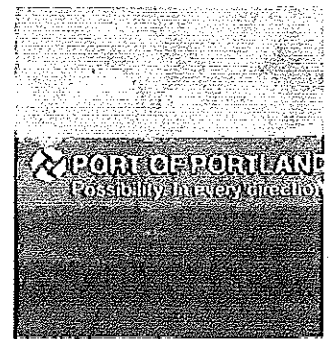
pump station and two outfalls. These two outfalls handle almost all of the treated sewage for the City of Portland from the Columbia Boulevard Wastewater Treatment Plant, with a designed capacity of 100 million gallons per day for secondary treatment.

Chapter 8-Bureau of Transportation

- On page 161, under the *Service Agreements & Partnerships* heading, the Union Pacific Railroad bullet mentions "the Union Pacific Railroad Bridge". It is unclear which bridge is being described, since the only bridge owned by the Union Pacific Railroad in Portland is the Steel Bridge. The rail lift span bridge over the Willamette River near Wacker Siltronic is owned by the BNSF Railway. The BNSF Railway also owns the Hayden Island Rail Bridge connecting Oregon and Washington, as well as Lake Yard in northwest Portland.
- On page 169-170, there should be discussion of the integrated freight network supporting the city's role as a gateway to national and international markets for business and passenger in Portland as well as the rest of the state.
- On page 171, the last bullet under the *Multi-Modal Transportation* heading, mentions the lack of modal preference in the TSP as a problem. As mentioned in the Port's comments from the Portland Comprehensive Plan Working Draft-Part 1, the concept of a green and active transportation hierarchy were borrowed in part from the City of Vancouver, B.C. Transportation 2040 Plan. However, unlike the Vancouver Plan, the movement of goods and the movement of people were combined in a single hierarchy in the Working Draft-Part 1. This would have the effect of relegating freight to a lower level than walking, cycling and transit. It also fails to acknowledge the value of the efficient movement of goods to the city's economy and quality of life. The Vancouver Plan establishes a hierarchy for "Moving People", but provides a separate set of policies for "Moving Goods and Delivering Services". Vancouver's overall goal for Moving Goods and Delivering Services states that "The efficient movement of goods and services is critical to city, regional, and national well-being." This goal is followed by policies related to Long-Distance Goods Movement, Local Goods and Services and Emergency Services. The Port recommends the Working Draft-Part 1 be amended to reflect the approach taken in the City of Vancouver's Transportation 2040 Plan.
- On page 207, under the *Growth and Congestion in the Freight System* heading correctly notes that "Not surprisingly, arterials that serve Portland's industrial areas have the highest volume of medium and heavy truck trips today and in the future." However, many of these same corridors outside of employment areas such as Sandy Boulevard, Powell Boulevard and 82nd Avenue, to name a few, are also proposed as Civic Corridors in the Map App. It is unclear how these arterial streets will continue to perform this freight function if the Civic Corridor concept is adopted in the same location. Related to the previous discussion about the green and active transportation hierarchy, the Port recommends that the green and active transportation hierarchy be amended to reflect the approach taken in the City of Vancouver's Transportation 2040 Plan, with a separate set of policies for "Moving Goods and Delivering Services" distinct from a hierarchy for "Moving People".
- On page 209, under the *Lift and Swing Spans over the Columbia River* heading, the discussion is only about the challenges presented to river traffic. There should also be a discussion of the impact of bridge lifts to freight carried by trucks using I-5. Specifically, the Columbia River I-5 bridge crossing is the only lift span bridge on the entire I-5 system between the Canadian and Mexican borders and has been identified as a key bottleneck to the regional freight network. The proposed I-5 replacement bridge would eliminate delay for truck traffic by eliminating the lift span design.

Appendix A-Investment Strategy

- The City should develop an integrated Five Year Capital Improvement Plan spanning across all bureaus, accessible to the public and updated every 2 years. This approach would help ensure that strategy directions proposed in the Comprehensive Plan are aligned



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.

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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.

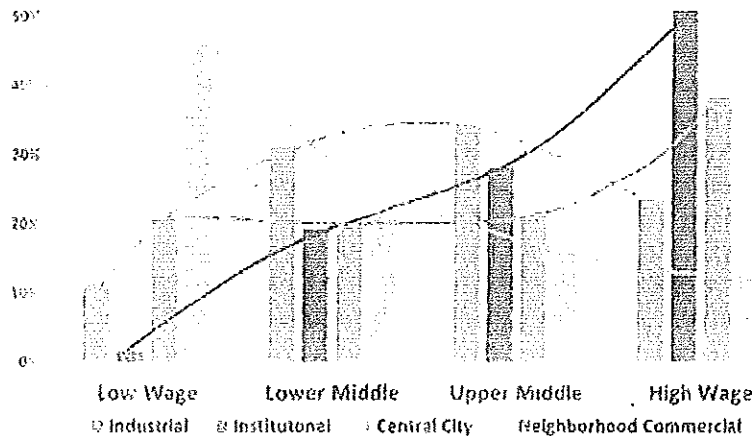
The provision for additional industrial lands, especially harbor access lands, is critical to the future of Portland. We commend staff for inclusion of several significant policies that, if properly implemented, would go a long way toward ensuring Portland's economic prosperity through greater equity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

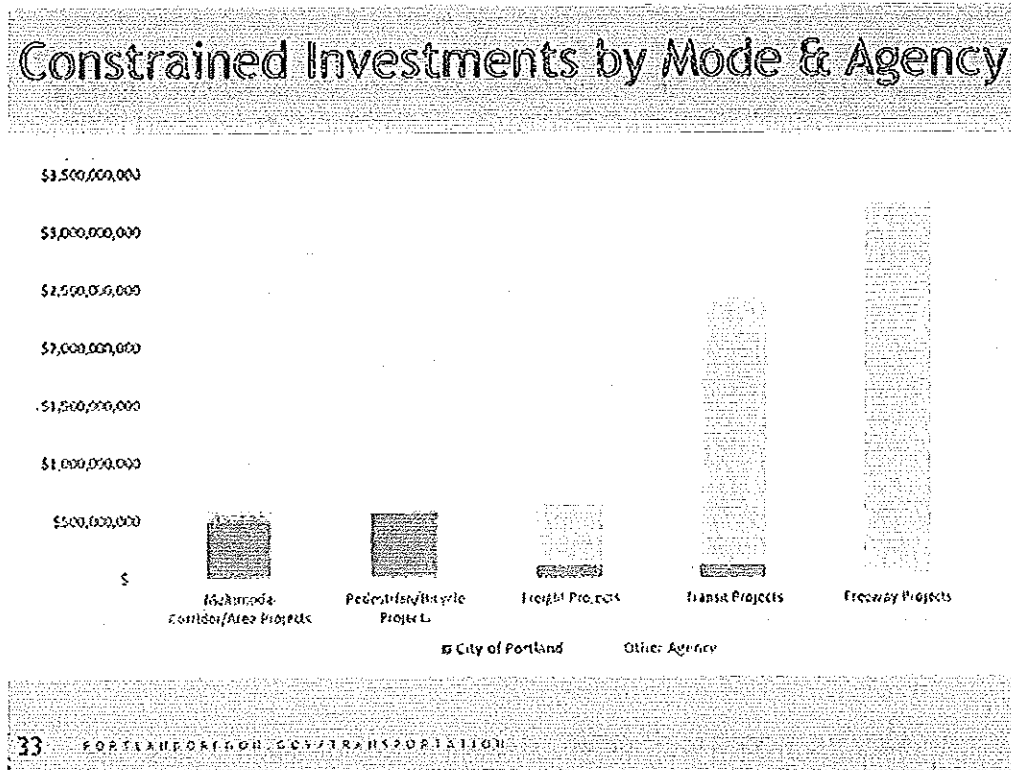
Efficient freight movement is also a key element to providing an adequate industrial land supply (as described in Policy 6.12), in part by increasing throughput on existing industrial sites (as described in Policy 6.38).

Portland's economy is far more dependent on freight movement than most other U.S. cities. The Portland region has the third highest percentage of total employment in the distribution and logistics sectors in the U.S., comprising 11% of the region's workforce. According to the Oregon Department of Employment, one out of nine jobs in the Portland area are in the transportation sectors.

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 24th 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:



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 Lahtene
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 47th Ave Corridor Improvements

Consider revising the project description to note that the intersection improvements at 47th/Columbia are complete but 47th 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.

TSP ID 40102: Columbia Blvd. Street Widening

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.

TSP ID 40001: 11th/13th Ave. Rail Overcrossing

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: 82nd 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.

TSP ID 103750: Cathedral Park Quiet Zone

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

TSP ID 113090: Cully Blvd. Rail Overcrossing

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

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

Bonneville Rail Yard Build Out

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

Widen Airport Way Outbound east of 82nd

Add new lane to provide additional capacity for anticipated growth in passenger traffic.
Cost: \$3,335,000

Deplaning Curbside Roadway Lanes

Add new lane to provide additional capacity for anticipated growth in passenger traffic.
Cost: \$2,976,000

Airport Way Westbound Approaching Return Road

Add new lane to provide additional capacity for anticipated growth in passenger traffic.
Cost: \$1,080,000

Terminal Exit Roadway at Post Office Curves

Add new lane to provide additional capacity for anticipated growth in passenger traffic.
Cost: \$1,500,000

Terminal Exit Roadway at Parking Plaza

Add new lane to provide additional capacity for anticipated growth in passenger traffic.
Cost: \$1,104,000

PDX Light Rail Station/Track Realignment

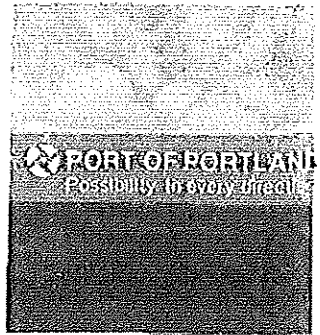
RTP# 10364 Realign light rail track into terminal building.
Cost: \$16,330,700

Add the following Other Agency Projects with Region as lead agency:

Willamette River Channel Deepening

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

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



June 22, 2015

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

Dear Chairman Baugh and Commission Members:

Thank you for the opportunity to provide a final set of comments on the Comprehensive Plan documents. As you are aware the Port of Portland has been engaged in this process with the Bureau of Planning since the Portland Plan established the broad foundation for the City of Portland's Comprehensive Plan. Consistent with the Port's mission, our comments have focused on the importance of trade, jobs and transportation investment and the significant role that the City of Portland can play in facilitating positive outcomes in those areas. We appreciate the response to our input on several of the points raised but remain concerned about several areas of the Comprehensive Plan and supporting documents.

- 1) The Draft Growth Scenarios Report defines performance measures. The performance measures proposed do not actually evaluate the economic measures of success defined in the Portland Plan. We have proposed five alternative performance measures for the Commission to consider (see attached letter "Draft Growth Scenarios Report").
- 2) The Economic Opportunities Analysis (EOA) March 2015 proposed draft recommends the low forecast scenario for the harbor lands. As noted in our April 17th letter, the low forecast scenario for harbor lands is inconsistent with past growth trends, is not aligned with current market activity and is likely to create a self-fulfilling prophecy that will impede the ability of the City to attract new investment to the harbor and support the superfund clean-up. Specifically the low growth forecast is for 28.246 million tons by 2040. Today, that same geography moves 27 million tons. The forecast proposes just over 1 million tons of growth in twenty-five years which translates to no growth in the harbor and is inconsistent with planned developments (see attached report Impacts of Channel Deepening on the Columbia River (ECONorthwest June 2015). We strongly urge you to adopt the mid or high growth forecast.

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Andre Baugh, Chair
June 23, 2015
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- 3) Our suggested changes to the Draft Recommended Comprehensive Plan June 2015 are in attachment 1. One of particular concern is highlighted below:

The removal of policy 6.41, (annexation of WHI). For all practical purposes, the Port is without options for future large scale marine terminal development. West Hayden Island represents a fantastic opportunity for economic growth and natural resource protection over the next 20 years. The seven years of work undertaken on WHI should be incorporated into the City Comprehensive Plan. This action would capture the community's and the Commission's level of understanding of the opportunities and requirements for annexation. The lack of a policy is inconsistent with City Council action (July 2010) and Metro's designation. We recommend policy language supporting future annexation of West Hayden Island for deep water marine terminal industrial uses and open space.

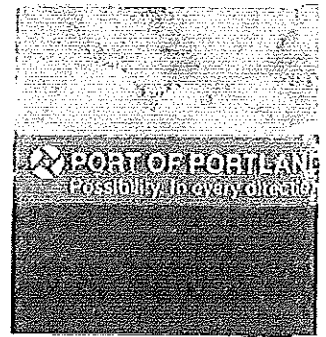
We appreciate the opportunity to raise our concerns with you again today. Please let me know if we can provide any additional information to clarify these points. We look forward to working with staff as the City's Comprehensive Plan moves to final review and adoption.

Sincerely,



Susie Lahsene, Senior Manager
Transportation and Land Use Policy

Attachments



June 23, 2015

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

Chair Baugh and Commissioners,

Thank you for the opportunity to comment on the Draft Growth Scenarios Report (GSR). We understand and appreciate the GSR has been evolving since initially published in 2013. We also understand that the root of the GSR is found in the 2012 Portland Plan, specifically the Portland Plan's 12 Measures of Success.

- | | |
|--------------------------|--------------------------------------|
| 1. Equity and inclusion | 7. Transit and active transportation |
| 2. Resident satisfaction | 8. Reduced carbon emissions |
| 3. Educated youth | 9. Complete neighborhoods |
| 4. Prosperous households | 10. Healthier people |
| 5. Growing business | 11. Safer city |
| 6. Job growth | 12. Healthy watersheds |

Of these 12 core measures, numbers 4-6 (highlighted) directly relate to the economic growth and vitality of the City. However, of the Performance Measures selected in the GSR, only one (highlighted) relates somewhat to the economic growth and vitality of the City:

1. Access to family-wage jobs
2. Housing choice
3. Gentrification risk areas
4. Complete neighborhoods
5. Frequent transit access
6. Low-stress bike network access
7. Transportation: Vehicle miles traveled and mode share
8. Greenhouse gas emissions
9. Parks access
10. Watershed health
11. Tree canopy
12. Natural area access

In addition, while "Access to family-wage jobs" is important, the measure is more about improved transit access and less about the jobs themselves. While transit access from East Portland to the Columbia could be improved, this measure is not meaningful if industrial jobs are not also being retained and grown. Our comments are also provided on the basis of how the GSR implements the Measures of Success and connects to the performance of the Comprehensive Plan.

The Performance Measures selected in the GSR are also not consistent with at least one of the key questions that the document purports to answer. Under the Purpose heading on page 8, "This report is intended to provide information about the potential implications of growth that will help answer key questions like: Where will new businesses be located?" With the current list of Performance Measures, that question will likely be impossible to answer.

TAKE ACTION

Add EOA Economic Measures: The Port's conversation with BPS staff has led us to believe that BPS feels economic-related metrics are not necessary in the GSR because they are already captured in the Draft Economic Opportunity Analysis (EOA). However, this argument is not compelling for several reasons:

- o Most, if not all, of the Performance Measures selected in the GSR are already reflected in other City documents. Examples include:
 - o PP&R Urban Canopy Report 2012, measuring change in tree canopy over time;
 - o BES Portland Watershed Management Plan Annual Report, measuring watershed health over time;
 - o Climate Action Plan 2009 and Draft 2015, measuring greenhouse gas emissions change over time;
 - o Transportation System Plan, measuring change in VMT and mode share over time.

Based on these examples in the GSR, economic measures contained in the EOA should not be an impediment to including similar measures in the GSR. The EOA economic measures should be included in the GR.

Add Income and Tax Receipt Measures: In addition, the EOA is created for a specific purpose, namely to comply with State Administrative Rule OAR 660-09-0015. As such, it is focused on the employment land supply and jobs that can be located on such land. However, there may also be useful economic measures beyond those contained in the EOA, such as the amount of tax generated by private investment for the benefit of the City of Portland and other public agencies.

Increase/Intensify Cargo Throughput: Alternate Growth Scenarios do not consider employment, and are only focused on housing. The report suggests measures are not applicable to employment, because it is a fixed geography. However, the same could be said about centers, corridors and the Central City. The scenarios all discuss policy levers for how to densify housing in discrete geographies. There should also be a discussion of policy levers to intensify cargo throughput and/or jobs on employment land in discrete geographies such as harbor access lands.

Andre Baugh, Chair
June 23, 2015
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Strengthen Pattern Area for Jobs/Economy: Of the five "Pattern Areas" (p.23-26), the Industrial and River Area only merits one sentence compared to multiple paragraphs for the other four "Pattern Areas". In addition, each of the four "Pattern Areas" except for the Industrial and River Area include multiple bulleted statements describing the positive attributes of new development within that particular geography. There are none identified for the Industrial and River Area. And finally, in the Key Findings (p. 78) there is nothing related to economic measures beyond east Portland access to jobs.

In an income tax dependent state, jobs not only create the opportunity for meaningful health and welfare benefits to the individual but they also provide the revenue to accomplish the many other objectives outlined in the Portland Plan and City Comprehensive Plan. Progress toward the provision of middle income job growth must be measured if the intent is to change the current trajectory. For these reasons, the Port recommends that robust and meaningful economic measures be added to the Growth Scenarios Report. Such measures should include:

- Foreign direct investment
- Export growth
- New business creation
- Portland Harbor cargo volumes
- Job distribution and growth by wage and location

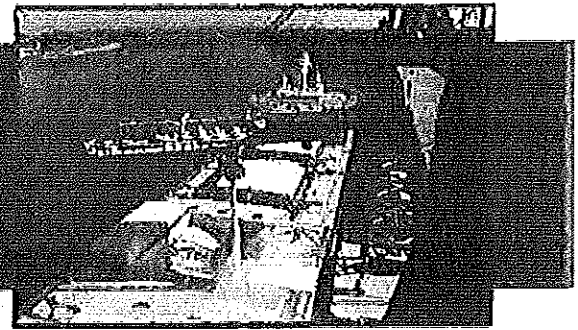
Again, the Port appreciates the work of the Commission to address growth scenarios and to incorporate all Measures of Success and additional Performance Measures.

Sincerely,



Susie Lahsene, Senior Manager
Transportation and Land Use Policy

Investment Growth and the Continued Economic Impact of the Portland Harbor



The deepening of the Columbia River shipping channel in 2010 opened a floodgate of investments at terminals and ports along the river. Nowhere is this more evident than in the Portland Harbor. Columbia Grain and LD Commodities upgraded and expanded their grain terminals. Kinder Morgan increased the capacity of their bulk-commodities terminal. International Raw Materials and Canpotex invested in their fertilizer operations. Servicing the larger ships that carry more cargo requires larger, more powerful tugs. Shaver Transport invested in a new tug that's being fabricated in Portland Harbor at Diversified Marine. Shaver also invested in the first new grain barge on the Columbia River in ten years. Vigor Industrial is now home to the largest drydock in the U.S. The Port of Portland, along with other public and private partners, is investing in road and rail improvements in the Rivergate area, which will help meet the growing demand for transportation services from the expanded terminals. But for the deepening of the Columbia River shipping channel many of these investments either would not have happened, or would not have happened in the Portland Harbor.

\$370 Million

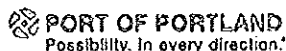
Total Investment at the Portland Harbor Since 2010

\$4.5 Million

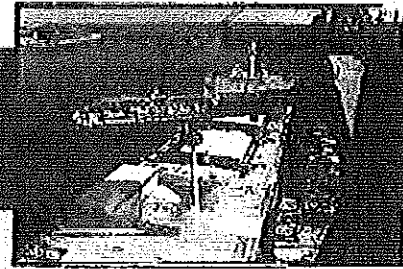
Estimated Increased Annual Tax Revenue from Investments at the Portland Harbor

Investments on the Portland Harbor Since the 2010 Deepening of the Columbia River Channel

Project (On-Line Date)	Investment Amount	Description
Columbia Grain (2015)	\$44 million	Upgraded grain storage and handling
Kinder Morgan Bulk Terminal (2013)	\$10 million	New ship loading facilities
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)	\$21 million	New barge, new tug and new engines
Capital Investments to Date	\$370 million	
Pembina (2018) (Proposed)	\$500 million	Propane export terminal
Recent and Proposed Investments	\$870 million	



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 in and out of the Northwest, 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 billion invested in facilities and transportation capabilities that are dependent on river commerce. Much of the investment made by private industry has been as 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. 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 impact jobs.

\$370 Million

Total Investment in the Portland Harbor

\$1 Billion

Total Investment on the Columbia River Since 2010

\$5.15 Billion

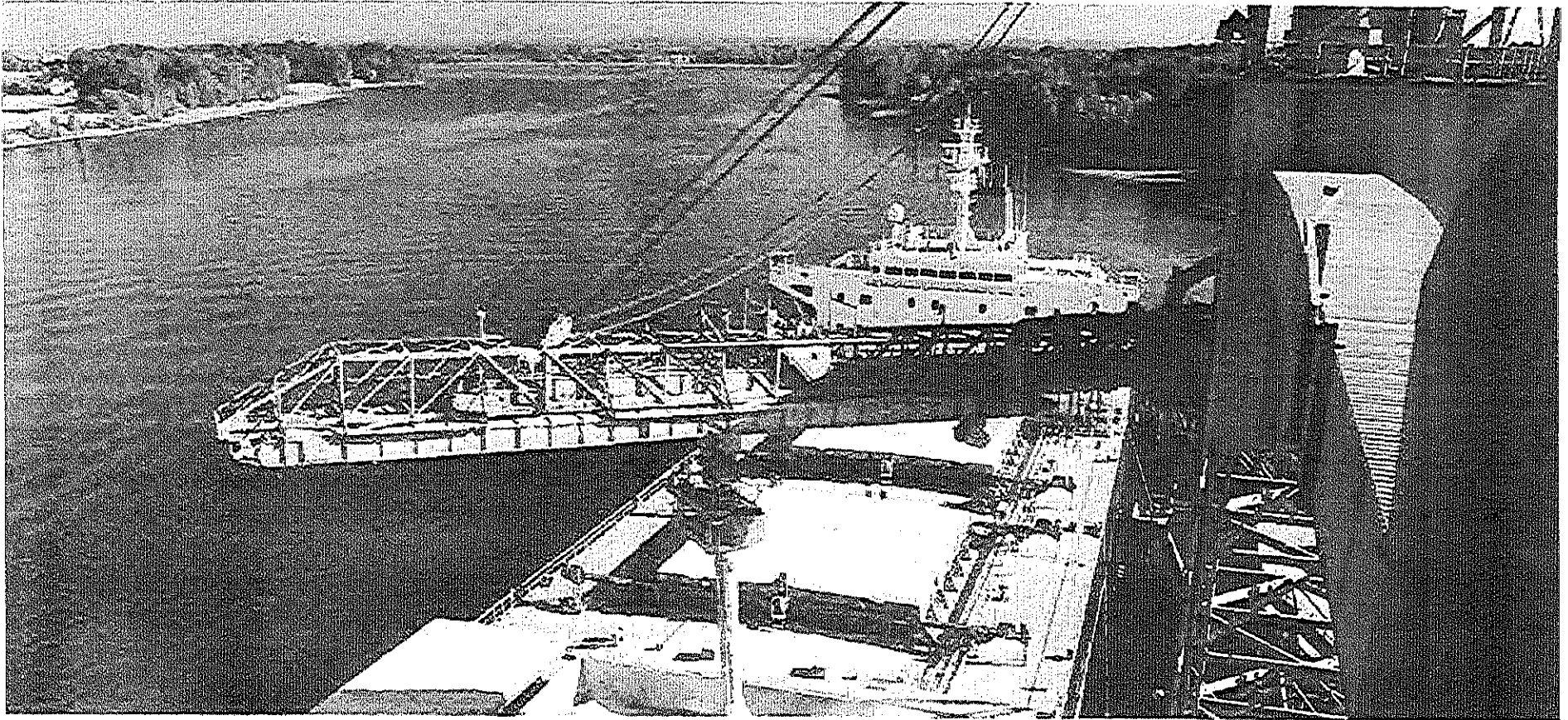
Additional Investments Planned for the Columbia River

Port	Project	Investment Amount	Description
Longview	Export Grain Terminal (2012)	\$230 million	New grain terminal
Kalama	Temco LLC (2015)	\$100 million	Increase capacity (grain)
	Port of Kalama (2014-15)	\$7 million	Rail upgrades at the Port
	Kalama Export Grain (2011)	\$36 million	Increase storage capacity
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
	Tidewater Barge Lines (2015)	\$30 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
	International Raw Materials (2014)	\$2 million	Improvements to rail and storage tanks
	LD Commodities (2014)	\$21 million	Expanded grain storage and moving facilities
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	Canpolex - Portland Bulk Terminal (2013)	\$140 million	Increase efficiency of shiploading
	Shaver Transportation (2014)	\$21 million	New barge, new tug and new engines
Sub Total		\$1.08 Billion	
Proposed Investments			
Longview	Millennium Bulk Terminal (2018)	\$500 million	New coal terminal
	Millennium Bulk Terminal (2018)	\$25 million	Smelter removal and environmental cleanup for new bulk terminal
Kalama	NW Works (2017-18)	\$1.8 billion	New methanol plant
	Global - Columbia Pacific Bio-Refinery (2018)	\$80 million	Increased storage and rail improvements
	NW Works (2017-18)	\$1.8 billion	New methanol plant
St. Helens Port Westward	Ambre Energy (2018)	\$242 million	Coal transport
	Vancouver Energy (2018)	\$100 million	Rail improvements and loading facilities
Portland	Pembina (2018)	\$500 million	Propane export terminal
Total Proposed		\$5.15 Billion	



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Impacts of Channel Deepening on the Columbia River

June 2015

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ASSOCIATION**

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ECONorthwest specializes in economics, planning, and finance. Established in 1974, ECONorthwest has over three decades of experience helping clients make sound decisions based on rigorous economic, planning and financial analysis.

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The Ports of Longview, Kalama, St. Helens, Portland, and Vancouver

Export Grain Terminal

Temco LLC

Kalama Export Grain

Global – Columbia Pacific Bio-Refinery

United Grain Corporation

West Vancouver Freight Rail Access

Vancouver Energy

Tidewater Barge Lines

Columbia Grain

Kinder Morgan Bulk Terminal

International Raw Material

LD Commodities

Vigor Industrial

Rivergate Road and Rail Improvements

Canpotex – Portland Bulk Terminal

Shaver Transportation Company

Millennium Bulk Terminal

NW Innovations Works

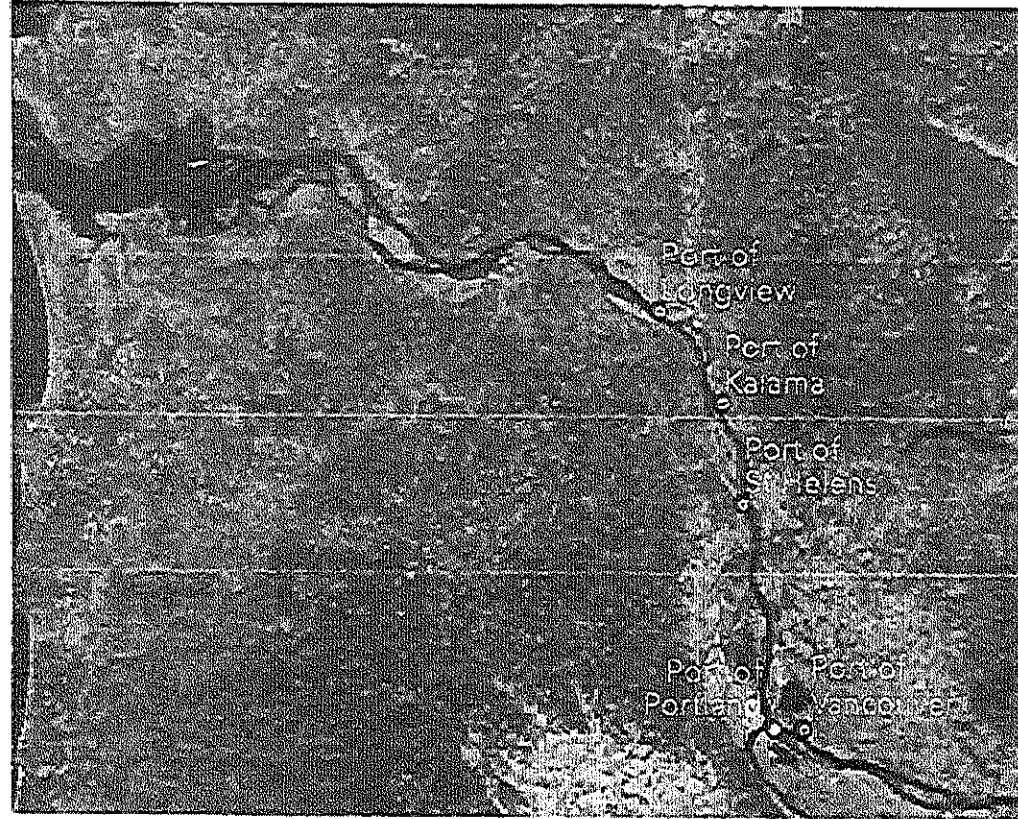
Pembina

SUMMARY

Three developments in the shipping industry are driving the push to deepen shipping channels around the world. The first is the increasing size and capacity of trade vessels.¹ The size of vessels continues growing as shippers strive for increasing efficiency gains that reduce costs. The second is the widening and deepening of the Panama Canal. When completed in 2016, the canal will accommodate ships with draft of up to 50 feet, and that can carry up to twice the cargo capacity of the ships that currently pass through the canal.² The third is the increasing competition among ports and terminals to attract and accommodate the larger trade vessels.³ The U.S. Army Corps of Engineers oversees the federal channel-deepening work in the U.S. The Columbia River channel deepening was coordinated by the Corps, with a mix of funding from the Federal government and the States of Oregon and Washington.

Completion of the deepening of the Columbia River shipping channel in 2010 opened a floodgate of investments at terminals and ports along the river. According to a port representative, the deepening and the investments that followed provides shipping and commodity firms with certainty—certainty that ports, terminals and vessels can manage the mix of commodities and tonnage that today's global economy requires. Firms have confidence that shipments won't face backlogs at ports due to capacity constraints. Shipments move efficiently. Firms also spend less time monitoring, planning, and developing contingency shipping plans.⁴

Figure 1: Columbia River Ports



Source: Esri, DigitalGlobe, GeoEye, i-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

¹Ryan, Timothy P. The Economic Impact of Deepening the Mississippi River to 50 Feet. Big River Coalition, August 22, 2013
²Panama Canal Authority, 2006. Proposal for the Expansion of the Panama Canal, Third Set of Locks Project. April 24
³Ryan, 2013.
⁴Interview with Katy Brooks, Port of Vancouver, March 5, 2015.

Table 1 lists the investments in our study. Private and public entities invested \$370 million in the Portland Harbor, and \$1 billion at terminals and ports along the Columbia River, since 2010. Additional investments planned along the river amount to \$5.15 billion. Investments completed to date include:

- The first new grain terminal built in the U.S. in 25 years
- Expansion of the largest export grain terminal on the West Coast of the U.S.
- The first new grain barge on the Columbia River since 2011
- The largest drydock in the U.S.

Maintaining the shipping channel to 43 feet will help ensure the continued growth in cargo movement and related economic activity that has occurred 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 impact jobs.

Table 1. Current and Planned Port Investments Along the Columbia River since 2010

Port	Project	Investment Amount	Description
Longview	Export Grain Terminal (2012)	\$230 million	New grain terminal
Kalama	Temco LLC (2015)	\$100 million	Increase capacity (grain)
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Vancouver	Vancouver Energy (2018)	\$100 million	Rail improvements and loading facilities
Portland	Pembina (2018)	\$500 million	Propane export terminal
Total Proposed		\$5.15 Billion	

INVESTMENT DETAILS

The Columbia River federal 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 of the region, making this shipping channel a critical connection between the region and the rest of the world. In the fall of 2010, the U.S. Army Corps of Engineers completed deepening the shipping channel from 40 to 43 feet. Since 2010, private and public entities invested more than \$1 billion in facilities and transportation capabilities. Much of this investment can be linked to the channel deepening.

ECONorthwest reviewed news reports, press releases, and other public information on the investments made at terminals and ports along the Columbia River since the 2010 channel deepening. We also interviewed representatives of terminal operators and ports about these investments. Table 1 (on page 2) lists the major investments by port and terminal and those proposed for the near future.

Here we summarize information on each investment and proposed investment, by port. We begin with investments at the Port of Longview, and then move upstream to the Ports of Kalama, St. Helens/Port Westward, Vancouver, and Portland.

THE CHANNEL DEEPENING MAKES THE PHONE RING AT PORTS AND TERMINALS.

Soon after it became clear that the deepening would happen, a "floodgate" of investment opened. The deepening gave private firms the confidence to invest in terminal and transportation infrastructure at ports along the Columbia River. But for the deepening, much of this investment would not have happened, or would not have happened at ports on the Columbia River.

The deepening of the Columbia River shipping channel, and the investments in port, terminal and transportation infrastructure that followed, provides shipping and commodity firms with the

certainty that ports, terminals and vessels can manage the mix of commodities and tonnage that competing in today's global economy requires. Firms have confidence that shipments won't face backlogs at ports due to capacity constraints. Shipments move efficiently. Firms also spend less time monitoring, planning, and developing contingency shipping plans.

A representative from one of the Columbia River ports summed up the effect of the deepening as: "The channel deepening makes the phone ring."⁷

PORT OF LONGVIEW

Export Grain Terminal

The Export Grain Terminal (EGT) at the Port of Longview was the first new grain terminal in the U.S. in 25 years. This efficient, state-of-the-art terminal was the first of a series of investments in grain terminals along the Columbia River. Increasing demand from Pacific Rim countries combined with the greater efficiency of larger ships with deeper drafts facilitated by the deepening of the Columbia shipping channel, gave EGT and other terminal operators the confidence that their investments would pay off. EGT invested approximately \$230 million in their

Longview terminal, which came online in 2012. Prior to the channel deepening, EGT primarily stored and moved wheat. Now, with expanded capacity and facilities, they store and move wheat, corn and soybeans. The increased grain shipments through the EGT terminal after the channel deepening also increased the demand for rail service to the terminal.⁵

Millennium Bulk Terminal

Millennium Bulk Terminal is proposing an investment of \$600 million toward renovating an existing terminal into a coal export terminal and another \$25 million to complete the environmental cleanup to make way for a new bulk terminal.⁶

⁵Interview with Ashley Helenberg, Port of Longview, March 18, 2015; Port of Longview New Release, Port of Longview Inks Property Lease for Export Grain Terminal, June 1, 2009, Export Grain Terminal New Release, July 9, 2012, <http://www.egtgrain.com/news/release/egt-facility-creates-new-export-opportunities-for-american-farmers/>.

⁶Interview with Peter Bennett, Millennium Bulk Terminal, March 14, 2015; Information on Millennium Bulk Terminal's website, www.millenniumbulk.com.

⁷Interview with Katy Brooks, Port of Vancouver, March 5, 2015.

PORT OF KALAMA

Temco (CHS/Cargill)

The \$100 million expansion of the Temco LLC grain terminal tripled the terminal's capacity. The project included a new vessel dock and loading equipment, new rail and barge receiving machinery, and upgraded grain cleaners. The terminal can now process up to 200 million bushels of grain per year, comparable to the Temco terminal in Tacoma. As a result of the expansion, employment during grain-shipping season will double to 120.⁸

The Port of Kalama invested \$7 million in rail upgrades at the port to facilitate and support the increased rail traffic.⁹

Kalama Export Company

Kalama Export expanded their grain storage and handling capacity by 25 percent with a \$36 million dollar investment. In addition to expanded storage, they added a new grain cleaning system and loading belt.¹⁰

NW Innovation Works

NW Innovation Works is considering multiple sites in Oregon and Washington to locate two methanol plants. The Port of Kalama is one of those sites. Each plant would be built in two

phases. A phase one \$1 billion investment, with \$800 million invested in phase two. Once operational, the plant would employ 120 full-time workers.¹¹

PORT OF ST. HELENS AND PORT WESTWARD

Global Partners– Columbia Pacific Bio-Refinery

Global Partners is investing approximately \$80 million in improved and expanded rail lines, increased oil storage and unloading capacity, and is working with the Port to expand their dock to support moorages of larger vessels.¹³

NW Innovation Works

NW Innovation Works is also considering the Port Westward location for a methanol plant. This plant would also happen over two phases with a total investment of \$1.8 billion and full-time employment of 120.¹⁴

Ambre Energy

Ambre Energy is pursuing the Morrow Pacific Project where up to 8 million tons of coal would travel by rail to the Port of Morrow and by barge to the Port of St. Helens for export loading. This project has a total investment of \$242 million and would create over 1,000 jobs.

CHANNEL DEEPENING INCREASED THE COMPETITIVENESS OF COLUMBIA RIVER PORTS AND TERMINALS.

The investments spurred by the deepening increased the competitiveness of Columbia River ports. For example, ports on the Columbia River have a cost and time advantage over Gulf Coast ports for corn and soybean shipments to the Pacific Rim. Before the deepening, corn and soybeans produced in the Midwest moved by barge down the Mississippi River to Gulf Coast ports for shipment through the Panama Canal to Pacific Rim destinations.

Terminals at Columbia River ports were not equipped to move these grains, which require different conveyer and storage infrastructure than wheat, the dominant grain moved through Columbia River terminals at the time. Investments made at ports along the Columbia River in the wake of the deepening include upgraded grain elevators designed for corn and soybeans, along with expanded unit train capabilities. The result: a significant shift in grain activity from Gulf ports to Columbia River ports.¹²

⁸Interview with Paul Butters, Temco LLC, March 2, 2015; Luck, M. 2014. "Temco grain terminal expansion nearly complete." TDN.com. November 24; Pittman, J. 2014. "Temco grain terminal expansion on track for fall completion officials say." TDN.com. July 21; Comments from Pacific Northwest Waterways Association staff, May, 2015.

⁹The Columbian. "Port of Kalama to double Temco site's rail capacity." December 13, 2013.

¹⁰Interview with Steve Oakes, Kalama Export Company, March 19, 2015; Olson, E. 2010. "Kalama port officials say grain export expansion will create 180 jobs." TDN.com. February 17; Siemers, E. 2011. "Vancouver port lands \$72M deal." The Portland Business Journal, <http://www.bizjournals.com/portland/pnnt-edition/2011/01/14/vancouver-port-lands-72m-deal.html?a=pnnt>; ADM. 2014. News Release: Marubeni and ADM Bolster Export Joint Venture in U.S. Pacific Northwest, September 30

¹¹Interview with Mark Wilson, Port of Kalama, March 9, 2014; Northwest Innovation Works, <http://nwinnovationworks.com/>; Castano, C. 2014. "China-funded methanol plants in Oregon." KOIN6. <http://koin.com/2014/01/22/china-funded-methanol-plants-oregon/>.

¹²Interview with Tony Flagg, United Grain Corporation, March 16, 2015.

¹³Interview with Pat Trapp, Port of St. Helens, March 9, 2014; Toledanes, L. 2013. "Port of St. Helens commissioners approve increase to train traffic." TDN.com. November 13.

¹⁴Interview with Pat Trapp, Port of St. Helens, March 9, 2014; Northwest Innovation Works, <http://nwinnovationworks.com/>; Castano, C. 2014. "China-funded methanol plants in Oregon." KOIN6. <http://koin.com/2014/01/22/china-funded-methanol-plants-oregon/>; Miller, M. 2014. "Port of St. Helens give OK to methanol plant lease option." Pamplin Media, <http://www.pamplinmedia.com/>; The Clatskanie Chief, 2014. "Port commission signs lease option with methanol company." The Clatskanie Chief. February 20. <http://www.thechiefarchive.com/author/clatskaniechief/page/147/>; Godley, V. 2014. Letter to the Port of St. Helens Community. NW Innovation Works. October.

BECAUSE OF THE DEEPENING, COLUMBIA RIVER PORTS AND TERMINALS ARE WELL POSITIONED TO RESPOND TO GROWING DEMAND FROM THE PACIFIC RIM. Many terminal operators indicated that without the deepening they would not have invested in upgrading their facilities. With growing demand from China and other countries along the Pacific Rim, this would have been a significant lost opportunity for terminal operators and shippers. Now, terminals along the Columbia River are well positioned to take advantage of this growth.¹⁵



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VANCOUVER

United Grain Corporation

With their \$80 million investment to expand their grain terminal, United Grain Corporation now has the largest export grain terminal on the West Coast, and the second tallest grain structure in the world. The development started in 2008-2009, anticipating the channel deepening completion and larger ships with deeper drafts calling on Columbia River ports. Like other grain terminals along the Columbia River, United Grain Corporation's expansion included adding

storage and transport capabilities for grains new to this market—corn and soybeans—along with their traditional wheat product.¹⁶

West Vancouver Freight Rail Access

The Port of Vancouver is investing \$228 million in rail and road improvements to meet the transportation demands of terminal operators such as United Grain Corporation. These investments include expanding rail tracks, adding a loop track, and improved road and rail access to the port and terminals.¹⁷

Vancouver Energy

Vancouver Energy is investing approximately \$100 million in a “crude-by-rail” terminal. The project is projected to start in 2016. The investment includes new rail lines and storage facilities to move crude oil through the terminal. This terminal will be one of those serviced by the new West Vancouver Freight Rail Access investments.¹⁸

¹⁵Interview with Pat Trapp, Port of St. Helens, March 9, 2014, Northwest Innovation Works, <http://www.innovationworks.com/>; Castano, C. 2014. “China-funded methanol plants in Oregon.” KOIN6 <http://koin.com/2014/01/22/china-funded-methanol-plants-oregon/>; Mille, M. 2014. “Port of St. Helens give OK to methanol plant lease option.” Pamplin Media. <http://www.pamplinmedia.com>; The Clatskanie Chief, 2014. “Port commission signs lease option with methanol company.” *The Clatskanie Chief*, February 20. <http://www.thechiefarchive.com/author/elatskaniechief/page/147/>; Gooley, V. 2014. Letter to the Port of St. Helens Community. NW Innovation Works, October.

¹⁶Interview with Katy Brooks, Port of Vancouver, March 5, 2015.

¹⁷Interview with Tony Flagg, United Grain Corporation, March 16, 2015, United Grain Corporation <http://www.ugcprnw.com/>; Siemers, E. 2011. “Vancouver port lands \$72M deal.” *The Portland Business Journal*, January 14. <http://www.bizjournal.com/portland/print-edition/2011/01/14/vancouver-port-lands-72m-deal.html?print>; Interview with Katy Brooks, Port of Vancouver, March 5, 2015; Mitsui & Co. “Harvesting opportunities in agriculture.” https://www.mitsui.com/japan/business/challenges/1201987_1856.html.

¹⁸Interview with Katy Brooks, Port of Vancouver, March 5, 2015; Port of Vancouver USA Press Release. “Port begins final phase of West Vancouver Freight Access rail projects.” November 12, 2014. Port of Vancouver USA. West Vancouver Freight Access. <http://www.portvanusa.com/wvfa/wvfa-home/>; Guerra, K. 2011. “Port of Vancouver launches key components of multimillion-dollar rail expansion project.” *The Oregonian*, December 7.

¹⁹Interview with Katy Brooks, Port of Vancouver, March 5, 2015, Port of Vancouver USA. Board of Commissioners Workshop Tesoro-Savage Joint Venture Lease Overview, July 22, 2013; Savage, Tesoro and Savage announce joint venture to construct and operate crude-by-rail unloading and marine loading facility at Port of Vancouver USA. <http://www.svageservices.com/pressroom/>; Energy Facility Site Evaluation Council, http://www.efsec.wa.gov/Tesoro_Savage.shtml

DEEPENING-RELATED INVESTMENTS STRETCH BACK TO THE MIDWEST

Most of the investments spurred by the deepening happened or are happening at terminals along the Columbia River. Some investments, however, occurred many miles away. For example, some shippers made investments in rail infrastructure that supports their upgraded and expanded elevators at terminals on the river. These investments include unit-train cars, rail loops, and loading facilities in Montana and North Dakota.²⁰

Tidewater Barge Lines

With the channel deepening came larger ships, with deeper drafts, carrying increased amounts of cargo. Much of this cargo moves up and downriver via tugs and barges. In response to this demand, Tidewater Barge Lines is investing an estimated \$30 million in three new and environmentally friendly tugs, with reduced air emissions and improved fuel efficiency. Vigor Industrial in Portland is fabricating the tugs, which will be delivered by the end of 2015. Fabricating the tugs in the Portland area helps keep more investment dollars in the local economy.¹⁹

PORTLAND

Columbia Grain

Columbia Grain is expanding their grain storage and handling capacity with a \$44 million investment. In addition to more storage capacity, the expansion will allow Columbia Grain to store and move corn and soybeans in addition to wheat, which had been their primary grain product.²¹

Kinder Morgan Bulk Terminal

Kinder Morgan invested \$10 million in a new ship loader. This is the largest investment Kinder Morgan has made in any of their terminals on the Columbia River (Ports of Longview, Vancouver, and Portland).²²

International Raw Materials

International Raw Materials switched their loading operations from loading shallow-water barges to a deep water berth that can service larger ships that use the added depth of the shipping channel. They invested \$1.5 million in the switch. International Raw Materials now has one of the deepest berths on the West Coast of the U.S. Ships carrying liquid fertilizer frequently dock at their facility to offload fertilizer and then head south to terminals with shallower berths that could not accommodate fully-loaded vessels.²³

LD Commodities

Louis Dreyfus Commodities invested \$21 million to remodel and update its grain terminal on the Willamette River. Prior to this investment, their terminal frequently hit capacity due to the increasing volumes of grains traveling down the Columbia River.²⁴

Vigor Industrial

The largest floating drydock in the U.S., the *Vigorous*, arrived at Vigor Industrial's Portland shipyard in August of 2014. Vigor invested \$40 million building the drydock and \$10 million delivering and assembling it. Demand for the new drydock will come from servicing cruise ships, post-Panamax vessels and U.S. Military Sealift Command ships. At the time the *Vigorous* arrived at Vigor Industrial, two large cargo ships operated by the Maritime Administration were waiting for service using the new drydock.²⁵

Rivergate Road and Rail Improvements

The Port of Portland, along with other public and private partners, is investing approximately \$82 million in road and rail improvements in the Rivergate area. These investments include widening roadways and adding rail overpasses, expanding rail yards, deepening berths, and investing in new cranes and wharfs. These investments are necessary to meet the growing demand for

¹⁹Interview with Jennifer Riddle, Tidewater Barge Lines, March 31, 2015; estimates by ECONorthwest.

²⁰Interview with Tony Flegg, United Grain Corporation, March 16, 2015.

²¹Interview with Amer Badawi, Columbia Grain, March 9, 2015; Interview with Patrick Bryan, Pacifcor LLC, February 25, 2015; ADM, "Marubeni and ADM bolster export joint venture in the U.S. Pacific Northwest," *Longshore Shipping News*, October 1, 2014. <http://www.longshoreshippingnews.com/2014/10/adm-marubeni-announce-changes-in-northwest-grain/>.

²²Interview with Neil Mauru, Kinder Morgan Bulk Terminal, March 10, 2015.

²³Interview with Tim Mahoney, International Raw Materials, March 11, 2015, International Raw Materials LTD. <http://www.irmteam.com/our-company/>;

²⁴Culverwell, W. 2012. "Louis Dreyfus plans \$21 M update to Rose Quarter grain elevator." *The Portland Business Journal*, December 27.

²⁵Interview with Alan Sprott, Vigor Industrial, March 19, 2015. Vigor Industrial, "The Vigorous: investing in the future," "Country's largest floating drydock coming to Portland," vigorindustrial.com/vigorous; Graves, M. 2014. "North America's largest drydock floats first ship at Swan Island's Vigor Industrial." *The Oregonian*, November 23. http://blog.oregonlive.com/business_impact/print.html?entry=2014/11/north_americas_largest_drydock_1.html.

²⁶Interview with Phil Healy, Port of Portland, February 17, 2015; Linsrom, A. 2012. "South Rivergate Rail Yard Expansion boosts flow of export." *PortDispatch*, Port of Portland, August, 7. <http://www.portofportland.com/publications/PortDispatch/post/South-Rivergate-Rail-Yard-Expansion-Boosts-Flow-of-Exports.asp>

transportation services from expanded terminals that service larger ships with deeper berths that use the added depth in the shipping channel.²⁶

Canpotex – Portland Bulk Terminal

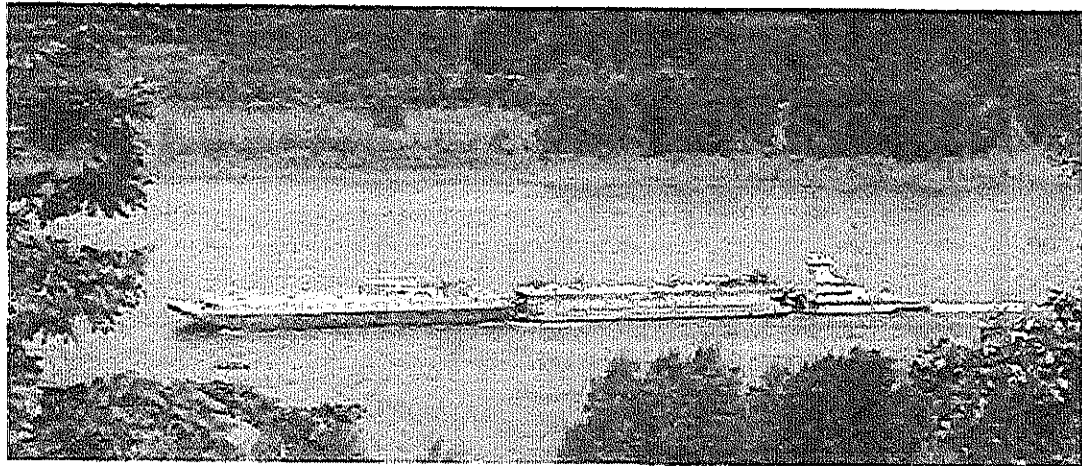
Canpotex is investing \$140 million in new facilities and equipment to increase the efficiency of their potash shiploading facility. The investment includes a new shiploader, improved operations and management capabilities, and an upgraded conveyance system. The increased efficiency will shorten turnaround times for Canpotex trains and ships at their Portland terminal.²⁷

Shaver Transportation Company

Shaver Transportation Company has been on a steady program of upgrade and construction since the channel deepening. The company responded to the increased demands from larger vessels with a repowering and new construction program kicked off in 2011. Shaver invested \$9.5 million in a new tug, the SUMMER S, which is being fabricated in Portland at Diversified Marine. They also invested \$4.9 million in new engines and repowering some of their existing tugs. They also invested \$7 million in two new grain barges, the first new grain barges on the Columbia River since 2011.²⁸

Pembina

Pembina proposes building a \$500 million propane export terminal. The City of Portland's Planning and Sustainability Commission recently voted to amend a zoning code to allow the terminal to be built. The



By Sarah McD from Portland, OR, USA (Tidewater Barge - Columbia River) [CC BY 2.0 (<http://creativecommons.org/licenses/by/2.0/>)], via Wikimedia Commons

proposal now goes to the Portland City Council for a vote. If the Council approves the project, it may come online by 2018.²⁹

CONCLUSION

According to terminal operators, if not for the deepening of the Columbia River shipping channel to 43 feet, many of the investments listed in this report either would not have happened, or would not have happened at ports or terminals along the Columbia River. The deepening occurred at a time of increasing demand from Pacific Rim countries, especially China, for U.S. grain exports. Columbia River ports and terminals capitalized on this demand in large part because of the enhanced shipping capacity that the deepening offered. Operators

upgraded and expanded grain terminals. Transportation investments facilitated moving increasing amounts of Midwest grain to ports on the Columbia River—grain that otherwise would have moved down the Mississippi River to Gulf Coast ports. In addition to grain terminal and transportation infrastructure investments, terminal operators expanded or proposed new facilities for energy and bulk commodities.

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 impact jobs.

²⁶Port of Portland, 2014. Press Release "Canpotex to Invest at Port of Portland Terminal" October 8. http://www.portofportland.com/NewsRelease_Canpotex_Logistics; Siemens, E. 2013 "Canpotex planning new potash storage facility at Port of Portland." *The Portland Business Journal* February 20. <http://www.bizjournals.com/portland/news/2013/02/20/canpotex-planning-new-potash-storage.html?si=print>; George-Cosh, D. 2014. "Canpotex expanding Portland, Ore., marine terminal." *The Wall Street Journal* October 8. <http://www.wsj.com/articles/canpotex-expanding-portland-ore-marine-terminal-1412796970>.

²⁷Interview with Rob Rich, Shaver Transportation Company, March 31, 2015.

²⁹Interview with Teresa Carr, Port of Portland, April 3, 2015; Holmstrom, C. 2015. "Propane pipeline one step closer to Portland." *KOIN 6*, April 7. <http://koin.com/2015/04/07/pembina-propane-plan-draws-port-protesters/>

Attachment 1

City	Policy Issue/Recommended by City staff (June 2015 draft comp plan)	Additional Port Comments June 2015
1.11	Consistency with Metro Urban Growth Management Functional Plan and Urban Growth Boundary. Ensure that the Comprehensive Plan is remains consistent with the Metro Urban Growth Management Functional Plan and supports a tight urban growth boundary for the Portland metropolitan area.	Support Policy is consistent with retaining WHI Policy 6.41 from prior draft and as proposed in this letter.
6.14 Brownfield Redevelopment	Overcome financial-feasibility gaps to cleanup and redevelop 60 percent of brownfield acreage by 2035. Additional related policies are found in the Industrial and employment districts section of this chapter.	Add specific policies to support, encourage and incent brownfield redevelopment 6.14.a Review local land use policies and development code regulations to ensure they are supportive of cleanup and redevelopment for the highest and best use. 6.14.b Pursue grants, loans and or other technical assistance to make redevelopment financially viable to a private developer. 6.14.c Commit future city budget surplus to brownfield redevelopment
6.39 Prime industrial land retention	Protect the multimodal freight-hub industrial districts at the Portland Harbor, Columbia Corridor, and Brooklyn Yard as prime industrial land (see Figure 6-1 – Industrial and Employment Districts) that is prioritized for long-term retention.	Support
6.39.a. Prime industrial land retention	Strictly limit Prohibit quasi-judicial Comprehensive Plan Map amendments that convert prime industrial land and consider the potential for amendments to otherwise diminish the economic competitiveness or viability of prime industrial land.	Support
6.39.c. Prime industrial land retention	Limit regulatory impacts on the capacity, affordability, and viability of industrial uses in the prime industrial area. Identify how regulations affect the capacity, affordability, and viability of industrial uses, and limit minimize those impacts.	Support

6.39.d. Prime industrial land retention	Strive to offset the reduction of development capacity as needed, with additional prime industrial capacity that includes consideration of comparable site characteristics. Offsets may include but are not limited to additional brownfield remediation, industrial use intensification, strategic investments, and other innovative tools and partnerships that increase industrial utilization of industrial land.	Support
6.39.e. Prime industrial land retention	Limit the use of prime industrial land for siting of parks, schools, large-format places of assembly, and large-format retail sales.	Change to read: STRICTLY limit the use of prime industrial land....
6.39.f. Prime industrial land retention	Promote efficient use of freight hub infrastructure and prime industrial land by limiting non-industrial uses that do not need to be located in the prime industrial area.	Support
6.41 West Hayden Island	Entire section 6.41 stricken from comp plan i.e. not included	Retain first section of 6.41: Provide for the future annexation of WHI for a combination of open space and deep water marine industrial uses with supplemental requirements in a plan district or implementation agreement that ensures mitigation of impacts and provision of public benefits. Policy is retained based on City Council action and Metro designation.
6.43 Columbia East	Provide a mix of industrial and limited business park development in Columbia East (east of 82 nd Avenue) that expand employment opportunities supported by proximity to Portland International Airport and multimodal access.	Support
7.46 Sensitive habitats	Enhance grasslands and wetland habitats in the Columbia Slough, such as those found in the Smith and Bybee Lakes and at the St. John landfill site, to provide habitat for sensitive species, and for wildlife traveling along the Columbia and Willamette river migratory corridors.	Support with clarification that grasslands do not include areas where dredge material deposition has occurred.
Chapter 7	Culture, cultural has been introduced into this chapter: bullet 1, p7-1; paragraph 1, p7-3; Goal 7.B, p 7-9	Remove "cultural" and "cultural values" from this section. It lacks definition and context.

	Natural hazards are treated as something to be avoided in the policy section, p 7-10 when in fact they are a component of well-functioning ecosystems. A healthy natural system has a healthy occurrence of natural hazards.	Rewrite policy paragraph 2, p7-10 to clarify that natural hazards are a function of well-functioning ecosystems and should not be eliminated.
Policy 7.4.a	Added language covers wetlands and other water bodies	Remove addition of wetlands and water bodies as providing meaningful carbon sequestration function.
Policy 7.9 Habitat and biological communities	Bullet added states: <i>Support recovery of species under the Endangered Species Act, and prevent new listings</i>	Restate: Strike PREVENT, replace with "preclude the need for new listings." We are uncertain as to why the city would act to prevent new listings when they might be needed to protect or recover a species.
Policy 7.15 Brownfield remediation	Improve environmental quality and watershed health by promoting and facilitating brownfield remediation and redevelopment that incorporates ecological site design and resource enhancement.	Restoration should be tied to redevelopment, not remediation. The immediacy of remediation and its positive impact on the environment should stand alone. Change to: Improve environmental quality and watershed health by promoting and facilitating brownfield remediation. And promote and support redevelopment that incorporates ecological site design and resource enhancement.
Policy 7.25 Mitigation effectiveness		Remove policy 7.25. This detail is better suited for specific code sections in Title 33.
Policy 7.37 and 7.47 Contaminated sites	Ensure that plans and investments are consistent with and advance Promote and support programs that facilitate the cleanup and reuse and restoration of the Portland Harbor Superfund site and other contaminated upland sites.	Change policy as follows: Promote and support programs that facilitate the cleanup and reuse of the Portland Harbor Superfund site and other contaminated upland sites.

7.49 Portland International Airport	<p>New policy: Protect, restore, and enhance natural resources and functions in the Portland International Airport plan district, as identified in the Portland International Airport/Middle Columbia Slough Natural Resources Inventory. – Accomplish this through regulations, voluntary strategies, and the implementation of special development standards.</p>	Support
9.5 Mode Share Goals and Vehicle Miles Travelled Reduction	A goal should be added for reducing vehicle hours of delay.	Reducing vehicle miles travelled doesn't necessarily reduce emissions if vehicles are idling in traffic and spending more time to travel less miles. There is also an economic cost for Portland businesses associated with vehicle congestion.
TSP Project List	The City of Portland Major Projects and Programs List has some funding for freight mobility projects and programs but the majority of freight mobility projects are on the separate Other Agency Major Projects list.	For the City to be able to support the benefits derived from its role as a major freight hub and to be able to provide good access to industrial lands the City should cooperate with other agencies such as the Port in funding and implementing freight mobility projects.

January 7, 2016

To: Mayor Hales, City Council Members

From: Linda Robinson

Re: Comprehensive Plan Update

As a lifelong resident of the Portland Metro Area (including nearly 50 years in the City of Portland), I am pleased to have this opportunity to comment on the proposed Comp Plan Update.

I'll start by telling you that I have found this whole process to be very confusing. It's been very hard to tell what I should be commenting on as part of the Comp Plan itself versus what is related to it but not part of it and, therefore, should be addressed at a different time.

I've summarized a number of concerns below:

- An issue of great concern to me, at this time, is the conversion of natural areas for industrial uses. I support the approach taken in the Comp Plan, as forwarded to City Council by the Planning & Sustainability Commission which puts the focus on cleaning up contaminated sites rather than converting critical natural areas to meet industrial demand, i.e., more intense use of the existing land base.
- I also feel very strongly that industrial landowners should NOT be exempt from environmental regulations, especially lands along our rivers. Nor should existing environmental regulations be curtailed or rolled back.
- West Hayden Island should NOT be included in the industrial land inventory!
 - Project #30018 - "Implement street plan for Hayden Island to improve circulation and access for all modes" is titled "West Hayden, N; Street Network Improvements". West Hayden Island is not in the City at this time and has been, I'm told, removed from the industrial lands inventory, so I'm questioning why the title refers to West Hayden Island, not just Hayden Island.
 - Project #30062 - "Extend rail from BNSF mainline to West Hayden Island and construct rail loop to serve future marine terminal." This should be removed from the Priority Project List.
- It's extremely important that infrastructure precede additional density of development in East Portland. Infill that occurred without infrastructure since annexation, has been very problematic.
- I applaud the down-zoning of some residential properties:
 - To avoid over-loading the David Douglas School District even more;
 - To avoid potential landslide risks in the East Buttes area of East Portland, and in some of the hillier areas on the west side.
- The existing transportation system in East Portland has too much focus on east-west travel, and not enough on north-south travel. This forces vehicles to use one of only four streets that cross over/under I-84 (NE 102nd, NE 122nd, NE 148th, NE 162nd). I know it would be difficult, if not impossible, to add another crossing of I-84, so the existing streets need to be upgraded to handle the larger volume of traffic generated by infill development and jobs creation (Columbia Corridor).
 - North-south transit service is especially deficient in East Portland.



PORTLAND FREIGHT COMMITTEE

January 7, 2016

Mayor Charlie Hales and Portland City Council
Portland City Hall
1221 SW Fourth Avenue
Portland, Oregon 97201

Dear Mayor Hales and Commissioners:

The Portland Freight Committee (PFC) appreciates the opportunity to provide our latest comments on the Planning and Sustainability Commission's (PSC) recommended draft of the Comprehensive Plan. We recognize the significance of this plan in providing direction for City decision-making on key land use and transportation issues and setting the framework for future infrastructure investments over the next 20 years. The PFC appreciates all the hard work on the part of Bureau of Planning and Sustainability and Portland Bureau of Transportation (PBOT) staff in their efforts to address many of the issues we originally raised in our comments submitted on April 30th 2013 and the improved recognition on freight transportation. We would, however, like to specifically highlight the following policy concerns - many of which were also raised in our March 9th 2015 letter to the PSC and which have not been addressed in the proposed draft Comprehensive Plan:

Family Wage Jobs and Equity

We believe it is critical for a successful city to maintain and encourage middle-income employment opportunities. We often stress the importance of industrial jobs because they pay higher wages and have lower barriers to entry and are accessible for people with less than a four-year college degree. Employers still need welders, machinists, barge builders, truck drivers and other skilled workers. The analysis prepared by the Bureau of Planning and Sustainability on Portland's changing income distribution (*Industrial Middle of Portland's Changing Income Distribution*) shows an increase in high and low wage jobs but a reduction in middle-wage jobs which are held at a higher rate by people of color. With the City's current emphasis on both equity and affordable housing, we would like to see stronger language that encourages and emphasizes these important sectors of our economy. It is also necessary to provide better transit service in our industrial employment areas to improve access and provide viable transportation options for workers. We understand that TriMet and PBOT have entered into a memorandum of understanding (MOU) and we would like to see that agreement memorialized in policy language in the transportation chapter of the comprehensive plan. Specifically, we would like reference to the MOU as it relates to improved transit access to industrial employment areas.

Working Waterfront

We understand the unique economic, environmental and cultural assets of the Portland harbor and the challenges associated with balancing these interests. Unfortunately, there appears to be conflicting policies within the environmental and watershed health and economic chapters of the Comprehensive Plan. We understand, for example, that strategies to update environmental zoning in the Columbia

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97204

Corridor and harbor industrial districts, are estimated to reduce industrial development capacity in these areas by 150 acres. As a result, we would like to see policy support both employment and business growth in this area. If a specific piece of Industrial land is not allowed to continue as Industrial land then an offset should be made to make up for the lost industrial land elsewhere so that we do not further exacerbate our industrial lands shortfall and compromise significant opportunities for economic growth. We should also implement the proposed employment zoning project for example, to help offset environmental policies that may further increase our industrial lands shortfall.

The Portland harbor is a vital employment area; home to thousands of valuable middle-income jobs. Many of the industrial businesses in the harbor are conscientious stewards of the environment and they make significant investments to help mitigate adverse environmental impacts while also providing critically needed middle-income jobs. The Bureau of Planning and Sustainability's own *Industrial Middle of Portland's Changing Income Distribution* report finds that communities of color and east Portlanders frequently rely on jobs on industrial lands. The middle-income jobs that industrial and mixed employment areas generate are significant for achieving an equitable city as previously outlined in the adopted Portland Plan. Portland's harbor and working waterfront are critical to the economic success of the city, especially as many Portlanders face growing housing affordability challenges.

Central City Portal Capacity

As the city grows in both population and employment there will be greater strain on our existing transportation system to accommodate increased travel demand for both people and goods movement, particularly in the central city area which is a major regional attractor for jobs and commerce. Since the cost of providing additional freeway capacity in the central city would be prohibitively expensive, it is essential that we maintain existing portal capacity on central city freeway interchanges and bridgeheads to ensure the efficient movement of people and goods and to help mitigate congestion at these regionally-significant areas.

Transportation Strategy

We appreciate that PBOT staff updated Transportation Hierarchy policy 9.6 language to include "Transportation strategies for people movement," and adopted the model that Vancouver, B.C. uses to differentiate between people movement and goods movement. However, it still remains unclear how the updated strategy will be applied at the project development and design levels and what will be prioritized in areas where there is overlap between the two types of movement. Since most Portland street corridors are multi-functional, street design is based on the context sensitivity of the surrounding land uses and connecting transportation network. Unless otherwise clarified, the PFC requests that the "Transportation strategies for people movement" be excluded from designated freight districts and along major commercial corridors. We look forward to continuing to work with BPS and PBOT staff to further clarify how the proposed hierarchy will be implemented beyond the policy-making phase.

The PFC also recognizes the need for providing bicycle and pedestrian access to industrial employment areas but encourages the use of safer alternative routes that do not conflict with heavy truck movements along major freight corridors. The PFC does not want to eliminate bike lanes or pedestrian paths but rather seeks ways in which they may be accommodated without compromising vision zero safety goals and the efficient freight movement of goods.

Freight and Civic Corridors

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The PFC appreciates that Freight Corridors have been included into the policy language and map in the Urban Form and Design chapter. As stated in Chapter 3: "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."

Many proposed Civic Corridors we previously identified as being in conflict with designated Priority and Major Trucks Streets are still included on the map on page 3-29 – i.e., St. Johns Bridge (US 30), MLK south of Lombard, NE Sandy Blvd, NE/SE 122nd Ave, SE Stark, 82nd Ave south of Sandy, Powell Blvd (US 26), SW Macadam Ave (Hwy 43), SW Barbur Blvd, and SW Bertha Blvd/Beaverton/Hillsdale Hwy. The PFC remains concerned that classifying these important freight streets as Civic Corridors will create potential policy conflicts and may compromise their intended function to provide truck mobility and access to surrounding commercial districts along these corridors. Much of the frontage along these truck streets has General Commercial zoning today that supports existing larger-format commercial businesses, truck circulation between urban centers, and alternative routes to freeways that accommodate high trip volumes, such as much of Barbur, Sandy, Powell, Foster, and 82nd. Street segments with predominant General Commercial zoning today should not be converted to civic corridors that are rezoned to promote mixed-use development and that do not consider freight mobility. Doing so would only result in incompatible uses and invite traffic safety concerns and noise complaints that are not in the community's best interest.

Emergency Vehicles and Over-Dimensional Truck Routes

The PFC believes it is essential for Portland's emergency preparedness strategies to be addressed in a specific section in the chapter on transportation. Over-dimensional truck routes are necessary for emergency response vehicles, police, fire, ambulance, tow trucks and other emergency providers to be able to reach their destinations in an efficient and timely manner. They also serve as the main recovery routes in the event of an earthquake or other natural disaster for providing essential supply lines to impacted citizens. It is, therefore, critical that policy language regarding the preservation and importance of over-dimensional truck routes be included in the transportation chapter.

Over dimensional routes are also necessary for transporting over-sized equipment (heavy construction equipment, culverts, transit supports, building materials, etc.) A Regional Over-Dimensional Truck Route Study is currently underway and is expected to be completed by the fall of 2016. We request that the results of the Study be reviewed and policies added or refined in Comprehensive Plan and Transportation System Plan (TSP) Updates.

Truck Parking and Loading Study

Truck loading zones are an important element in the movement and delivery of goods and services throughout the City. Policy language needs to be included to protect and provide safe loading zones for delivery personnel. We understand that a separate Central City Truck Parking and Loading Plan is currently underway that seeks to implement elements of the adopted Climate Action Plan. It is expected to be completed by late spring 2016 and the PFC requests that recommendations from this Study be included in Comprehensive Plan and TSP Updates.

Transportation System Plan Project List

The PFC is pleased to see that the following list of project priorities are included in the TSP Project List:

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- **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 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 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 185th.
- **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.

Other Agency Project Priorities

The PFC also supports the following projects from other agencies to form partnerships with other non-city freight infrastructure providers:

- **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/Weidler 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.

We urge that the TSP continue to reflect our city's 20-year multi-modal transportation needs by ensuring that the aforementioned projects remain on the TSP project list. Additionally, we urge that the following freight studies (currently absent) be included on the TSP project list:

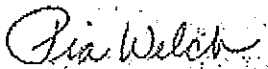
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97204

- **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 17th 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.

While these projects and studies alone will not address all of our transportation needs, they will help improve the function and resilience of our goods delivery system and traded-sector economy and provide insights to future system needs.

The Portland Freight Committee applauds the hard work of BPS and PBOT staff and looks forward to continuing our work together to help ensure a strong multi-modal transportation network that promotes a prosperous economy. Thank you for your consideration of these comments.

Sincerely,



Pia Welch
PFC Chair

Page 1 of 2

December 15, 2015

Council Clerk
 1221 SW 4th Ave, Room 130
 Portland, Oregon 97204

Re: "Comprehensive Plan Testimony"

Dear Sir,

My name is Shannon Benson. My late husband and I purchased our home at "6000 NE Bryant Street, Portland, Oregon 97218", located on the "Columbia Slough" when we were newly married in "1974". I have lived there for "42 years". This is a **"PROTECTED WILDLIFE HABITAT AND A WELL HIDDEN "PARADISE LOST" IN THE MIDDLE OF THE CITY ON THE COLUMBIA SLOUGH!**

When we moved in - all that surrounded us were farms and fields as far as you could see and a White Church in the distance. The variety of wildlife was abundant and thriving, I saw what appeared to be a Prehistoric Monster Bird fly over the Slough and thought perhaps we had moved to an environment forgotten in time. It turned out to be a "Blue Heron", but I have yet to see any "Blue Heron" as big with such a wide immense "wing-span", since that period of time. We rowed our boat on the Sparkling Columbia Slough filled with Carp, Crawdads, Frogs, Turtles, Beaver, Musk Rats, and we ate crawdads from the Slough with no health worry. Owls, Blue Herons, Hawks, Crows, Bluejays, Squirrels, Deer and Coyotes were some of the many wildlife inhabitants that called the **"COLUMBIA SLOUGH THEIR HOME"!**

The "City of Portland", recognized the extreme importance of the area, and had a protection clause in effect to save this irreplaceable environment. This **"WILDLIFE SAUCTUARY AND THE HOMES INTER-TWINED WERE TO BE PROTECTED FROM ANY OUTSIDE INFLUENCES, (ENVIRONMENTAL, ETC)! THIS AREA WAS TO REMAIN UNTOUCHED AND UNCHANGED! AS NEIGHBORS IN A COMMON CAUSE, WE WERE ASTONISHED WHEN DOWN THE ROAD THE "CITY OF PORTLAND" DIS-AVOWED ANY PROTECTION SAYING WHEN THAT "PROTECTION" WAS PROMISED - MANY YEARS AGO, THAT IT WAS DOUBT-FUL ANY OF THOSE COLUMBIA SLOUGH RESIDENTS WERE STILL ALIVE FROM THAT "TIME-FRAME", SO THE "CITY OF PORTLAND" THREW THAT PROTECTION CLAUSE OUT LIKE "THE BATH WATER"!**

About a decade down the road, we noticed swift changes encroaching on our environment, the old white church was torn down, the fields were turning into industrial buildings, the property across the street had the zoning changed without notification to any of the neighbors and they paved a parking lot on a weekend, a cell tower sprung up less than 65 feet from our home, the Columbia Slough turned murky and green growth appeared below the surface, the crawdads grew many legs, more eyes and turned odd bluish colors, after that we did not crawdad out of the slough anymore. My dog drank out of the slough, and he developed bumps all over his body, and cried out in pain, and I had to have him put to sleep! With our large population of feral cats along the slough, I rescued them only to have them die one by one of a mysterious disease like cancer (being radiated by the cell tower less then 65 feet away as they sat in the windows of my home). My late husband, a vibrant energetic engineer with beautiful skin, his health started to fail in this environment and he developed **"Plague Psoriasis"**, causing him to be in constant pain, and **"passed away after (MANY YEARS OF SUFFERING)"!** Perhaps his illnesses were caused directly from the Columbia Slough!

THIS IS THE END RESULT FROM THE "CITY OF PORTLAND", TURNING HER BACK ON

NATURE, A SITUATION THAT CANNOT BE REVERSED!

Page 2 of 2

PLEASE STOP THIS ZONING CHANGE BEFORE IT IS TOO LATE!

AS NEIGHBORS OF THE COLUMBIA SLOUGH WILDLIFE SANTUARY, WE ARE ALL
UNITED TOGETHER "AS ONE", AGAINST THIS ZONING CHANGE IN ORDER TO
PRESERVE THIS FRAGILE DOMAIN!

THIS "PROTECTED WILDLIFE (HABITAT) SANTUARY" IS SUPPOSED TO BE PROTECTED
FOR A REASON -- IF NOT PROTECTED, IT WILL BE LOST FOREVER!!!!

STOP THIS "COMPREHENSIVE PLAN ZONING CHANGE" AT ALL COSTS!!!!

SIGNED "LIFE FOR ALL LIVING CREATURES"!!!!

SHANNON BENSON.



Shannon Benson
6000 NE Bryant Street
Portland, Oregon 97218

P.S. Enclosed, please find a copy of my letter mailed to the "Audubon Society" to "Micah Meskel" in October of 2015.

cc: Micah Meskel
Audubon Society

Enclosure (1)

MEETING - PSC PUBLIC HEARING PAGE 2

OCTOBER 27, 2015

10/9/15

3:00 PM

1900 S.W. 4TH AVE, ROOM 2500
PORTLAND OR

AUDUBON SOCIETY

REZONING -
COLUMBIA SLOUGH
PROTECTED WILDLIFE
HABITAT

DEAR MICAH MESKEL

I PHONED YOU 10/9/15

COPY

RE: CITY OF PORTLAND

REZONING PROPERTY -

ON COLUMBIA SLOUGH

WE NEED TO STOP THIS -

I HAVE OWNED THIS PROPERTY
SINCE 1974.

WE NEED TO SAVE THIS AREA -

(PROTECTED WILDLIFE HABITAT)

THE WILDLIFE & BLUE HERONS
ARE WONDERFUL HERE -

I LOVE IT! PLEASE HELP US.

SHANNON BENSON
6000 N.E. BRYANT STREET
D... AFFAIR 97719

(P.S. I WILL BE
AT THE MEETING)

THANK YOU

P.S. HERE IS A COPY OF THE DOCUMENT I SAID I WOULD MAIL YOU

SHANNON D. BENSON
6000 N.E. BRYANT STREET
PORTLAND, OREGON 97218



MR. MICAH MESKEL
C/O AUDUBON SOCIETY OF PORTLAND
5151 N.W. CORNELL ROAD
PORTLAND, OREGON 97210



PORTLAND PARKS & RECREATION

Healthy Parks, Healthy Portland

Date December 2, 2015
To: Portland City Council
From: Portland Parks Board
Re: Comments on Proposed Comprehensive Plan

Dear Mayor and Commissioners:

On several occasions over the past two years, the Portland Parks Board has submitted comments to the Portland Bureau of Planning and Sustainability (BPS) on elements of the City's Comprehensive Plan Update. At its March 4, 2015 meeting, the Parks Board voted unanimously to submit comments to the Planning & Sustainability Commission (PSC) on the Proposed 2035 Comprehensive Plan that:

- Acknowledged that the issues that the Board had raised on the initial draft of the Plan had largely been responded to.
- Generally supported the parks, recreation and natural areas space elements of the Proposed 2035 Comprehensive Plan and specifically reiterated support for Proposed Plan goals and policies to protect and enhance parks, recreation facilities, open spaces and urban natural resources and to increase their equitable distribution across the City.
- Opposed in principle the concept of converting open spaces and natural areas to industrial lands.
- Specifically opposed converting the Columbia Slough golf courses to industrial lands and supported removal of West Hayden Island from the industrial lands inventory.
- Supported a strategy of investment in green infrastructure that prioritizes neighborhoods with poor access to parks, natural areas, or with limited tree canopy.
- Supported comments submitted by the Urban Forestry Commission that promote improving, protecting and restoring Portland's urban forests.

Portland Parks Board

Judy BlueHorse Skelton, Chair

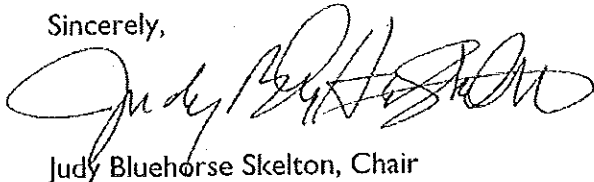
*Tonya Booker • Kendall Clawson • Patricia Probes • Kathy Fong Stephens
Ian Jaquiss • Dion Jordan • Andy Nelson • Jim Owens • Linda Robinson
Gladys Ruiz • Christa Stout • Sue Van Brocklin
Julie Vigeland • Mauricio Villarreal*

At its December 2 meeting, the Parks Board unanimously voted to submit comments to City Council that reiterate our prior comments to PSC. In addition, the Board desires to specifically:

- Support the Comprehensive Plan's recognition of parks and natural areas as essential infrastructure, among other reasons.
- As suggested by the Portland Bureau of Parks and Recreation in its November 18 comments, support amendment of Economic Development Policy 6.39e to clarify that protection of prime industrial land does not preclude the siting of parks.
- Because the policies adopted will direct Plan implementation through projects such as the Employment Zoning Project, request that City Council specifically reiterate the long-standing policy that parks and natural areas are permitted uses in all zones in the City.

Thank you for this opportunity to comment and for your commitment to sustaining a park and recreation system that benefits all Portlanders.

Sincerely,



Judy Bluehorse Skelton, Chair

cc: Patti Howard, Tim Crail – Commissioner's Fritz's Office
Mike Abbate, Brett Horner, Kia Selley, Jenn Cairo – Bureau of Parks & Recreation
Jim Owens, Kathy Fong Stephens, Linda Robinson, Meryl Reddish – Portland Parks Board
Eric Engstrom – Bureau of Planning and Sustainability

COLUMBIA CORRIDOR
A S S O C I A T I O N

5 January 2016

Mayor Charlie Hales
Portland City Council
1221 SW 4th Avenue, Room 340
Portland, OR 97204

Re: Portland Comprehensive Plan

Dear Mayor Hales and Portland City Commissioners,

The road to a new Comprehensive Plan has been very long, but fruitful. We applaud the Bureau of Planning and Sustainability for a thorough and thoughtful process. As a comprehensive plan, this document does a good job of providing direction. That said, there are a few suggestions we ask you to consider.

Harbor Jobs Forecast

Using the low range marine jobs forecast is disconcerting. On one hand, it's easy to dismiss the choice because any forecast will eventually be wrong. It is only a forecast. On the other hand, it carries two messages that bother us:

1. To some, it appears the City is saying the one employment sector worthy of reduction is marine industrial.
2. Using the low range forecast in only this one projection raises questions about intent. It's our belief that Planning staff initially used the mid-range forecasts throughout the document—a reasonable and predictable thing to do.

We suggest using the mid-range forecasts in all cases and adjusting policy to fit the numbers, rather than adjusting the numbers to fit the policy.

Brownfield Redevelopment

While we're very excited about the increased desire for brownfield redevelopment, we're concerned about the very ambitious targets without increased funding. It's far past time for us to get more serious about cleaning up contaminated sites. They're bad for the economy, the environment, human health and Portland pride.

CCA has worked on the brownfield paradox for over ten years and has a good understanding of the obstacles. We applaud city efforts to improve our brownfield legacy. The Comp Plan is a continuation of those efforts; however, words without funding tend to fall short. The funding doesn't have to come from the City, but the City does have to take steps to make funding available.

We suggest including language that either suggests adequate funding to hit the brownfield redevelopment targets or legislative changes, such as increased protection for buyers, that will lead to availability of more private funding. If we had done this in the last Comp Plan, our City would be a healthier place today.

COLUMBIA CORRIDOR ASSOCIATION

Industrial Zoning Designation

We are heartened by the attention to the industrial sector. There were some good ideas, but at least one that got distorted into not such a good idea. CCA was initially pleased with the idea to give all the Columbia Corridor golf courses a special zoning designation that would allow them to easily convert to industrial, should they desire to do so. If this designation had been applied evenly, as initially intended, it may have worked. However, exemptions were given to Columbia Edgewater Country Club and City-owned Heron Lakes Golf Club. The result is that Riverside Golf & Country Club has had to battle the public perception that they are converting to industrial land while the others are not. This has created a financial burden on their marketing efforts.

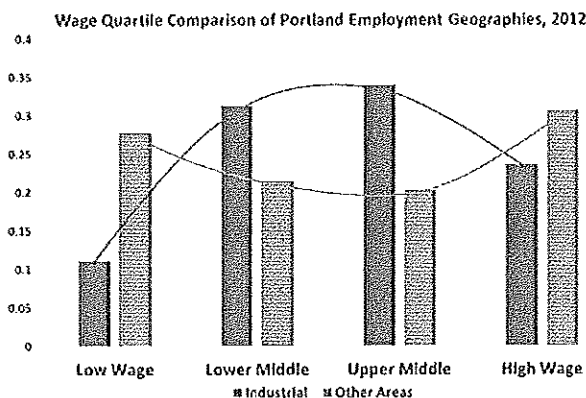
We ask that you give Riverside the same exemption from this designation that was given to Columbia Edgewater and City-owned Heron Lakes.

At the same time, Broadmoor Golf Course welcomes the zoning designation as a potential benefit to their long-term plans. Keeping the zoning designation for this property would be beneficial to Broadmoor and the City's Comp Plan.

Middle Wages and Equity

Portland has done much to improve equity, but we often overlook some of the most effective solutions. The growing wage gap has perhaps the greatest negative impact on communities of color and our poorest neighborhoods. It leads to disparities in employment, income, education, criminal justice, health and housing. Some of the solution lies in our industrial sector.

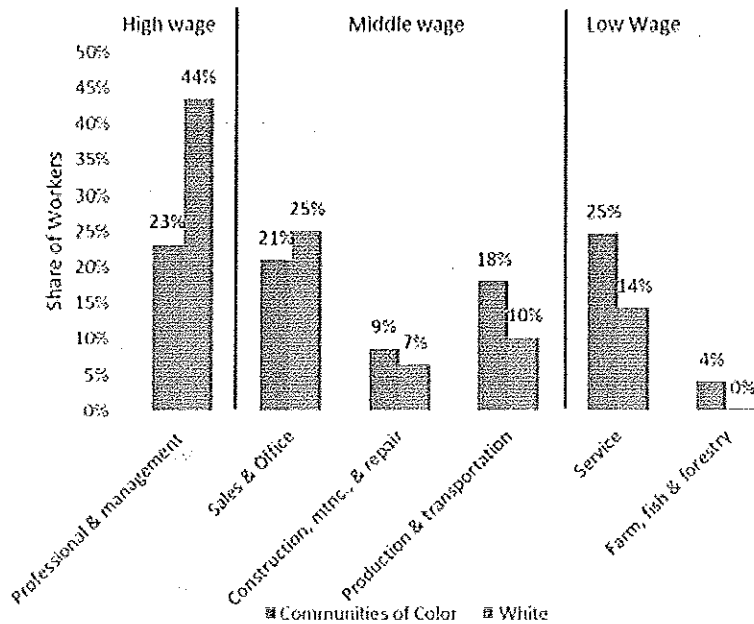
CCA has worked with City staff to study Portland's wage gap. Some of the findings are:



The industrial sector provides primarily middle wage jobs, offsetting the wage gap created by the other employment sectors in Portland.

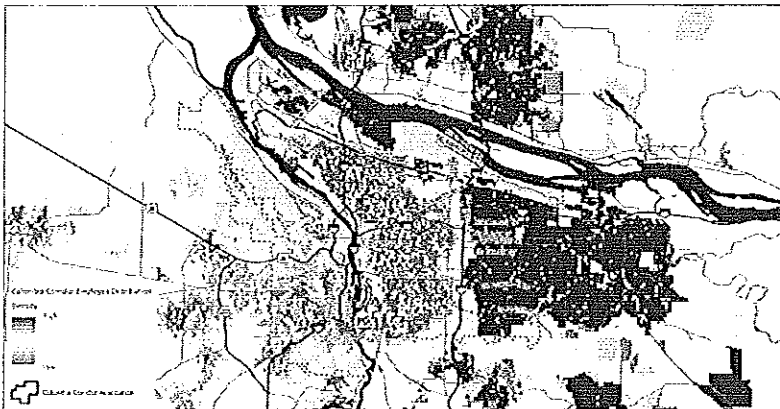
Source: Portland Bureau of Planning & Sustainability

COLUMBIA CORRIDOR ASSOCIATION



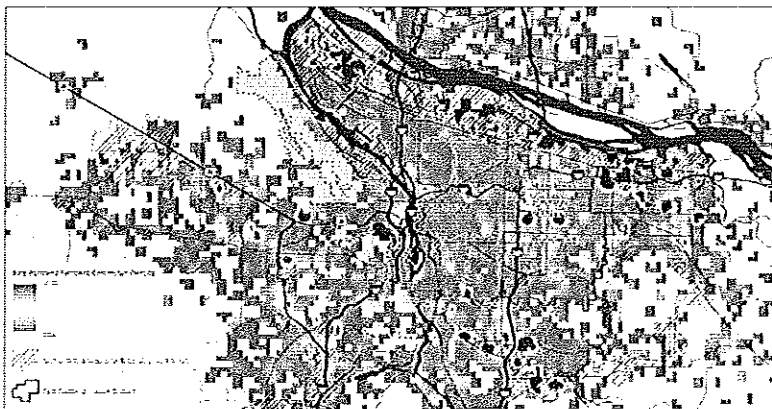
Industrial businesses hire more communities of color than any other middle or high income sector. The other sectors that hire high percentages of communities of color pay low wages, exacerbating the wage gap and increasing the need to fund affordable housing.

Source: Coalition of Communities of Color in Multnomah County



The hotspots for where Columbia Corridor employees live are east of I-205. The middle wages earned in industrial jobs are going to the neighborhoods that need it most.

Source: Portland Bureau of Planning & Sustainability from LEHD data



The hotspots for where east Portlanders work are primarily in industrial areas. Hash marks designate industrial zoning.

Source: Portland Bureau of Planning & Sustainability from LEHD data

COLUMBIA CORRIDOR
A S S O C I A T I O N

The Comp Plan should recognize that the industrial sector has a greater impact on Portland's wage gap than any other employment sector. Industrial employment does more to lift the middle class and communities of color than any other employment sector. The industrial sector offered \$15/hour and above as minimum starting wages for employees without degrees or experience long before the current debate over a phased \$15/hour minimum wage. The industrial sector included sick leave as the norm long before the City debated a sick leave policy. Industrial employers make their share of mistakes, but they provide good living wages for families that need it most.

We respectively suggest adding a call for reduction of the wage gap in an effort to reduce racial disparities. Efforts to assist employment sectors that pay middle wages and employ high percentages of communities of color should be prioritized in our long range planning.

Thank you for your efforts and consideration of our requests.

Respectfully submitted,



Corky Collier
Executive Director

Arevalo, Nora

From: Hales, Mayor
Sent: Wednesday, January 20, 2016 4:32 PM
To: BPS Comprehensive Plan Testimony
Subject: FW: Comprehensive Plan

Follow Up Flag: Follow up
Flag Status: Completed

From: Thomas Dana [mailto:thomashdana@gmail.com]
Sent: Wednesday, January 06, 2016 3:57 PM
To: Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>; Hales, Mayor <mayorcharliehales@portlandoregon.gov>; Novick, Steve <Steve.Novick@portlandoregon.gov>
Subject: Comprehensive Plan

Please limit the height of future development on Hayden Island to be less than what it is in the Hayden Island Plan because the traffic infrastructure will not handle the additional people.

Also, please prohibit West Hayden Island from being developed. Development is not necessary and would destroy a valuable natural resource.

Thank you for your consideration,

Tom Dana
ThomasHdana@gmail.com
503-954-9217
1501 N Hayden Island Dr, Unit 110E
Portland, OR 97217

Arevalo, Nora

From: Hales, Mayor
Sent: Tuesday, December 29, 2015 3:11 PM
To: Julia Hutchinson
Cc: BPS Comprehensive Plan Testimony
Subject: RE: Please Prevent Industrial Development in Wildlife Habitat

Follow Up Flag: Follow up
Flag Status: Completed

Dear Julia,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard you concerns and appreciates your feedback. Your email has been forwarded to the comp plan email inbox. They will review your testimony and reply to you.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: Julia Hutchinson [mailto:juliahut6@gmail.com]
Sent: Tuesday, December 15, 2015 3:19 PM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: Please Prevent Industrial Development in Wildlife Habitat

Dear Mayor Hales,

I'm writing to show my support for the approach taken on industrial lands in the recommended draft of the Comprehensive Plan. I feel strongly that West Hayden Island should not be included in the industrial lands inventory.

I moved to Portland last year for school. Though I am now across the country living in New York State, I still care about the PNW's environmental health. I heard about this current issue through the Portland Audubon Society's newsletter.

I hope that you and the City Council continue to make decisions based on protecting wildlife and the environment.

Thanks for your time,

Julia Hutchinson



900 S.W. Fifth Avenue, Suite 2600
Portland, Oregon 97204
main 503.224.3380
fax 503.220.2450
www.stoel.com

December 21, 2015

STEVEN W. ABEL,
Direct (503) 294-9599
steve.abel@stoel.com

BY EMAIL (CPUTESTIMONY@PORTLANDOREGON.GOV) AND U.S. MAIL

Portland City Council
c/o Council Clerk
1221 SW Fourth Ave, Room 130
Portland, Oregon 97204

Re: Comprehensive Plan Testimony - College Coalition

Dear Commissioners:

We appreciate the opportunity to comment on the Recommended Comprehensive Plan Map ("Recommended Map"). This office represents Lewis & Clark College, Reed College, Concordia University, and the University of Western States. This letter is written for those institutions as well as other members of a coalition.

Throughout the Comprehensive Plan Update process, the City of Portland ("City") has recognized the economic importance of campus institutions to the future of the City and the region. The City has also recognized the fact that lands available for institutional growth are currently deficient.¹ Indeed, due to the importance of campus institutions to the City's economic health and the desire to provide for growth of those campuses as major employers, the Bureau of Planning and Sustainability is currently revising those portions of the Portland Zoning Code applicable to campus institutions as part of the Campus Institutional Zoning Project. The institutions listed above have spent countless hours working with the City to develop zoning code standards that will allow institutions more flexibility to develop their campuses.

Unfortunately, the Recommended Map falls short of addressing the City's employment needs and the overarching goals of the Campus Institutional Zoning Project in that it does not yet provide adequate expansion opportunities for campus institutions to meet the demonstrated need

¹ To meet institutional employment demand, the City forecasts the need for an additional 380 acres of campus institutional land by 2035. Portland Economic Opportunities Analysis (2012). The City estimates that "[n]ore than one third of the forecast [sic] job growth in Portland over the next 20 years is expected to be in the health care and education sectors, which is particularly concentrated in 19 large college and hospital campuses dispersed throughout the city." Campus Institutional Zoning Project - Proposed Draft at 5.



for additional institutional employment land. As we have discussed with planning staff, the Institutional Campus designation proposed for the above-mentioned campuses would effectively lock or restrict the institution to the campus boundary approved in the existing conditional use master plans ("CUMP") or impact mitigation plans ("IMP"). This is the case despite the fact that these institutions own a number of properties outside and adjacent to the CUMP/IMP boundaries that are reasonable and obvious expansion lands for the institutional campus. Thus, if the Council adopts the Recommended Map, any future expansion of a campus boundary would require a comprehensive plan map amendment and corresponding zoning change, processes that are not well-suited to evaluating deliberate and orderly campus institutional expansion, and certainly do not encourage the necessary expansion of institutions to meet the identified need for institutional employment land. The practical effect of the proposed Institutional Campus designations in the Recommended Draft would be to hinder the growth of institutions that are contributing significantly to the employment base and economic health of the City.

To meet the objective for institutions to expand to meet the demonstrated need for additional institutional employment land, we recommend that all land owned by an institution adjacent to the current CUMP/IMP boundary also be given an Institutional Campus designation. This would help provide for the orderly expansion of the institution over the next several decades, allowing these important institutions to continue to grow as a service provider, center of innovation, and major employer. The properties the institutions recommend that the City include within the Institutional Campus designation are all properties that are owned by the institution including those presently outside any CUMP or IMP boundary.

With these additional lands included we support the changes to the Comprehensive Plan Map, but with one important qualification.

The process, which calls for approving the map designations before the zoning provisions applicable to the CI zone have been approved, presents us with a possible new map designation but without the zoning regulations necessary to understand what the designation means. It is somewhat like buying a house without looking at the inside. We ask that the City Council consider this timing issue as it moves forward with comprehensive planning. While current drafts of the CI zone regulations are promising, we believe a longer, optional phase in period would provide certainty for institutions operating under recently approved CUMP's.

Thank you for this opportunity to comment on the considerable work that has been done on the Comprehensive Plan Update to date, and thank you in advance for your careful consideration of the proposed revisions to the Proposed Draft.



Portland Planning and Sustainability, Campus Institutional Zoning Testimony
December 21, 2015
Page 3

Very truly yours,

A handwritten signature in black ink, appearing to read 'S. Abel', written over the printed name.

Steven W. Abel

Arevalo, Nora

From: Washington, Mustafa
Sent: Friday, December 18, 2015 2:51 PM
To: William Risser
Cc: BPS Comprehensive Plan Testimony
Subject: RE: Planning and Sustainability Commission's draft Comprehensive Plan

Follow Up Flag: Follow up
Flag Status: Completed

Dear William and Jan,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard you concerns and appreciates your feedback. Your email has been forwarded to the comprehensive plan testimony email inbox. They will review your testimony.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: William Risser [mailto:wrisser@gmail.com]
Sent: Thursday, December 10, 2015 10:19 AM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: Planning and Sustainability Commission's draft Comprehensive Plan

My wife Jan and I support the Planning and Sustainability Commission's draft Comprehensive Plan that was recently forwarded to you. It takes the right approach to industrial development. Will Risser, Portland

Arevalo, Nora

From: Washington, Mustafa
Sent: Friday, December 18, 2015 11:35 AM
To: Laura Carlson
Cc: BPS Comprehensive Plan Testimony
Subject: RE: Comprehensive Plan

Follow Up Flag: Follow up
Flag Status: Completed

Dear Laura,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard your concerns and appreciates your feedback. Your email has been forwarded to the comprehensive plan testimony email inbox. They will review your testimony.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: Laura Carlson [mailto:lauraanncarlson@comcast.net]
Sent: Wednesday, December 09, 2015 10:05 PM
To: Commissioner Fish <nick@portlandoregon.gov>
Cc: Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov.onmicrosoft.com>; Commissioner Fritz <amanda@portlandoregon.gov>; Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: Comprehensive Plan

I fully support the approach to industrial lands outlined in the current draft of the Comprehensive Plan which focuses on cleaning up more than 900 acres of contaminated sites, intensifying use of the existing industrial land base, and limiting conversions of industrial land to other uses, rather than converting irreplaceable natural areas to industrial use. Do not let short-sighted interests undermine the source of our wealth and existence.

Thank you.

Laura Carlson



Southeast Uplift
3534 SE Main St
Portland, OR 97214

p: 503 232-0010
f: 503 232-5265

www.southeastuplift.org

MEMORANDUM

Date: December 15, 2015

To: Mayor Hales
Commissioner Fritz
Commissioner Fish
Commissioner Novick
Commissioner Saltzman

From: Neighborhood Coalition Directors and Chairs Group.

Subject: Public Involvement and Comprehensive Planning Process

On November 15, 2015 the Directors and Chairs group held a three hour meeting to review the progress of the Comprehensive Plan. The meeting was noticed and well attended, but it should be made clear that the attached summary represents the observations of the Directors and Chairs of the city's neighborhood coalitions.

Given the rapid timeline before us, we have not had time to get approval of this statement from all our 95 Portland neighborhood associations, so we present it to you, as we have heard it, from all quarters of yours, ours, and everyone's Portland.

Please read the attached summary of our findings carefully since we hold, collectively, many concerns about the level of public involvement in the draft plan before you for approval.

Yours,

A handwritten signature in black ink, appearing to be 'R. McCullough', written in a cursive style.

Robert McCullough
President
Southeast Uplift

Portland Neighborhood Coalition Directors and Chairs Group

Portland Comp Plan Update

COMMENTS REGARDING COMMUNITY ENGAGEMENT

12/10/15

TO: Portland City Council
FROM: Neighborhood Coalition Leaders and Staff
RE: **COMMUNITY ENGAGEMENT IN THE COMP PLAN**

Neighborhood coalition leaders and staff, from all seven of Portland's neighborhood coalitions, want to share with you some important concerns about the community engagement in the update of Portland's Comprehensive Plan (Comp Plan).

Our group held a special three-hour meeting on November 12, 2015 to discuss community concerns about how BPS engaged the community in the update of the Comp Plan.

We recognize that lots of process took place, but we also are hearing strong concerns in the community about the quality of these processes, who was heard, and what impact community member input has had on the development of the recommended draft.

A key message is that both planning staff and community members need more time, and that the process needs to have enough resources and realistic timelines to ensure that the community effectively is involved in shaping the final products.

As leaders and staff for Portland's seven neighborhood coalitions, we want to share with you below what we are hearing and what we believe to be accurate.

SUMMARY OF KEY THEMES

Process did not follow Proposed "Chapter 2—Community Engagement" goals and policies

- We recognize that the recommended "Chapter 2: Community Engagement" language includes goals and policies that set strong expectations for good community engagement. We find it ironic and disturbing that the process used to engage the community in the Comp Plan Update did not follow these recommended goals and policies.

Community input appears to have had little effect

- We found many instances in which community members and neighborhood and community organizations provided extensive and detailed input but did not see that their input had any effect on the final product.

- Neighborhood and community groups and community members often did not receive a formal acknowledgement that their input was received, and often received no feedback on what was done with their input.
- In some cases, more savvy neighborhood and community activists who really understood the system and had good inside relationships were able to move some of their priorities forward. However, community members, in general, appear to have had little effect on the outcomes.

Decision making processes were not transparent

- Rather than a transparent, “additive,” process by which community members could see how different products and documents evolved, community input seemed to go into a BPS “black box” in which decisions were made without any explanation of how community input was or was not used and why. Community members complain that they are not able to “reverse engineer” BPS decisions to understand how these decisions were made.
- Community members want to know: What was the decision making logic? Were decisions just made by senior planners? What criteria did they use and what level of understanding of the prior community input and existing plans did they bring to their decisions?
- Recommendations in this process often appear to have gone forward without support of the groups that had been involved in helping develop the recommendations.

Lack of Community Access to Planning Commission

- Many community members feel that the Planning and Sustainability Commission (PSC) was not accessible to the community during the process. Community input to the PSC was filtered through the staff. Community members do not feel confident that PSC members adequately were aware of and understood community concerns and recommendations.

Disconnect with prior, existing plans and earlier products

- The Comp Plan Recommended Draft proposals and recommendations do not appear to reflect earlier aspirational goal and policy language—e.g. visionPDX, Portland Plan, earlier Comp Plan aspirations, goals for specific zoning, Zoning Code density standards, existing plan districts, etc. For instance, the Comp Plan map and zoning updates and changes being proposed do not seem to correlate with the aspirational language in the Comp Plan goals and policies.
- The Comp Plan Recommended Draft does not appear to incorporate and reflect other existing plans that often were developed with significant community input: e.g. District Plans, Parks Vision 2020, Climate Action Plan, Age-Friendly City Plan, etc.

Community engagement processes were not designed to be appropriate to different audiences

- Community engagement should focus on helping community members understand how a project or proposed policies will affect them and their community and how they can have an effect on the issues that are most relevant to them.
- Many community members and organizations did not have the capacity to get themselves up to the level at which planning staff were working.
- Much of the community outreach and engagement was done in language and formats that many community people could not understand. Outreach and engagement also was not designed to be accessible to many different groups of people in our community and often was not tailored adequately to the needs and context and communication styles of different cultural communities.
- Outreach also was not tailored adequately to different areas of the city. Too many presentations had a general city-wide focus and were not relevant or useful to community members—community members could not see how the issues and processes would affect them and what they could do to affect outcomes that mattered to them.
- Outreach also needed to be staged and tailored to audiences with different levels of interest and expertise. Too much of the information came all at once. Processes needed to make sure that the right people were in the room for the content being presented—e.g. “101” sessions for people who are very new to planning, and more advanced sessions for more experienced people.

Multiple Projects were underway in parallel without being clearly integrated

- Too many different planning projects were underway at the same time. It was not clear to most community members how they all fit together. Even the most savvy and experienced neighborhood and community activists had trouble following and understanding what was happening.
- BPS staff also often were overwhelmed and said they did not understand how all the pieces fit together. This made it difficult for them to help the community engage effectively.
- The Comp Plan is about much more than just land use, including transportation, bikes, parks, etc. This process affects so many different areas important to the community that it was easy for community members to lose track. Many felt that the whole picture was not being looked at.

Projects were not pursued in a logical sequence with adequate time

- Projects at different levels of the planning process were happening all at the same time, rather than a logical progression from the most broad to the most specific. Implementation projects were started before goals and policies were finished, and often shared the same deadlines.

- The process also was marked by a feeling that BPS staff were rushing to get everything done to meet what appeared to be artificial deadlines. This appeared to sacrifice the goals of producing a quality product and ensuring that the community understood and was able to provide meaningful input and have an effect on the outcomes.
- In some cases, staff reports were released to the community with only a week for the community to review and respond. This was completely inadequate given the complexity and importance of many of these products.
- Many community members feel overwhelmed and exhausted trying to follow, understand, and participate in all the different processes that were happening at the same time.
- Both planning staff and community members need more time.

Inadequate Resources

- BPS staff were overwhelmed by the scope and complexity of the processes and products they needed to deliver. While some planning staff tried hard to engage the community, BPS did not have enough people and resources to adequately involve the community in all the different projects.
- BPS staff did not have the resources to acknowledge, consider, and respond adequately and effectively to all the community input. This resulted in many community members and organizations feeling that their input was not heard or considered.

“One-size fits all policies” do not work for many parts of Portland

- The Mixed Use Zoning project proposes a one-size fits all approach at the general level that amplifies the drive toward greater density and other effects that often contradict the goals of existing plan districts and disregard existing plans and public input. The more fine grain levels and impacts of these proposed policies are not clear.
- The “five Portlands” approach does not describe the Portland community members see. We need zoning and planning that reflects the neighborhoods in question.
- No mechanisms exist for neighborhood associations to have a say in design and development in their neighborhoods.
- Neighborhood livability is being sacrificed for regulatory simplicity.

Lack of adequate analysis and modeling—identification of unintended consequences

- BPS generally has not analyzed adequately the different proposed policies to identify their likely, real-world outcomes in the community.
- Analysis has been limited primarily to static studies. Finer grained studies of the likely impacts on local areas have not been done. Analysis tools have not been responsive to the questions that the community is asking.
- BPS also does not track the actual impact of adopted policies on different neighborhoods in Portland.

- Community members already are seeing unintended consequences of this process. It's important to daylight these consequences earlier rather than later. Some additional mechanism is needed to identify and respond to these unintended consequences as the many elements of the Comp Plan are implemented.

Arevalo, Nora

From: Washington, Mustafa
Sent: Friday, December 18, 2015 10:56 AM
To: Kimber Nelson
Cc: BPS Comprehensive Plan Testimony
Subject: RE: Comprehensive Plan on industrial lands

Follow Up Flag: Follow up
Flag Status: Completed

Dear Kimber,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard your concerns and appreciates your feedback. Your email has been forwarded to the comprehensive plan testimony email box. They will review your testimony.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: Kimber Nelson [mailto:kimber_nelson@hotmail.com]
Sent: Friday, December 11, 2015 7:35 AM
To: Commissioner Fish <nick@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: Comprehensive Plan on industrial lands

Dear City Council,

I support the approach taken on industrial lands in the recommended draft of the Comprehensive Plan.

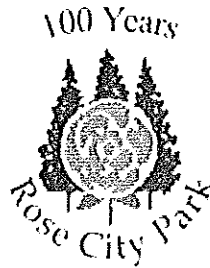
Portland has over 900 acres of contaminated sites. The Draft Comprehensive Plan takes the right approach in focusing on cleaning up these contaminated sites and restoring them to productive use rather than converting natural areas to meet industrial land demand. It also takes the right approach in focusing on intensification of use of the existing industrial land base rather than converting natural areas to meet industrial land demand. I also appreciate that it limits conversion of industrial lands for non-industrial uses rather than destroying the last remaining natural areas along our rivers. Industrial interests should not be allowed to cash out their industrial land holdings and then turn around and demand cheap new industrial acres in critical natural areas.

West Hayden Island should not be included in the industrial lands inventory. It should be a natural area.

Environmental regulations on industrial lands should not be restricted or rolled back. Industrial lands along our rivers are also some of our most important and degraded natural resource lands and industrial landowners should not be exempted from protecting our rivers.

Thank you for your continued attention to these important issues.

Kimber Nelson
SE Portland



Dec. 10, 2015 (Transmitted this day via e-mail to the following)

City of Portland
City Council <cctestimony@portlandoregon.gov>
1221 SW 4th
Portland, OR 97204

CC: Susan Anderson, BPS Director, Susan.Anderson@PortlandOregon.gov
Leah Treat, PBOT Director, Leah.Treat@portlandoregon.gov
Joe Zehnder, Long Range Planning Manager, Joe.Zehnder@portlandoregon.gov
Eric Engstrom, Senior Planner, Eric.Engstrom@portlandoregon.gov
Nan Stark, BPS NE District Liaison, nan.stark@portlandoregon.gov
Alison Stoll, Executive Director Central NE Neighbors, alisons@cnnecoalition.org

Subject: RCPNA Proposed Amendments to the Recommended Comprehensive Plan Update-Economic Development and the Comprehensive Plan Map

Honorable Mayor Hales and City Commissioners:

Thank you for the opportunity to testify on the Recommended Comprehensive Plan Update document. On Tuesday December 1, 2015 the Rose City Park Neighborhood Association Board accepted their Land Use and Transportation Committee's recommendations for amendments to the Economic Development chapter and the Comprehensive Plan Map recommendations. These comments are in addition to our previous RCPNA testimony to you on November 17th, 2015 regarding Transportation and Parking in the Plan. This letter focuses adding automobiles back into the equation of for economic vitality for the city's small businesses that make up more than 75% of Portland's jobs. We also identify the city-assistance needed to provide off-street public parking for Commercial Corridors to retain economic vitality. We also ask for your help in reassessing the plan density designed for the 60th St. Station Area so that it will help protect lower income housing from I-84's poor air quality.

Recommended Comprehensive Plan Amendments are indicated as follows:

Additions = **Underline and bold**

Deletions = ~~Strikethrough~~

"Chapter 6 Economic Development

Neighborhood business districts

Neighborhood business districts are mixed-use corridors and centers outside of the Central

City. See Figure 6-3 – Neighborhood Business Districts. Home to retail and related businesses that typically serve customers on-site, these districts are commonly interspersed with multifamily housing. Many of these districts are experiencing significant growth and change, providing synergistic locations for concentrated housing and commercial growth in “complete neighborhoods” with convenient access to services.

Neighborhood business districts also provide major economic benefits by keeping local dollars circulating within Portland, providing goods and services to nearby residents, defining neighborhood character, supporting small business vitality, and accounting for more than 75% ~~about a quarter~~ of all jobs in the city. Neighborhood business districts are especially important to Portland because we are a city mainly made up of small business. New directions to support these multi-functional places include:

- A framework of new centers and civic corridors well-served by automobile, pedestrian, bicycle, and transit systems.”

RCPNA Commentary: Small businesses employ the vast majority of Portland’s workforce. It is important that the vitality of these businesses are supported through policies in this plan. The amendments made add the term ‘automobile’ as a directive to the policies since the majority of businesses will fail if their access to automobile traffic was severed.

“Policy 6.68 Involuntary commercial displacement. Evaluate plans and investments for their impact on existing businesses.

6.68.a. Limit involuntary commercial displacement in areas at risk of gentrification, and incorporate tools to reduce the cost burden of rapid neighborhood change on small business owners vulnerable to displacement.

6.68.b. Encourage the preservation and creation of affordable neighborhood commercial space to support a broad range of small business owners.”

<ADD New Policy>6.68.c. Help identify sites, implement, and promote off-street public parking to retain customers and minimize impact of decreased on-street customer parking created by multi-unit residential development.”

RCPNA Commentary: Many small businesses are located along commercial corridors, such as Sandy Blvd. and Fremont St. These narrow bands of Commercial/Mixed Use often rely on nearby on-street parking and small lots for off-street parking. The Centers and Corridors Parking study identifies parking permits by zone and leaves Residential uses the upper hand in blocking on-street parking for commercial businesses. Many of these businesses are dealing with the same escalating rental costs as experienced by apartment dwellers. The city’s assistance in helping address their parking needs through creating public parking is one of the few tools the city has to relieve commercial displacement.

“Policy 6.70 Community economic development. Encourage collaborative approaches to align land use and neighborhood economic development for residents and business owners to better connect and compete in the regional economy.”

“6.70.c. Encourage cooperative efforts by area businesses, business associations, and neighborhood associations to work together on commercial revitalization efforts, sustainability initiatives, and transportation demand management.”

<ADD New Policy> 6.70.d. Implement funding strategies and investment programs that develop and maintain shared and public off-street parking to help maintain customer access and promote area businesses.

RCPNA Commentary: Currently, the areas outside of the Central City do not have access to grants or services from city agencies, such as PDC, that address the needed strategy for public parking in the commercial centers and corridors. The addition of this policy will help put this needed parking program in motion and allow local businesses to compete in the regional economy.

“Policy 6.71 Centers. Encourage concentrations of commercial services and employment opportunities in centers.”

“6.71.e. Encourage employment opportunities as a key function of centers, including connections between centers, institutions, and other major employers to reinforce their roles as vibrant centers of activity.”

<ADD New Policy> 6.71.f. Implement funding strategies and investment programs that develop and maintain shared and public off-street parking to help support customer access and promote businesses and employment in the centers.

RCPNA Commentary: The Plan identifies the Centers as receiving a large percentage of the projected growth over the next 20 years. This growth is to occur primarily in residential uses as well as in commercial, services, and light manufacturing uses and employment. The 1993 Livable Cities Study as well as the Sandy and Hollywood Plan call out the need for public and shared parking for the Hollywood Town Center. Yet, no city assistance has yet been provided, as called for in the 1993 study, and the result has been a growing lack of access to off-street parking and no coordination on implementing a public off-street parking for the Hollywood Town Center. For example, the new 73 unit apartment complex on NE Tillamook St, the Ann de Lee, has 30 off-street parking spaces that stand empty during the day as they do not share parking access with other uses.

Proposed Amendments to the Recommended Comprehensive Plan Map:

1. Deny the up-zoning of the 2 properties that contain the New Deal, located on the SW corner of NE Halsey and NE 53rd Ave. The Recommended Plan Map has this site identified as Mixed Use Commercial, an upzone from R-5. There is serious concern regarding a Mixed Use Commercial zone on this property, including:

RCPNA Commentary: The neighborhood would lose control of what could be built on the site if it were rezoned to Mixed Use Commercial. It could become an apartment building with no parking or high trafficked commercial use. We appreciate the possible Dispersed Commercial (CMI) zoning designation. But, the list of allowed uses is too broad for a very isolated pre-existing non-conforming commercial use. The concern also is that if this property were rezoned Commercial then this could start the neighborhood on the slippery slope of making all of the Halsey Corridor commercial, as is the case for our neighborhood on NE Fremont.

2. RCPNA respectfully requests a new land use review to be completed with the property owners in the 60th Station Area District prior to any more properties being rezoned to Comprehensive Plan Density. The issues that we find need to be addressed include:
 - a. Air quality and housing equity. The 1980’s design of increased density of multi-unit

residential focused on the 60th Ave. Station Area failed to consider the poor air quality being generated by vehicles on I-84 and the rail road at that same site. The possibility of re-aligning the higher density focused on NE 60th Ave. is one consideration that could help invigorate the commercial uses at the NE Halsey intersection while providing the majority of the high density and physical distance buffer to the poor air quality along I-84.

- b. Parity. Residential housing density was added to this station area back in 1980 but has not been added to the station areas at NE 82nd, and the newer station areas on the Max line to the City of Milwaukee. Concern is that this area was selected solely based on the fact that it consists primarily of low income houses, which would be largely demolished and replaced with multi-family apartments. The high density zoning was applied to this area prior to Measure 56 notification requirements. It is likely that many of these property owners do not realize their property holds the fate of being demolished.
- c. Transportation options. This area is primarily serviced by NE 60th Ave. that has an undersized right-of-way of only 50 ft. in width and contains sidewalks that are only 2-feet wide. Yet, there is a need to provide adequate pedestrian, bicycle, automobile, and freight travel access to and through 60th Ave. It is also the proposed crossing point for the Sullivan's Gulch Trail that currently is aligned to intersect at Hassalo, the industrial truck access point for the industrial uses located to the south of Normandale Park. The intersection of NE 60th and Halsey is constrained and offers no signalized turning movement for westward vehicles turning south.

Thank you again for the opportunity to comment on this important policy document for our community. We look forward to continuing to work together in building a livable and vibrant community as we grow into the year 2035.

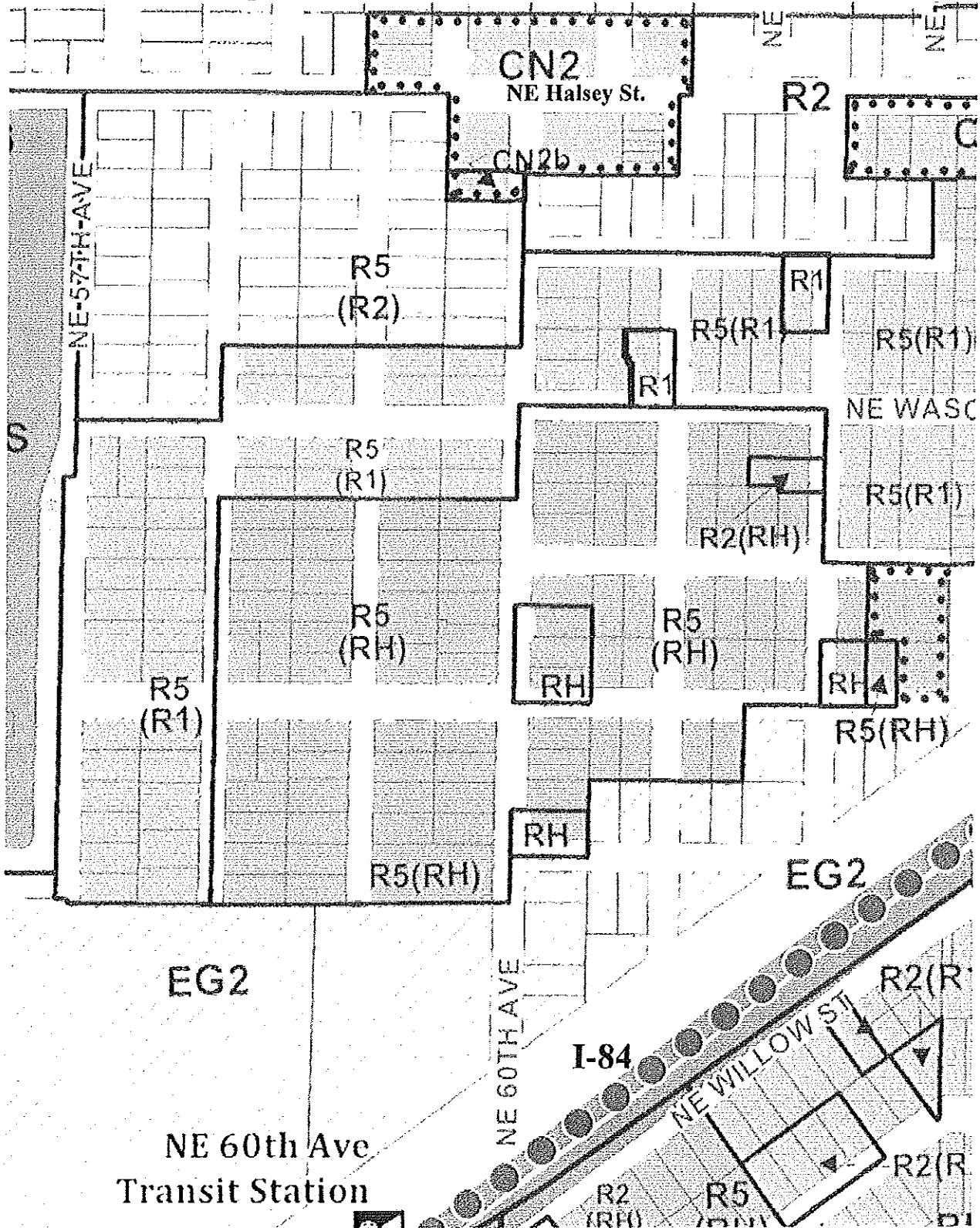
Respectfully,



Tamara DeRidder, AICP
Chair, Rose City Park Neighborhood Association
Representative, Centers and Corridors Parking Advisory Committee
1707 NE 52nd Ave.
Portland, OR 97213
503-706-5804

Attachment: Exhibit A – 60th Ave. Station Area, north of I-84

Recommended Comprehensive Plan Map – 60th St. Transit Station Area Exhibit A



Submitted
12-10-15

187831

✓
CPU

Helzer to City Council: Remove WHI from Industrial Lands Inventory

After nearly two years of studying in great detail the Port's proposed industrial development of WHI, the PSC got it right in August, 2013 (yes, that long ago!). It attached a number of very limited but protective mitigation requirements to the Port's proposal, and sent it on City Council. Six months later (January, 2014), the Port withdrew its WHI marine industrial complex proposal from further consideration, claiming the mitigation requirements made it too expensive to build there. But, the Port, the Business Alliance, the Working Waterfront Coalition, and others continue their plan that is factually unsupported and economically unsustainable to paving over West Hayden Island to meet imaginary industrial needs. (The Port can't even manage profitably the facilities it has now! What will they do with an unneeded and unsustainable new one?)

For nearly 20 years, Bob Sallinger, on behalf of Audubon and all other regional environmental groups, has opposed the Port's development of WHI, mainly on environmental grounds. And, as a career-long business management consultant, I've been doing the same for reasons of economic sustainability on behalf of Hayden Island Neighborhood Network (HINooN) for almost 15 years. We've made it almost a "career" studying the business economics, and environmental and social impacts of the Port's plans on WHI for all of these years; and still none of it makes any more sense today than it did in 1998. Now, the City's own experts finally conclude WHI is not even needed as part of the industrial lands

inventory; yet, the Port and others continue to lobby you behind closed doors to keep it on the inventory list.

What's more, from 2006 to 2009, the City spent hundreds of thousands of dollars developing a Comprehensive Neighborhood Plan for Hayden Island and a Community Preference Overlay to guide future development, all predicated on the design and completion of the Columbia River Crossing project (what a multi-million dollar boondoggle that was for transportation planners and engineers). But, what's left on the island is the same 1960's community grid with double the traffic, crumbling and flooded streets, and approved high rises that violate that Comprehensive Plan, and that can't be adequately supported by our totally outdated infrastructure. Yet, none of it appears in this Comp Plan.

Now it the time to: 1) permanently take WHI out of this Comprehensive Plan's Industrial Lands Inventory, 2) memorialize the mitigations for future protection of WHI and the rest of Hayden Island the PSC so wisely affirmed, and 3) focus instead on the serious needs of the poorly planned and built but now crumbling, unsafe, and "not ready for the future" other half of Hayden Island.

Respectfully submitted,

Timme A. Helzer, Ph.D.
Consultant and Professor
Management and Research Methods
220 North Hayden Bay Drive
Portland, Oregon 97217
helzert@comcast.net
December 10. 2015

Arevalo, Nora

From: Hales, Mayor
Sent: Wednesday, December 09, 2015 3:08 PM
To: Jane Pullman
Cc: BPS Comprehensive Plan Testimony
Subject: RE: Support Our Natural Areas - clean up existing industrial areas

Follow Up Flag: Follow up
Flag Status: Completed

Dear Jane,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard your concerns and appreciates your feedback. Your email has been forwarded to the comprehensive plan testimony email inbox. They will review your testimony.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: Jane Pullman [mailto:jane.scout@gmail.com]
Sent: Tuesday, December 08, 2015 11:57 AM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: Support Our Natural Areas - clean up existing industrial areas

Dear Mayor Hales,

I understand that the Port of Portland and the Portland Business Alliance (among others?) are trying to limit environmental regulations at West Hayden Island and other industrial land in Portland. I thought we had put the prospect of development of West Hayden Island behind us. I am asking that you PLEASE support the Comprehensive Plan and leave West Hayden Island out of the City's inventory of industrial land. Don't let industrial interests convert the already limited areas for nature to industrial use! The Comprehensive Plan is the voice of the people and has been years in the making. PLEASE. We already have at least 900 acres of contaminated industrial land that should be cleaned up. Let's clean it up! We need to consider the long term costs to our natural areas and the wildlife that live there. Our natural areas are critical and essential to the short AND long-term health of what make Portland the city we love.

Thank you for your attention,
Jane Pullman

3423 SE Alder St
97214

Arevalo, Nora

From: Washington, Mustafa
Sent: Wednesday, December 09, 2015 2:55 PM
To: powolfe@earthlink.net
Cc: BPS Comprehensive Plan Testimony
Subject: RE: Industiral Lands Comprehensive Draft Plan

Follow Up Flag: Follow up
Flag Status: Completed

Dear Phyllis,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard you concerns and appreciates your feedback. Your email has been forwarded to the comprehensive plan testimony email inbox. They will review your testimony.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: powolfe@earthlink.net [mailto:powolfe@earthlink.net]
Sent: Tuesday, December 08, 2015 12:30 PM
To: Commissioner Fish <nick@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregongov.onmicrosoft.com>; Commissioner Fritz <amanda@portlandoregon.gov>; Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: Industiral Lands Comprehensive Draft Plan

Dear Portland Commissioners and Mayor Hales,

As a member of Willamette River Keeper, Tualatin Riverkeeper, Portland Audubon, and Trails Club of Oregon, I am one of the many citizens of Portland who support the approach to industrial lands outlined in the current draft of the Comprehensive Plan. We need to continue to clean up industrial waste sights and prevent any more conversions of irreplaceable natural areas to industrial uses. Everyone I know in the entire Metro area has supported, and will continue to support with our votes your decisions which protect our precious natural areas. We do pay attention and are thankful to those of you who vote for the future health of our land and our citizens. Please stay with us in your meeting on December 10.

Thank you,

Phyllis Wolfe

4329 SE Steele St., Portland 97206

Arevalo, Nora

From: Hall, Stacie <stacie.hall@intel.com>
Sent: Wednesday, December 09, 2015 10:04 AM
To: BPS Comprehensive Plan Testimony
Subject: Support for the Draft Comp Plan to clean up contaminated sites and use them for natural areas for wildlife

Follow Up Flag: Follow up
Flag Status: Completed

To Whom It May Concern:

I highly support the approach taken on industrial lands in the recommended draft of the Comprehensive Plan that focuses on cleaning up the contaminated sites to use as natural areas for wildlife.

- Portland has over 900 acres of contaminated sites. The Draft Comp Plan takes the right approach in focusing on cleaning up contaminated sites and restoring them to productive use rather than converting natural areas to meet industrial land demand;
- The Draft Comp Plan takes the right approach in focusing on intensification of use of the existing industrial land base rather than converting natural areas to meet industrial land demand;
- The Draft Comp Plan takes the right approach in limiting conversion of industrial lands for non-industrial uses rather than destroying the last remaining natural areas along our rivers. Industrial interests should not be allowed to cash out their industrial land holdings and then turn around and demand cheap new industrial acres in critical natural areas.
- West Hayden Island should not be included in the industrial lands inventory;
- Environmental regulations on industrial lands should not be restricted or rolled back. Industrial lands along our rivers are also some of our most important and degraded natural resource lands and industrial landowners should not be exempted from protecting our rivers.

We MUST protect precious natural areas like West Hayden Island from industrial development. Thanks so much for your efforts and striving to balance industry with natural areas.

Sincerely,
Stacie Hall
stacie.hall@intel.com
927 Clearbrook Dr.
Oregon City, OR 97045

Phone: 503-557-1697

Arevalo, Nora

From: Hales, Mayor
Sent: Wednesday, December 09, 2015 8:54 AM
To: Julia Harris
Cc: BPS Comprehensive Plan Testimony
Subject: RE: Comprehensive Plan

Follow Up Flag: Follow up
Flag Status: Completed

Dear Julia,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard your concerns and appreciates your feedback. Your email has been forwarded to the comprehensive plan testimony email inbox. They will review your testimony.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

-----Original Message-----

From: Julia Harris [mailto:jhgpx@comcast.net]
Sent: Tuesday, December 08, 2015 7:54 PM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: Comprehensive Plan

Dear Mayor Hales,

Please support the approach to industrial lands outlined in the current draft of the Comprehensive Plan which focuses on cleaning up more than 900 acres of contaminated sites, intensifying use of the existing industrial land base, and limiting conversions of industrial land to other uses, rather than converting irreplaceable natural areas to industrial use.

Sincerely,

Julia Harris
4045 SW Council Crest Drive
Portland, OR 97239

Arevalo, Nora

From: Mary Hayden <hayden.mary.k@gmail.com>
Sent: Wednesday, December 09, 2015 12:40 AM
To: BPS Comprehensive Plan Testimony
Subject: Re: I Support the Draft Comprehensive Plan

Follow Up Flag: Follow up
Flag Status: Completed

Adding address per your instructions

From: **Mary Hayden** <hayden.mary.k@gmail.com>
18347 S. Redland Rd. Oregon City, OR 97045

- I support the Draft Comprehensive Plan from the Planning and Sustainability Commission.
- The Draft Comp Plan takes the right approach in limiting conversion of industrial lands for non-industrial uses rather than destroying the last remaining natural areas along our rivers. Industrial interests should not be allowed to cash out their industrial land holdings and then turn around and demand cheap new industrial acres in critical natural areas.
- The Draft Comp Plan takes the right approach in focusing on intensification of use of the existing industrial land base rather than converting natural areas to meet industrial land demand.
- Portland has over 900 acres of contaminated sites. The Draft Comp Plan takes the right approach in focusing on cleaning up contaminated sites and restoring them to productive use rather than converting natural areas to meet industrial land demand.
- West Hayden Island should not be included in the industrial lands inventory.

Thanks for listening!

Mary Hayden

Arevalo, Nora

From: Dunphy, Jamie
Sent: Tuesday, December 08, 2015 3:09 PM
To: BPS Comprehensive Plan Testimony
Subject: FW: Audubon of Portland

From: Sheila Forrette [<mailto:sforrette77@gmail.com>]
Sent: Tuesday, December 08, 2015 1:51 PM
To: Commissioner Novick <novick@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>;
Commissioner Saltzman <dan@portlandoregongov.onmicrosoft.com>; Commissioner Fritz
<amanda@portlandoregon.gov>; Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject:

Dear Mayor Hales and Commissioners Fritz, Fish, Novick, and Saltzman,

As an Audubon of Portland member I support the current draft of the Portland's Comprehensive Plan because it takes the right approach on cleaning up contaminated sites instead of converting these natural areas to meet industrial land demand. The beauty of this city is in its rivers, parks, forests, hiking trails, trees, etc. Any more expansion of Portland to industrial use would damage Portland's reputation as a vibrant and beautiful city. I would also like the Portland City Council to exclude West Hayden Island in the industrial lands inventory. Finally, environmental regulations on industrial lands should not be restricted or rolled back. Industrial lands along our rivers are also some of our most important and degraded natural resource lands and industrial landowners should not be exempted from protecting our rivers.

Thanks for your attention in this important matter,
Sheila Forrette
1610 NE 65th Ave
Portland 97213

Arevalo, Nora

From: Washington, Mustafa
Sent: Tuesday, December 08, 2015 11:54 AM
To: Diana Lynn Kekule
Cc: BPS Comprehensive Plan Testimony
Subject: RE: THANK YOU

Dear Diana,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard you concerns and appreciates your feedback. Your email has been forwarded to the comprehensive plan testimony email inbox. They will review your testimony.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: Diana Lynn Kekule [mailto:luvsea33@gmail.com]
Sent: Tuesday, December 08, 2015 11:04 AM
To: Commissioner Fish <nick@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregongov.onmicrosoft.com>; Commissioner Fritz <amanda@portlandoregon.gov>; Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: THANK YOU

We support the approach taken on industrial lands in the recommended draft of the Comprehensive Plan;

- Portland has over 900 acres of contaminated sites. The Draft Comp Plan takes the right approach in focusing on cleaning up contaminated sites and restoring them to productive use rather than converting natural areas to meet industrial land demand;
- The Draft Comp Plan takes the right approach in focusing on intensification of use of the existing industrial land base rather than converting natural areas to meet industrial land demand;
- The Draft Comp Plan takes the right approach in limiting conversion of industrial lands for non-industrial uses rather than destroying the last remaining natural areas along our rivers. Industrial interests should not be allowed to cash out their industrial land holdings and then turn around and demand cheap new industrial acres in critical natural areas.
- West Hayden Island should not be included in the industrial lands inventory;
- Environmental regulations on industrial lands should not be restricted or rolled back. Industrial lands along our rivers are also some of our most important and degraded natural resource lands and industrial landowners should not be exempted from protecting our rivers.

Many conservation groups have tried for years to protect precious natural areas like West Hayden Island from industrial development. Please know that we support the approach taken to industrial lands in the Draft Comp Plan.

THANK YOU FOR HELPING TO RAISE THE CONSCIOUSNESS OF HUMANITY!
Kekule Bastron Family and Friends



From Heaven Sweet Nature Springs!



Arevalo, Nora

From: emile combe <emile@wa-net.com>
Sent: Thursday, December 03, 2015 4:36 PM
To: BPS Comprehensive Plan Testimony
Subject: BPS Comprehensive Plan Testimony email (cputestimony@portlandoregon.gov)

Follow Up Flag: Follow up
Flag Status: Completed

Dear Emile,

Thank you for your email – I am responding on behalf of Commissioner Nick Fish.

I will make sure that our policy lead has a copy on this matter. However, in order to ensure that your comments are part of the official record you may want to send them to the BPS Comprehensive Plan Testimony email (cputestimony@portlandoregon.gov) as well.

Thanks again.

Sincerely,

Betsy Ruth Quitugua

Interim Constituent Relations Coordinator
Office of Commissioner Nick Fish
503-823-3603

From: emile combe [<mailto:emile@wa-net.com>]
Sent: Thursday, December 03, 2015 11:31 AM
To: Commissioner Fish <nick@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Cc: nhardigg@audubonportland.org; bsallinger@audubonportland.org
Subject: Industrial Element of Comprehensive Plan

Commissioner Nick Fish: 503-823-3589 | nick@portlandoregon.gov
Commissioner Steve Novick: 503-823-4682 | novick@portlandoregon.gov
Commissioner Dan Saltzman: 503-823-4151 | dan@portlandoregon.gov
Commissioner Amanda Fritz: (503) 823-3008 | amanda@portlandoregon.gov
Mayor Hales: (503)-823-4120 | mayorcharliehales@portlandoregon.gov

Dear Portland Mayor and City Commissioners,

As a property owner in the Eliot neighborhood in Northeast Portland, I want to underscore my support for the Planning and Sustainability Commission's recommendations on industrial land use planning included in the current draft of the City of Portland's Comprehensive Plan. The approach to industrial lands outlined in the current draft of the Comprehensive Plan, which focuses on cleaning up contaminated sites and restoring them to productive use, intensifying use of the existing industrial land base, and limiting conversions of industrial land to other uses, rather than converting irreplaceable natural areas to industrial use, should be adopted by the Portland City Council. Specifically, I support the following measures:

1. Focusing on cleaning up contaminated sites and restoring them to productive use rather than converting natural areas to meet industrial land demand. Portland has over 900 acres of contaminated sites which need to be cleaned up and brought back to productive industrial use rather than creating new industrial property in other use areas, including but not limited to natural areas.
2. Focusing on intensification of the use of the existing industrial land base in Portland rather than converting natural areas to meet industrial land demand.
3. Focusing on limiting the conversion of industrial lands for non-industrial uses rather than destroying the last remaining natural areas along our rivers. Industrial interests should not be allowed to cash out their industrial land holdings and then turn around and demand cheap new industrial acres in critical natural areas.
4. Environmental regulations on industrial lands should not be restricted or rolled back—industrial lands along our rivers are also some of our most important and degraded natural resource lands and industrial landowners should not be exempted from protecting our rivers.
5. West Hayden Island should not be included in the industrial lands inventory. It should be preserved as natural habitat.

We have fought for years to protect precious natural areas like West Hayden Island from industrial development. Now is not the time to reverse that position. Portland is a unique and pristine jewel in the Pacific Northwest, and we should do everything we can to insure that our city be kept that way for generations to come.

Sincerely

Emile H. Combe
59 NE Monroe
Portland, OR 98684

Cc: Portland Audubon Society:
Nick Hardigg, Executive Director, nhardigg@audubonportland.org.
Bob Sallinger, Conservation Director. bsallinger@audubonportland.org



November 20, 2015

RE: Portland Comprehensive Plan Economic Opportunities Analysis

Dear Mayor Hales and Commissioners:

I am writing to express our concern with the application of the Economic Opportunities Analysis (EOA) to inform the update of the Portland Comprehensive Plan.

Oregon's 23 ports provide recreational, commercial, and economic services to residents and businesses in Oregon and beyond, serving as state, national, and international transportation gateways. They are a key component in sustaining Oregon's economy and quality of life, supporting thousands of family wage jobs. One out of six Oregon jobs is directly or indirectly tied to cargo, recreation, industrial, commercial or other activities at Oregon's ports.

In projecting future cargo growth, the Planning and Sustainability Commission recently recommended a "low growth" forecast. This forecast is wholly inconsistent with the trends we see in the movement of cargo and the growing importance of Oregon exports to our economy. If adopted as recommended, this decision puts Portland at risk of being ill prepared to respond to trade opportunities. Another issue not commonly understood is the role our ports - small and large - play in *intra-region* trade. We don't just export; our facilities remove thousands of trucks from the road by transporting freight from one part of Oregon to other ports in Oregon and points along the West Coast. Limiting capacity, which the "low growth" forecast will do, means a greater reliance on surface transportation.

Portland is uniquely positioned to take advantage of significant new opportunities being shaped by the altering dynamics of shipping routes and trade. Between the receding ice in the Arctic that is allowing passage with faster times and improvements to passage through the expanded Panama Canal, our ability to reach global markets quickly is no longer limited by our distance from the Atlantic Ocean. In addition, the historic Trans-Pacific Partnership Agreement negotiated by the Obama Administration substantially strengthens and improves trade rules with already strong Oregon export markets in Asia. There is nothing that suggests that opportunities for trade will be constrained in the coming years; Quite the opposite is true.

We urge the Portland City Council to update the EOA growth forecast to come into compliance with the clear economic opportunity through investment and exports.

Thank you for your consideration of our input.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark J. Landauer", is written over a long, horizontal, wavy line that serves as a decorative underline.

Mark J. Landauer
Executive Director
Oregon Public Ports Association

Arevalo, Nora

From: Washington, Mustafa
Sent: Tuesday, December 01, 2015 3:45 PM
To: RICHARD EMERY
Cc: BPS Comprehensive Plan Testimony
Subject: RE: Please Prevent Industrial Development in Wildlife Habitat

Follow Up Flag: Follow up
Flag Status: Completed

Dear Richard,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard your concerns and appreciates your feedback. Your email has been forwarded to the comprehensive plan testimony email inbox. They will review your testimony.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: RICHARD EMERY [mailto:rsemery1@me.com]
Sent: Tuesday, December 01, 2015 2:05 PM
To: Commissioner Fish <nick@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov.onmicrosoft.com>; Commissioner Fritz <amanda@portlandoregon.gov>; Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: Please Prevent Industrial Development in Wildlife Habitat

Honorable Portland City Council Members and Mayor Hales,

- I support the approach taken on industrial lands in the recommended draft of the Comprehensive Plan;
- Portland has over 900 acres of contaminated sites. The Draft Comp Plan takes the right approach in focusing on cleaning up contaminated sites and restoring them to productive use rather than converting natural areas to meet industrial land demand;
- The Draft Comp Plan takes the right approach in focusing on intensification of use of the existing industrial land base rather than converting natural areas to meet industrial land demand;
- The Draft Comp Plan takes the right approach in limiting conversion of industrial lands for non-industrial uses rather than destroying the last remaining natural areas along our rivers.

- Industrial interests should not be allowed to cash out their industrial land holdings and then turn around and demand cheap new industrial acres in critical natural areas.
- West Hayden Island should not be included in the industrial lands inventory;
- Environmental regulations on industrial lands should not be restricted or rolled back—industrial lands along our rivers are also some of our most important and degraded natural resource lands and industrial landowners should not be exempted from protecting our rivers.

Thank you,

Richard Emery

Portland, Oregon

Arevalo, Nora

From: Hanson, Laura
Sent: Tuesday, December 01, 2015 12:21 PM
To: BPS Comprehensive Plan Testimony
Subject: FW: comprehensive environmental plan

Follow Up Flag: Follow up
Flag Status: Completed

Laura Hanson
Scheduler & Constituent Relations Coordinator
Office of Commissioner Steve Novick
503-823-4682
portlandoregon.gov/novick

From: William Risser [mailto:wrisser@gmail.com]
Sent: Tuesday, December 01, 2015 11:39 AM
To: Commissioner Novick <novick@portlandoregon.gov>
Subject: comprehensive environmental plan

My wife Jan and I wanted you to know that we support the approach to industrial lands outlined in the current draft of the Comprehensive Plan that focuses on cleaning up more than 900 acres of contaminated sites, intensifying use of the existing industrial land base, and limiting conversions of industrial land to other uses, rather than converting irreplaceable natural areas to industrial use. thanks you for this plan and we hope that it will be implemented. William Risser, Portland

Arevalo, Nora

From: Washington, Mustafa
Sent: Tuesday, December 01, 2015 12:10 PM
To: Colleen Sullivan
Cc: BPS Comprehensive Plan Testimony
Subject: RE: support the approach to industrial lands currently in the Draft Comp Plan

Follow Up Flag: Follow up
Flag Status: Completed

Dear Colleen,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard your concerns and appreciates your feedback. Your email has been forwarded to the comprehensive plan testimony email inbox. They will review your testimony.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: Colleen Sullivan [mailto:sullcomm@earthlink.net]
Sent: Friday, November 27, 2015 8:14 AM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: support the approach to industrial lands currently in the Draft Comp Plan

Hi, Mayor Hales,

I support, and hope you will support, the approach taken on industrial lands in the recommended draft of the Comprehensive Plan, cleaning up contaminated sites and restoring them to productivity rather than converting natural areas to meet industrial land demand. West Hayden Island should not be included in the industrial lands inventory, and environmental regulations on industrial lands should not be restricted or rolled back—industrial lands along Portland's rivers are some of our most important and degraded natural resource lands, and industrial landowners should not be exempted from protecting our rivers.

Thanks for representing me in keeping Portland a healthy and desirable place to live,
Colleen Sullivan

Arevalo, Nora

From: Washington, Mustafa
Sent: Tuesday, November 24, 2015 2:52 PM
To: Ali Berman
Cc: BPS Comprehensive Plan Testimony
Subject: RE: Comprehensive Plan feedback on industrial lands

Follow Up Flag: Follow up
Flag Status: Completed

Dear Ali,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard your concerns and appreciates your feedback. Your email has been forwarded to the comprehensive plan testimony inbox. They will review your testimony.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely,

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: Ali Berman [mailto:emmash@gmail.com]
Sent: Tuesday, November 17, 2015 11:11 AM
To: Commissioner Fish <nick@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: Comprehensive Plan feedback on industrial lands

Dear Mayor Hales, Commissioner Amanda Fritz, Commissioner Fish, Commissioner Novick, and Commissioner Saltzman,

First, thank you so much for your vote on fossil fuels and on oil trains! I was thrilled to see Portland step up in the fight against fossil fuels.

Second, I wanted to reach out and tell you how happy I am about the Comprehensive Plans approach to industrial lands. By making industrial developers make better use of the land they have, clean up contaminated sites, and stop selling their industrial lands for other uses for profit, we can keep Portland green for people and for animals. It's critical that we protect the natural areas we have left. Let's make sure this approach to industrial lands stays secure through the hearing process.

Thank you so much!

Best,

Alyson Berman
1125 NW 9th Ave #509
Portland OR 97209

--

www.aliberman.com

Locally Grown and GROWING STRONG

November 19, 2015

Dear Mayor Hales and Commissioners:

I write to you as a proud family farmer. I also write representing the 7,000 farming and ranching families of the Oregon Farm Bureau. I have been given the great privilege of traveling around, not on the US, but also around the world. My work with the American Farm Bureau Federation and USDA Ag Trade Advisory Committees, Citizens Network for Foreign Affairs Self Help Africa have given me the ability to see first hand that the decisions public officials make have major implications worldwide. The decisions you make on SW 4th Ave are no different and have major implications on our great state.

The blueprint for the future growth and development of the City of Portland does not assign much of that growth to the Portland Harbor. The Draft Comprehensive Plan and the supporting Economic Opportunities Analysis shows little future growth in the harbor.

Oregon Farm Bureau represents growers who produce the more than 220 recognized commodities that are raised in Oregon. The success of the Port of Portland not only is critical to the agricultural, Oregon's second largest industry, but also to the state's overall economy. Oregon agriculture production is valued at \$5.4 billion (2014), making it the second-largest economic driver in the state. Agriculture's direct economic impact in Oregon adds up to 10% of the state's total sales and 7% of its value-added activity. About 12% (1 in 8) of all jobs in Oregon are directly or indirectly connected to farming and ranching.

Our commodities are desired all over the world. 80% of what is produced in Oregon leaves the state and half of that leaves the country. Our top 20 commodities include beef, grass seed, wheat, potatoes, hay, dairy, hazelnuts, pears, blueberries, onions, Christmas trees and apples, just to name a few. These products are enjoyed and cherished all over the world and rely on a viable and functioning port. It isn't only Oregon agriculture that depends on a working port. Product throughout the country makes its way through the Port of Portland making it an international transportation hub. Portland exports more wheat than any other port in the country, and it is the second largest grain exporting center in the world. Wheat, soybeans, barley and other grains arrive at the port both by rail and on barges moving along Columbia and Snake rivers continually.

I urge you to recognize the impact that this can have on one of the most trade dependent states in the nation. If you care about working families and understand the impact your decisions have for the entire health of our state you should ensure that there is adequate growth in the harbor.

I urge you to preserve the future of the Portland harbor for farms and Oregon.

Sincerely,

Barry Bushue,

A handwritten signature in black ink, appearing to read "Barry Bushue".

Bushue Family Farms, Owner
Oregon Farm Bureau, President
American Farm Bureau, Vice-President

Bossco Trading LLC

November 18, 2015

Dear Mayor Hales and Commissioners:

As a member of the agricultural community, I spend most of my time on farms than in our urban city of Portland. While our farmland and fields are miles from City Hall, the decisions you make on SW 4th Ave have major implications for the rest of our state.

It has come to my attention that the blueprint for the future growth and development of the City of Portland does not assign much of that growth to the Portland Harbor. In fact, the Draft Comprehensive Plan and the supporting Economic Opportunities Analysis shows little future growth in the harbor. For the future of my business, and the farming families of Oregon, this does not make sense.

We are a family farm growing grass seed, wheat and hazelnuts. In addition, we bale grass straw and export it overseas as cattle feed to Japan and Korea. We employ approximately 45 employees year round with an additional 35 for summer harvest. Our family's four connected agri-businesses are as local as they come, but also a global enterprise. That's because our business revolves around harvesting, processing, and transporting Oregon-grown grass straw for export to international markets. The past year has been our most challenging "off-season" in our 32 years of business – all stemming from the port crisis. The wait times at ports our trucks endured, the massive amount of confusing and incorrect shipping information coming from the shiplines and terminals, and most importantly the dissatisfaction from our customers stemming from challenges outside our control. It is still undecided how the impact will hurt the future of our industry.

Moving forward and looking into the future when Terminal 6 becomes the driving force in and support for Oregon containerized exports again, limitations on capacity will be exacerbated if the city reduces the amount of available land in the harbor for facilities. Forward thinking will help Oregon get on the path to where it needs to be considering the amount of exports we have and have the potential for.

I urge you to recognize the impact that this can have on one of the most trade dependent states in the nation. If you care about working families and understand the impact your decisions have for the entire health of our state you should ensure that there is adequate growth in the harbor.

Set the Portland harbor forecast back to the moderate growth as originally recommended by Bureau of planning and sustainability staff, and preserve the future for farms and Oregon.

Sincerely,

Shelly Boshart Davis
Vice President
Bossco Trading LLC

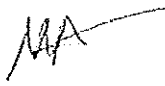


PORTLAND PARKS & RECREATION

Healthy Parks, Healthy Portland

Date: November 18, 2015

To: Mayor & Members of the City Council

From: Mike Abbaté, Director 

cc: Commissioner Amanda Fritz, Patti Howard, Tim Crail,
Brett Horner, Kia Selley, Jenn Cairo

RE: Comments on the Draft Recommended Comprehensive Plan

Dear Mayor and Commissioners:

Portland Parks & Recreation (PP&R) appreciates the opportunity to address the Council about this important visionary planning effort. We also wish to thank the staff at the Bureau of Planning & Sustainability (BPS) for working so closely with us over the last several years.

We are pleased to support adoption of this new plan because it:

1. *Recognizes* that parks are essential public infrastructure, on par with water service, fire and police protection. The plan incorporates many of our Parks goals, including having every resident within ½ mile walk of a park, protecting natural resources, and expanding and stewarding the urban forest.
2. *Ensures* future expansion and buildout of our regional trails system, including the City greenways and the Green Loop.
3. *Speaks* well to equity considerations, and supports meeting the City's equity objectives, particularly in underserved areas such as East Portland.

Administration
1120 S.W. 5th Ave., Suite 1302
Portland, OR 97204
Tel: (503) 823-7529 Fax: (503) 823-6007

www.PortlandParks.org
Amanda Fritz, Commissioner
Mike Abbaté, Director



4. *Addresses*, in the upcoming Central City documents, the City's important viewsheds, and will establish key views that today may not be identified or protected, such as the view of Portland and Mt. Hood from the Japanese Garden in Washington Park.

5. *Acknowledges* the importance of parks and particularly natural areas in addressing climate change and providing for ecosystem, habitat, and human health. Health and well-being is a central part of PP&R's mission.

Suggested Revision:

We do recommend that Policy 6.39e (on page GP6-14) be rewritten so it better conveys its intent. As currently worded, this policy seems to claim that park uses are responsible for diminishing the City's supply of industrial land, when in fact, since we've known of an undersupply of industrial land in 2010, over 45 acres have actually gone in the other direction, converting from open space to industrial land. These 45 acres are located at the upper portion of the former Colwood golf course site, a conversion which we supported in 2013.

PP&R would recommend the Policy 6.39e language change to say:

“Ensure that adequate land is provided and zoned to accommodate the City's desired level of future industrial job growth and to provide the industrial functions that are vital to the City's and region's economy.”

We would further recommend that the Comprehensive Plan seek out ways to provide incentives to attract high jobs-per-acre industries, and to restrict land uses that only provide low numbers of jobs per acre (for example, uses that provide less than the average 16 jobs per acre for industrial developments).

We thank you for your consideration, and also wish to thank the BPS staff for their assistance and responsiveness to our concerns.

**THE
GREENBRIER
COMPANIES**

One Centerpointe Drive Suite 200
Lake Oswego Oregon 97035

PORTLAND
OR 970
19 NOV '15
PW 6 L

request
11/19/2015
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Mayor Hales and Commissioners
Portland City Hall
1221 SW 4th Avenue
Portland, OR 97204

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The Greenbrier Companies, Inc.

One Centerpointe Drive Suite 200
Lake Oswego Oregon 97035
503 684 7000 Fax 503 684 7553

RECEIVED
11/19/2015 10:39

November 19, 2015

Mayor Hales and Commissioners
Portland City Hall
1221 SW 4th Avenue
Portland, OR 97204

Dear Mayor Hales and City Commissioners,

As you deliberate, review the facts and decide upon the policies within the Portland Comprehensive Plan and Economic Opportunities Analysis (EOA), I urge you to consider the health and welfare of waterfront businesses such as Gunderson and what businesses like Gunderson bring to the City of Portland.

Gunderson is a homegrown Oregon company located in the City of Portland that originated in 1919 when the Gunderson Brothers formed a steel fabrication company. In 1947, Gunderson began building barges and in 1958 added rail car manufacturing to our portfolio. In 1985, Gunderson was acquired by The Greenbrier Companies and the Gunderson name was restored to the facility on the Portland waterfront. Today, Greenbrier is publicly traded on the New York Stock Exchange. We employ over 1,400 people in Oregon and more than 10,000 worldwide. We are a leading supplier of transportation equipment and services on 3 continents including Europe and South America. Greenbrier's business and those like Greenbrier in the Portland Harbor generate more than 23,000 direct jobs; more than 52,000 if you consider our suppliers of raw material, services and equipment.

As you consider elements of the Portland Comprehensive Plan and EOA, I urge you to take a very close look at The Planning and Sustainability Commission's recommendation to change assumptions in the EOA from a medium forecast to a low forecast for harbor job growth. This is based on several false assumptions:

First, it assumes low growth of harbor-related tonnage across all cargo types. Since 2010, the Portland Harbor has seen \$200 million invested in infrastructure to increase cargo capacity and the Harbor and Columbia River continue to see volume growth—the annual average is about 2.9%.

Second, the plan lays out an unrealistically high amount of projected brownfield redevelopment with limited tools and no additional resources. Brownfields are expensive and complicated to redevelop and are made increasingly problematic by the fact that the land is in the midst of a Superfund site that, after 20 years of study, has yielded no more certainty for businesses than when it began. A low forecast coupled with an unpredictable business climate provides little incentive or pressure to undertake costly and complex brownfield clean-up efforts by the private sector or investors.

Third, the assumption is made that jobs currently located in the harbor can simply move elsewhere in the city. This is as ludicrous as assuming a wheat farmer could simply pick up and move his fields to another region that provides cheaper access to his global markets.

By agreeing to change assumptions in the plan from a medium forecast to a low forecast for harbor job growth, you are seriously underestimating the demand for harbor land and the significance of recent investments. Consider these facts:

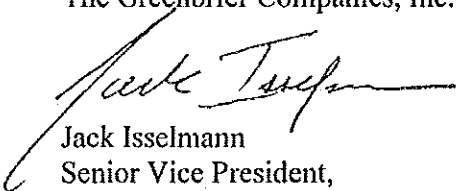
- Since 2010, the Portland Harbor has seen \$200 million invested in infrastructure to increase cargo capacity.
- The deepening of the Columbia River Channel (at a cost of \$183 million) has generated nearly \$1.3 billion in waterborne trade investment.
- The Columbia River continues to see major volume growth—the annual average is about 2.9%.
- The Portland Harbor tonnage has ranged from a high of 32 million tons before the great recession to 23 million today. The high of the proposed low range forecast is 28 million tons in 20 years. That is only 5 million tons more than today.

The businesses in the harbor believe our city and region still have a growing and vital role in creating and facilitating the transport of goods to global markets. Those businesses are going to need room to grow.

The Portland Harbor volume forecast is closer to the 1.8% adopted by City Council in 2012. The 2015 EOA assumption of 1% is off the mark by nearly half. Let's send a clear message that Portland is prepared to employ its citizens, not only the young and highly-educated in targeted fields, but all workers across a range of industry. Let's get this right.

Sincerely,

The Greenbrier Companies, Inc.



Jack Isselmann
Senior Vice President,
External Affairs and Programs

JJ/mv

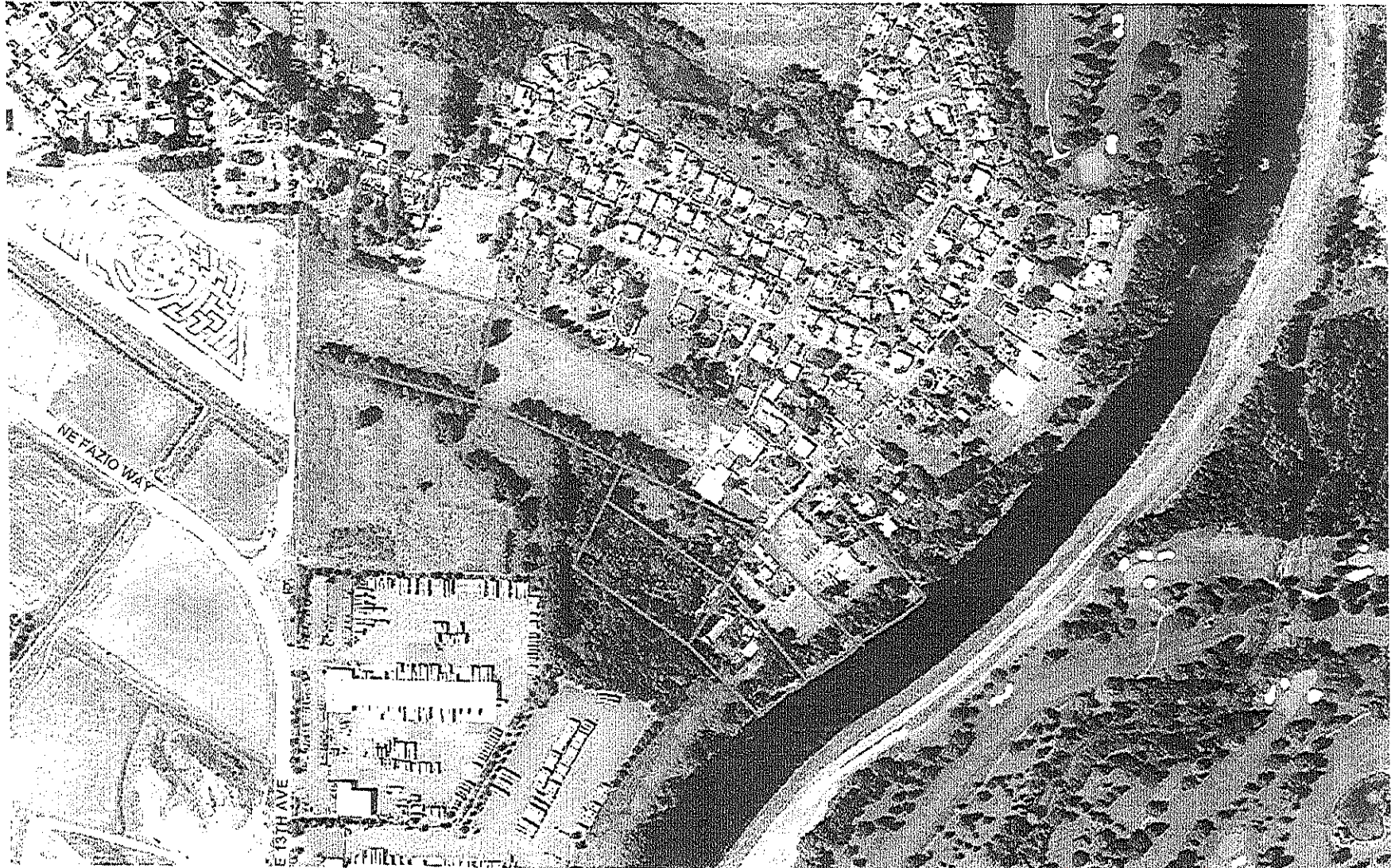


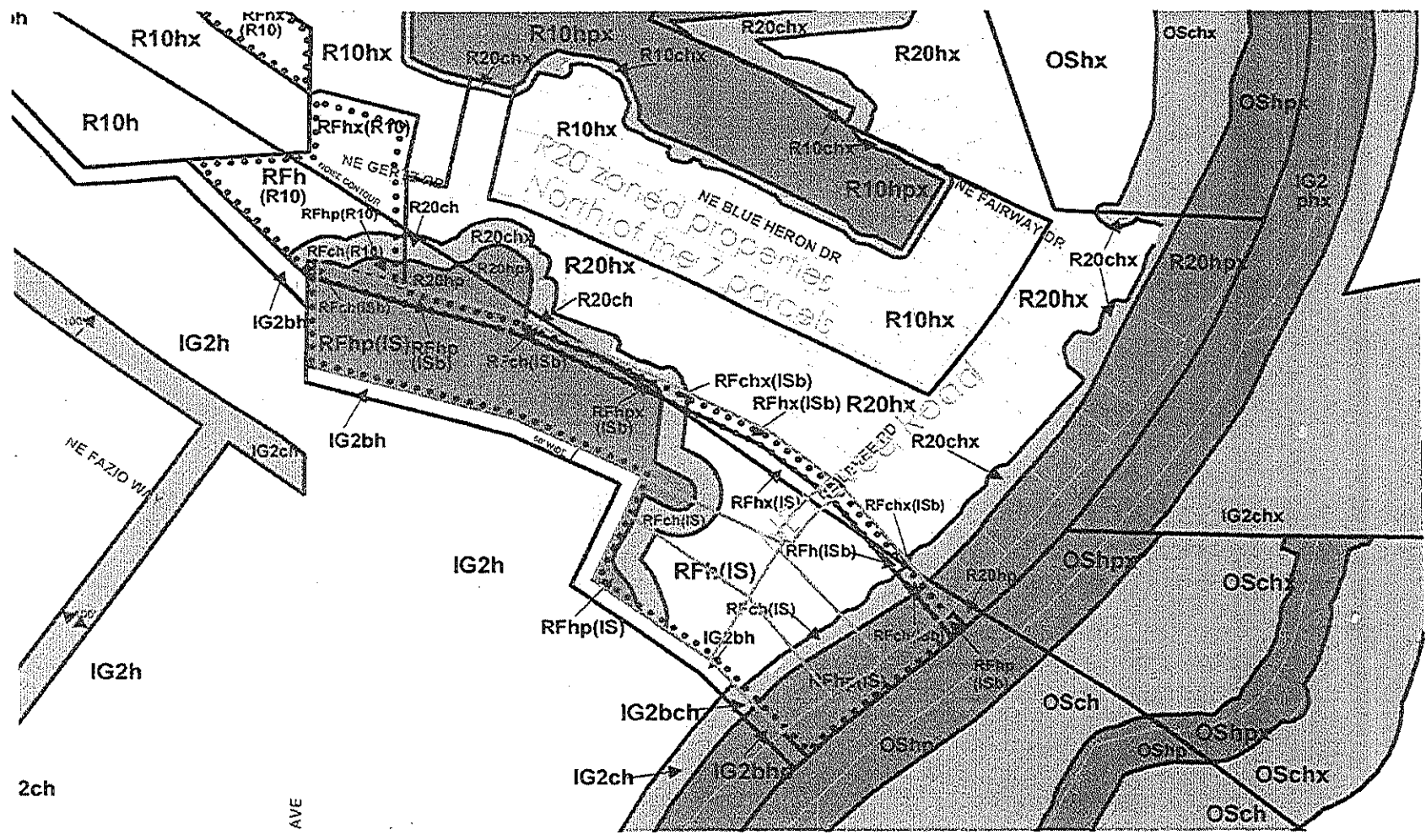
Submitted by Martha
NOV. 19, 2015 Johnston

To: Council Members

11-19-15 - East Columbia NA

Map of Affected (IS) complex
Properties - N.E. Levee Rd.





environmental overlay areas

East Columbia NA
11-16-15



Oregon Dairy Farmers Association
1320 Capitol Street NE, Suite 160
Salem, OR 97301
Phone - (971) 599-5269

November 16, 2015

The Honorable Charlie Hales
Portland City Mayor

Sent via email:

mayorcharliehales@portlandoregon.gov
novick@portlandoregon.gov
nick@portlandoregon.gov
dan@portlandoregon.gov
Amanda@portlandoregon.gov

Portland City Council

Dear Mayor Hales and Members of the Council:

As you may know, Oregon is home to 240 fully operating Grade A Dairies. These dairies contributed more than \$655 million dollars to Oregon's economy in 2014. This economic contribution is factored on their "farm gate" value of the fluid milk they produce. Therefore, the value added by the processors who acquire the fluid milk and convert it to cheese, yogurt, ice cream, etc. far surpasses the farm gate value. Oregon's producers and processors take extreme pride in their products and Oregon is home to a booming sector of cottage industries who produce and sell specialty dairy products including gourmet cheeses.

With the recent passage of the Trans Pacific Partnership Agreement by USDA Trade Officials, and the inclusion of Dairy in the agreement, it is conceivable that the Dairy industry will experience additional growth and expansion in the export marketplace. Currently, nearly 14% of all U.S milk production is exported. Our Association recently engaged the Governor's staff in requesting their assistance in locating and encouraging overseas dairy processing companies to consider locating their business expansions in Oregon. We believe additional demand created by new processing facilities will serve to support the farmers through steady milk prices.

We understand the City Council intends to consider the Portland Comprehensive Plan and Economic Opportunities Analysis (EOA) as the "blueprint" for city growth for the next twenty years. As we see it, the Planning and Sustainability Commissions' recommendation to change assumptions in the plan from a medium forecast to a low forecast for the Portland Harbor and shift jobs elsewhere would result in an underestimate of the demand for harbor land and overestimate the supply of harbor land and capacity of harbor businesses. Ultimately, the outcome will be a less robust Port and suppressed business growth. For expansion to occur in all agricultural sectors, a viable and robust harbor where businesses can be located and products shipped and received is vitally important.

We urge you to recognize the value of production agriculture as one of the most trade dependent sectors in Oregon's economy by setting the Portland harbor forecast back to the "most likely" moderate growth as originally recommended by Bureau of planning and sustainability staff, and preserve the future for farms and Oregon.

Thank you, in advance, for allowing us to contribute to this discussion.

Sincerely,

Tami Kerr, Executive Director
OREGON DAIRY FARMERS ASSOCIATION

James F. Peterson
Custom Woodworking
2502 SW Multnomah Blvd.
Portland, Oregon 97219

November 19, 2015

Portland City Council
1221 SW Fourth Ave
Portland, Oregon 97204

Re: Growth Scenarios Report

The projected growth of 124,000 housing units that the City of Portland is planning for in the 2035 Comprehensive Plan has some flawed assumptions. The Metro is using a capture rate of 72 % in their forecast, when their historically the capture rate has been 62 %. That is 8.6 % higher rate than has been achieved. The City of Portland is planning is also planning for 60% share of the new housing units with in the Metro UGB. The largest share of housing units that the city of Portland has achieved has been 36%. Thus the more likely number of housing units should be 68,000 housing units. The city of Portland has been averaging 2,700 housing units per year. The best years of 2003 and 2014 it produced a little over 5000 units. This is far from the average of 6,000 housing units it would take to get to 124,000 housing units.

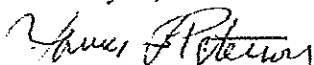
It should be noted that Clark County Washington has been producing close to the same number of housing units with 56% of the growth out side the UGB. Most of the housing units planed in the Portland will be apartments and condos. The 2014 Housing Preference Study found another flaw in Portland's plan because 80 % of respondents preferred single family detached housing. Will Portland's growth then happen in Clark County?

The Bureau of Planning and Sustainability has projected an increase in capacity of 28% in Multnomah Neighborhood in their proposed changes to the Comprehensive Plan. They have stated that there is more than enough with the current zoning thus the increase capacity would be considered Market Factor which is prohibited. The neighborhood is also slated for a misappropriate 11% growth of SW Portland due to the proposed changes in the plan

The increase in housing capacity in excess of the projected growth will put undetermined loads on an underfunded transportation system which is inconsistent with the State Transportation Rule.

Please add this to the record of the Comprehensive Plan

Thank you,



James F Peterson

Encl: Development Potential Urban Centers April 14, 2015

Urban growth management decision topic paper: Development potential in urban centers

Topic paper purpose

Policy makers have indicated an interest in further discussion of topics raised in the draft Urban Growth Report (UGR). This topic paper is intended to summarize relevant portions of the UGR as well as present additional summary information to inform policy dialogue. This topic paper relates to the likelihood of development of housing in urban centers such as Portland's.

Background

Communities in our region have decided that most new housing should happen in existing urban areas. That policy direction is reflected in the draft UGR, which includes a forecast of how the market may respond to existing policies and plans over the next twenty years.

Based on existing state, regional and local plans and policies, the draft UGR estimates that, over the next 20 years, about 60 percent of the new homes inside the urban growth boundary (UGB) will be built in the City of Portland. Most of these new homes will be apartments and condos, particularly those in Portland.

MPAC, Council, and others have expressed an interest in discussing this forecast and its implications. While achieving this level of growth in urban centers such as Portland's will present challenges, it is also clear that building sufficient housing at appropriate price levels will be difficult in any location, including any potential urban growth boundary expansion areas.

Policy questions

- What are the risks and opportunities of relying on locally-adopted plans, which focus most of the region's residential growth in urban centers and corridors?
- What additional actions or investments may be needed to support Portland's plans?
- If sustained development in Portland appears unlikely over the next 20 years, where might that development occur instead? What policies and investments would be adopted to achieve more growth elsewhere? Or, should the region as a whole plan for lower growth rates?

What are some of the reasons why the draft UGR forecasts substantial growth in Portland?

- Demographic factors favor apartments and condos, which are most appropriate and likely in urban locations:
 - Most of the region's new households (60%) will include one or two people.
 - Half of the region's new households will be headed by someone over the age of 65. Most of those households won't include kids.
 - Most of the region's new households (60%) will make less than \$50,000 per year.

- Nationwide, there is a clear trend of urban areas attracting new residents. The 2014 Residential Preference Study identified strong preferences for neighborhoods with amenities and services within walking distance. The study also indicated that people are willing to accept longer commutes to live in their preferred neighborhood type. Today, Portland's neighborhoods offer many of the amenities that people prefer.
- There are constraints to growth in all locations – inside the Metro UGB, in potential UGB expansion areas, and in neighboring communities. Some of those constraints include:
 - Federal funding for new infrastructure has been decreasing for the last few decades.
 - State growth management laws in Oregon and Washington place limits on outward growth. The draft UGR reflects those constraints and forecasts that the Metro UGB will “capture” a greater share of future households than in the past.
 - The adoption of urban and rural reserves signals clear policy direction to focus most growth inside the existing UGB. In this policy context, over 75 percent of the region's long-term residential growth capacity is already inside the UGB (with the remaining 25 percent in urban reserves). Under these adopted plans, much of the region's growth capacity is in the City of Portland.
 - The state Metropolitan Housing Rule requires that cities and counties provide at least half of their residential capacity on buildable land for multifamily housing or single-family attached housing. This type of housing is most likely to occur in urban centers such as those in Portland.
 - There are ongoing infrastructure finance and governance challenges in UGB expansion areas. Though there have been over 32,000 acres added to the UGB since its adoption in 1979, those expansion areas have produced little housing, particularly housing that would be affordable to households making less than \$50,000 per year.

What are some of the reasons why it will be challenging to produce this much housing in urban centers?

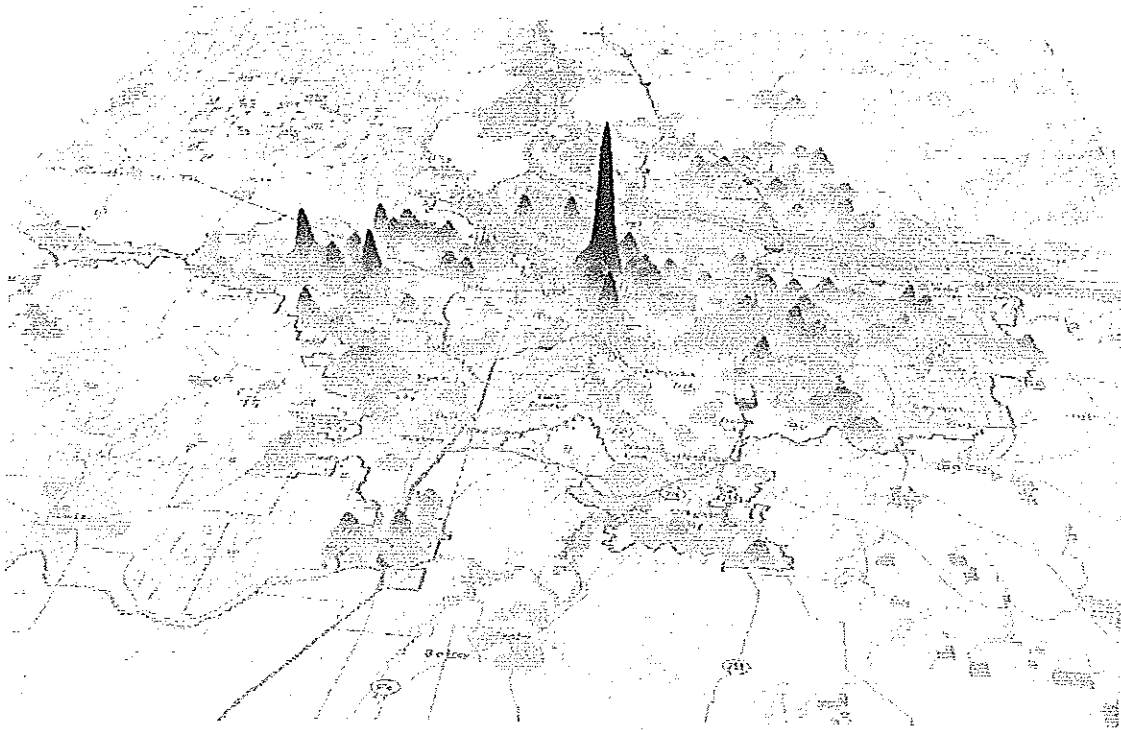
- On a per-square-foot basis, mid-rise and high-rise construction tends to cost more than lower density housing types. This is particularly the case when multifamily housing includes structured parking, which can add about \$25,000 to the cost of each unit.
- As a consequence of higher costs-per-square foot, multifamily units tend to be smaller than single-family detached homes. This poses challenges for producing family-friendly housing in urban areas.
- The region's mixed-use corridors sometimes pass through neighborhoods. Neighborhood associations often oppose new construction.
- Most of the expected housing in Portland will be apartments and condos. Questions remain about how well this will match people's housing preferences. The 2014 Housing Preference Study found:

- o Without asking for respondents to make tradeoffs such as price, neighborhood type, and commute time, 80 percent of respondents preferred single-family detached housing.
- o Accounting for tradeoffs such as price, neighborhood type, and commute time, 62 percent of respondents chose single-family detached housing (comparable to the share that live in this housing type today).
- The draft UGR indicates that the city would see about 124,000 new households over the next 20 years. This amounts to an average of about 6,000 new homes every year, which exceeds average annual housing production for the city.

What are some of the recent development trends around the region?

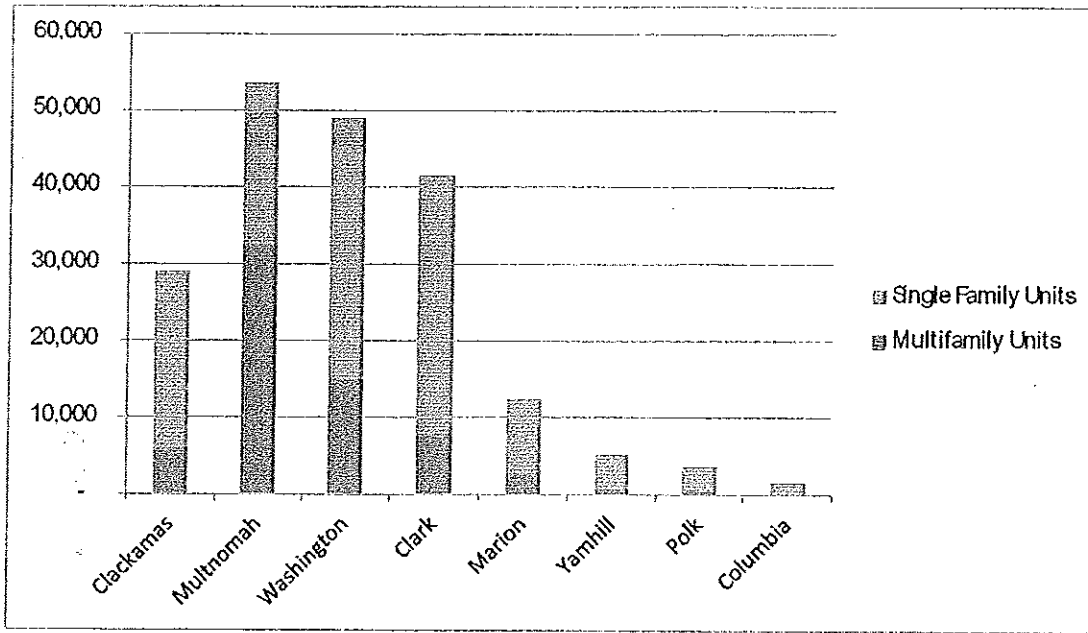
Growth management decisions are an exercise in planning for the future. However, what has happened in the past can inform discussions about what might happen over the next 20 years. Below are data on past residential development activity from 1998 through the third quarter of 2014.¹

Figure 1: New residential permit activity (total new residences 1998 through 3rd quarter 2014)



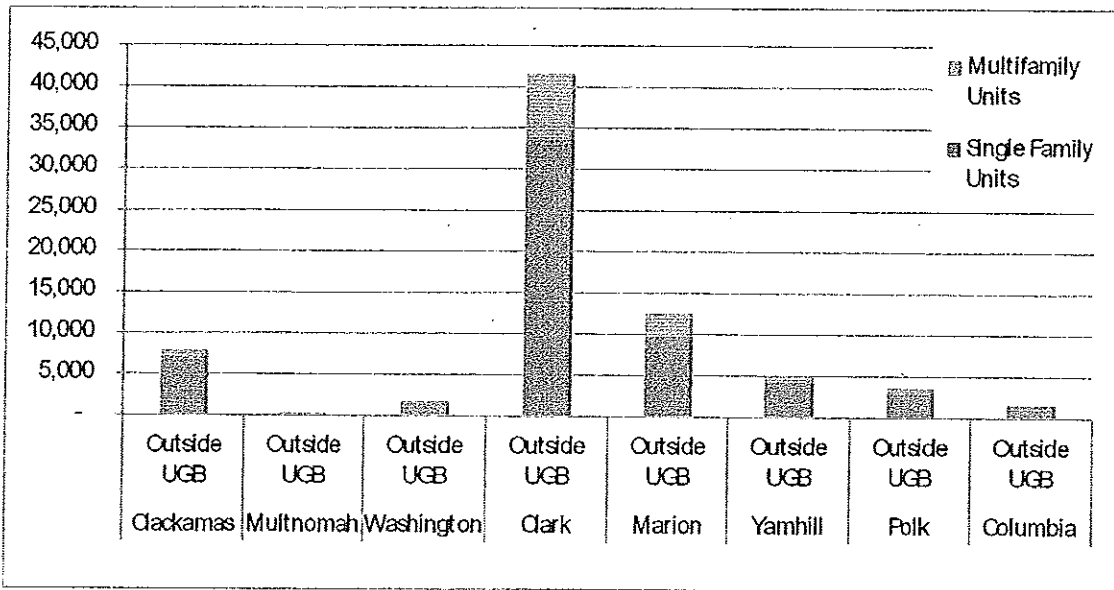
¹ Data source: Construction Monitor. These data are for approved permits for new residential construction. Pending permits and renewed permits were excluded. These data were compared with and found to closely match U.S. Census Bureau permit data. Though this is the best available data, there may be some instances when approved permits did not get built.

Figure 2: Permitted new residences by county and housing type (1998 through 3rd quarter 2014)



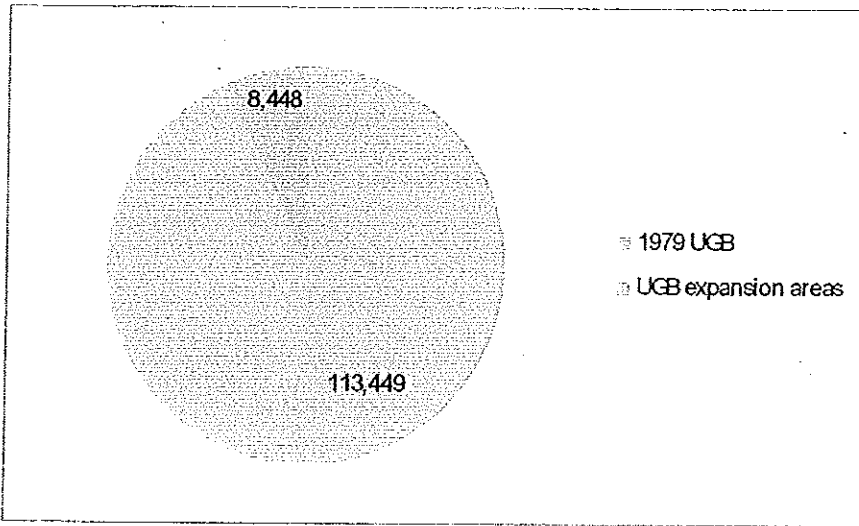
As depicted in Figure 2, there were about 196,000 new residences permitted in the eight counties shown. These new residences are evenly split between single-family and multifamily units.

Figure 3: Permitted new residences outside the Metro UGB by housing type (1998 through 3rd quarter 2014)



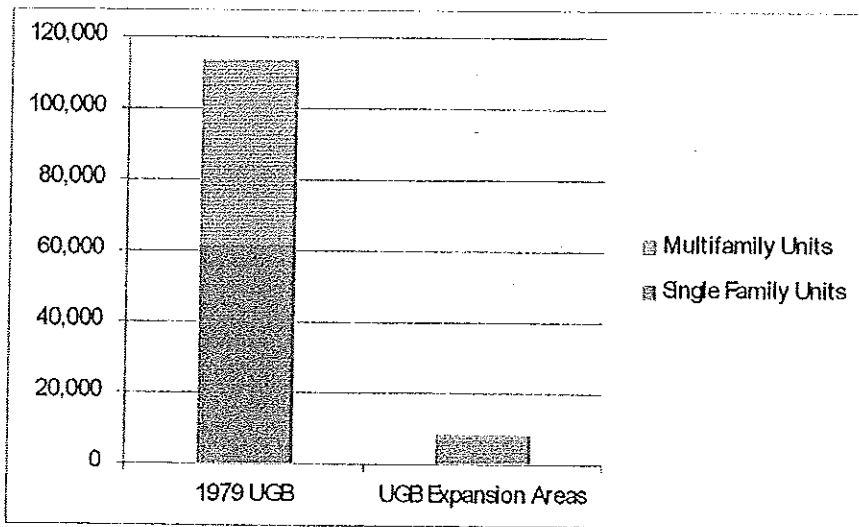
As depicted in Figure 3, most (56 percent) of the residential growth happening outside the Metro UGB has occurred in Clark County. Washington State also manages growth through its Growth Management Act.

Figure 4: Permitted new residences in original 1979 UGB and expansion areas (1998 through 3rd quarter 2014)



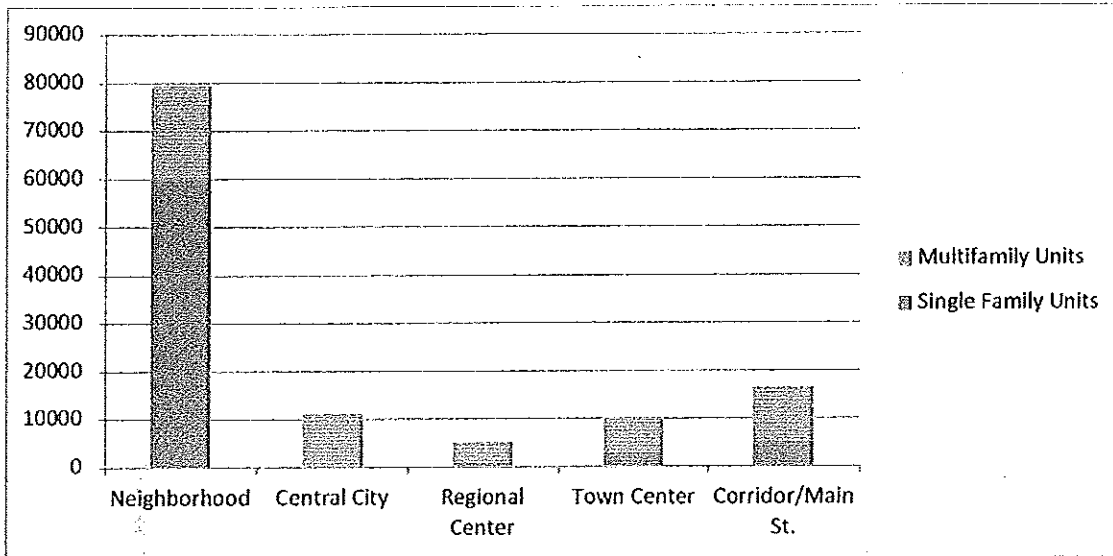
There are approximately 260,000 acres inside the Metro UGB, including about 32,000 acres that have been added since the UGB's adoption in 1979. As depicted in Figure 4, 93 percent of the new residences were permitted inside the original 1979 Metro UGB. UGB expansion areas contributed seven percent of the region's new housing.

Figure 5: Permitted new residences by type in the original 1979 UGB and expansion areas (1998 through 3rd quarter 2014)



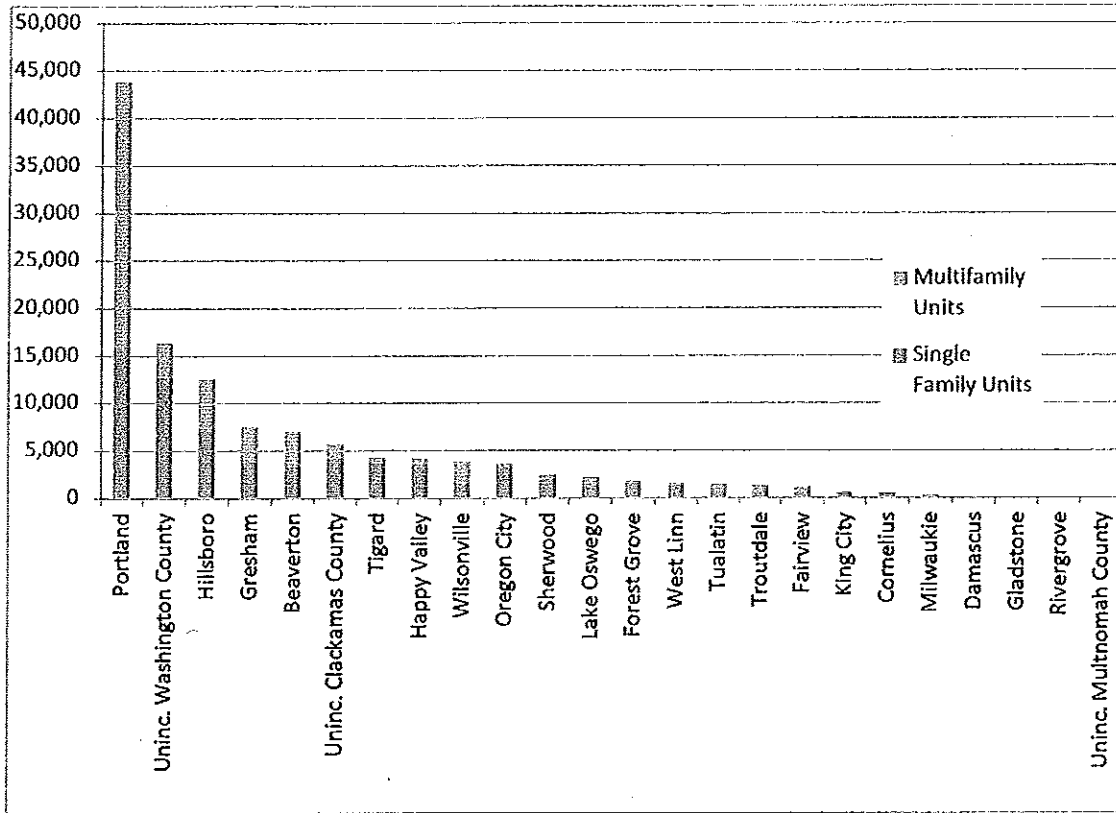
As depicted in Figure 5, 54 percent of the new housing permitted inside the original 1979 UGB has been single-family housing. In UGB expansion areas, single-family housing represents 87 percent of the new housing.

Figure 6: Permitted new residences in the Metro UGB by 2040 design type and housing type (1998 through 3rd quarter 2014)



The regional vision for growth, the 2040 Growth Concept, identifies several different design types. The Neighborhood design type is the most ubiquitous and, as depicted in Figure 6, accounted for most (65 percent) of the new residences in the Metro UGB.

Figure 7: Permitted new residences by city inside the Metro UGB (1998 through 3rd quarter 2014)

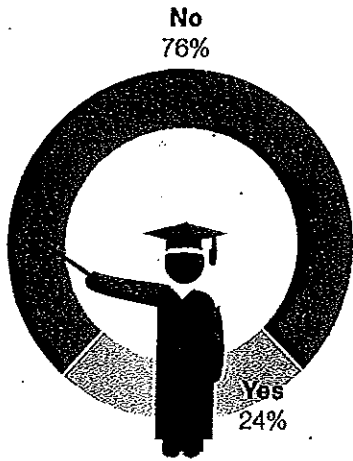


As depicted in Figure 7, over the last 16 years, the City of Portland led residential construction in the Metro UGB with 36 percent of the new residences. This represents an average housing production in Portland of over 2,700 units per year, which is about half of the average annual housing production forecast for the City of Portland in the draft UGR. In its best years (2003 and 2014), Portland produced over 5,000 units of new housing per year. Portland's lowest housing production occurred during the Great Recession. From 1998 through the third quarter of 2014, 64 percent of Portland's new housing was multifamily.

Portland Harbor Workforce Demographics

31,000 jobs

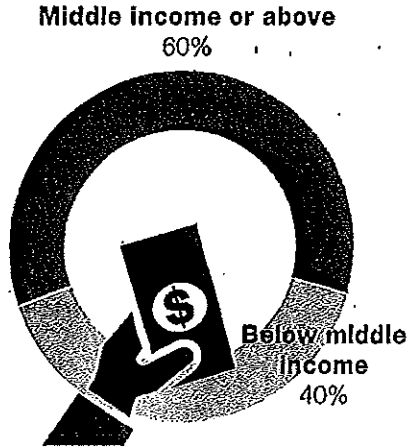
Bachelor's degree or advanced degree
Portland Harbor workforce



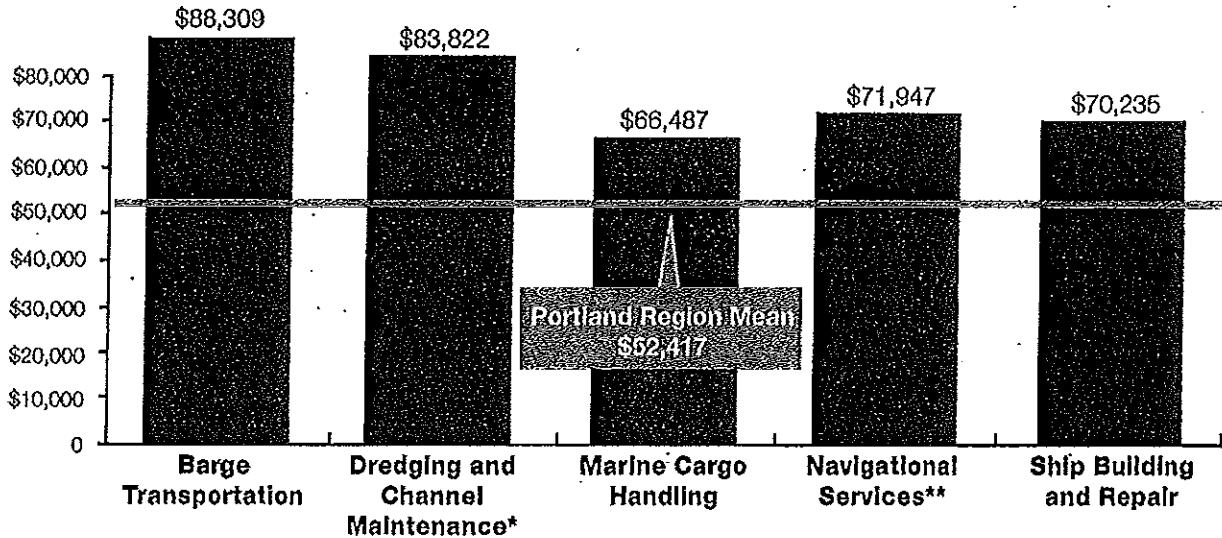
Gender
Portland Harbor workforce



Earnings
Portland Harbor workforce



2014 Portland MSA wage comparison

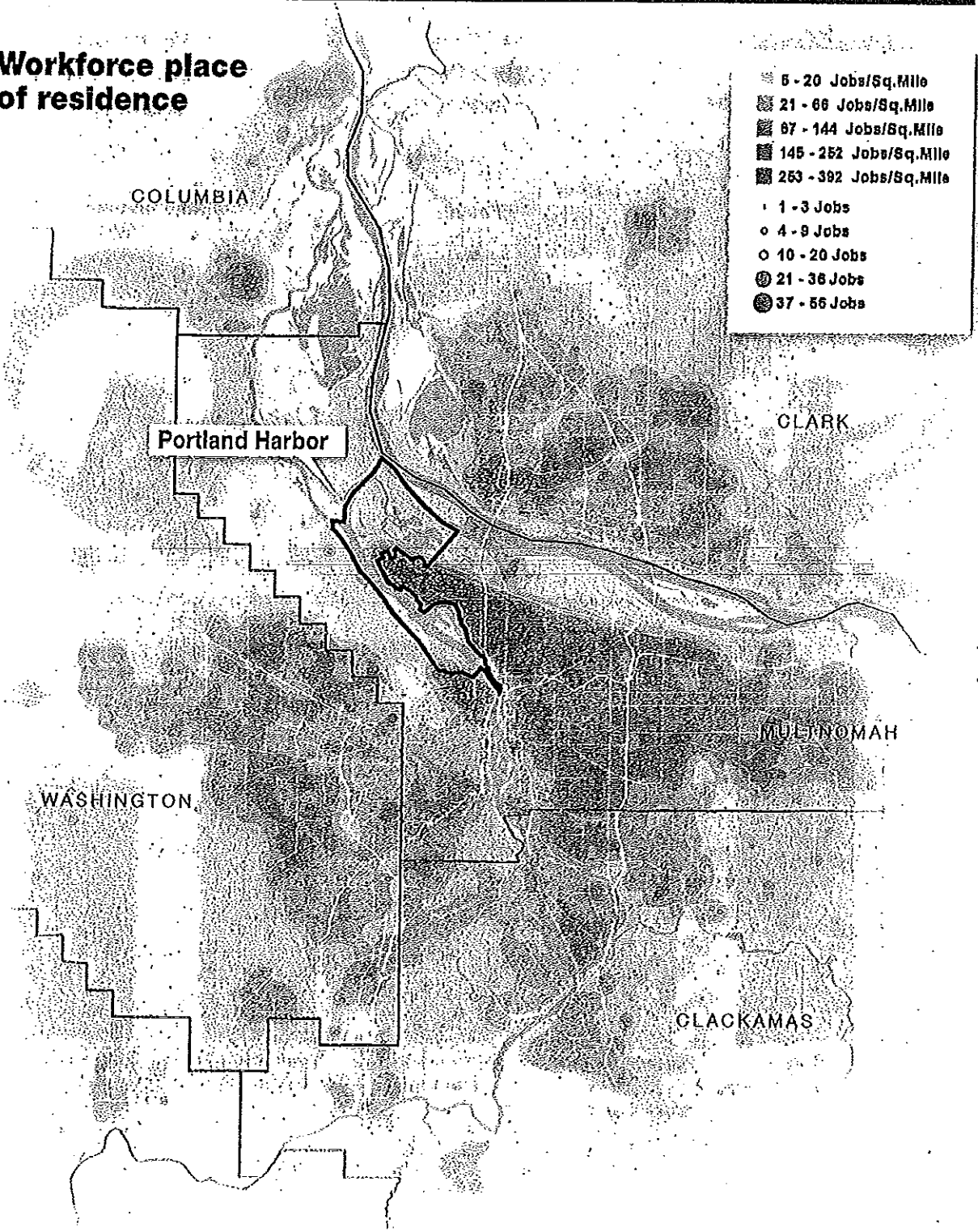


Sources: U.S. Census Bureau, ECONorthwest, with data from U.S. BLS 2014
 Note: Wages chart based on Average Annual Pay for these NAICS codes (from left to right): 483211 (Inland Water Freight Transportation), 237990 (Other Heavy and Civil Engineering Construction), 488320 (Marine Cargo Handling), 488330 (Navigational Services to Shipping), 336611 (Ship Building and Repairing)
 *2013 data used
 **2012 data used (current is not disclosed)

Portland Harbor Workforce Demographics

31,000 jobs

Workforce place of residence



November 19, 2015

Re: Testimony to Portland City Council on the Economic Opportunities Analysis, Growth Scenarios Report and other supporting documents for the current draft Comprehensive Plan.

To: Mayor Charlie Hales and Members of the Portland City Council

From: Mike Rosen, Principal
Ecoliteracy Collaborative
6005 SE 20th Ave.
Portland, OR 97202

I have a BA in Chemistry and a PhD in Environmental Science and Engineering. I've worked in natural resource cleanup, protection, and program management for the last 27 years, the most recent 13 as the Portland Watershed Division manager. I currently run the Ecoliteracy Collaborative, a non-profit dedicated to providing project based, K-12, sustainability education to under-represented communities.

I am here to express my support of the Planning and Sustainability Commission's supporting documentation for the draft Comprehensive Plan. In short, I believe it accurately reflects the ~~the cargo demand~~ ^{marine projections} for the region and therefore appropriately sets the stage for protection of Portland's limited natural habitat, such as West Hayden Island.

Over the past 13 years the city's watershed group created three powerful tools to accurately assess, protect, and restore Portland's critical environmental habitat and water quality,

particularly for riverine environments: the Portland Watershed Management Plan, the comprehensive watershed monitoring strategy, and the Watershed Health Index and associated Watershed Report Cards. Each of these tools, based on decades of science and local and national natural resource work, show that in order to protect and enhance local water quality, the natural environment, and environmental health, Portland must continue to take bold steps to protect our remaining natural resources, in balance with sensible economic development. We know:

1. That for the continued restoration of endangered salmon runs we must protect shallow water habitat,
2. That the accurate cargo projections contained in the Economic Opportunities Analysis shows, that through the reclamation of Brownfields and more effective use of existing Port property, Portland can meet the needed industrial land supply ^{removal} in order to support ongoing economic development and generation of middle-income jobs,
3. And, unfortunately we know that even after millions of dollars spent, over two decades, to refute credible science that supports the protection of critical habitat such as West Hayden Island, the Port is intent on the industrial development of West Hayden Island and its habitat destruction.

In the most recent process, to determine the feasibility of the industrial development of West Hayden Island, even when given the opportunity to provide only the most minimal habitat protection and mitigation, the Port walked away from the table claiming the cost was too high.

The draft Comprehensive Plan does what it needs to: it sets a solid policy framework that will require the restoration and use of

available industrial land, while providing economic growth and adequate protection for critical habitat.

I encourage Council to adopt this plan and continue to show the exemplary environmental leadership it has in the past several weeks.

November 18, 2015

Dear Mayor Hales and Commissioners,

Established in 1914, Northwest Food Processors Association (NWFP) supports the needs of the Pacific Northwest food processing industry in Idaho, Oregon and Washington. Membership includes some of the foremost brand names in the food industry in the United States, key producers of private label and institutional products, and locally run family businesses. NWFP is one of the nation's largest food processing trade associations, with more than 500 member companies including 154 food processors and 357 suppliers.

The Northwest food industry views the Portland harbor as a vital link in our ability to get our products to foreign markets. In Oregon, the food processing industry employs roughly 25,000 Oregonians and represent over \$6 billion in economic activity. A growth in the food industry should coincide with growth at the Portland harbor to accommodate additional exports of the Northwest's food products.

It has come to our attention that the blueprint for the future growth and development of the City of Portland does not assign much of that growth to the Portland Harbor. In fact, the Draft Comprehensive Plan and the supporting Economic Opportunities Analysis shows little future growth in the harbor. This does not make sense. The Portland harbor:

- is home to nearly 100 businesses
- those businesses employ more than 300 smaller local businesses
- together they employ more than 50,000 employees
- nearly 60% of the workforce receives middle income wages
- about 20% of the workforce is ethnically or racially diverse
- in the past 5 years the harbor businesses have invested more than \$370 million
- and generated more than \$4.5 million annually in tax revenue locally

If there is any place in this City that leadership should urge job growth, it's the Portland harbor. This is a place of job diversity and predominantly middle wages. One employer in the harbor has more than 22 languages spoken on site. Many of the employers work directly with Portland Community College for job placement and skill development for existing employees. This is exactly what our City needs to ensure future work force diversity and wages to afford a reasonable standard of living in Portland.

The businesses in the harbor are major employers in this City and they greatly assist the Northwest's ability to compete in a global food market. The future growth of the Portland harbor is necessary in order to handle future growth of the Northwest's food industry.

I urge you to change the Portland harbor forecast back to the "most likely" moderate growth as originally recommended by Bureau of planning and sustainability staff.

Sincerely,

Ian Tolleson

Ian Tolleson
Director, Government Affairs
Northwest Food Processors Association



November 17, 2015

Portland City Council
City Hall
1221 SW 4th Ave
Portland OR 97204

Dear Mayor Hales and Commissioners:

I am writing to you today about the low forecast growth of the Portland harbor in the Economic Opportunities Analysis (EOA) document for the Draft City of Portland Comprehensive Plan. A more constructive approach would be to designate a "most likely" moderate growth forecast given the important value of Portland harbor jobs and the opportunities they bring to the entire state. The harbor is a major impact employer and the services they provide are a crucial part of the economic vitality of our state.

Our organization is committed to advocating for a healthy economic environment on the Westside of Portland, Oregon metropolitan region. WEA provides its members with a balanced perspective on local, regional and state issues and operates as a problem solver for the entire Westside business community. Decisions regarding the working harbor impact not only Portland, but the surrounding region that depends on the Port for materials, trade, shipping and, most importantly, jobs.

In order to promote the future viability of Washington County businesses and the jobs they provide to Portland residents, designating the Portland harbor with a low growth forecast during a time when we are seeing significant expansion in the harbor sends an inaccurate message. I recommend the Portland harbor forecast be changed back to the "most likely" moderate growth description as originally recommended by Bureau of Planning and Sustainability staff and look forward to supporting the future of our region growing together.

Sincerely,

Pamela Treece
Executive Director

10220 SW Nimbus Ave.
Suite K-12
Tigard, Oregon 97223
Office 503.968.3100
Fax 503.624.0641
www.westsidealliance.org

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City of Tigard City of Beaverton

Mayor Lou Ogden Mayor Jerry Willey
City of Tualatin City of Hillsboro

Arevalo, Nora

From: Maya Jarrad <maya@350pdx.org>
Sent: Friday, November 20, 2015 9:11 PM
To: BPS Comprehensive Plan Testimony
Subject: Re: Comp Plan and Industrial Lands

Follow Up Flag: Follow up
Flag Status: Completed

Yes,

My address is 3414 SE 21st Ave, Portland OR 97202

Thank you!

On 17-Nov-15 12:06, BPS Comprehensive Plan Testimony wrote:

Thank you for your submission. In order for us to include it as public testimony, we will need your physical mailing address. Could you provide us with such?

Thank you and best regards,

From: Hales, Mayor
Sent: Tuesday, November 17, 2015 10:38 AM
To: Maya Jarrad <maya@350pdx.org>
Cc: BPS Comprehensive Plan Testimony <cputestimony@portlandoregon.gov>
Subject: RE: Comp Plan and Industrial Lands

From: Maya Jarrad [mailto:maya@350pdx.org]
Sent: Monday, November 16, 2015 2:52 PM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: Comp Plan and Industrial Lands

Dear Mayor Hales,

I am writing to let you know that I support the approach taken on industrial lands in Comp Plan recommended draft.

The 900 acres of contaminated "brownfields" in Portland need to be addressed in a way that improves the health of Portland's soils and residents, and returns them to productive uses. Converting existing natural areas to meet industrial land demand is not a valid solution. The Draft Comp Plan takes the right approach! In limiting conversion of industrial lands for non-industrial uses rather than destroying the last remaining natural areas along our rivers, we will move forward in beneficial City Planning.

Industrial interests should not be allowed to cash out their industrial land holdings and then turn around and demand cheap new industrial acres in critical natural areas that

provide valuable habitat and ecosystems services to our residents. West Hayden Island should not be included in the industrial lands inventory, and environmental regulations on industrial lands should not be restricted or rolled back--industrial lands along our rivers are also some of the most important and degraded natural resource lands and industrial landowners should not be exempt from protecting our rivers.

Thank you for your service,
Maya Jarrad

Arevalo, Nora

From: Hales, Mayor
Sent: Friday, November 20, 2015 9:02 AM
To: Lucinda and Stefan Karlic
Cc: BPS Comprehensive Plan Testimony
Subject: RE: West Hayden Island and the Comprehensive Plan

Follow Up Flag: Follow up
Flag Status: Completed

Dear Lucinda,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard your concerns and appreciates your feedback. Your email has been forwarded to the comprehensive plan testimony email inbox. They will review your testimony.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: Lucinda and Stefan Karlic [mailto:cyberluluandstefan@hotmail.com]
Sent: Thursday, November 19, 2015 10:12 AM
To: Commissioner Fritz <amanda@portlandoregon.gov>; Hales, Mayor <mayorcharliehales@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov.onmicrosoft.com>; Commissioner Fish <nick@portlandoregon.gov>; Novick <commissioner-novick@portlandoregon.gov>
Subject: West Hayden Island and the Comprehensive Plan

Dear Commissioners,

Over the years the Port of Portland has tried and failed to industrialize or have West Hayden Island included in the industrial inventory.

They have failed to prove that the land is needed beyond a shadow of a doubt. Tying up precious City and Count and State resources that could have gone to more beneficial use for the citizens of Portland. The money spent by the various agencies at the behest of the Port of Portland to turn what is the last, largest natural area in Portland into an unneeded industrial area could also have gone to more needed items.

Please vote to secure West Hayden Island out of the comprehensive plan as industrial land.

There is plenty of unused industrial land that the port has on its books. Along with this and the cleanup of the brownfields and other damaged areas there is an overabundance of land for industrial and Port of Portland use.

We also ask that the Port of Portland be stopped from dumping dredge spoils on that portion of the island that they have "used forever." To protect and restore the dump site to further enhance and stop the creep of damage into the natural area.

A quick look will confirm that not all is as is should be at this site. Questioned by us many times they tell us that, "Nothing grows there because it is sand". Unfortunately this does not hold true as other areas of sand have lush vegetation. The 820 acres is sand, so why does nothing grow on the dump site?

Thank you for your time and your service to the citizens of Portland

Respectfully,

Stefan Karlic
Lucinda Karlic



GREATER PORTLAND INC
111 SW COLUMBIA ST, #830, PORTLAND, OR 97201
GREATERPORTLANDINC.COM
503-445-8065

November 18, 2015

Portland City Council
City Hall
1221 SW 4th Ave
Portland OR 97204

Dear Mayor Hales and Commissioners:

I'm writing this letter to express concern for the low-forecast growth of the Portland Harbor in the Economic Opportunities Analysis (EOA) document for the Draft City of Portland Comprehensive Plan. The harbor is a major impact employer, and the services provided are a crucial part of the economic vitality of our region and state. A low forecast signals doubt and sends a negative message about the value of Portland Harbor jobs and the opportunities they bring to the entire region.

As the regional economic development organization, Greater Portland Inc (GPI) understands the keystone nature of a working harbor to a city, county and region's economic vitality. GPI markets the region to companies seeking to expand or locate, and together with our local and state partners, GPI positions the region as one of the nation's most vibrant metro economies. Decisions regarding the working harbor impact not only Portland, but also the surrounding region that depend on the Port for efficiency, transportation and jobs.

If you care about the future of our state and the broader region, labeling the Portland Harbor with a low-growth forecast at a time when we are seeing significant expansion in the Harbor sends the wrong message.

I respectfully request that you return the Portland Harbor forecast to the "most likely" moderate growth, as originally recommended by Bureau of Planning and Sustainability staff and support the future of our region.

Sincerely,

A handwritten signature in black ink, appearing to read "Janet LaBar".

Janet LaBar
President and CEO

Arevalo, Nora

From: Hales, Mayor
Sent: Friday, November 20, 2015 9:35 AM
To: Ron Schmidt
Cc: BPS Comprehensive Plan Testimony
Subject: RE: I support your proactive planning on industrial lands from a business and natural resource perspective

Follow Up Flag: Follow up
Flag Status: Completed

Dear Ron,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard your concerns and appreciates your feedback. Your email has been forwarded to the comprehensive plan testimony email inbox. They will review your testimony.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: Ron Schmidt [mailto:ronspdx@gmail.com]
Sent: Thursday, November 19, 2015 7:19 AM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>; Nick Fish <Nick@ci.portland.or.us>; Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Dan Saltzman <campaign@dansaltzman.com>
Subject: I support your proactive planning on industrial lands from a business and natural resource perspective

Mayor and Council Members:

My years as Director and past Chair of the Hayden Island Neighborhood Network (HINooN) and years as a Director of the Waterfront Organizations of Oregon (WOO) puts me in a unique position of supporting our natural areas, supporting water related businesses and knowing we can do both by better utilization of industrial lands rather than sloppily eating up more resources with abandon. I support your approach taken on industrial lands in the recommended draft of the Comprehensive Plan:

- Portland has over 900 acres of contaminated sites. The Draft Comp Plan takes the right approach in focusing on cleaning up contaminated sites and restoring them to productive issue rather than converting natural areas to meet industrial land demand;

- The Draft Comp Plan takes the right approach in focusing on intensification of use of the existing industrial land base rather than converting natural areas to meet industrial land demand;
- The Draft Comp Plan takes the right approach in limiting conversion of industrial lands for non-industrial uses rather than destroying the last remaining natural areas along our rivers. Industrial interests should not be allowed to cash out their industrial land holdings and then turn around and demand cheap new industrial acres in critical natural areas.
- West Hayden Island should not be included in the industrial lands inventory;
- Environmental regulations on industrial lands should not be restricted or rolled back— industrial lands along our rivers are also some of our most important and degraded natural resource lands and industrial landowners should not be exempted from protecting our rivers.

While I write this as a citizen of Portland rather than my official capacities with various boards I sit on, I congratulate you on a good plan well thought out and I encourage you to stand strong against the huge resources available to those who will be promoting personal agendas to take resources away from our community.

Sincerely,

Best wishes,

Ron Schmidt
1983 N Jantzen Avenue
Portland OR 97217
ronspdx@gmail.com
503-539-6817

Testimony of Raihana Ansary
Government Relations Manager
Portland Business Alliance
Before Portland City Council
Regarding Economic Opportunity Analysis
November 19, 2015

Good afternoon, Mayor Hales, Commissioners.

My name is Raihana Ansary and I'm here to comment on the recommended 2015 Economic Opportunity Analysis (EOA) on behalf of the Portland Business Alliance.

The Alliance has been tracking the comprehensive plan update for the last two years and would like to commend staff for their hard work to accommodate our city's future growth. We plan to provide input on the broader plan but this afternoon, I'd like to focus on a few assumptions that have been made to artificially fulfill the state of Oregon's 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 forecast is not justified by recent market trends nor is it consistent with existing plans that have been approved by Portland City Council including the city's *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, export-related jobs pay on average 18 percent more than non-exporting jobs across sectors. Manufacturing jobs that produce traded-sector goods are also found to

provide higher wages and better benefits than non-manufacturing jobs, particularly for communities of color and for those with less than a four-year college degree. A low marine cargo forecast does not promote our traded-sector economy or middle-income job growth.

2. **Aspirational brownfield redevelopment.** The EOA also 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 regulations associated with their redevelopment.
3. **Aspirational golf course conversion.** Finally, the EOA relies on golf course conversion to meet its industrial land needs. Golf courses are privately owned and an owner must be willing to sell their property. Not all of the golf courses that are being counted have confirmed an interest to sell.

While we appreciate efforts to meet the industrial lands shortfall, these strategies are aspirational at best. We urge that the EOA reflect market realities to help ensure a prosperous and equitable future for all Portlanders.

Thank you.

Arevalo, Nora

From: Moore-Love, Karla
Sent: Thursday, November 19, 2015 8:14 PM
To: BPS Comprehensive Plan Testimony
Subject: FW: Comp Plan & Employment Opportunities Analysis testimony

Follow Up Flag: Follow up
Flag Status: Completed

From: Barbara Quinn [mailto:barbaraqnn718@gmail.com]
Sent: Thursday, November 19, 2015 4:22 PM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>
Cc: Moore-Love, Karla <Karla.Moore-Love@portlandoregon.gov>; Micah Meskel <mmeskel@audubonportland.org>
Subject: Comp Plan & Employment Opportunities Analysis testimony

Mayor and commissioners,

I agree with the drafts of the EOA and Comp. Plan where they support these points:

- existing brownfields should be restored and returned to productive industrial use instead of converting remaining green space to that use.

West Hayden Island and north Portland's golf courses especially should be preserved as green space since they are part of a larger, rich wetland area that serves as a valuable remaining ecosystem.

North Portland neighbors have asked for this throughout the Comp. Plan / EOA feedback process.

- businesses need to be required to pay for the cleanup of contaminants on their land or develop more sustainable practices that avoid passing on the prohibitive costs of cleanup to others. Businesses have long been allowed to degrade industrial land and then move on leaving the expense of cleanup to others.
- the more efficient and intense use of existing industrial land including brownfields should be prioritized.
- policies that help create a clean fuels economy and move away from fossil fuel dependence, storage and transport.

Arevalo, Nora

From: Washington, Mustafa
Sent: Thursday, November 19, 2015 3:56 PM
To: Bob Wilson
Cc: BPS Comprehensive Plan Testimony
Subject: RE: Comprehensive Plan

Follow Up Flag: Follow up
Flag Status: Completed

Dear Bob,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard your concerns and appreciates your feedback. Your email has been forwarded to the comprehensive plan testimony email inbox. They will review your testimony.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: Bob Wilson [mailto:bdcw@comcast.net]
Sent: Thursday, November 19, 2015 11:13 AM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: Comprehensive Plan

Dear Mayor Hales—

I am writing in support of the draft Comprehensive Plan's treatment of natural areas and industrial land.

Please protect important natural areas—like West Hayden Island—from industrialization. Such areas (many along our rivers and waterways) are vital components of Portland's livability.

Instead, focus on cleaning up and reusing existing industrial lands, while enforcing strong environmental regulation.

Thank you.

Bob Wilson
8333 SE 23rd Avenue
Apt. D
Portland, OR 97202

Arevalo, Nora

From: Washington, Mustafa
Sent: Thursday, November 19, 2015 3:48 PM
To: Cheryl Baker
Cc: BPS Comprehensive Plan Testimony
Subject: RE: I support the current draft of the Comprehensive Plan

Follow Up Flag: Follow up
Flag Status: Completed

Dear Cheryl,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard your concerns and appreciates your feedback. Your email has been forwarded to the comprehensive plan testimony email inbox. They will review your testimony.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: Cheryl Baker [mailto:cheryl74074@gmail.com]
Sent: Thursday, November 19, 2015 1:09 PM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: I support the current draft of the Comprehensive Plan

Dear Mayor Hales,

I fully support the approach to industrial lands outlined in the current draft of the Comprehensive Plan. This approach focuses on cleaning up more than 900 acres of contaminated sites, intensifying use of the existing industrial land base, and limiting conversions of industrial land to other uses, rather than converting irreplaceable natural areas to industrial use.

- Portland has over 900 acres of contaminated sites. The Draft Comp Plan takes the right approach in focusing on cleaning up contaminated sites and restoring them to productive use rather than converting natural areas to meet industrial land demand;
- The Draft Comp Plan takes the right approach in focusing on intensification of use of the existing industrial land base rather than converting natural areas to meet industrial land demand;
- The Draft Comp Plan takes the right approach in limiting conversion of industrial lands for non-industrial uses rather than destroying the last remaining natural areas along our rivers. Industrial interests should not be

allowed to cash out their industrial land holdings and then turn around and demand cheap new industrial acres in critical natural areas.

- West Hayden Island should NOT be included in the industrial lands inventory; much of the land is liquefiable and subject to major destruction in the event of a large earthquake.
- Environmental regulations on industrial lands should not be restricted or rolled back—industrial lands along our rivers are also some of our most important and degraded natural resource lands and industrial landowners should not be exempted from protecting our rivers.

I fully support the current draft of the Comprehensive Plan.

Thank you,

Cheryl Baker

1719 N Jantzen Ave

Portland, OR 97217

Arevalo, Nora

From: Washington, Mustafa
Sent: Thursday, November 19, 2015 3:40 PM
To: James Ryan
Cc: BPS Comprehensive Plan Testimony
Subject: RE: Our Comprehensive Plan

Follow Up Flag: Follow up
Flag Status: Completed

Dear James,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard your concerns and appreciates your feedback. Your email has been forwarded to the comprehensive plan testimony email inbox. They will review your testimony.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: James Ryan [mailto:jimryan1@gmail.com]
Sent: Thursday, November 19, 2015 1:35 PM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: Our Comprehensive Plan

Dear Mayor Hales,

I fully support the approach to industrial lands outlined in the current draft of the Comprehensive Plan. This approach focuses on cleaning up more than 900 acres of contaminated sites, intensifying use of the existing industrial land base, and limiting conversions of industrial land to other uses, rather than converting irreplaceable natural areas to industrial use.

- Portland has over 900 acres of contaminated sites. The Draft Comp Plan takes the right approach in focusing on cleaning up contaminated sites and restoring them to productive use rather than converting natural areas to meet industrial land demand;
- The Draft Comp Plan takes the right approach in focusing on intensification of use of the existing industrial land base rather than converting natural areas to meet industrial land demand;
- The Draft Comp Plan takes the right approach in limiting conversion of industrial lands for non-industrial uses rather than destroying the last remaining natural areas along our rivers. Industrial interests should not be

allowed to cash out their industrial land holdings and then turn around and demand cheap new industrial acres in critical natural areas.

- West Hayden Island should NOT be included in the industrial lands inventory; much of the land is liquefiable and subject to major destruction in the event of a large earthquake.
- Environmental regulations on industrial lands should not be restricted or rolled back—industrial lands along our rivers are also some of our most important and degraded natural resource lands and industrial landowners should not be exempted from protecting our rivers.

I fully support the current draft of the Comprehensive Plan.

Thank you,

James Ryan

1719 N Jantzen Ave

Portland, OR 97217

Arevalo, Nora

From: Washington, Mustafa
Sent: Thursday, November 19, 2015 3:14 PM
To: Leigh Schelman
Cc: BPS Comprehensive Plan Testimony
Subject: RE: I support all plans that prevent industrial development in wildlife habitat in Portland.

Follow Up Flag: Follow up
Flag Status: Completed

Dear Leigh,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard your concern and appreciates your feedback. Your email has been forwarded to the comprehensive plan testimony email box. They will review your concern.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: Leigh Schelman [mailto:newbike@teleport.com]
Sent: Tuesday, November 17, 2015 3:26 PM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: I support all plans that prevent industrial development in wildlife habitat in Portland.

Mayor Charlie Hales,

I've lived in Portland for 18 years, and own a house in SE Portland. The reason I love this city is that it has places like West Hayden Island, and that we continue to set new regulations in protecting our environment and wildlife.

I support the approach taken on industrial lands in the recommended draft of the Comprehensive Plan. I would like to see the last remaining natural areas along our rivers kept that way, including West Hayden Island. Please focus on cleaning up contaminated sites and leave natural sites alone.

Thanks,
Leigh Schelman
3577 SE Caruthers
Portland, OR 97214
503-234-6593

Arevalo, Nora

From: Tim Davis <pdxfan@gmail.com>
Sent: Thursday, November 19, 2015 1:04 PM
To: Washington, Mustafa
Cc: BPS Comprehensive Plan Testimony
Subject: Re: FW: The Port will try to change the Planning Commission's West Hayden decision; do NOT let them!

Follow Up Flag: Follow up
Flag Status: Completed

Thank you so very much, Mustafa, BPS and everyone!!

I'm taking an advanced transportation class right now with some world-famous urban planners, and EVERYTHING we're learning makes me realize all the MORE that "developing" 300 acres of West Hayden is not only insane and unnecessary, but it would harm life for ALL people in the Portland area.

Thanks again for passing along my concerns and taking them very seriously; it's *crucial* that we NOT make this mistake!!

Thanks,
Tim

On Thu, Nov 19, 2015 at 1:56 PM, Washington, Mustafa <Mustafa.Washington@portlandoregon.gov> wrote:

Dear Tim,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard you concerns and appreciates your feedback. Your email has been forwarded to the comprehensive plan testimony email box. They will review your testimony.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington

Constituent Services Specialist

mustafa.washington@portlandoregon.gov

From: Tim Davis [mailto:pdxfan@gmail.com]
Sent: Tuesday, November 17, 2015 3:57 PM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>; Commissioner Novick <commissioner-novick@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov.onmicrosoft.com>
Subject: The Port will try to change the Planning Commission's West Hayden decision; do NOT let them!

Hi City Council!

I hope you don't mind the "tough love/getting straight to the point" email--not my usual style. :)

I'm relieved that the Planning Commission got it right; the draft comprehensive plan/ economic opportunity analysis leaves West Hayden Island out, and it rightfully tells industry to clean up their HUGE amounts of contaminated sites and be more EFFICIENT with their bloated industrial land base.

However, we ALL know that the Port and other industrial interests are lobbying you to change the Planning Commission's recommendations. Do not even THINK about saying anything to them other than a resounding "NO WAY!!" Don't let the Port's propaganda and highly paid attorneys sway you one single bit. Any benefits of "developing" West Hayden are outweighed many times on multiple levels; it just is not needed at all.

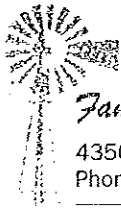
With everything we've learning about transportation, environmental, planning, brownfields, land use, efficiency and other issues around the world lately, it's utterly depressing that that anyone in power would even THINK about letting the Port get away with obliterating 300 acres of the best, largest, most sensitive natural land left in the entire city.

Why do we still subscribe to 1950s thinking? PPS **seriously** wants to build a PARKING STRUCTURE under Lincoln High School? It's **already** way too easy to drive to school. And we STILL can't even start to build a north-south cycle track downtown that's already **paid** for? I wish I knew what was happening to our city and how we used to lead the way in transportation issues.

I've been to over 50 major cities in the past two years, and it's just shocking how much we're falling behind other cities in every modern transportation measure, especially **people-friendly** infrastructure. Can we please, please, please take a stand against ridiculously nonsensical proposals by the Port and our very own major school district?!?

Thank you so much, as always... :)

--Tim Davis



KIRSCH

Family Farms, Inc.

4350 Mahony Rd. • St. Paul, Oregon 97137
Phone: (503) 633-4772 • Fax: (503) 633-4788

November 18, 2015

Dear Mayor Hales and Commissioners:

As a farmer I spend most of my time in the fields rather than in our urban city of Portland. While my soil is miles from City Hall, the decisions you make on SW 4th Ave have major implications for my farm and the rest of our state.

It has come to my attention that the blueprint for the future growth and development of the City of Portland does not assign much of that growth to the Portland Harbor. In fact, the Draft Comprehensive Plan and the supporting Economic Opportunities Analysis shows little future growth in the harbor. For the future of my business, and the farming families of Oregon, this does not make sense.

I farm 1000 acres growing over 11 different crops every year. Crops that include hazelnuts, vegetable seeds, grass seed, and wheat to name a few. Of these crops a large percentage of our straw, seed and nuts leave this country to feed the world via the Port of Portland. Our ability to continue to be a worldwide player in the industry of agriculture is imperative to keeping Oregon farmers strong and viable into the future. My fear of a lack of port planning for that future will put the future of my farm in great danger very quickly.

I urge you to recognize the impact that this can have on one of the most trade dependent states in the nation. 1 in 8 jobs in Oregon is tied to agriculture, so the impact of a port that is not workable for our industry would hurt Oregon far beyond just my farm and those I employ. Please understand the impact your decisions have for the entire health of our state and see the importance of ensuring that there is adequate growth in the harbor is a large piece of that puzzle.

I would ask that you set the Portland harbor forecast back to the "most likely" moderate growth as originally recommended by Bureau of planning and sustainability staff, and preserve the future for farms and Oregon.

Sincerely,

Brenda Frketchich
President
Kirsch Family Farms, Inc.

Arevalo, Nora

From: Washington, Mustafa
Sent: Thursday, November 19, 2015 10:28 AM
To: Randy Kiyokawa
Cc: BPS Comprehensive Plan Testimony
Subject: RE: Portland Harbor Comprehensive Plan

Follow Up Flag: Follow up
Flag Status: Completed

Dear Randy,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard you concerns and appreciates your feedback. Your email has been forwarded to the comp plan mail box. They will review your testimony.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: Randy Kiyokawa [mailto:randykiyo@gmail.com]
Sent: Wednesday, November 18, 2015 2:05 PM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Cc: Commissioner Novick <novick@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Gail Greenman <Gail@oregonfb.org>; Jean Godfrey <cgfg@hrecn.net>
Subject: Portland Harbor Comprehensive Plan

Nov. 18, 2015

Dear Mayor Hales and Commissioners:

I'm a third generation Apple and pear grower here in the beautiful Hood River Valley. My orchard is 80 miles from City Hall, but the decisions you make on SW 4th Ave have major implications for the rest of our state.

It has come to my attention that the blueprint for the future growth and development of the City of Portland does not assign much of that growth to the Portland Harbor. In fact, the Draft Comprehensive Plan and the

supporting Economic Opportunities Analysis shows little future growth in the harbor. For the future of my business, and the farming families of Oregon, this does not make sense.

Forty-five percent of the Hood River Valley's #1 crop gets exported and much through the port. Last years "slow-down" severely hurt our prices and has effect how I'm farming this year.

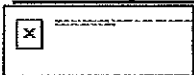
I urge you to recognize the impact that this can have on one of the most trade dependent states in the nation. If you care about working families and understand the impact your decisions have for the entire health of our state you should ensure that there is adequate growth in the harbor.

Have the vision to set the Portland harbor forecast back to the "most likely" moderate growth as originally recommended by Bureau of planning and sustainability staff, and preserve the future for farms and Oregon.

(A signed letter is attached)

Sincerely,

Randy Kiyokawa
541-806-7115
www.kiyokawafamilyorchards.com



Thank you for voting Kiyokawa Family Orchards one of the top five USA Today's Reader's Choice 10Best Apple Orchards in the country!

"Do not go where the PATH may lead; go instead where there is not path and leave a trail."
—Ralph Waldo Emerson

Call
Send SMS
Add to Skype
You'll need Skype CreditFree via Skype

Arevalo, Nora

From: Washington, Mustafa
Sent: Thursday, November 19, 2015 9:52 AM
To: Dawn Smallman
Cc: BPS Comprehensive Plan Testimony
Subject: RE: comment on Draft of Comprehensive Plan re: industrial land and West Hayden Island

Follow Up Flag: Follow up
Flag Status: Completed

Dear Dawn,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard you concerns and appreciates your feedback. Your email has been forwarded to the comp plan mail box. They will review your testimony and reply to you.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: Dawn Smallman [mailto:dawnsmallman@gmail.com]
Sent: Wednesday, November 18, 2015 5:49 PM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Novick <commissioner-novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov.onmicrosoft.com>
Subject: comment on Draft of Comprehensive Plan re: industrial land and West Hayden Island

Dear Mayor and Commissioners,

I'm writing to urge you to support the approach to industrial lands currently in the Draft of the Comprehensive Plan.

We need to use all industrial land before creating any new industrial sites and land. This approach will protect important natural habitat areas and limit environmental destruction.

Please advocate for maintaining current environmental regulations that cover all industrial lands - especially industrial lands along our rivers.

We need to clean-up industrial sites that are contaminated and work to restore them; and aim at a sustainable and environmentally-healthy future for our city and all of its inhabitants - both human and animal. Industrial

pollution effects all of us in negative ways - it cannot discriminate by species. When we pollute our salmon, we pollute ourselves as well.

Industries should be prevented from cashing-out their industrial lands, and then trying to acquire new lands at cheaper costs - lets create City codes, laws - whatever it takes - to prevent such damaging actions. Any business trying this kind of maneuver only has their monetary interests in mind - we need regulations that prevent this and hold industrial land owners responsible to their land, the condition of their land and if they leave the land - the condition they leave it in, before being released from ownership. Flipping industrial lands only encourages an excess of unused, industrial lands and greater loss of important natural areas and habitat.

West Hayden Island should be excluded from the industrial lands inventory - this is a key natural habitat area for numerous species, including salmon - it needs to be protected from all development. Please formally exclude it from the inventory.

Thank you,
Dawn Smallman
SE Portland

WAS No. 72 ON TESTIMONY LIST

Written Testimony* to Portland City Council, Nov. 19, 2015 re Draft Comprehensive Plan

Dear Mayor Hales and Commissioners,

I'm Rob Mathers. I work for a company and with many others that depend upon a viable working harbor... supported, at least policy-wise, by the city, state and region.

Portland's BPS & PSC have changed & artificially-reduced the cargo forecast in the EOA. It's my contention that this was done to avoid having to provide an adequate inventory & supply of realistically-developable industrial land, as required by the state, in the city's Comprehensive Plan. It represents yet another intentional effort by some individuals & groups, using BPS and PSC, to thwart industrial vibrancy & severely limit traded-sector activity in & thru Portland's working harbor. It's wholly-inconsistent with other "high aiming" aspects of the city's Plan. And it's self-defeating in many ways.

As currently targeted, the low cargo forecast is (among other things):

- Dismissive of the working harbor's contribution to the economic prosperity of the city, state, and region,
- Discouraging of investment in the working harbor, and
- Disrespectful to many low-barrier-to-entry, living-wage workers who cannot be here today, and who are too busy doing their jobs & supporting their families to mount e-mail or social-media campaigns.

Please send the EOA and cargo forecast back to PSC and BPS for appropriate, corrective action. A more realistic, balanced and impartial effort is required of the Commission and the Bureau. They work for all us and should act accordingly.

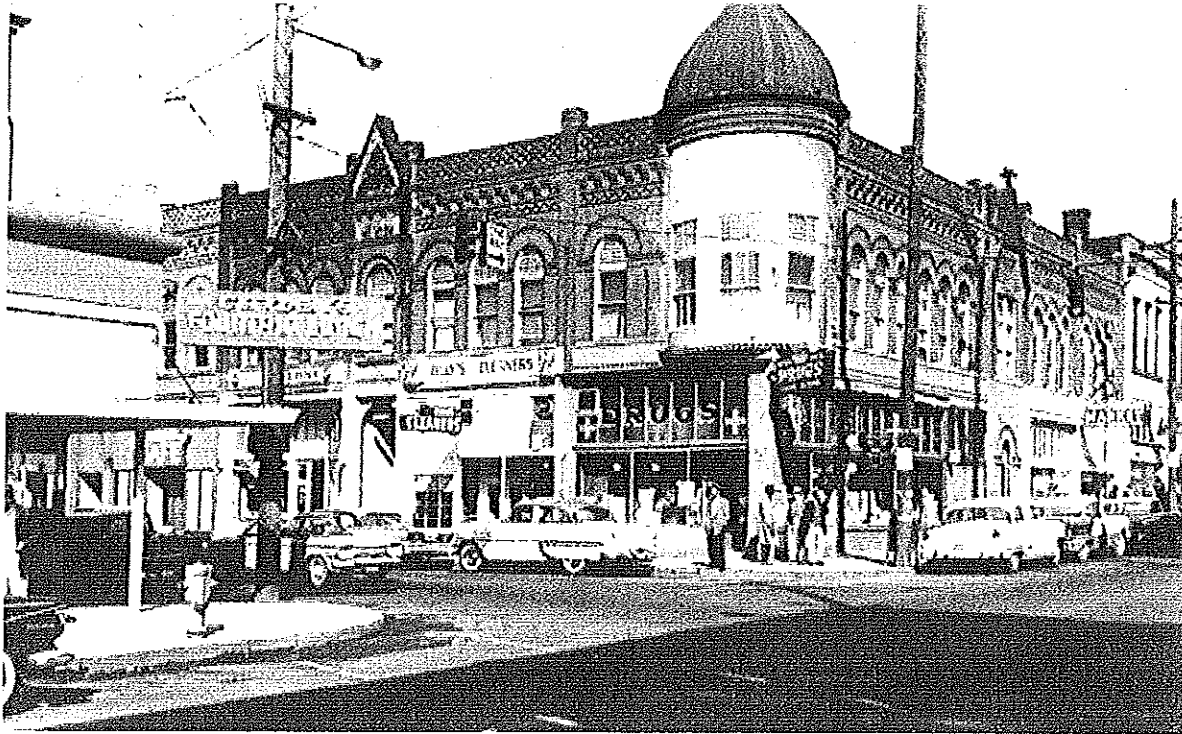
*if unable to deliver in person

Rob Mathers
5880 NW ST HELENS RD
PORTLAND, OR 97210

Oregon Historical Photo: Intersection of North Williams Avenue & North Russell Street

In the heart of the Albina district, the corner of North Williams and North Russell was once the center of a small yet thriving business district. These businesses were torn down in the early 1970s as part of large-scale urban renewal projects. Photo ca 1962.

The Oregon Historical Society. #bb009732



by [Jen Bodendorfer OPB](#) | April 20, 2015 8:42 a.m. | Updated: April 21, 2015 10:26 p.m.

Every week, Oregon Experience shares a photo highlighting the state's diverse, exciting history. All photos are courtesy of The Oregon Historical Society. At the turn of the last century, Portland's small African American community of about 2,000 lived near the train station on the west side of Portland. During World War II, more than 20,000 African Americans moved to Portland to work in the shipyards. Many of these workers lived in Vanport, a hastily constructed public housing project. When the Columbia River flooded in 1948, Vanport was destroyed. Due to Portland's discriminatory real-estate and banking practices, most of Vanport's African American residents were forced to relocate across the Willamette River to the inner-northeast district of Albina. Over time, the corner of North Williams and North Russell had become the thriving heart of the Albina business district. However, in the 1960s an urban renewal project to expand Emanuel Hospital displaced many of those living in Albina's central core. Once again, African Americans were forced out of their homes and funneled to neighborhoods further north and east. To learn more about the history of African Americans in Portland, watch the Oregon Experience documentary "Portland Civil Rights: Lift Ev'ry Voice."

Recommendations to City Council

Dear Mayor and City Council members:

On behalf of the Division Clinton Business Association, I am submitting the attached Top Ten Policy Recommendations created by the Division Design Initiative to the City of Portland. *These policies have the unanimous support of the Division Clinton Business Association Board* and have also been endorsed by the Hawthorne Area Business Association, and the Richmond Neighborhood Association and the Division Design Committee.

These policies represent a response to extensive community outreach, research, and stakeholder engagement over the past 18 months to create proactive approaches to engage community members in the planning and design of their neighborhoods.

The redevelopment of SE Division St can be viewed as a pilot effort or a prototype of what is being proposed in the Comprehensive Plan. Although the changes have brought benefits, our experience during the past three years of growth and change has led us to summarize the accompanying concerns of the community as follows.

Concerns Frequently Expressed by Division Neighborhood Residents, Property and Business Owners:

- A reduction in safety on adjacent neighborhood streets due to increased traffic speeds and volumes, and congestion on Division
- New development that creates discontinuity with existing neighborhood patterns, style, materials and building form.
- Loss of solar access for nearby residents
- Decrease in availability of parking for residents and customers
- Lack of access to green space and public gathering spaces to serve residents
- Dramatic neighborhood socio-economic changes, gentrification, and increasing lack of affordability of housing and loss/lack of neighborhood-serving businesses
- Lack of information, notification, or meaningful ability to participate in the planning process
- Lack of adequate design standards, and planning/design review criteria to ensure compatibility

We would like to highlight that the attached Top Ten Policy Recommendations are applicable city-wide and are not intended to reduce overall density, but simply to advance quality urban infill density that is more compatible, with fewer development impacts. We believe that we can accommodate our increasing population and long-range planning and sustainability goals if the following are better analyzed and incorporated into our Comprehensive Plan Update.

Growth Scenarios are Incomplete & Need Additional Analysis & Refinement:

We encourage the City Council not to approve the Draft Comprehensive Plan without directing further assessment of some important missing components not fully analyzed as part of the published Growth Scenarios Report.

We respectfully request the City Council to direct the Bureau of Planning & Sustainability (BPS) staff to conduct the following additional analysis:

1. **Study Growth Scenario Alternatives for Increasing Infill Density with Fewer Development Impacts:**

- o Higher density on wider streets, North-South corridors and major arterials, higher density at major intersection nodes to balance the reductions proposed below.
 - o Reduce/refine scale of development on narrower streets and older street-car era main streets with special character.
2. **Evaluation of a more comprehensive "Missing Middle" Neighborhood Infill Scenario** in addition to the "Centers & Corridors" growth scenario. This would mean further assessment of existing and potential increased neighborhood units achieved through additional Accessory Dwelling Units (ADU's), conversions of existing houses into duplexes, and more small-medium infill housing types like courtyards, rowhouses, etc on major arterials and narrow streets that when balanced with the suggestions in item two below could achieve our density goals in a more context-sensitive manner.
 3. **Evaluate sustainability impacts of focusing more density on N-S corridors** (including environmental, social and economic impacts), and likely reduced shading impacts, as well as the value of maintaining reasonable fair and equitable solar access in order to:
 - o Economic: retain existing economic value of residential and commercially developed properties.
 - o Social: contribute to public health, well-being, and thermal comfort; and
 - o Environmental: reduce costly energy consumption, generate alternative energy sources, and foster community resilience and sustainability.

Continue Portland's Leadership in Sustainability with more aggressive goals, programs and incentives

4. **Direct staff to research and return with a recommendation to Council for a set of further incentives and programs that support greater innovation, climate resiliency and sustainability including:**
 - a. Application of a "Green Factor" Program (used in Germany and Seattle) for the City of Portland or similar program that sets higher performance criteria and requirements for sustainable site and landscape requirements in new buildings. These programs help reduce urban heat island effect, advance resilient cool cities, and improved air quality benefits.
 - b. Assess impacts and value of tree preservation related to urban heat island protection, create recommendations and incentives for preserving large mature trees, and establish design goals and standards for maintaining spaces where large trees can be planted in the future.
 - c. Create relevant Incentive programs (Top 10 Policy #7,#8,#9) for:
 - "Zero Energy" verified buildings
 - Incentives for Beneficial Projects: waive transportation impact fees (SDC's) for beneficial community uses such as affordable housing, senior housing, daycare, and alternative transit-oriented businesses.
 - Adaptive reuse of older commercial buildings with special character (see report by preservation Green Lab, "Older, Smaller, Better" on the key value that mixed vintage buildings bring to communities)
5. **Close the Residential Floor Area Ratio Code Loophole in Mixed Use Buildings (Top 10 Policy #2)**
 Community members have expressed extensive concerns about the overly built-out, boxy nature of recent developments, the creation of large blank walls, flat facades, the lack of context-sensitivity, and buildings with significant impacts on adjacent residents and neighboring buildings.

Direct staff to come back with a recommendation for how to implement the residential FAR requirement now, in an expedited manner that does require the community to wait for code improvements until 2017. The floor area ratio requirement will help restore a

more reasonable building envelope and create better code consistency and parity for the residential development in mixed use buildings.

We encourage you to consider the concerns, goals and pro-active solutions presented by the Division Design Committee. They highlight important policy opportunities that can help Portland to grow into a more compact, livable city through innovative design that is both dense and sensitive to community context.

Respectfully submitted on behalf of the Division Clinton Business Association,

Sydney Mead, Founder & President of Habitate, LLC
President of the Division Clinton Business Association, Division Design Committee
member

ATTACHMENT

About the Division Design Initiative

The Division Design Committee is the implementing committee of the Division Design Initiative (DDI), a community grassroots project to help give a greater voice in the future of design, planning and evolution of Division Street. This work began in December 2013 with the unanimous authorization by the Richmond Neighborhood Association to form an inter-neighborhood committee to a) respond to community design issues and concerns and to b) make further recommendations for implementation of the Division Green Street/Main Street Plan.

The Division Design Initiative maintains a Design Committee of elected and appointed members representing seven neighborhood and business associations including the Richmond Neighborhood Association, Hosford, Abernethy Association, Mount Tabor, South Tabor, Southeast Uplift, Sustainable Southeast, and the Division Clinton Business Association. The boundaries of the project are the existing Division Green Street/Main Street Plan extents which span Division Street from 11th through 60th Street.

How much effort has been put into the Division Design Initiative

- **Extensive Community Engagement & Research:** Listening to the community over 18 Division Design Committee meetings open to the public to discuss community goals and design priorities; through surveys, tabulating results and priorities and translating into DDI documents. The DDI has held large public events to map community priorities, organized public forums on infill and managing growth, and walking tours to engage neighbors and get feedback. In May 2015 the DDI also held a stakeholder workshop with City planning staff, City Bureau of Housing, neighborhood and business association leaders, affordable housing buildings, Division property owners, architecture and real estate professionals, local developers, and building efficiency nonprofits to discuss strategies to address affordable, green and adaptive reuse.
- **Development of Tools including a Working Draft of Division Design Guidelines + Draft Toolkit for Neighborhood Design:** DDI products are intended to guide policy makers, developers, and give the community specific tools, strategies and, importantly, language that allows them to describe the issues and be constructively involved in the ongoing discussions about development on Division.
- **Policy Recommendations:** DDI work has not only clearly identified the issues, but most importantly, has proposed solutions, through Design Guidelines and now a Policy Framework including:
 - a. Community Notification & Engagement Recommendations (supported by RNA, DCBA, HAND, HBBA, Laurelhurst NA, and others)
 - b. Top Ten Policy Recommendations – Community-wide application (Endorsement of all 10 received by the Division Clinton Business Association, Richmond Neighborhood Association and the Hawthorne Area Business Association).
 - c. Comprehensive Plan Recommendations
 - d. Mixed Use Zoning Recommendations - City-wide and specific to Division
 - e. Division Perception Survey

These recommendations for additional clear and objective development standards improve upon Portland's current system by establishing a finer level of control over shape and size of

buildings and are tailored, in a sensible way, to the context of main street environments like Division.

Extra Stuff we have written that could be drawn from as background...

Since 2012, the Division corridor has undergone a rapid transformation unparalleled in the history of Eastside development and well beyond what was envisioned in the Green Street Main Plan. The area between SE 30th and 50th Avenues has seen the arrival of close to 400 new residential units with accompanying commercial spaces. On one hand, the street has become a vibrant commercial corridor attracting visitors from other parts of the city and the region. However, for many long-residents, the dramatic transformation of the corridor represents a tsunami of growth that has been quite traumatic, causing a deep sense of loss for the small, locally-serving, "village-like" atmosphere, special streetcar/main street character, eclectic street identity that has shifted seemingly overnight to serve a higher-end level of business and rental market, making it less affordable to local businesses. This loss of affordability has also impacted the housing rental prices, making the new developments out of reach for many renters and causing concerns about gentrification, increased traffic congestion on traditionally quiet residential streets, parking problems and other impacts such as loss of solar access, privacy and displacement of residents. Of great concern is that the majority of this private development of eight blocks of the Division corridor is in direct contradiction to broad community concern expressed in the media, in public testimony and in neighborhood surveys responses. With few avenues to help shape the changes occurring all around them, there is a good deal of anger and frustration in the Division community, some of it perhaps masking a sense of grief and loss, even of despair. Citizens have deep connections to their neighborhoods and "psychology of place" is important consideration for planners and designers when areas of our city are experiencing rapid growth and change.

For Division, some of the breaks in our civic fabric may have happened with the Mt Hood Freeway project that, when ultimately abandoned, led to a fragmentation, displacement, and later disinvestment of public and private improvements for next 40 years. The impacts of this legacy of disinvestment further led to ongoing decline of street and land conditions. It should also be recognized that this history has also contributed to the identity of Division as a small scale, affordable, funky and eclectic, blue collar "maker" street with a collection of scattered historic buildings. With the rapid redevelopment of Division from both public investments in the Division Streetcape project and extensive new private large development projects over the span of 18-24 months, the long-standing neighborhood character and identity as well as social fabric of the neighborhood has been significantly altered. This has left many residents without either the policy or political framework to have a voice in the evolution of their neighborhood. This has caused a crisis within the local Division community that some may paint as growth/no growth, density/anti-density. We see this same crisis reflected citywide. In an effort to help shift the dialogue away from complexities that polarize communities when discussing issues of density to the fundamental importance of DESIGN, ideally focusing less on where we may be divided towards what we can agree upon as shared goals. By creating design guidelines that help us connect to our history, sense of place, and unique identity we hope to help heal some of these impacts and collectively shape a common vision for the future evolution of Division.



Testimony of:

Kristin Meira
Executive Director
Pacific Northwest Waterways Association (PNWA)

Submitted to:

City of Portland City Council
1221 SW Fourth Avenue, Suite 7100
Portland, OR 97201

Consideration of:

Comments on the City's Draft Comprehensive Plan
November 19, 2015
Portland, Oregon

Mr. Mayor, Councilmembers,

Thank you for the opportunity to provide comment. I represent the Pacific Northwest Waterways Association, or "PNWA". PNWA is non-profit based here in Portland, and comprised of over 135 public ports, towboat companies, steamship operators, agriculture and forest products producers, public utilities, manufacturers and others in Oregon, Washington, and Idaho. Our members join together to address navigation, transportation, trade, energy, regulatory and environmental policies. The Port of Portland is a member of our group, and a full list of our membership is attached to this testimony.

The Columbia Snake River System is a critical piece of the nation's navigation portfolio, providing benefits not just to the Pacific Northwest, but far into the heartland of our country. The Columbia River is the nation's number one gateway for the export of wheat, and second for soy. When you consider all the grains moving on our river, we are the third largest grain export gateway in the world. We are also tops on the West Coast for wood exports and mineral bulk exports. We are an export heavy system, including significant quantities of Oregon goods, and play an important role in balancing the nation's trade deficit.

In 2010, the region celebrated the completion of the Columbia River channel deepening project. The federal government, the states of Oregon and Washington, and ports on the Lower Columbia River invested over \$183 million to deepen the Columbia River navigation channel to 43 feet. The purpose of this project was to make the river system more marketable and to bring new business to our region.

www.pnwa.net

It has been five years since the channel deepening project was completed. A recent study found that in those five years, over \$1 billion in new private and public investment has occurred along the lower river. Over \$370 million was invested in the Port of Portland area alone. Channel deepening has truly solidified the Columbia River's position as one of the nation's leading international trade gateways.

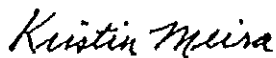
The significant federal and state investments that have been made in our river system means that we are positioned to operate more efficiently, move more cargo, and employ more residents in our area. These investments were made because leaders recognized the steady growth in cargo movement which has occurred on our river system for over fifty years. This growth is forecasted to continue, including here in Portland.

The Port of Portland serves a wide variety of bulk cargos which have grown to over 23 million tons a year, valued at over \$13 billion. Those numbers are impressive, but we know what is most important to the people we talk to is what this means to the people who live here. It is critical to note that this river system directly supports over 40,000 jobs in our region, and over half of those jobs are located in the Portland area.

For over 80 years, PNWA has advocated for the region's navigation projects and broader regional economic development. We have supported river system infrastructure since 1934 because of the living wage jobs and economic opportunity it provides for Northwest communities. We know the Port of Portland will continue to play a key economic development role for the City of Portland. We urge you to recognize the trends and economic activity in our area, and change assumptions in the draft Comprehensive Plan from a low forecast to a medium forecast for the Port.

Thank you for considering these comments.

Sincerely,



Kristin Melra
Executive Director
Pacific Northwest Waterways Association

PNWA Membership Roster



Advanced American Construction	ILWU Puget Sound District Council	Port of Longview
Almota Elevator Company	J-U-B Engineers, Inc.	Port of Morrow
American Construction	Kalama Export Company	Port of Newport
American Waterways Operators	Kiewit Infrastructure West Co.	Port of Pasco
Apollo Mechanical Contractors	KPFF Consulting Engineers	Port of Peninsula
Bell Buoy Crab Co.	Lampson International, LLC	Port of Port Angeles
Bellingham Cold Storage	Landau Associates	Port of Portland
BergerABAM Engineers, Inc.	LD Commodities Pacific, LLC	Port of Ridgefield
Bergerson Construction, Inc.	Lewis-Clark Terminal Association	Port of Royal Slope
BNSF Railway Company	Marine Industrial Construction	Port of Seattle
BST Associates	McGregor Company	Port of Sluslaw
Business Oregon Infrastructure	Millennium Bulk Terminals	Port of Skagit
Finance Authority	Moffatt & Nichol	Port of St. Helens
Central Oregon Basalt Products	Morrow County Grain Growers	Port of Sunnyside
Central Washington Grain Growers	Morrow Pacific Project	Port of Tacoma
Clark Public Utilities	Normandeu Associates, Inc.	Port of Toledo
Clearwater Paper Corporation	Northwest Grain Growers, Inc.	Port of Umatilla
Collins Engineers Inc.	Northwest Public Power Assoc.	Port of Umpqua
Columbia Basin Development	OBEC Consulting Engineers	Port of Vancouver
League	OR Public Ports Association	Port of Walla Walla
Columbia County Grain Growers	OR Wheat Growers League	Port of Whitman County
Columbia Grain	Pacific Northwest Farmers Co-op	Port of Woodland
Columbia River Bar Pilots	Pacific Northwest International	PROCESS, Inc.
Columbia River Pilots	Trade Association	Puget Sound Pilots
Columbia River Port Engineers	Parsons Brinckerhoff	RSEC Environmental & Engineering
Columbia River Steamship	PBS Engineering & Environmental	Consulting, Inc.
Operators Association	PND Engineers, Inc.	Schwabe, Williams & Wyatt
Columbia River Towboat	PNGC Power	Scouler Company
Association	Pomeroy Grain Growers	SDS Tug & Barge
Cooperative Agricultural Producers	Port of Anacortes	Shaver Transportation Company
Dawson & Associates	Port of Astoria	Stoel Rives LLP
David Evans and Associates	Port of Bandon	Summit Strategies
Dunlap Towing	Port of Bellingham	Teevin Bros.
Dutra Group	Port of Benton	TEMCO
East Columbia Basin Irrigation	Port of Camas-Washougal	Tidewater
District	Port of Cascade Locks	United Grain Corporation
EGT, LLC	Port of Chelan County	USA Dry Pea & Lentil Council, Inc.
Evergreen Engineering	Port of Chinook	Vancouver Energy
Foss Maritime Company	Port of Clarkston	Van Ness Feldman
Foster Pepper	Port of Columbia County	WA Association of Wheat Growers
Franklin PUD	Port of Coos Bay	WA Council on International Trade
GEI Consultants	Port of Everett	WA Grain Commission
Gibbs & Olson, Inc.	Port of Garibaldi	WA Public Ports Association
Global Partners LP	Port of Gold Beach	WA State Potato Commission
Gordon Thomas Honeywell	Port of Grays Harbor	Westwood Shipping Lines
Government Affairs	Port of Hood River	Whole Brain Creative
Great Lakes Dredge & Dock	Port of Ilwaco	Wildlands, Inc.
Hart Crowser, Inc.	Port of Kalama	
Idaho Wheat Commission	Port of Kllickitat	
ILWU Oregon Area District Council	Port of Lewiston	

www.pnwa.net

November 16, 2015

Mayor Charlie Hales
Commissioner Nick Fish
Commissioner Amanda Fritz
Commissioner Steve Novick
Commissioner Dan Saltzman
1221 SW 4th Avenue, Room 110
Portland, OR 97204

Portland Comprehensive Plan

Riverside Golf and Country Club would like to offer some comments on the Draft Portland Comprehensive Plan. As an overall perspective on this issue, Riverside plans on continuing to operate as a golf course for a very long time. We don't have any desire to change our great facility and we are operating successfully. **This designation is bad for our operation.**

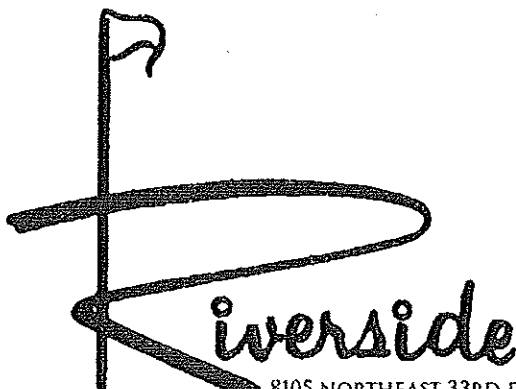
After much discussion among our management team and the Board of Directors, we have concluded that we must oppose the designation of Riverside as future industrial. In addition, we believe the Economic Opportunities Analysis (EOA) characterization of metro area golf courses is incorrect, and its prediction of Riverside's demise in the next twenty years is wrong.

The specific EOA language we refer to is (March 15 Proposed Draft, Section 4 - Community Choices, p. 23):

"While these golf courses (Riverside and Broadmoor) could potentially remain in operation indefinitely, national market trends indicate an oversupply of golf courses in the coming years relative to population demographics, particularly in inner-city locations. Given these trends and continuing intensification of industrial development in the surrounding area, it is reasonable to expect potential reuse of these sites in the 2035 planning horizon and the proposed Comprehensive Plan proposal would accommodate that change."

We take issue with these statements for several reasons. With regard to market trends, there are certainly market changes occurring which affect golf operations, both positively and negatively. Riverside has a number of inherent advantages:

1. A close-in location near many vibrant neighborhoods accessible to a large area population in Oregon and Washington.
2. A membership-based operational model, which provides a more consistent cash flow than a traditional public use, pay-as-you-go course.
3. A growing Portland-area population.
4. A strong core membership base.
5. A strong junior golf program.



GOLF & COUNTRY CLUB

8105 NORTHEAST 33RD DRIVE PORTLAND, OR 97211-2095 PHONE (503) 288-6468 FAX (503) 282-1383

Ord. 187831, Vol. 1.S.A., page 1360

November 16, 2015

So, while there has been a decline in the number of golf courses nationally, one needs to look at individual circumstances. Riverside has a very different operating model than Broadmoor or Colwood. They charge per round played, while Riverside is membership based. If Riverside had been experiencing declining membership and severe financial hardship, we could understand the conclusion. On the contrary, we weathered the recession and are doing quite well. We are planning for the future and continue to make improvements to our facility. Our current membership is currently 415 golfing members and 163 non-golfing members for a total of 578 (our golfing membership is considered full at 430). We have 84 employees, 40% of which are youth working after school and summers.

A more appropriate strategy might be to look at this issue again later in the 20-year time frame, such as 2030-2035.

While we have many long-term members, there is always turnover in this market and we are always recruiting a certain number of new members. This designation is bad for our operation and will degrade our business operation. Eroding this ability to attract members is not in the best interests of Riverside. The word is starting to get out that Riverside has been "rezoned industrial" and will convert (though this is technically not correct). Our competitors will use this against us to boost themselves at our expense.

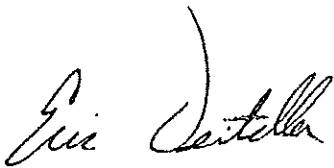
We are also concerned about the regulatory process going forward with this designation and the uncertainties that it provides. There may also be unintended consequences of this action. For example, in future discretionary reviews, City staff may unintentionally apply inapplicable standards because of this designation.

Riverside has been a part of Portland's northeast neighborhoods for 90 years and expects to continue this for another 90 years. Thus we don't see Riverside as a viable industrial land candidate and staff should look for other opportunities that have more potential.

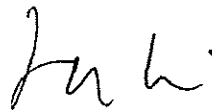
We would request that:

1. The EOA be revised to remove the speculative language specifically calling out Riverside's eventual demise.
2. The City removes the map designation of industrial from Riverside, just as was done for Columbia Edgewater and city-owned Heron Lakes golf courses.

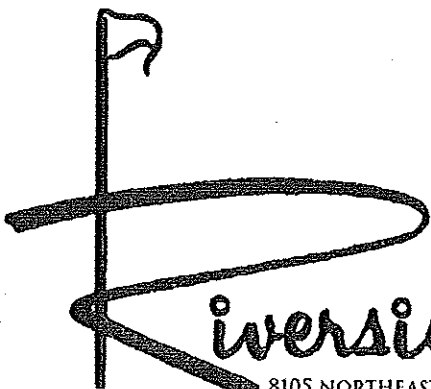
Sincerely,



Eric Deitchler, President



Lucas Miller, General Manager



GOLF & COUNTRY CLUB

8105 NORTHEAST 33RD DRIVE PORTLAND, OR 97211-2095 PHONE: (503) 288-6468 FAX: (503) 282-1383

Ord. 187831, Vol. 1.S.A., page 1361



OREGON
ASSOCIATION OF
NURSERIES

29751
SW Town Center
Loop W

Wilsonville, OR
97070

Phone
503.682.5089

Toll-Free
1.888.283.7219

Fax
503.682.5099

Web
www.oan.org

November 17, 2015

Dear Mayor Hales and Commissioners:

As a member of the agricultural community, I spend most of my time on farms than in our urban city of Portland. While our farmland and fields are miles from City Hall, the decisions you make on SW 4th Ave have major implications for the rest of our state.

The nursery and greenhouse industry is the state's second largest agricultural sector, and is finally seeing a resurgence following years of significant economic declines during and after the great recession. Oregon's nursery industry ranks third in the nation, with over \$830 million in sales annually to customers in Oregon, the rest of the United States, and abroad. In fact, nearly 75% of the nursery stock grown in our state leaves our borders - with over half reaching markets east of the Mississippi River. We send ecologically friendly green products out of the state, and bring traded sector dollars back to Oregon.

Nursery association members represent wholesale plant growers, Christmas tree growers, retailers, and greenhouse operators. Our members are located throughout the state, with our largest nursery growing operations found in Clackamas, Marion, Washington, Yamhill and Multnomah Counties.

It has come to my attention that the blueprint for the future growth and development of the City of Portland does not assign much of that growth to the planning area near the Portland Harbor (which from our view is the Port of Portland). In fact, the Draft Comprehensive Plan and the supporting Economic Opportunities Analysis shows little future growth in the planning area. For the future of my business, and the farming families of Oregon, this does not make sense.

The slowdown at the Port earlier this year harmed the nursery and greenhouse industry. It costs more to truck a load of trees or shrubs up to Tacoma or Seattle in order for it to be shipped to our overseas markets. The City of Portland is conducting its own slowdown of the Port by your actions to harm one of the few economic generators you have. Generally if a state or local government wants something to go away - they tax it, if they want to suffocate a sector - poor planning and artificial restrictions of growth opportunities is a certain way to do it.

Portland does not act in a vacuum and would urge to you to consider why trade is critical for our economic health.

- International trade is one of the most important economic opportunities for Oregon workers. Trade in Oregon supports over 490,000 jobs.

- Trade-dependent jobs grew 7.5 times faster than total employment over the last decade.
- Wages in trade-dependent jobs are 20-40% higher than non-export jobs, now totaling nearly \$21 billion, have increased by 40% since the 2009 recession.
- Greater Portland was one of only four regions in the country to double their exports over the last decade.

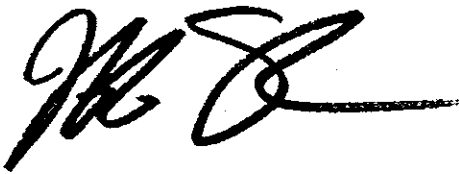
Trade is vital to the growth of small companies, which export directly and supply export-dependent large businesses. A total of 6,001 companies exported goods from Oregon locations in 2012. Of Oregon's exporting companies, 88 percent were small- and medium-sized enterprises. Small and medium sized firms generated 34 percent of Oregon's total exports of merchandise in 2012.

Oregon produces the best agricultural commodities in the world. Oregon's agricultural exports include wheat, processed fruits and nuts, fresh fruits, processed vegetables, dairy products, wine, grass seed, and nursery stock. The State of Oregon offers domestic and international trade assistance programs to provide help to Oregon farmers, ranchers, nursery growers, fishermen and companies with market development, products development and marketing.

I urge you to recognize the impact that this can have on one of the most trade dependent states in the nation. If you care about working families and understand the impact your decisions have for the entire health of our state you should ensure that there is adequate growth in the harbor.

We implore you to consider the many factors that set the region up for sustainable economic growth. The OAN urges you to set the Portland harbor forecast back to "most likely" moderate growth as originally recommended by Bureau of planning and sustainability staff, and preserve the future for farms and Oregon.

Sincerely,

A handwritten signature in black ink, appearing to read 'J Stone', with a long horizontal flourish extending to the right.

Jeff Stone, Executive Director
Oregon Association of Nurseries

Arevalo, Nora

From: Hales, Mayor
Sent: Tuesday, November 17, 2015 10:04 AM
To: Peggy Dollar
Cc: BPS Comprehensive Plan Testimony
Subject: RE: Draft Comp Plan

Dear Margaret,

Thank you for contacting the Mayor's office. I would like to let you know your email has been forwarded to the Comp Plan Testimony mail box. They handle all testimonies and questions regarding the comp plan.

Sincerely,

Mustafa Washington
Constituent Services Specialist
Office of Mayor Charlie Hales
P:503-823-4120
mustafa.washington@portlandoregon.gov
www.portlandoregon.gov/mayor

From: Peggy Dollar [mailto:peggydollar@gmail.com]
Sent: Sunday, November 15, 2015 2:03 PM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Cc: Commissioner Fish <nick@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov.onmicrosoft.com>; Commissioner Fritz <amanda@portlandoregon.gov>
Subject: Draft Comp Plan

To Whom This Concerns:

The Draft Comp Plan takes the right approach in focusing on intensification of use of the existing industrial land base rather than converting natural areas to meet industrial land demand. The Draft Comp Plan takes the right approach in limiting conversion of industrial lands for non-industrial uses rather than destroying the last remaining natural areas along our rivers. Industrial interests should not be allowed to cash out their industrial land holdings and then turn around and demand cheap new industrial acres in critical natural areas.

I support the approach taken on industrial lands in the recommend draft of the Comprehensive Plan. Portland has over 900 acres of contaminated sites. The Draft Comp Plan takes the right approach in focusing on cleaning up contaminated sites. Environmental regulations on industrial lands should not be restricted or rolled back—industrial lands along our rivers are also some of our most important and degraded natural resource lands and industrial landowners should not be exempted from protecting our rivers.

Personally, this is an area my Bridgeton Road neighborhood enjoys just across the North Portland Harbor. We have fought for years to protect precious natural areas like West Hayden Island from industrial development. West Hayden Island should not be included in the industrial lands inventory.

I support the approach to industrial lands currently in the Draft Comp Plan.

Very Sincerely,

Margaret Dollar
12 NE Bridgeton Rd
Portland, OR 97211
on the North Portland Harbor



Oregon State
Building and Construction Trades Council
AFL-CIO



November 11, 2015

RECEIVED

NOV 16 2015

Commissioner Nick Fish

VIA FACSIMILE & U.S. MAIL

Mayor Charlie Hales
1221 SW 4th Avenue
Portland, OR 97204

Commissioner Amanda Fritz
1221 SW 4th Avenue, Room 220
Portland, OR 97204

Commissioner Nick Fish
1221 SW 4th Avenue, Room 240
Portland, OR 97204

Commissioner Steve Novick
1221 SW 4th Avenue, Room 210
Portland, OR 97204

Commissioner Dan Saltzman
1221 SW 4th Avenue, Room 230
Portland, OR 97204

Dear Mayor Hales and Commissioners Fish, Saltzman, Fritz and Novick:

It has come to my attention that the blueprint for the future growth and development of the City of Portland does not assign much of that growth to the Portland Harbor. In fact, the Draft Comprehensive Plan and the supporting Economic Opportunities Analysis shows little future growth in the harbor. This does not make sense. The Portland harbor:

- is home to nearly 100 businesses
- those businesses employ more than 300 smaller local businesses
- together they employ more than 50,000 employees
- nearly 60% of the workforce receives middle income wages
- about 20% of the workforce is ethnically or racially diverse
- in the past 5 years the harbor businesses have invested more than \$370 million
- and generated more than \$4.5 million annually in tax revenue locally

If there is any place in this City that leadership should urge job growth, it's the Portland harbor. This is a place of job diversity and predominantly middle wages. One employer in the harbor has more than 22 languages spoken on site. Many of the employers work directly with Portland Community College for job placement and skill development for existing employees. This is exactly what our City needs to ensure future work force diversity and wages to afford a reasonable standard of living in Portland.

The businesses in the harbor are major employers in this City and their procurement of supplies, raw materials, capital goods and services from small local businesses is meaningful to the neighborhoods and that folks that are employed as a result. The Building Trades wants to support these businesses because they support us. We build, maintain, repair, and upgrade their buildings and facilities. These are important jobs for the men and women of this Council- journey level and apprentices.

Therefore, if you care about the diverse employment opportunities for all of the residents of the City, then you should ensure that there is adequate growth in the harbor. I urge you to change the Portland harbor forecast back to the "most likely" moderate growth as originally recommended by Bureau of planning and sustainability staff.

Sincerely,



John Mohlis
Executive Secretary-Treasurer

JCM:cmc
opeiu #11
aff-cio

Arevalo, Nora

From: Washington, Mustafa
Sent: Monday, November 16, 2015 3:49 PM
To: BPS Comprehensive Plan Testimony
Subject: FW: Comprehensive Draft Plan

Follow Up Flag: Follow up
Flag Status: Completed

From: powolfe@earthlink.net [mailto:powolfe@earthlink.net]
Sent: Friday, November 13, 2015 2:11 PM
To: Commissioner Fish <nick@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>;
Commissioner Saltzman <dan@portlandoregongov.onmicrosoft.com>; Commissioner Fritz
<amanda@portlandoregon.gov>; Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: Comprehensive Draft Plan

Dear Portland Commissioners and Mayor Hales,

I am one of the many citizens of Portland who support the approach to industrial lands outlined in the current draft of the Comprehensive Plan. We need to continue on our pathway to clean up industrial waste sights and prevent future conversions of irreplaceable natural areas to industrial uses. Everyone I know in the entire Metro area has supported, and will continue to support in the ballot booth, your decisions which protect our precious natural areas. We do pay attention and are thankful to those of you who vote for the future health of our land and our citizens.

Thanks,

Phyllis Wolfe

4329 SE Steele St., Portland 97206

Arevalo, Nora

From: Washington, Mustafa
Sent: Monday, November 16, 2015 3:43 PM
To: BPS Comprehensive Plan Testimony
Cc: Elmore-Trummer, Camille
Subject: FW: Comprehensive Plan & West Hayden Island

Follow Up Flag: Follow up
Flag Status: Completed

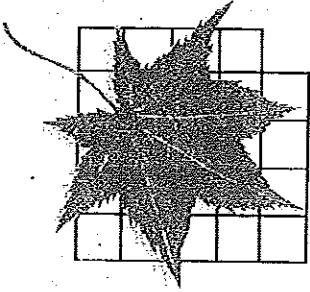
From: Thomas Dana [mailto:thomashdana@gmail.com]
Sent: Saturday, November 14, 2015 5:46 PM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: Comprehensive Plan & West Hayden Island

Dear Mayor Hales,

Please support the Draft Comprehensive Plan and keep West Hayden Island out of the Industrial Lands Inventory.

Thank you,

Tom Dana
ThomasHDana@gmail.com
503-954-9217
1501 N Hayden Island Dr
Unit 110E
Portland, OR 97217



Dear Mayor Hales and City Commissioners

11/12/15

I am writing to you because we are concerned about the low growth rate forecast for the Portland Harbor in the Economic Opportunities Analysis for the Draft City of Portland Comprehensive Plan. Our concern is that a low growth forecast minimizes the success of businesses that we rely on for our small business. Further we firmly believe that a diverse mix of business is a good recipe for a resilient economy.

Our company, Stevenson & Associates Inc, is a 31 year old Oregon Sub-S Corporation that installs and maintains landscape for companies including: Farwest Steel, International Paper, EVRAZ NA, Oregon Metal Slitters, Peterson Cat, Haney Trucking, Powin LLC, Tarr Fuel LLC, Rivergate LLC, Get Space Storage among others. While we have noticed a decline in truck traffic following the pull out of the containers companies, the Harbor area is a business strong hold for us. We hope the City of Portland is more foresighted than the people controlling the container business at the Port.

Please consider revising the Portland Harbor forecast to insure a diverse economic base for present and future generations of Portlanders.

Sincerely,

Lee Stevenson/ President.

Thank you.

STEVENSON & ASSOCIATES, INC.
LANDSCAPERS, NATURALLY

P O Box 23398 • Tigard, Oregon 97281 • License # 5650 • CCBW License STEVEA0924NG • tel 971-228-8431 • fax 971-228-8436

Ord. 187831, Vol. 1.3.A, page 1370

NECN

NORTHEAST COALITION
OF NEIGHBORHOODS

RECEIVED
15 SEP 26 AM 10:27

Mayor Charlie Hales
1221 SW 4th Avenue, Room 340
Portland, OR 97204

Re: Comprehensive Plan Growth Scenarios Report

September 21, 2015

Dear Mayor Hales,

The Northeast Coalition of Neighborhoods is dedicated to the safety and livability of our twelve inner North and Northeast neighborhoods. We are writing to express concern with the Comprehensive Plan's Growth Scenarios Report, which we feel indicates that the current draft of the Comprehensive Plan may fail to meet the performance goals laid out in the Portland Climate Action Plan and other documents. Further, we are concerned about the process, and the fact that citizens were never offered a scenario for consideration that clearly reached or exceeded the planning goals.

None of the growth scenarios presented, including the draft Comp Plan, appear to actually achieve the City's goals for mode split, VMT reduction, or GHG reduction in the target year. However, some of these numbers were difficult to tease out of the report, due to mixing and matching of base years for goals versus the draft plan (2008 vs. 2010, for instance). City staff should use consistent base year and horizon year numbers in all instances; where a primary data source is not available for a particular year, the number should be estimated using a transparent and peer-reviewed methodology.

In particular, the goal for VMT reduction is a 30% reduction from 2008 by 2030. The draft Comprehensive Plan achieves a 27% reduction from 2010 by 2035. There is no discussion in the scenarios report concerning whether a 27% reduction from 2010 by 2035 is sufficient to meet the goal of reducing by 30% from 2008 by 2030. Ideally, city staff would produce and report these numbers.

Further, the target for mode share is for 70% of trips to be on modes other than the single-occupant automobile by 2035. The proposed plan only achieves 65% non-auto mode share. There is no additional information provided regarding how it may be possible to hit the 70% goal.

The information concerning GHG emissions is scant at best. While a VMT reduction of 3% is claimed below 2010 levels by 2035 as a result of the land use and transportation investments in the Proposed Plan, the lion's share of the emission reductions shown are from technological

www.necoalition.org

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

Ord. 187831, Vol. 1.3.A, page 1371

changes to the automobile fleet that are not due to any policies contained within the Plan. It would be helpful if an additional scenario were developed that expressed a set of policies that would result in greater VMT (and thus GHG) reductions as a direct result of policies contained within the Plan.

Indeed, there were no scenarios presented which clearly showed a package of policies that would exceed the City's goals for GHG emissions reduction, VMT reduction, or horizon-year mode split. It is traditional in a scenario planning exercise to offer such a goal-exceedance scenario, so that participants in the exercise understand the trade-offs involved in meeting or exceeding goals. This is especially true for a city like Portland, which considers itself at the forefront of implementing innovative and ambitious carbon reduction policies. Without such a scenario present, it's hard to ascertain what package of strategies would be required to achieve performance beyond the best-performing scenario presented to date. Especially when meeting or exceeding goals can involve difficult policy decisions and trade-offs, it is important to present options as early as possible, so participants in the scenario planning exercise (in this instance, the citizens and decision-makers of Portland) have enough data to make informed choices.

There was no breakdown of factors contributing to performance towards goal achievement. Often, the results of a sensitivity analysis will be presented as a part of a scenario analysis report, so that participants can understand which policy levers result in the most movement towards goal achievement. This can require many hours of processing time, as the same scenario may need to be run with and without a certain policy "turned on" to determine the order of magnitude of impact that it may have. This is time well spent, as the results can be important in informing cost-benefit analyses regarding specific policy choices.

Some strategies that we would like to see the City consider studying to meet or exceed the mode share and VMT reduction targets include: Transportation Demand Management, including pricing (parking pricing, cordon pricing, congestion pricing, etc.), employer-based mode switch incentive programs, etc.; greater investment in bicycle, pedestrian, and transit infrastructure; reduction in road ROW dedicated to automobiles; and exploration of additional land use policies that provide the option of car-lite living to a maximum number of Portland households and businesses.

We would be happy to meet with staff to better explain our concerns and allow them to answer our questions.

Signed,



Alan Silver
Chair, NECN Board of Directors

CC: Director Susan Anderson, BPS, Planning & Sustainability Commission, Commissioner Nick Fish, Commissioner Amanda Fritz, Commissioner Steve Novick, Commissioner Dan Saltzman

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

Arevalo, Nora

From: Dunphy, Jamie
Sent: Friday, November 06, 2015 1:13 PM
To: BPS Comprehensive Plan Testimony
Subject: FW:
Attachments: 20151106100152322.pdf

Follow Up Flag: Follow up
Flag Status: Completed

-----Original Message-----

From: Commissioner Fish
Sent: Friday, November 06, 2015 1:11 PM
To: Dunphy, Jamie <Jamie.Dunphy@portlandoregon.gov>
Subject: FW:

FYI Comp Plan

Jennifer Kalez
Constituent Relations Coordinator
Arts & Culture Liaison
Office of Commissioner Nick Fish

-----Original Message-----

From: Pat Daniels [mailto:patd@constructinghope.org]
Sent: Friday, November 06, 2015 10:58 AM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Cc: Commissioner Novick <novick@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>;
Commissioner Saltzman <dan@portlandoregon.gov>; Commissioner Fritz
<amanda@portlandoregon.gov>
Subject: FW:

Dear Mayor Hales,
Constructing Hope Pre-apprenticeship Training Program would like to extend our support for the Portland Harbor Project. As a former Port of Portland employee for more than 17 years, I am now involved in workforce development as the Executive Director of Constructing Hope Pre-apprenticeship Training Program. We are asking that you consider and support the original recommendation by the Bureau of Planning and Sustainability, for moderate growth for this project. Attached is a letter of support for your review.

Sincerely,
Patricia Daniels

Pat Daniels | Executive Director
Constructing Hope Pre-Apprenticeship Program

405 NE Church Street | Portland | Oregon 97211
Direct: 503-281-1740 | Cell: 971-295-2626 | Fax 503-719-7685 www.ConstructingHope.org



Constructing Hope Pre-Apprenticeship Program

405 NE Church St., Portland, OR 97211

503-281-1234

www.constructinghope.org

November 3, 2015

Portland City Council
City Hall
1221 SW 4th Ave
Portland OR 97204

Dear Mayor Hales and Commissioners:

I am writing to you today about the low forecast growth of the Portland harbor in the Economic Opportunities Analysis (EOA) document for the Draft City of Portland Comprehensive Plan. I believe that a low forecast sends a negative message to at risk communities about the value of Portland harbor jobs and the opportunities they bring. The harbor is a major impact employer in this City and the opportunities they provide to a wide range of the community is a crucial part of the economic vitality of our city.

My organization, Constructing Hope Pre-Apprenticeship Program, is a partner for community growth and change. We are the space where people with all different backgrounds can start a life and earn a living wage to support themselves and their family. We depend on partnerships and a thriving working harbor to open doors for our trained workforce. Each of our graduates gains knowledge of opportunities within the trades, basic entry-level skills, plus familiarity with trade tools, terminology and basic principles. The Port and working harbor support citizens from all walks of life with meaningful, family-wage jobs and changes their lives for the better.

If you care about the future of our city's entire community, painting the Portland harbor with a low growth forecast during a time when we are seeing significant expansion in the harbor sends the wrong message. Change the Portland harbor forecast back to the "most likely" moderate growth as originally recommended by Bureau of Planning and Sustainability staff and support opportunities for our changing community.

Sincerely,

Patricia Daniels
Executive Director
Constructing Hope

CC:

Commissioner Nick Fish
Commissioner Amanda Fritz
Commissioner Steve Novick
Commissioner Dan Saltzman

**City of Portland Comprehensive Plan Briefing
September 18, 2015**

Background

This fall, Council will consider the Portland Comprehensive Plan and supporting documents that will guide city policy and growth for the next twenty years. Our concern centered on the Planning and Sustainability Commission's recommendation to change the Economic Opportunities Analysis (EOA) from a medium forecast to a low forecast for the Portland Harbor and shift of jobs elsewhere results in an underestimate of the demand for harbor land and overestimate the supply of harbor land and capacity of harbor businesses. These policy choices signal a lack of knowledge of the maritime markets and subsequent lack of support for harbor businesses and the contributions they make to the region.

Based upon the analysis our concerns are:

- **The EOA is a requirement of State land use goal 9 and serves as a foundation document for the comprehensive plan policies, as such it is intended to be objective and reflect trends.** The staff recommendation prior to PSC review was for the medium forecast for harbor land demand also described "as most likely" in their base reports.
- **Staff consistently chooses the mid- range of a forecast for all other assumptions** including the base assumptions from the Metro growth allocation for the Comprehensive Plan and employment allocation to all sectors including industrial.
- **The PSC recommended EOA assumes low growth of harbor related tonnage across all cargo types.** This is a reduction from the City's projection from just a couple of years ago, and is contrary to 50 years of data.
 - **The PSC recommended EOA assumes an unrealistically high amount of brownfield redevelopment in a superfund site with limited tools and no additional resources.**
 - **The PSC recommended Comprehensive Plan assumes that unfunded improvements to the transportation system will create more cargo efficiency and increase harbor businesses' capacity.** Funding or priority is not given to the relied upon improvements.
 - **The PSC recommended EOA assumes that some jobs that are currently located in the harbor are not harbor-related or dependent, so can move elsewhere in the City.** It mistakenly implies that once these jobs are moved; there will be more capacity for harbor-related jobs.

Consequences:

- **Inhospitable climate for further investment-**Inconsistencies with other policies adopted by the City and other agencies abound, which will compromise opportunities for future investment. For example, the lack of alignment or clear direction in City policies may be detrimental to efforts to obtain grant funding, such as TIGER grants. The low cargo forecast makes using third party investment less attractive. For example, a private company may not consider investing because of the challenging environment and little economic support from the local jurisdiction.
- **More challenge for the existing harbor businesses to expand -**By underestimating the demand for harbor businesses and overestimating the land available for harbor businesses, it is likely that some will perceive that there is more room to impose additional environmental regulations, including overlay zones on currently undesignated areas.

- **Limited incentive for brownfield redevelopment-** A low forecast coupled with an unpredictable business climate provides little incentive or pressure to undertake costly and complex brownfield clean-up efforts by the public sector or investors.
- **International role compromised** -- Externally the city will not be viewed as a thriving gateway to international markets and the region's export goals will be compromised.
- **Creates stagnation through policy-** It becomes a self-fulfilling prophecy that may impact the long term viability of the harbor businesses "ecosystem." Negative outlooks impact the future of thriving businesses in the harbor, which could have a ripple effect for the remaining businesses and the clean-up costs.
- **Negatively impacts climate-**From a climate perspective, the most climate friendly mode for freight movement is by water. The City's plans direct commodity movement to other, less desirable, modes. Traffic congestion is likely to increase, further stressing our aging surface transportation infrastructure.

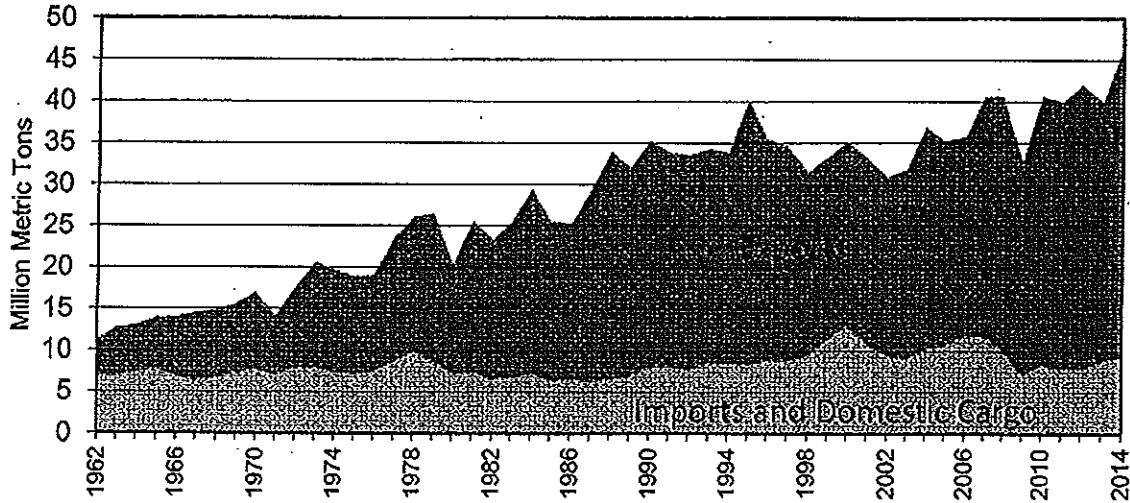
Our Recommendation:

Adjust the forecast back to the medium growth scenario to more realistically reflect the actual activity in the Portland harbor as well as send a message about the importance of the harbor as a future area of investment and growth (see chart).

Portland EOA Forecast Rebuttal RE: Marine Cargo moving on the Lower Columbia River

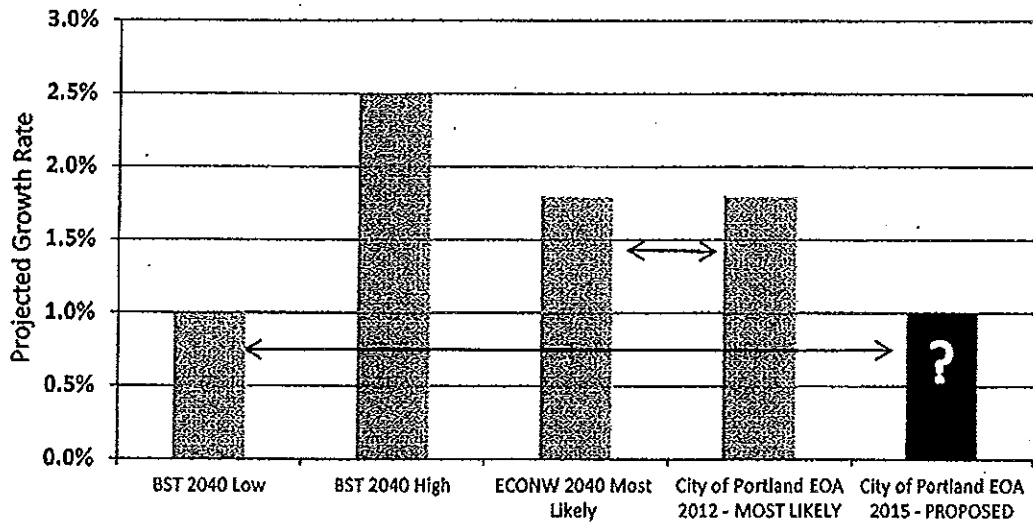
In 50+ years cargo volumes on the lower Columbia River have a compound annual growth rate of 2.9%.

Long-term marine cargo volumes handled on the Lower Columbia River (Portland to Astoria)



Despite a recession, the Lower Columbia River continues to see volume growth.

Long-term Marine Cargo Trends in Portland Harbor



“Most likely” volume forecasts for Portland Harbor is 1.8%, and adopted by City of Portland in 2012 EOA.

Since 2010, the Portland Harbor has seen nearly \$200 million invested aimed at increasing cargo capacity.

In 2015, the City of Portland EOA assumes the lowest projected growth at 1.0%.

ADOPT NEW AND AMENDED SUPPORTING DOCUMENTS
FOR PORTLAND COMPREHENSIVE PLAN UPDATE

IF YOU WISH TO SPEAK TO CITY COUNCIL, PRINT YOUR NAME.

IF YOU ALSO WISH TO BE ON THE NOTIFICATION LIST, SUPPLY YOUR MAILING ADDRESS.

Number	Name (please print)	Address & Zip Code	Email (optional)
✓ 1	Mary Ann Schwab	605 SE 38 th Pk, OR	e33mschwab@gmail.com
✓ 2	Barbara Quinn	7034 N. Charleston Pk, OR	barbaraqnn718@gmail.com
✓ 3	Bob Sallinger	5151 NW Correll Row	brallinger@earthlink.net
✓ 4	Shaunte Myers	10640 C. Burnside	shauntemyersdemmeuel@earthlink.net
✓ 5	Tim Helzer	220 N. Hayden Bay Dr. Pdx	helzer.t@imcast.net
6	Ron Elorssole	123	#
✓ 7	Alastair Roxburgh	1503 N Hayden Isld Dr	aroxburgh@ieee.org
✓ 8	Robert Bernstein	7415 SE Main	
✓ 9	Darise Weller	9259 NW Benmarvounis	dwellerg72@comcast.net
✓ 10	CHRISTINE FOUNTAIN	3939 N. MARINE DR #5 97217	cfount@earthlink.net

ADOPT NEW AND AMENDED SUPPORTING DOCUMENTS
FOR PORTLAND COMPREHENSIVE PLAN UPDATE

IF YOU WISH TO SPEAK TO CITY COUNCIL, **PRINT** YOUR NAME.

IF YOU ALSO WISH TO BE ON THE NOTIFICATION LIST, SUPPLY YOUR MAILING ADDRESS.

Number	Name (please print)	Address & Zip Code	Email (optional)
1	✓ ELLEN WAX WORKING WATERFRONT COALITION	200 SW MARKET ST STE 190 P.O. 97201	ellen.wax@workingwaterfront.org PORTLAND, OR
2	✓ TIM Helzer	Hayden IS.	
3	✓ Micah Mesked	4927 NE Rodney	—
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Number	Name (please print)	Address & Zip Code	Email (optional)
1	✓ Jeff Cole	4343 SE MADISON ST	
2	✓ ROB MATHERS	5880 NW ST HELENS RD ^{Portland} 97210	
3	✓ LEIGH MILVAINÉ	7055 N. CONCORD AVE.	leigh@tradeswomen.net
4	✓ John Gibbon	9822 SW Quail Post Rd	jtgrayw@ad.com
5	✓ ALAN SPROTT	5555 N. CHANNEL ^{PORT} 97417	ALAN.SPROTT@vzw.net
6	✓ Joe Esmonde Sheila Fink	628 SW Chestnut Str. ^{PDX} 97219	
7	✓ Lee Stevenson		
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Number	Name (please print)	Address & Zip Code	Email (optional)
✓ 1	James Peterson	2502 SW Multnomah	custon wu d... @NW-CORP
✓ 2	Bob Sallinger	511 NW Cornell Rd	bsallinger@audbonport.com
✓ 3	Raihana Ansary	200 SW Market	
✓ 4	Troy Clark	—	—
✓ 5	Rick Brown	3425 SW 12 th Ave 97239	—
✓ 6	Meg Ruby	—	—
✓ 7	Kristin Meira	516 SE Morrison, Suite 1000	kristin.meira@pnwa.net
✓ 8	David Red Thunder	1503 N Hayden Dr	
✓ 9	JEFF STONE	29751 SW Town Center Loop W Wilsonville	jstone@oan.org
✓ 10	Byron Tennant	NECN	

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Number	Name (please print)	Address & Zip Code	Email (optional)
✓ 11	JANET LABAR	111 SW COLUMBIA ST STE 830 POX 97219	JANET.LABAR@ GREATERPORTLANDINC.COM
✓ 12	Patti Iversom - Sumner	5933 NE 80th AVE POX 97218	psuedmer@gtri.net
✓ 13	KATE ROSS	—	—
✓ 14	Mike Rosen		
✓ 15	Jeff Geisler	11614 N. PTLD 97217 ISLAND COVE LN	jeffgeisler@msu.com
✓ 16	Joseph miles Kelly	13260 NW Parmley ave BANKS OR 97106	twtyjat@gmail.com
✓ 17	Lightning Watchdog PDX	X	X
✓ 18	Jim Laubenthal	3019 NE 26th AVE	laubenthaljim@gmail
✓ 19	meghan moyr	Portland Community College	meghan.moyr@pcc.edu
✓ 20	Jennifer Hudson	Schnitzer Steel	jhudson@schn.com

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Number	Name (please print)	Address & Zip Code	Email (optional)
✓ 21	FRED LACAPRA	17670 Koch Ct Sandy	FRED.LACAPRA@GDRK.COM
22	ALAN SPOTT	5 N. Channel Pt	
23	Dara Snyder	1111 SW 15th Ave	dsnyder@impactnw.org
24	TOM LIPTAN	7707 SE Madison St	TLIPTAN@MSN.COM
25	HEATHER FLINT CHATTO	2121 SE 32ND AVE	heather@newbuildings.org
26	LEIGH McILVAINE	7055 N. CONCORD AVE 97217	leigh@tradeswomen.net
Spoke 27	Mike Rosen	6005 SE 20th	mikarosen@comcast.net
28	STEVENSON	9720 SW ASHEN BLDG	stevenson@easy street.net
29	Jepp Cole	4343 SE MADISON ST	
30	John Gibbon	9822 SW Quail Post	jtgorygun@aol.com

2:00 PM TIME CERTAIN

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Number	Name (please print)	Address & Zip Code	Email (optional)
31	Gotin Rowan, Multnomah County Drainage District	1880 NE Elrod Dr 97211	crquan@medd.org error - TR
32	David HAMPSTEN	2304 Golden Gate Dr Apt. A Greensboro NC 27405	Growth Scenarios
33	Tom Karwki (UPNA)	7139 N. Macrum	Karwki@yach.com
34	JAMPA LATHSANG	3804 NE 148th	—
35	KEN DIENER	536 SE 17th Ave	Kandersjdarck.com
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