

Andre Baugh, Commission Chair
The Portland Planning and Sustainability Commission
Bureau of Planning and Sustainability
City of Portland
psc@portlandoregon.gov
September 22, 2014

Dear Chairman Baugh and Fellow Commissioners:

On July 9th, 2013, the Planning and Sustainability Commission voted seven for and three against recommending City Council support annexation of West Hayden Island into the City, thus allowing the Port of Portland's Marine Development Complex proposal to move forward. In this five-year-long and detailed process of discovery of the Port's development proposal, the PSC accomplished many critically important results, including a long list of mitigations and cautions the City should consider in any follow-up action. However, none of them appear in the Draft Comprehensive Plan. Please consider the following:

First, this Commission made a commitment to the community that it would not recommend allowing WHI development to move forward without a binding agreement in place that the Port of Portland fully mitigate for all impacts to the environment and the community. However, the Draft Comp Plan completely disregards as unimportant and unnecessary your commitment to the health and wealth of this community. Instead, this DCP completely circumvents this five-year-long fact-based public process, and breaks faith with the community and the commitments of the PSC by offering this plan for WHI;

Second, this Commission "got it right" over a year ago, and now should affirm its fact-based belief in the accuracy and the rectitude of its responsible work by removing the DCP's section on West Hayden Island. Without affirming its own well-documented findings, the PSC will allow for unmitigated marine industrial development of 300 acres to go forward, and without any protection whatsoever of the surrounding 500 acres of high-value urban natural wildlife habitat. Instead, retain WHI's current zoning designations or designate it as open space; but definitely do not allow it to be re-zoned industrial; and,

Third, this Commission, in revising this DCP, should strongly recommend to the City it reject the false notion that "acres equal jobs" achieved by converting critical natural areas or openspaces to industrial use, particularly when none of your mitigation requirements have been honored. If the City needs more industrial land, it should focus on a) cleaning up its 900 acres of brownfields, b) intensifying use of its industrial land base, and c) preventing organizations like the Port of Portland from converting existing industrial lands to other uses in order to make a profit, when they can easily collaborate with other ports on profitable joint developments.

In closing, since your findings over a year ago, no changes to the environment, economy, community, or transportation infrastructure have occurred that in any way justify the City's by-passing your previously responsible and accurate investigation, deliberation, and decision in order to re-zone West Hayden Island as industrial land suitable for development.

Instead, the most critical requirement for the Port's feasible and sustainable marine terminal and industrial park, namely a viable I-5 bridge replacement plan for the Columbia, no longer exists and is highly unlikely to exist anytime soon. So, the industrial development of WHI is definitely not feasible or sustainable without such infrastructure support, and is therefore not justified to be re-zoned industrial in the Draft Comprehensive Plan in the foreseeable future.

Respectfully submitted,

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