

WILLAMETTE RIVER GREENWAY INVENTORYIF YOU WISH TO SPEAK TO CITY COUNCIL, **PRINT** YOUR NAME, ADDRESS, AND EMAIL.

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October 16, 2014

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

**Re: Testimony in Support of the Proposed Willamette River Greenway Goal 15  
Inventory Update (Agenda Item 1088)**

Dear Mayor Hales and City Commissioners:

On behalf of Schnitzer Steel Industries, Inc. and MMGL (formerly Schnitzer Investment Corp.), I submit the following comments for your consideration. Schnitzer Steel Industries, Inc. and MMGL (collectively, "Schnitzer") own the approximately 101 acre properties at 12005 N. Burgard Way and 10400 N. Burgard Way that include a marine slip, two piers, and related metals recycling facility and river dependent industrial uses (the "Site"). The Site is located on the north reach of the Willamette River and is depicted as Site ID 258 on the proposed Greenway Inventory's Map 5: Ownership. The Site has been used for river dependent uses since World War II, and remain important properties that can serve river dependent use market opportunities.

Schnitzer has reviewed the Inventory, and initially had some technical concerns about the accuracy of an earlier draft of the Inventory that did not designate the entirety of the Site as river dependent. Since providing our initial testimony to the Planning and Sustainability Commission about our concerns, we have worked with BPS staff to address our concerns.

We support BPS' proposed revisions to the Inventory, including:

- Clarify that Map 2 and Map 3 of the Inventory represent land that is currently "committed to industrial, commercial and residential uses," which is an element of the Inventory required by Goal 15.
- Retain the "Industrial" designation on all of Schnitzer's property on Map 4: Land Use
- Eliminate the "River Dependent Use" overlay from Map 4: Land Use.

With these changes, the confusion and inconsistencies in previous Inventory drafts about what land is committed to river dependent industrial use is eliminated, and the Site's long historical use, and commitment to ongoing use, as a maritime dependent property is recognized.

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We appreciate BPS staff's, particularly Sallie Edmunds, willingness to collaborate so that the Inventory that is proposed to Council for adoption is accurate, supported by substantial evidence and compliant with Goal 15. Schnitzer requests that Council adopt the Inventory with the revisions noted above.

Sincerely,



Jennifer Hudson  
Associate Counsel

cc: Perkins Coie LLP