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**BY E-MAIL AND U.S. MAIL**  
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City of Portland Planning Staff  
Planning and Sustainability Commission  
1900 S.W. 4th Avenue, Suite 7100  
Portland, Oregon 97201-5380

Subject: Comment for Employment Zoning Proposed Draft–Support for Proposed Industrial Inventory Map Revision at 3333 and 3335 N.E. Marine Drive

Dear Steve Kountz and Planning Staff:

This comment supports the proposed change in zoning of the property at 3333 and 3335 N.E. Marine Drive (the "Site"). This Site is being redesignated to Industrial Sanctuary from Residential Farm as part of the recent Comprehensive Plan Update efforts due to its site characteristics and the fact that it is surrounded by industrial zoning. We support the proposed change in base zoning to IG2 (General Industrial 2) for the Site to match the new Comprehensive Plan zoning and the zoning of surrounding lots.

Attached to this letter is a site suitability assessment that demonstrates why the Site should be included in the City's industrial inventory and rezoned to IG2. The Site is better suited to general industrial zoning as a result of the City of Portland Comprehensive Plan update, the policies discussed in the attached analysis, and the following site characteristic considerations:

- The Site is currently being redesignated to Industrial on the Comprehensive Plan map and RF zoning conflicts with the new industrial designation.
- The Site is not suited for residential development due to its location at the end of a Portland Airport runway and surrounded by industrial land.

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- The Site is surrounded exclusively by industrially zoned land. See Exhibit 1, Zoning Map.
- The Site is surrounded by Prime Industrial land. See Figure 6-1 in the proposed Comprehensive Plan.
- The residential zoning of the Site is problematic for surrounding Prime Industrial land which conflicts with a residential use zoning.
- There is a dearth of commercial services, public transit, and other amenities supportive of residential use near the Site.
- There has never been a house or a farm on the Site.
- A house could probably not be sited on the Site due to its configuration and proximity to the Columbia River and overlay zones.
- The current use of the Site as a marina is more appropriate for an industrial zone (which allows marinas through a conditional use) than an RF zone.
- The multi-modal shipping opportunities near the Columbia River, Portland Airport, and Columbia Boulevard Freight Corridor that lead to the industrial sanctuary designation on surrounding properties apply equally to the Site.
- Industrial redevelopment of the abutting properties may require consolidation of nearby lots, including the Site, which would be impossible with a nonindustrial zoning.

I will follow up with this submittal with direct communication to the planning staff that coordinate adoption of the Employment Zone Map update and determine if any additional information for this request would be helpful.

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Please feel free to contact me directly if I can be of any assistance in this matter.

Very truly yours,



William L. Rasmussen

cc: Ms. Carolyn Burris

Enclosure (Site Suitability Analysis)

## **Site Suitability Assessment – 3333 and 3335 N.E. Marine Drive**

This Site Suitability Assessment documents the site characteristics of the property at 3333 and 3335 N.E. Marine Drive in Portland (the “Site”) and analyzes the appropriate Zoning for the Site based on its characteristics. This assessment concludes that the current RF Zone of the site is inappropriate and that the site is most suited to an IG2 (General Industrial) zoning to match its surrounding parcels pursuant to the applicable City of Portland policies.

This assessment is divided into two sections. In the first section, the Site’s characteristics are documented. In the second section, the Site’s characteristics are analyzed in relation to applicable City of Portland Comprehensive Plan policies.

### **3333 and 3335 N.E. Marine Drive Site Characteristics**

- A. Site location. The Site is approximately one acre in size, comprised of two legal lots of record. One lot, created by historic deed, is to the property at 3333 N.E. Marine Drive and the other lot, also created by historic deed, is to the property at 3335 N.E. Marine Drive. The Site is bordered to the south by Marine Drive and bordered to the North by the Columbia River.
- B. Base designation and zoning. The Site is zoned and designated RF (Residential Farm). The base designation is being updated to Industrial as part of the City’s ongoing Comprehensive Plan update effort. All adjacent properties and property in the area of the Subject Size are designated Industrial Sanctuary and zoned IG. See attached Exhibit A, Zoning Map and Figure 6-1 of proposed Comprehensive Plan. The Site is currently an island of residential zoning surrounded by a large Prime Industrial area.
- C. Overlay zoning. Portions of the Site and abutting industrial properties are subject to C (environmental), H (aircraft landing), S (scenic resource), and X (aircraft noise impact) overlays. See attached Exhibit A, Zoning Map.
- D. Onsite and adjacent uses. The Site is occupied by two marina uses. Both parcels of the Site have been granted leases by the Oregon Department of State lands to operate marinas on the Columbia River. Marinas are considered an outdoor recreation use by the City of Portland, which are characterized as commercial uses by the City.
- E. Site ownership. The Stern Group, LLC owns 3333 N.E. Marine Drive. Stephen L. Ryan owns 3335 N.E. Marine Drive. The owners of both parcels support conversion of the Site to Industrial.
- F. Development history. The Site has been developed with two marina uses for decades. No farms or houses have ever existed on the Site.
- G. Zoning history. The Site has been zoned and designated RF for decades.

- H. Land use history. Neither parcel of the Site has received land use approval for their marina uses (or any other use) because the uses predate zoning in this area and are lawful nonconforming uses under the City's code.
- I. Existing improvements. Improvements on the Site consist of driveways, parking areas, fences, planks, and docks. See attached Exhibit B, Aerial Photos of Site. The great majority of the upland portion of the Site is covered by paved parking that serves the marina uses on site.
- J. Topography. The Site slopes up from the Columbia River to the north towards Marine Drive to the south. City maps indicate that a portion of the Site close to the Columbia River bank has slope exceeding 25 percent. See Exhibit C, Hazards Map.
- K. Natural features. The Columbia River to the north is the predominant natural feature of the Site. Most of the upland portion of the site is improved and covered with impervious parking surfaces. There is marginal streamside habitat of small bushes along the river as can be seen in Exhibit B, Aerial Photos of Site.
- L. Geologic hazards. The portions of the Site abutting and within the Columbia River within the Special Flood Hazard Area and 1996 Flood Inundation Area, are shown on the attached Exhibit C, Hazards Map. Also, portions of the Site closest to the river are mapped as having steep slopes and high earthquake hazard.
- M. Transportation accessibility. The Site has frontage along Marine Drive and the Columbia River. The Site is also adjacent to the Portland Airport (PDX), near the Columbia Boulevard Freight Corridor, and near rail facilities abutting Columbia Boulevard. This portion of Marine Drive is not served by TriMet or other mass transit.
- N. Fire and police. The Site is served by City of Portland Police Northeast Precinct and the City of Portland Fire District #8 PDX (Port of Portland).
- O. Water. The Site abuts water facilities in N.E. Marine Drive, as shown on the attached Exhibit D, Access to Public Facilities.
- P. Sewage disposal. The Site abuts a sewer line in N.E. Marine Drive, as shown on the attached Exhibit D, Access to Public Facilities.
- Q. Noise. The Site is across the street from the terminus of a PDX runway. It is in the noise impact overlay of PDX and routinely subjected to noise events above 65 dBA. See attached Exhibit E, Airport Noise Contour Map.

Policies of the proposed Comprehensive Plan that pertain to applicable site characteristics of the Site are listed, quoted, and analyzed in the following section.

## **Analysis of Applicable Comprehensive Plan Policies**

Policy 10.4 - Comprehensive Plan Map. The Comprehensive Plan Map is the official long-range planning guide for uses and development in the city. The Comprehensive Plan Map uses the designations listed below. The designations state the type of area each is intended for, general uses and development types desired, and the corresponding zone or zones which implement the designation. Comprehensive Plan Map designations are shown on the Official Zoning Maps.

*Policy Application to Site:* This policy calls for the Comprehensive Plan map to be the official long-range planning guide for the City and states that the uses and development types appropriate for a site shall be driven by the Comprehensive Plan Map. It also indicates that corresponding zones should be used to implement the Comprehensive Plan designation. On this subject Site, the Comprehensive Map designation is changing to industrial. This Policy calls for the City to change the subject zoning to match the Comprehensive Plan Map – IG2 zone would be most appropriate.

Policy 6.6 - Competitive advantages. “Maintain and strengthen the city’s comparative economic advantages including access to a high-quality workforce, business diversity, competitive business climate, and multimodal transportation infrastructure.”

*Policy Application to Site:* This policy argues in favor of converting the Site to industrial zoning. It reflects the City’s interest in maintaining locations with key multi-modal transportation access for industrial uses because of the limited supply of such sites and their importance for maintaining Portland’s comparative economic advantages. The Site has adjacent proximity to the Columbia River shipping channel and the Portland Airport. The Site is also close to the Columbia Boulevard Freight Corridor and the rail access abutting Columbia Boulevard. This proximity to multi-modal transportation infrastructure has led to every other property in the vicinity of the Site being designated Prime Industrial land. See attached Zoning Map and Figure 6-1 in proposed Comprehensive Plan. This policy argues in favor of designating the Site Industrial Sanctuary.

Policy 6.7 - Business environment. “Use plans and investments to help create a positive business environment in the city and provide strategic assistance to retain, expand, and attract businesses.”

*Policy Application to Site:* The Site currently houses a small marina business. The current zoning of RF gives this local business no opportunity to grow, become an allowed use, or integrate into the greater Portland business community because it is a nonconforming use. From a redevelopment standpoint, the Site in the middle of Prime Industrial land and inclusion in future redevelopment for industrial use would be prohibited by the RF zoning. This policy argues in favor of designating the Site Industrial Sanctuary.

Policy 6.8 - Small business development. “Facilitate the success and growth of small businesses and coordinate plans and investments with programs that provide technical and financial assistance to promote sustainable operating practices.”

*Policy Application to Site:* The Site houses a small marina business that has operated at this location for decades. The current zoning of RF gives this local business no opportunity to grow because it is treated as a nonconforming use. This policy argues in favor of designating the Site Industrial Sanctuary.

Policy 6.11 - Economic role of livability and ecosystem services. “Conserve and enhance Portland’s cultural, historic, recreational, educational, food-related, and ecosystem assets and services for their contribution to the local economy and their importance for retention and attraction of skilled workers and businesses.”

*Policy Application to Site:* The Site currently houses a marina, which is classified as an outdoor recreation use by Portland’s Comprehensive Plan and Zoning Code. The current RF zone does not allow marinas either as an allowed or conditional use. The surrounding IG industrial zoning allows marinas as a conditional use. By misdesignating the site RF, the City is neither conserving nor enhancing the recreational asset on this Site by making it a nonconforming use. This policy argues in favor of designating the Site Industrial Sanctuary.

### **“Land development**

“According to forecasts, Portland will continue to have relatively strong demand for employment land development. However, most of Portland’s land supply for employment growth is on land that has constraints or is already developed.

“Statewide Planning Goal 9 – Economic Development requires Portland to provide adequate long-term and short-term land supply for economic development and job growth, consistent with an Economic Opportunities Analysis. Forecasted demand for buildable land by 2035 includes 150 acres in the Central City, 1,350 acres in industrial districts, 690 acres in neighborhood business districts, and 370 acres for campus institutions.

“New directions to support Portland’s land supply for job growth include policies for adequate long-term and short-term development capacity, a targeted increase in brownfield redevelopment, incentives to maintain competitiveness in regional markets, and guidance for streamlining the City’s regulatory climate.”

“The new comprehensive plan identifies the City’s need to find more industrial land, facilitate brown field development of industrial land, and facility greater utilization of existing industrial lands. Re-designating the Site would further all three of these Land Development needs.”

*Application to Site:* The Land Development introductory language quoted above demonstrates Portland’s ongoing need for employment and industrial land. The City’s Economic Opportunity Analysis documents the deficit of industrial land in Portland and the need for more Industrial Sanctuary designated areas. Further, the Site’s existence as a residential area is a liability to development of the surrounding Prime Industrial land because the Comprehensive Plan and Zoning Code require additional mitigation on industrial sites that abut residentially designated land. This section argues in favor of designating the Site Industrial Sanctuary.

Policy 6.12 - Land supply. “Provide supplies of employment land that are sufficient to meet the long-term and short-term employment growth forecasts, adequate in terms of amounts and types of sites, available and practical for development.”

*Policy Application to Site:* The Site is approximately one acre in size and is well suited to add to the City’s industrial land supply because of its adjacent and proximate access to multi-modal transportation infrastructure. The upland portions of the Site are largely undeveloped with parking lots that serve the existing marinas dominating the site. The sites abut Marine Drive, which has city services available to serve the Site. This policy argues in favor of designating the Site Industrial Sanctuary.

Policy 6.13 - Land efficiency. “Provide strategic investments and incentives to leverage infill, redevelopment, and promote intensification of scarce urban land.”

*Policy Application to Site:* The current land zoning of the Site provides no incentive for infill redevelopment in the area of the Site. The Site is an island of RF zoning surrounded exclusively by Industrially designated land in all directions. See Exhibit A, Zoning Map. The surrounding industrially designated properties are a mix of smaller and larger sites, ranging in size from .5 acres, to hundreds of acres. Because of the size required by most industrial users, a party looking to site infill, redevelopment, or intensification of use in this area would probably look to acquire multiple smaller parcels to enable consolidation. The presence of the RF zoned island in the middle of this industrial area prevents such infill, redevelopment, and intensification of potential industrial uses in this area. This policy argues in favor of designating the Site Industrial Sanctuary.

Policy 6.14 - Brownfield redevelopment. “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.”

*Policy Application to Site:* While the Site is not a pure brownfield site because of the marina use on the aquatic portion of the site, the upland areas are severely underutilized. Rezoning of the site to match abutting industrial properties would enable redevelopment of the subject site with surrounding small-acreage industrial sites. This policy argues in favor of designating the Site Industrial Sanctuary.



Policy 6.16 - Regionally-competitive development sites. “Improve the competitiveness of the vacant and underutilized sites located in Portland’s employment areas through the use of incentives and regional and state assistance for needed infrastructure and site readiness improvements.”

*Policy Application to Site:* The current land zoning of the Site hurts the competitiveness of the Site and surrounding vacant and underutilized industrial land in the area. The Site is an island of RF zoning surrounded exclusively by Industrially designated land in all directions. See Exhibit A, Zoning Map. The surrounding industrially designated properties are a mix of smaller and large sites, ranging in size from .5 acres to hundreds of acres. Because of the size required by most industrial users, a party looking to site infill, redevelopment, or intensification of use in this area would probably look to acquire multiple smaller parcels to enable consolidation. The presence of the RF zoned island in the middle of this industrial area makes these properties materially less competitive for potential industrial uses in this area. This policy argues in favor of designating the Site Industrial Sanctuary.

Policy 6.17 - Regulatory climate. “Improve development review processes and regulations to encourage predictability and support local and equitable employment growth and encourage business retention, including:

“6.17.a. Assess and monitor cumulative regulatory costs to ensure that Portland is financially competitive with other comparable cities.

“6.17.b. Promote certainty for new development through appropriate allowed uses and “clear and objective” standards to permit typical development types without a discretionary review.

“6.17.c. Allow discretionary-review as a way to facilitate flexible and innovative approaches to meet requirements.

“6.17.d. Design and monitor development review processes to avoid unnecessary delays.

“6.17.e. Promote cost effective compliance with federal and state mandates, productive intergovernmental coordination, and avoid duplicative procedures when City policies can be achieved through other means.”

*Policy Application to Site:* The Site does not suffer from a lack of regulation. In addition to being an RF designated property that has no residence or farm, the Site contains C, H, S, and X overlays to protect natural resources, scenic resources, and mitigate airport impacts. Because of the adjacent proximity to the Columbia River, the Site is also subjected to regulatory regimes of the Oregon Department of Environmental Quality, Oregon Department of State Lands, and U.S. Army Corps of Engineers. Each of these regulatory regimes serves their individual purposes, but it leads to a complex regulatory climate on the Site. Subjecting the Site to the RF zoning on top of these other regulations makes the site potentially unusable for redevelopment and hurts the

employment growth opportunity along Marine Drive. This policy argues in favor of designating the Site Industrial Sanctuary.

**“Traded sector competitiveness**

“Global trends have put increasing pressure on regions to strengthen their competitiveness for traded-sector growth, which drives regional prosperity. Traded sectors are local businesses of all sizes that export goods and services and compete in markets outside of the region, bringing income and jobs into the region. These sectors have become more vulnerable and dynamic in the shifting global marketplace, as they reinvent their supply and distribution lines and concentrate activity in lower cost or higher productivity locations.”

“The following policies call for focusing limited resources on strategic traded sector specializations with growth prospects. This region’s growing export activity is concentrated in high tech and advanced manufacturing, where job growth has been modest but output growth continues to outpace the service sectors. Other growing export specializations include software, apparel, clean-tech, freight-hub distribution, and creative services. While these growing specializations are expected to shift over time with market changes, connecting existing and emerging local business with global markets helps bring new resources into the region.”

*Application to Site:* The Site’s RF zoning hinders the ability of the City to capitalize on its Trader Sector cluster surrounding the Portland Airport. The Site is a unique opportunity for future traded sector development because of its proximity to unique multi-modal transportation assets and industrial cluster around the Portland airport. The site abuts the Columbia River Shipping channel and the Portland Airport. It is near the Columbia Boulevard Freight Corridor and the rail access abutting Columbia Boulevard. The current RF zoning on the site precludes use of the site for traded sector employment opportunities and is a liability to surrounding industrial properties because of the Site’s residential zoning. This policy argues in favor of designating the Site Industrial Sanctuary.

Policy 6.21 - Traded sector competitiveness. “Align plans and investments with efforts to improve the city and regional business environment for traded sector and export growth. Participate in regional and statewide initiatives.”

*Policy Application to Site:* The current land zoning of the Site hurts the competitiveness of the Site and surrounding vacant and underutilized industrial land in the area, which are identified in local and regional plans as a key area for traded sector and export growth. The Site is an island of RF zoning surrounded exclusively by Prime Industrial land in all directions. See Exhibit 6-1 in proposed Comprehensive Plan. Because of the proximity to the Portland Airport and key terrestrial shipping assets, this area is identified by Metro and the City as a unique opportunity for traded sector competitiveness. The surrounding industrially designated properties are a mix of smaller and large sites, ranging in size from .5 acres to hundreds of acres. Because of

the size required by most industrial users, a party looking to site infill, redevelopment, or intensification of use in this area would probably look to acquire multiple smaller parcels to enable consolidation. The presence of the RF zoned island in the middle of this industrial area makes these properties materially less competitive for potential traded sector uses. This policy argues in favor of designating the Site Industrial Sanctuary.

Policy 6.22 - Clusters. “Align plans and investments with efforts that direct strategic business development resources to enhance the competitiveness of businesses in traded sector clusters.”

*Policy Application to Site:* The RF zoning of the subject site hinders the competitiveness of the industrial cluster surrounding the Portland Airport by introducing a residential zoning in the midst of Prime Industrial land. This policy argues in favor of designating the Site Industrial Sanctuary.

Policy 6.23 - Trade and freight hub. “Encourage investment in transportation systems and services that will retain and expand Portland’s competitive position as a West Coast trade gateway and freight distribution hub.”

*Policy Application to Site:* Transportation fees and improvements associated with development around the Portland Airport industrial area is a key component to improving transportation infrastructure in that area. The Columbia Boulevard Freight Corridor, the Columbia River, PDX, and the nearby rail line are key links in this infrastructure. Having an RF designated property in the midst of this Prime Industrial land area hinders development in the area, which thereby discourages investment in the surrounding transportation infrastructure. This policy argues in favor of designating the Site Industrial Sanctuary.

Policy 6.28 - East Portland job growth. “Improve opportunities for East Portland to grow as a business destination and source of living wage jobs.”

*Policy Application to Site:* The subject site houses a small marina in East Portland. The RF zoning makes expansion of this marina or redevelopment of this property with abutting industrial properties impossible. The current zoning discourages business opportunities in and around this East Portland Site. This policy argues in favor of designating the Site Industrial Sanctuary.

### **“Industrial and Employment Districts**

“Portland is the core of the region’s distribution and diverse manufacturing economy, including the state’s (and the Columbia River Basin’s) largest seaport, rail hub, and airport. Established “industrial sanctuaries” meet the needs of manufacturing and distribution firms for medium to large sites, and are buffered from housing. Other types of employment areas include flex space developments, incubator districts for emerging local businesses, industrial headquarters offices, and dispersed neighborhood employment areas. The businesses in these districts

are a primary source of Portland’s middle-wage jobs, upward mobility opportunities, and traded sector activity (See Figure 6-1).”

“Looking forward to 2035, new strategies are needed to expand capacity for employment growth while also meeting environmental and other objectives. The policies below call for new tools to accelerate brownfield redevelopment, make freight investments that expand market access and industrial land intensification, more effectively protect prime industrial land, and strategically expand industrial and flexible neighborhood employment areas.”

*Application to Site:* The introductory language for the Industrial and Employment Districts section of the Comprehensive Plan reflects the key asset of the Portland Airport and Columbia River for industrial and employment uses. It also notes the need to buffer industrial sanctuaries from housing and the need to protect Prime Industrial land. The Site is underutilized based on its proximity to the key assets of the Columbia River and Portland Airport. Further, the residential zoning of the property is a liability for surrounding industrial properties because of the potential for conflict between residential and industrial uses. This policy notes the need for buffers between such uses. This section argues in favor of designating the Site Industrial Sanctuary.

Policy 6.34 - Industrial land. “Provide industrial land that encourages industrial business retention, growth, and traded sector competitiveness as a West Coast trade and freight hub, a regional center of diverse manufacturing, and a widely accessible base of family-wage jobs, particularly for under-served and underrepresented people.”

*Policy Application to Site:* The current land zoning of the Site hurts the ability of the Site and surrounding industrial land to maintain and improve businesses and traded sector competitiveness in the area, which is identified in local and regional plans as a key area for traded sector and export growth. The Site is an island of RF zoning surrounded exclusively by Prime Industrial land in all directions. See Exhibit 6-1 in the proposed Comprehensive Plan. Because of the proximity to the Portland Airport and key terrestrial shipping assets, this area is identified by Metro and the City as a unique opportunity for traded sector competitiveness. The surrounding industrially designated properties are a mix of smaller and large sites, ranging in size from .5 acres to hundreds of acres. Because of the size required by most industrial users, a party looking to site infill, redevelopment, or intensification of use in this area would probably look to acquire multiple smaller parcels to enable consolidation. The presence of the RF zoned island in the middle of this industrial area makes these properties materially less competitive for potential traded sector uses. This policy argues in favor of designating the Site Industrial Sanctuary.

Policy 6.35 - Industrial sanctuaries. “Protect industrial land as industrial sanctuaries identified on the Comprehensive Plan Map primarily for manufacturing and distribution uses and to encourage the growth of industrial activities in the city.”

*Policy Application to Site:* The Site is surrounded by the Prime Industrial Areas of Columbia Boulevard and Portland International Airport. The Site is the only land not designated Prime Industrial area in the vicinity immediately to the northwest of the Portland Airport. See Proposed Comprehensive Plan Figure 6-1. The Site's RF zoning is a residential zoning. This poses a risk to the surrounding prime industrial area. If a residence or residences were sited on the Site in the future, this would likely be a source of conflict with surrounding industrial users or employers considering siting industrial or employment uses on the adjacent and nearby industrial lands. Further, the presence of the residential zoning of the Site by itself triggers additional requirements for surrounding industrial lands to mitigate potential impacts. This policy argues in favor of designating the Site Industrial Sanctuary.

Policy 6.36 - Prime industrial land retention. "Protect the multimodal freight-hub industrial districts at Portland Harbor, Columbia Corridor, and Brooklyn Yard as prime industrial land (see Figure 6-1) that is prioritized for long-term retention:

"6.36.a. - Strictly limit 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.

"6.36.b. Limit conversion of prime industrial land through land use plans, regulations, or public land acquisition for non-industrial uses, especially land that can be used by river-dependent and river-related industrial uses.

"6.36.c. Identify how regulations affect the capacity, affordability, and viability of industrial uses, and minimize those impacts.

"6.36.d. Strive to offset the reduction of development capacity as needed, with additional prime industrial capacity that includes consideration of comparable site characteristics."

*Policy Application to Site:* The Site is suited to bolster the Prime Industrial capacity as called for by Policy 6.36.d. The Site is surrounded by Prime Industrial land as shown in Proposed Comprehensive Plan Figure 6-1 and contains the same site characteristics as those surrounding industrial lands which make it well suited for Industrial zoning. Those characteristics suited for Prime Industrial zoning include, but are not limited to the following:

- Adjacent proximity to the Portland Airport
- Frontage along the Columbia River for potential future river-related use
- Adjacent proximity to existing Prime Industrial lands
- Availability of urban services, including multi-modal transportation facilities, water service, and sewer service in Marine Drive
- Proximate location to Columbia Boulevard Freight Corridor

- Proximate location to rail lines

This policy argues in favor of designating the Site Industrial Sanctuary.

Policy 6.38 - Industrial land use intensification. “Encourage reinvestment and intensification of industrial land use, as measured by output and throughput per acre.”

*Policy Application to Site:* Several parcels abutting the site to the east and west are under an acre in size and would likely need to be consolidated to facilitate an industrial use north of Marine Drive. The presence of this RF designated Site in the middle of these small to mid-sized industrial parcels severely hinders the redevelopment potential in this area for industrial land uses. This policy argues in favor of designating the Site Industrial Sanctuary.

Policy 6.42 - Multimodal freight corridors. “Encourage freight-oriented industrial development to locate where it can maximize the use of and support reinvestment in multimodal freight corridors.”

*Policy Application to Site:* The Site is uniquely situated with access to existing multimodal freight corridors presented by the Portland Airport, Columbia River, Columbia Boulevard and nearby rail access. The RF zoning of the site prevents freight-oriented development on the Site and hinders freight-oriented development on nearby industrial sites. This policy argues in favor of designating the Site Industrial Sanctuary.

In addition to the industrial lands policies discussed above, assessment of the Housing policies in Chapter Six of the proposed Comprehensive Plan shows that the Site is not appropriate for RF or any other residential zoning.

Policy 6.49 - Residential and commercial reuse. “Facilitate compatible industrial or employment redevelopment on residential or commercial sites that become available for reuse if the site is in or near prime industrial areas, and near a freeway or on a freight street.”

*Policy Application to Site:* The Site is in the Middle of the Prime Industrial area surrounding the Portland Airport and Columbia Boulevard. Currently, the Site houses two marinas which are classified as an outdoor recreation use, which falls within the commercial umbrella of use categorization in the City of Portland’s Comprehensive Plan and Zoning Code. The properties abutting the Site are exclusively designated and zoned for industrial use and are included within the City of Portland’s Prime Industrial areas as mapped on Exhibit 6-1 in the Proposed Comprehensive Plan. Redesignating the Site to industrial will enable future development with an industrial use. This policy argues in favor of designating the Site Industrial Sanctuary.

Policy 6.52 - Neighborhood buffers. “Maintain and enhance major natural areas, open spaces, and constructed features as boundaries and buffers for the Portland Harbor and Columbia Corridor industrial areas.”

*Policy Application to Site:* This Policy reflects the need to buffer residential areas from industrial areas. The Site is currently designated residential and surrounded by Prime Industrial land near the Columbia Corridor and Portland Airport. There is no ability to insert a natural or other buffer between the Site and the abutting industrial properties. This policy notes the need for buffers between such uses. This section argues in favor of designating the Site Industrial Sanctuary.

### **“Goal 5.C: Healthy connected city**

“Portlanders live in safe, healthy housing that provides convenient access to jobs and to goods and services that meet daily needs. This housing is connected to the rest of the city and region by safe convenient affordable multimodal transportation.”

*Goal Application to Site:* The Site is an island of residentially designated land that has no nearby commercial amenities, public transit, town centers, or town corridors. The only opportunity for a resident to build a home on the Site would be to commute to work and to necessary commercial sites by automobile. The dearth of commercial uses such as grocery stores, dry cleaners, restaurants, and the like in the area around the Site would necessitate long automobile trips to accommodate a residential user on the Site. A residence on the Site would be a liability to the surrounding industrial properties, as a source of complaints for air, noise, and other impacts from employment and industrial uses. This policy argues in favor of designating the Site Industrial Sanctuary.

### **“Housing location**

“The Portland Plan’s Healthy Connected City strategy provides policy guidance to expand opportunities for Portlanders to live in complete communities offering a mix of desirable services and opportunities. Housing that is located in a walkable neighborhood near active transportation, employment centers, open spaces, high-quality schools and various services and amenities enhances the general quality of life for its residents. Neighborhoods in Portland offer varying levels of opportunity (See Figure 5-1), with housing in high opportunity neighborhoods tending to be expensive compared to more affordable housing in areas that offer fewer opportunities. However, there are also small parts of Portland that are lacking in both opportunities as well as quality affordable housing units.”

The Site is designated as a Low Opportunity site on the Housing Opportunity Map, Figure 5-1 in the Proposed Comprehensive Plan. In fact, the Site is one of the furthest sites in that City from a medium or high scoring Housing Opportunity area. This is because of the dearth of appropriate services available to support housing in the vicinity of the Site. There are little to no commercial services, schools, transit opportunities, or usable open space near the Site.

*Application to Site:* The housing location introductory language reflects the importance of proximate transportation, open spaces, schools, and amenities to housing. The site offers none of these things because it is surrounded by industrial land. There are no convenience stores, bus stops, or schools within walking distance of the Site. This section argues in favor of designating the Site Industrial Sanctuary.

Policy 5.19 - Access to opportunities. “Improve equitable access to active transportation, jobs, open spaces, high-quality schools, and supportive services and amenities in areas with high concentrations of under-served and underrepresented populations and an existing supply of affordable housing.”

*Policy Application to Site:* This policy reflects the importance of access to transportation, open spaces, schools, and amenities for housing. The site offers none of these things because it is surrounded by industrial land. There are no convenience stores, bus stops, or schools within walking distance of the Site. This policy argues in favor of designating the Site Industrial Sanctuary.

Policy 5.20 - New development in high opportunity areas. “Locate new affordable housing in areas that are opportunity rich in terms of access to active transportation, jobs, open spaces, high-quality schools, and supportive services and amenities (see Figure 5-1: Housing Opportunity Map).”

*Policy Application to Site:* This policy calls on the City to locate new affordable housing near transportation opportunities, open spaces, schools, and amenities for housing. The Site offers none of these things because it is surrounded by industrial land. There are no convenience stores, bus stops, or schools within walking distance of the Site. The Site is designated as a low housing opportunity area by Figure 5-1 in the proposed Comprehensive Plan. This policy argues in favor of designating the Site Industrial Sanctuary.

Policy 5.25 - Housing cost burden. “Evaluate plans and investments for their impact on household cost, and consider ways to reduce the combined cost of housing, utilities, and/or transportation.”

*Policy Application to Site:* This policy calls on the City to evaluate costs imposed on households by housing policies. One of those costs is the anticipated money that is required when housing is sited in a location with no public transit options. The Site’s location on Marine Drive is not served by TriMet or any other public transit. There are no convenience stores, bus stops, or schools within walking distance of the Site, which will lead to long vehicle trips from the Site. This policy argues in favor of designating the Site Industrial Sanctuary.

Policy 5.33 - Compact single-family options. “Encourage development and preservation of small resource-efficient and affordable single family homes in all areas of the city.”



*Policy Application to Site:* This policy calls for compact housing in Portland. The Site is approximately one acre in size and two legal lots of record. If housing could be located on the Site, it would be at most two houses because of the RF zoning. This is an inefficient use of land and contrary to Policy 5.33. This policy argues in favor of designating the Site Industrial Sanctuary.

Policy 5.41 - Housing quality. “Encourage housing that provides high indoor air quality, access to sunlight and outdoor spaces, and is protected from noise, pests, hazardous environmental conditions, and materials.”

*Policy Application to Site:* The Site in the middle of a Prime Industrial area and near the end of one of the Portland Airport’s runways. The proximity to potential industrial uses, with the anticipated noises, smells, and emissions makes the Site inappropriate for residential use. Further, the necessary noise from the Portland Airport makes it unlikely that the Site can provide quality housing as called for by Policy 5.41. The Site routinely experiences noise exceeding 65 dBA. See attached Exhibit E, Airport Noise Contour Map. This policy argues in favor of designating the Site Industrial Sanctuary.

Policy 5.44 - Walkable surroundings. “Encourage active transportation in residential areas through the development of pathways, sidewalks, and high-quality onsite amenities, such as secure bicycle parking.”

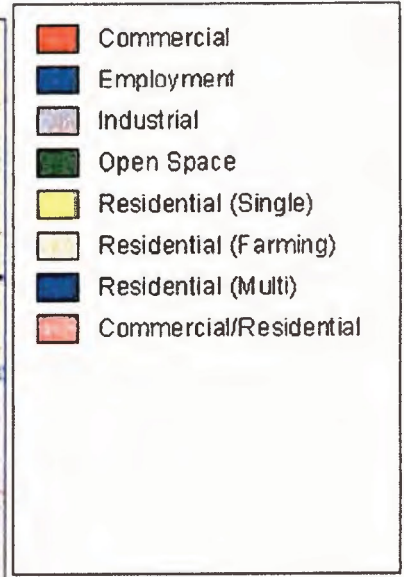
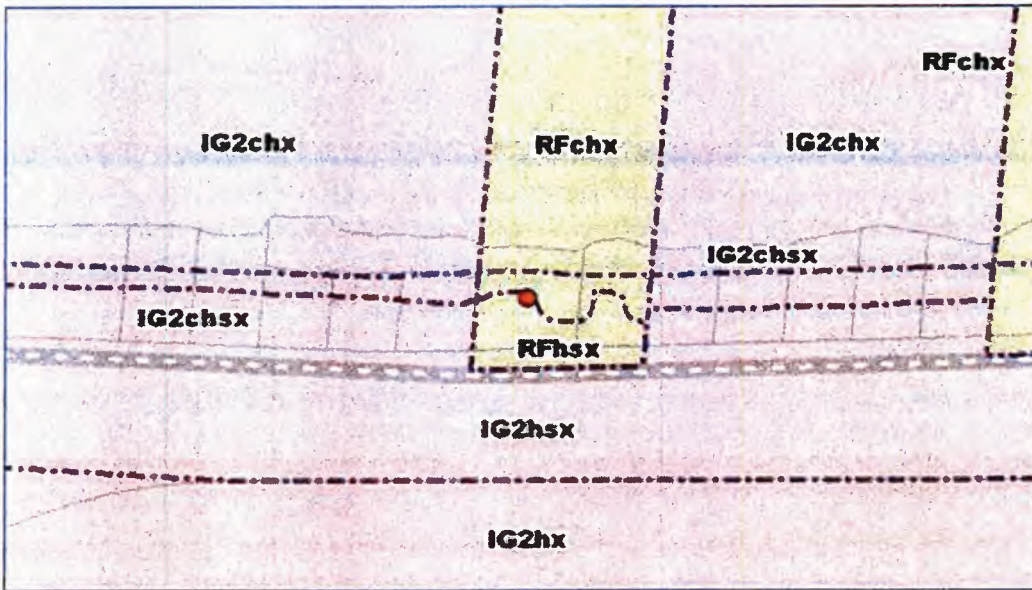
*Policy Application to Site:* The Site is only served by road without bicycle or walking pathways. See attached Exhibit B, Aerial Photographs. There is insufficient right-of-way and room in this area to add these amenities. This policy argues in favor of designating the Site Industrial Sanctuary.

## **Conclusion**

The Site characteristics of the property at 3333 and 3335 N.E. Marine Drive in Portland, as analyzed in relation to the appropriate Comprehensive Plan policies, show that the Site should be zoned industrial, with the IG2 zone being most appropriate to match the other properties surrounding the Site. This conclusion is largely driven by the multi-modal transportation assets proximate to the Site and the detrimental impact that the Site’s RF zoning on surrounding Prime Industrial land.

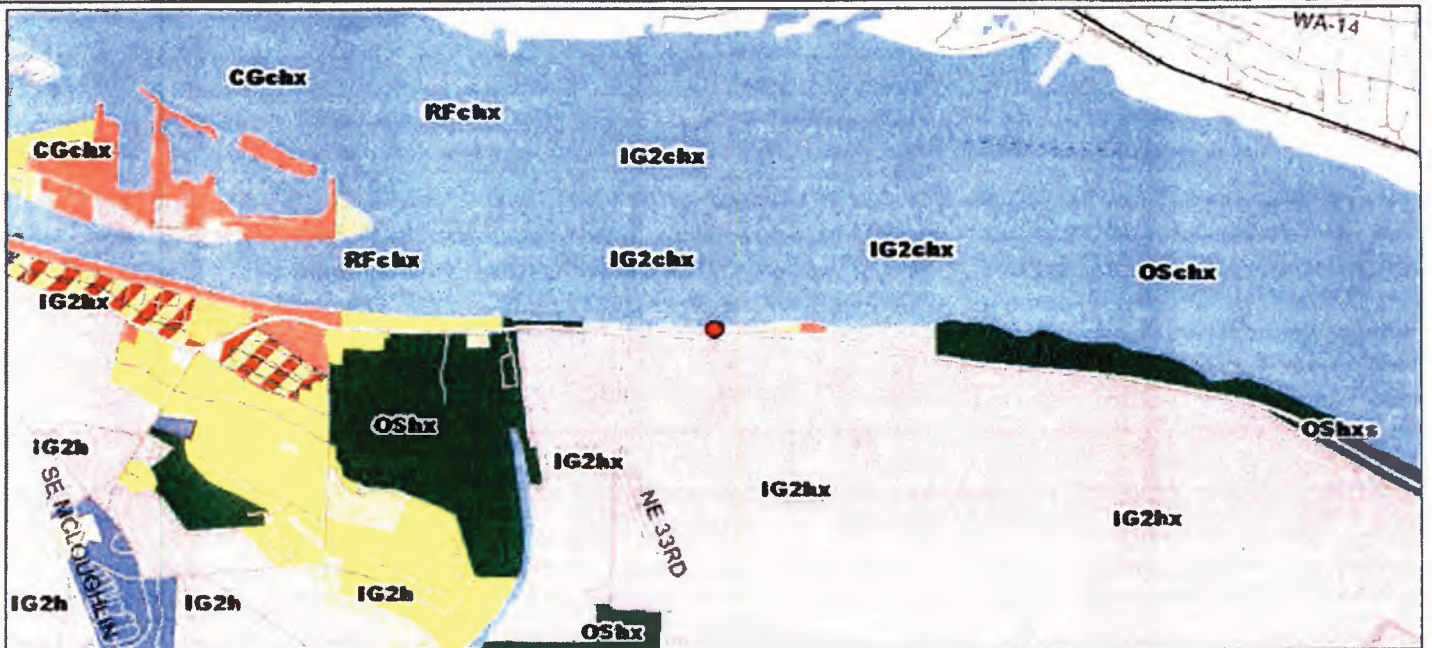
Zoning

Exhibit A - Zoning Map, page 1



0 ————— 300 FT

Zone	RF (Residential Farming)	Plan District	Portland International Airport Plan District
Overlay	c, x, h	NRMP District	
Comp Plan	RF	Historical Resource Type	
Comp Plan Overlay		Historic District	
Zoning Map	1934	Conservation District	
Urban Renewal Area		Wellhead Protection Area	No



0 ————— 3000 FT



Aerial Photos



**Aerial Photo**

**Exhibit B - Aerial Photos of Site, page 2**

**2012 / '11 / '10 / '09 / '08 / '07 / '06 / '05 / '04 / '03 / '02 / '01 6" / 2' / 4' / 10' / 20' Streets: Off Lots: On Dot: On**



0 ————— 50 FT

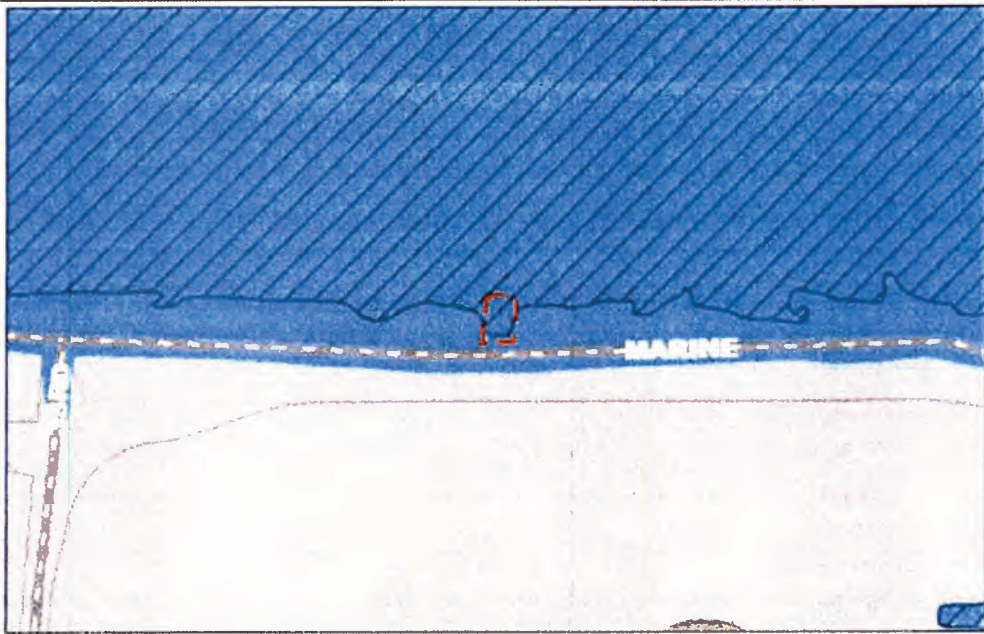
Exhibit B - Aerial Photos of Site, page 3

Aerial Photo (2011)



Exhibit C - Hazard Maps, page 1  
Flood Hazards: FEMA Special Flood Hazard Area (SFHA) & 1996 Flood Inundation Area

Is this property within 50' of the SFHA? Yes



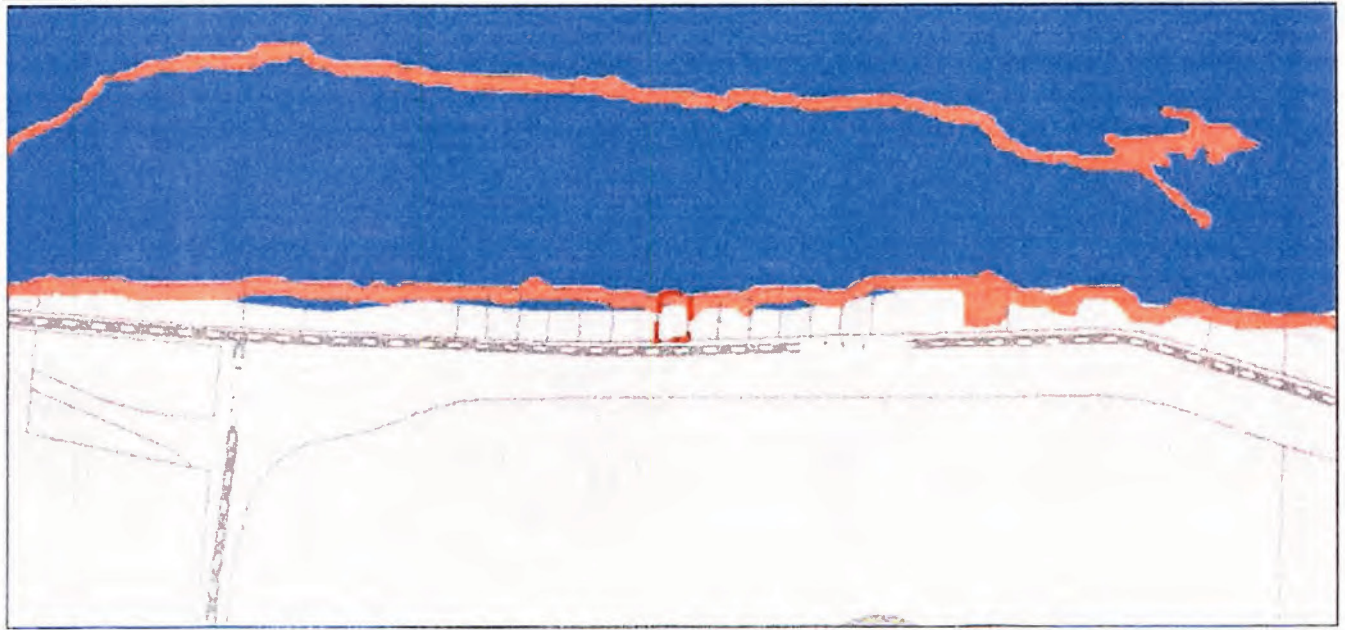
- special flood hazard area\*
- 1996 flood inundation area

\* also referred to as the 100-year floodplain

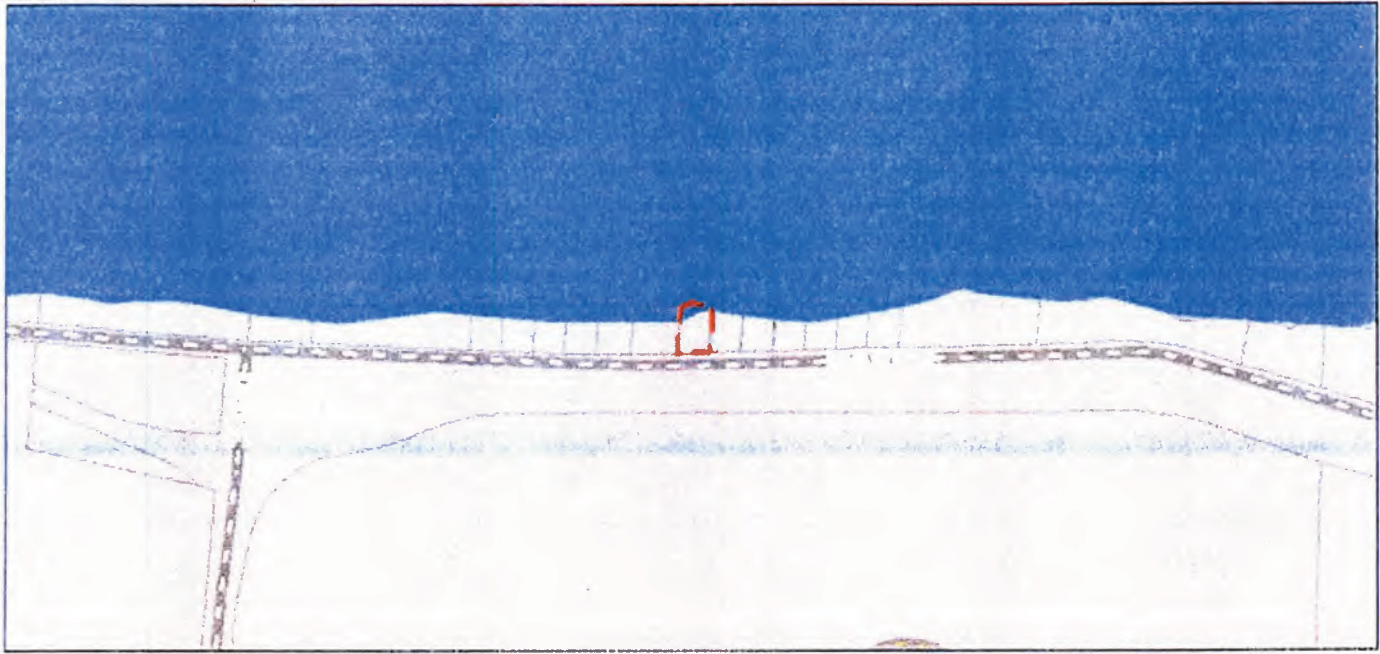
0 700 FT

Steep Slope (25%)

On Steep Slope Yes



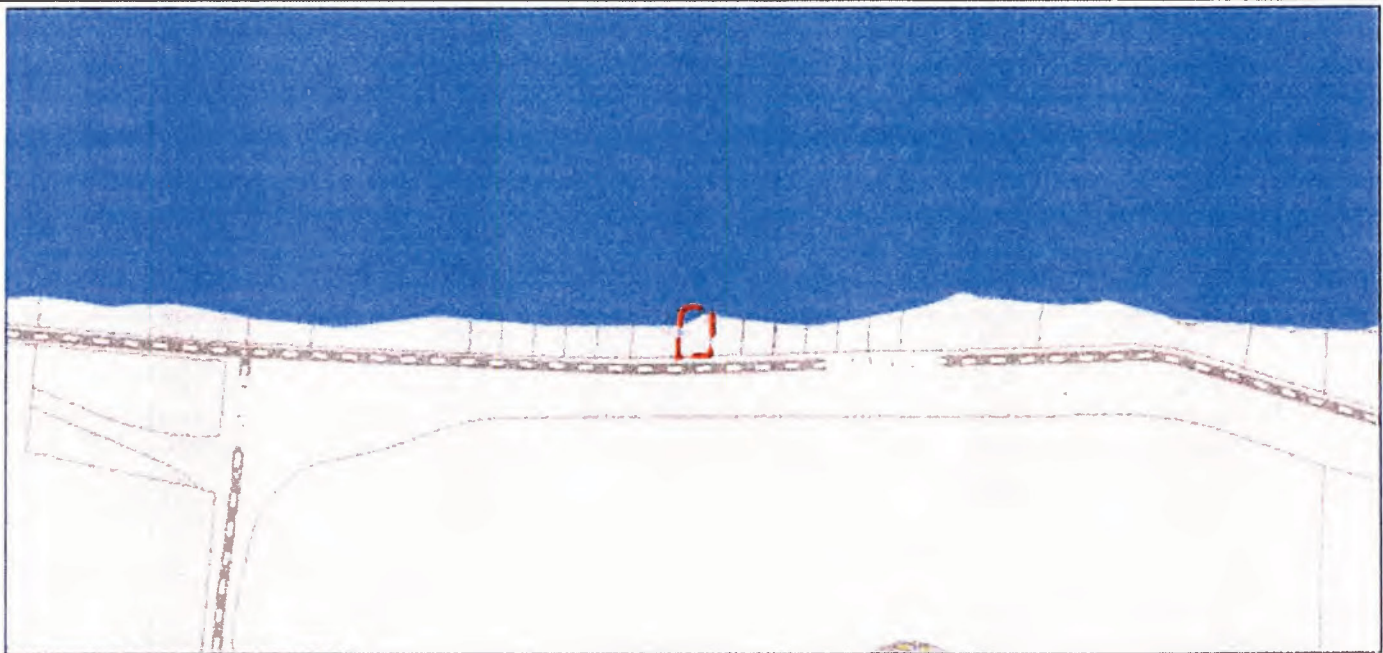
0 700 FT



0 |—————| 700 FT

**Wild Lands Fire Hazard**

Wild Fire Hazard | No



0 |—————| 700 FT

**Earthquake Hazard**

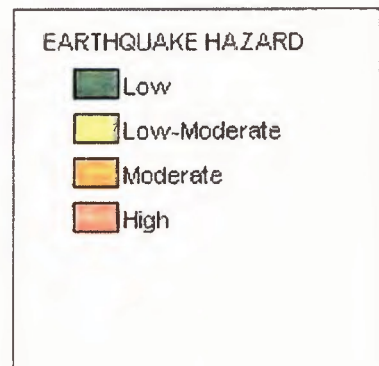
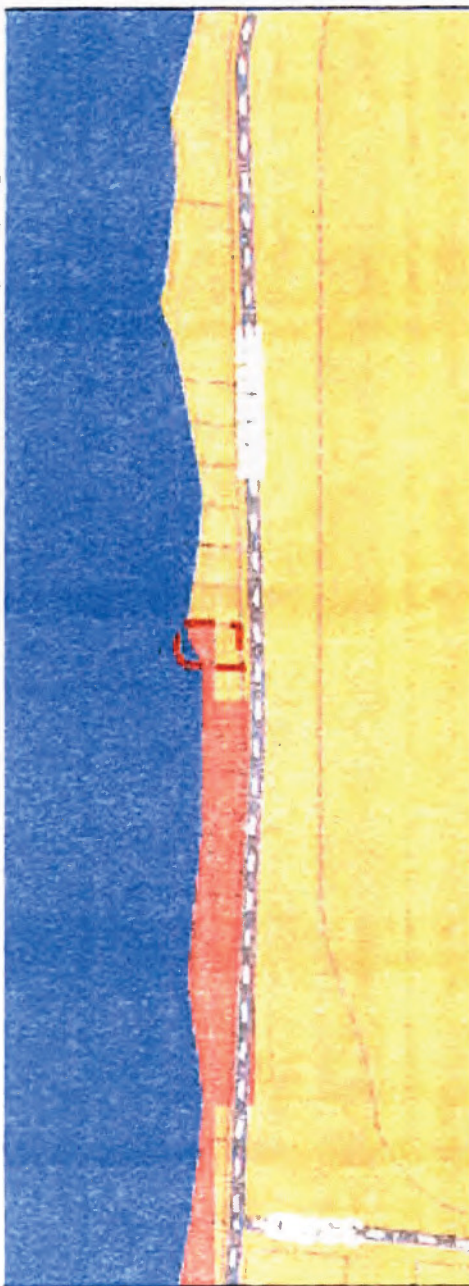
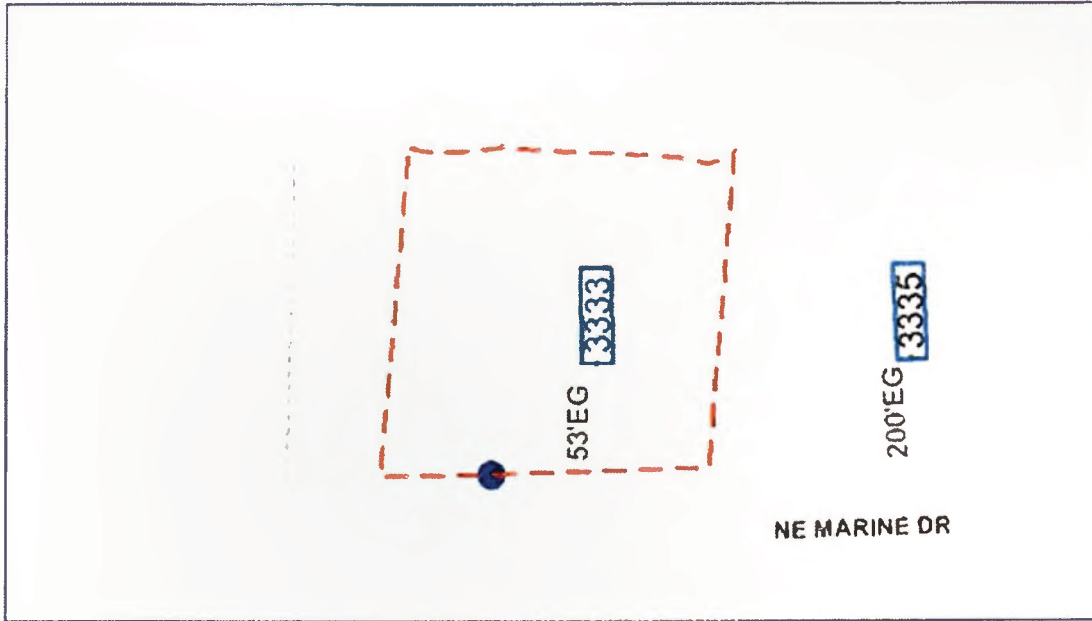


Exhibit C - Hazard Maps, page 3

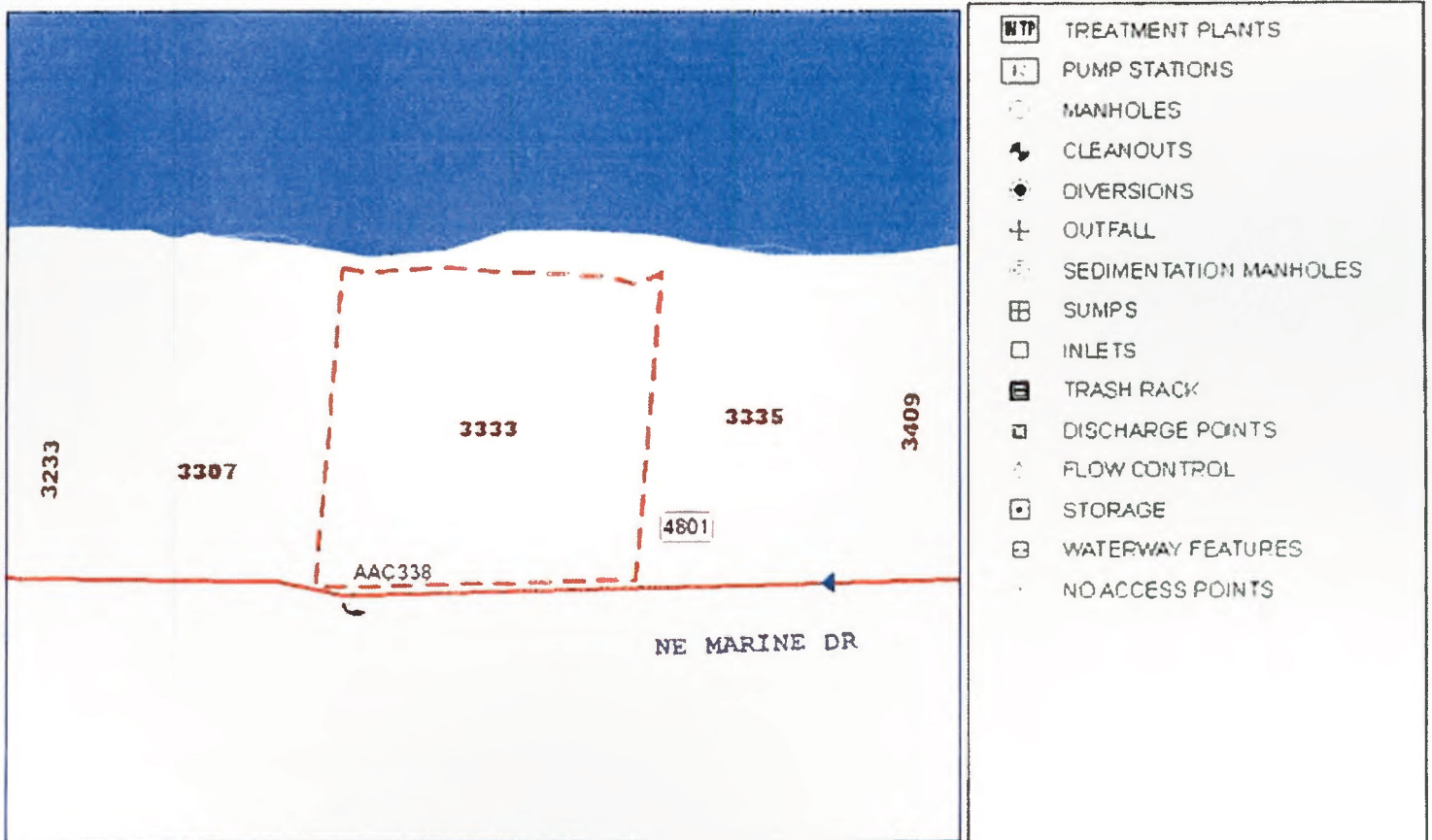






This map depicts the approximate location of water facilities located in the public right-of-way; the actual physical location can only be established by requesting a free utility locate. Call the Oregon Utility Notification Center by dialing 811. Location of water piping on privately owned property is unknown to the Portland Water Bureau, and is shown for illustrative purposes only.

Sewer System



**3333 NE MARINE DR -  
PORTLAND**

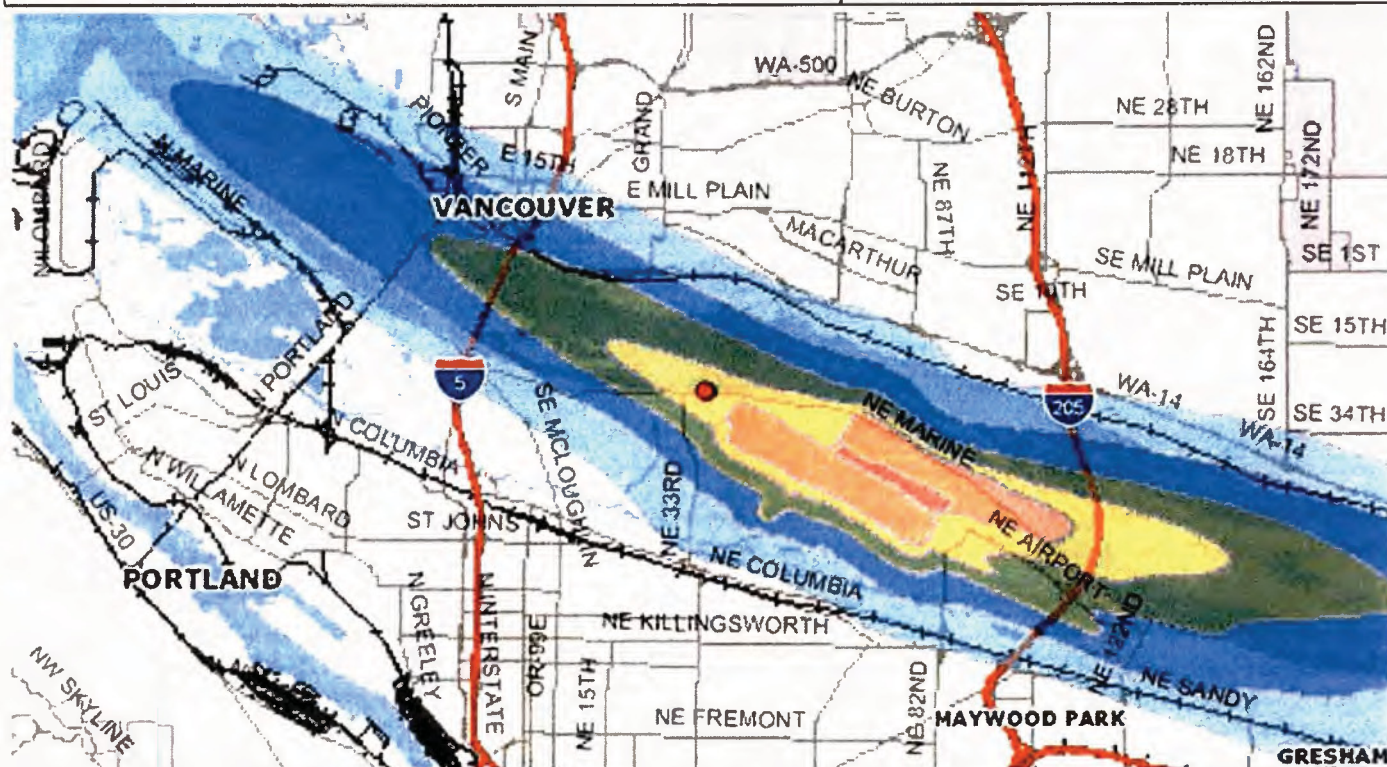
[Explorer](#) | **Property** | [Maps](#) | [Projects](#) | [Crime](#) | [Census](#) | [Environmental](#) | [Transportation](#)

[Summary](#) | [Assessor](#) | [Permits/Cases](#) | [Block](#) | [Schools](#) | [Parks](#) | [Development](#) | [Garbage/Recycling](#) | **Noise** | [Historic Permits](#) | [Water](#) | [Documents](#)

## Portland International Noise DNL Contour

The contour is driven by the loudest aircraft that utilizes the airport on a regular basis. DNL (Day-Night Average Sound Level) - Noise contours are expressed using the DNL descriptor, which is the 24 hour average sound level, in decibels, obtained from the accumulation of all events over the period of a year, with the addition of 10 decibels to sound levels during the FAA defined nighttime hours (10 p.m. to 7 a.m.), when background ambient noise levels are typically lower. Ldn is another symbol for DNL.

Within Contour Area	Yes / 55 DNL
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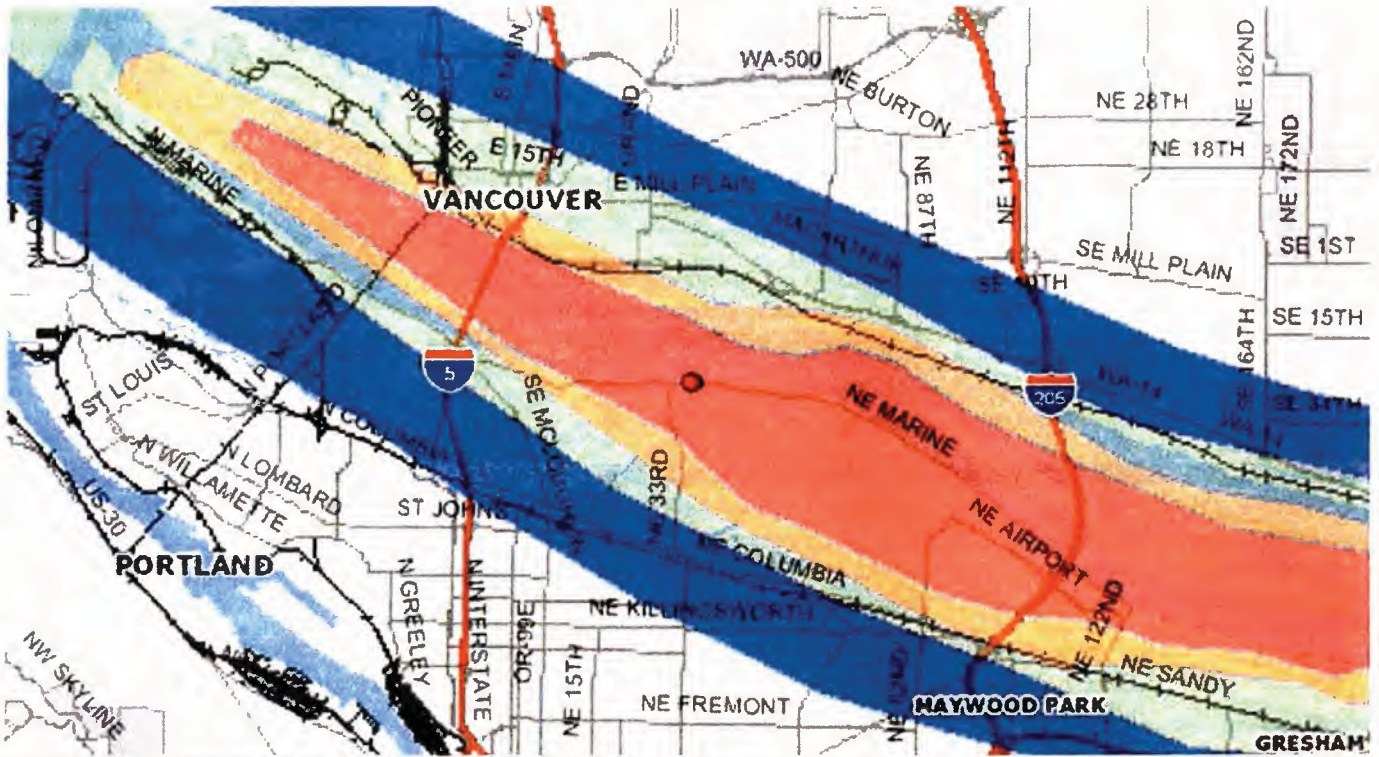


The Portland International Airport publishes a wealth of information related to noise management and other activities. The following link can be used to access more information: [PDX Noise Management Information](#)

## Portland International Noise Events Above 65 dBA

Depicts the number of events above 65 dBA per day that a resident can expect given their location, based on an average.

Events Above 65 dBA	10
---------------------	----

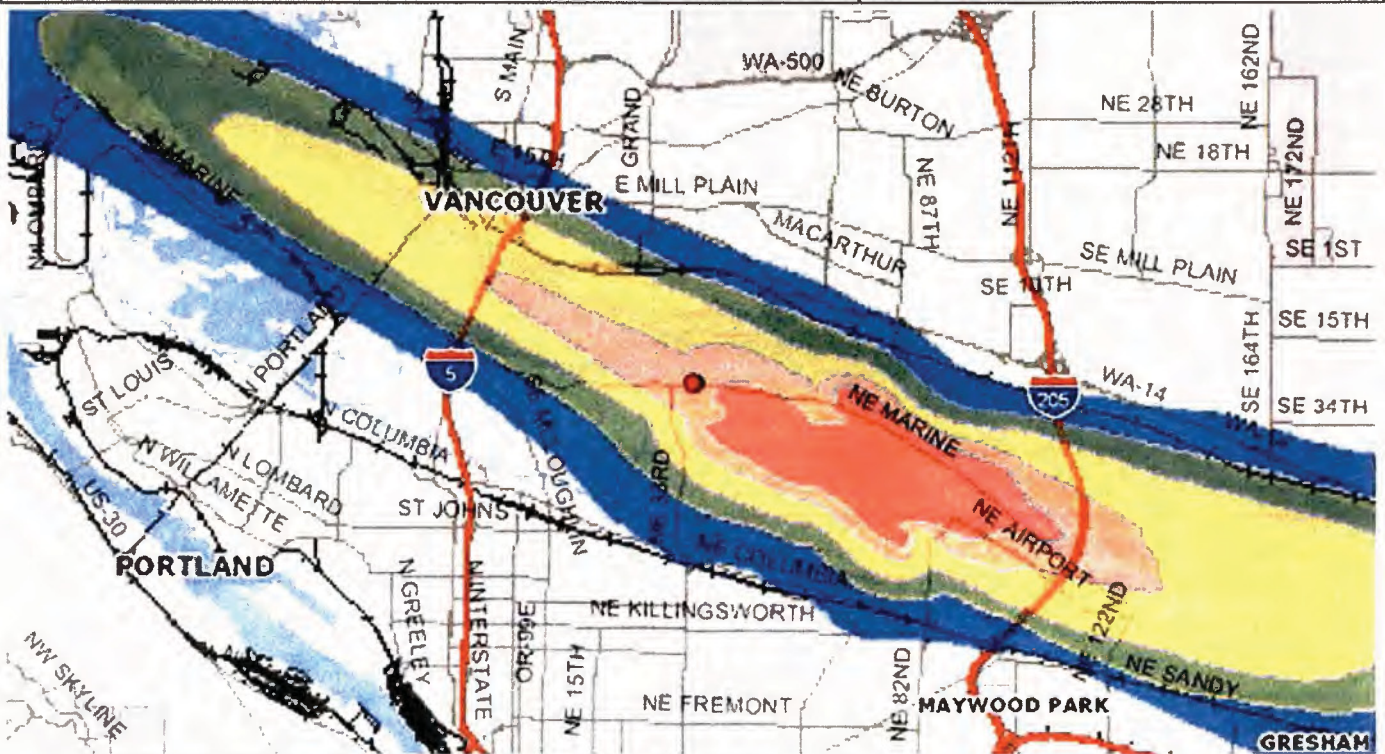


The Portland International Airport publishes a wealth of information related to noise management and other activities. The following link can be used to access more information: [PDX Noise Management Information](#)

**Portland International Noise Time Above 65 dBA**

Depicts the time above 65 dBA in minutes per day that a resident can expect given their location, based on an average.

Time Above 65 dBA 60 minutes



### Exhibit E - Airport Noise Contour Maps, page 3

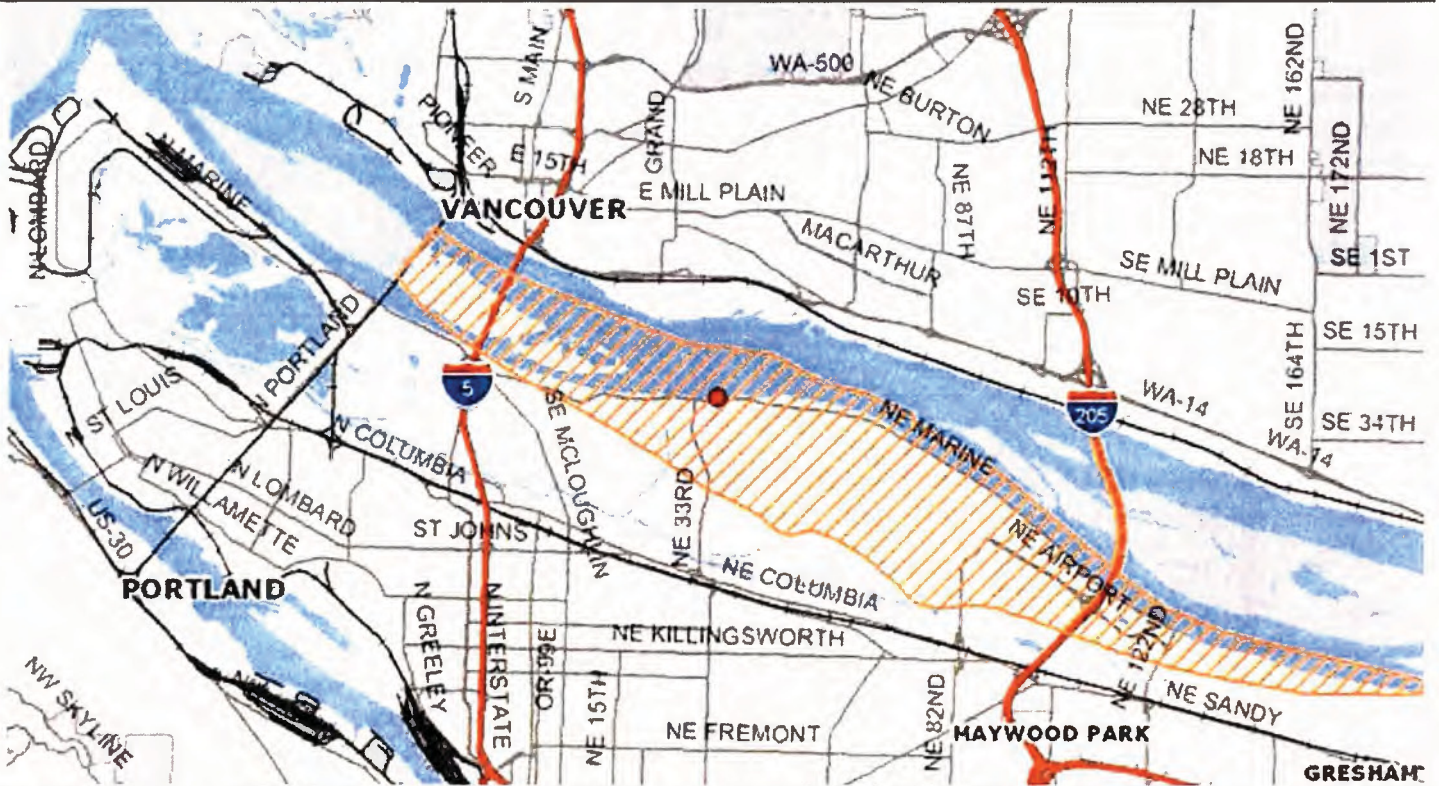
The Portland International Airport publishes a wealth of information related to noise management and other activities. The following link can be used to access more information: [PDX Noise Management Information](#)

#### Portland International Airport Noise Impact Zone

The Portland International Noise Impact overlay zone reduces the impact of aircraft noise on development within the noise impact area surrounding the Portland International Airport. The zone achieves this by limiting residential densities and requiring noise insulation, noise disclosure statements, and noise easements.

For more information refer to: [Portland International Airport Noise Impact Zone \(Zoning Code\)](#)

Within Noise Impact Zone	Yes
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The Portland International Airport publishes a wealth of information related to noise management and other activities. The following link can be used to access more information: [PDX Noise Management Information](#)

#### Aircraft Landing Overlay Zone

The Aircraft Landing overlay zone provides safer operating conditions for aircraft in the vicinity of Portland International Airport by limiting the height of structure and vegetation.

For more information refer to: [Aircraft Landing Zone \(Zoning Code\)](#)

Within Height Impact Zone	Yes
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