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VIA EMAIL (PSC@PORTLANDOREGON.GOV)

Planning and Sustainability Commission  
City of Portland  
1900 SW Fourth Avenue, Suite 7100  
Portland, OR 97201-5380

**Re: Schnitzer Steel Industries, Inc.'s Comments on the September 2015 Proposed Draft  
of the Employment Zoning Project**

Dear Chair Baugh and Members of the Commission:

Thank you for the ongoing opportunity to comment on the Employment Zoning Project. This testimony is offered on behalf of Schnitzer Steel Industries, Inc. ("Schnitzer"), supplements our August 28, 2015 comments, and is limited to the Employment Zoning Project.

Overall, Schnitzer is supportive of the text amendments proposed in the Employment Zoning Project, particularly the new Prime Industrial overlay. We believe that the amendments are a good first step toward retaining prime industrial land in the harbor. However, further protections are necessary, and additional land capacity in the harbor is needed.

**Prime Industrial Overlay Zone (PCC 33.475)**

Retaining the quantity and functionality of harbor access lands ("HAL") is essential to the success of harbor businesses, so we support protecting these lands from conversion to non-industrial uses. Our comments on the Prime Industrial overlay zone include:

- Historically, more prime industrial land capacity and functionality has been lost to legislative map and text amendments than to quasi-judicial map amendments. We can rely on the retention of the limited HAL supply as a means to comply with Goal 9 only if PCC 33.475.040 is expanded so it reflects the requirements in OAR 660-009-0010(4) and legislative map and text amendments are prohibited, or allowed only if lost capacity is offset with land with similar site characteristics.<sup>1</sup>
- We agree that off-site mitigation for impacts from development in the Prime Industrial overlay zone should be an allowed use. PCC 33.475.080(A)(2). We appreciate the

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<sup>1</sup> "Site Characteristics" are defined as "the attributes of a site necessary for a particular industrial or other employment use to operate. Site characteristics include, but are not limited to, a minimum acreage or site configuration including shape and topography, visibility, specific types or levels of public facilities, services or energy infrastructure, or proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes." OAR 660-009-0005(11).

clarification in the commentary that the allowed off-site mitigation includes mitigation related to the Portland Harbor Superfund cleanup.

- We support a limitation on converting prime industrial land to parks and open space areas. We understand that there was objection to the Discussion Draft's proposal to allow parks and open space areas over 2 acres subject to a conditional use review, so that option has been eliminated from the Proposed Draft. The Proposed Draft now requires a comp plan map and zoning map amendment from industrial to open space for parks and open space areas over 2 acres. We believe that this legislative process will provide appropriate opportunities for public participation and City discretion to ensure that an adequate supply of HAL remains and that any lost capacity is offset with land or capacity with similar site characteristics. OAR 660-009-0010(4).

### **Prime Industrial Land Efficiency and Capacity**

Increasing the efficiency and capacity of HAL is necessary in order to meet the City's projected demand for jobs and cargo.<sup>2</sup> It is unclear whether the City believes that the Employment Zoning Project will increase HAL capacity. If so, we request a quantitative assessment that correlates the specific text amendments or other assumptions to the expected increase in capacity. For example, the "efficient use of freight hub infrastructure" is assumed to increase HAL capacity. However, it is not clear which infrastructure improvements are relied upon to make this statement, and whether they are funded and expected to be constructed during the planning horizon.

Very truly yours,



Dana L. Krawczuk

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cc: Jennifer Hudson, Schnitzer Steel Industries, Inc. (via email)  
Steve Kountz, Senior Economic Planner, BPS (via email)

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<sup>2</sup> Schnitzer continues to object to the City's cargo forecast.