



November 6, 2015

Andre Baugh, Chair
Portland Planning & Sustainability Commission
1900 SW 4th Ave., Suite 7100
Portland, OR 97201

Re: Additional Employment Zoning Project Comments

Dear Chair Baugh:

Thank you for the opportunity for additional comments on the Employment Zoning Project (EZP) September 2015 Discussion Draft, part of the Comprehensive Plan Update.

As a follow-up to our verbal testimony provided at the October 27, 2015 Planning and Sustainability Commission (PSC) hearing, we would like to respond more fully to a letter and maps submitted by Metro to the PSC dated October 23, 2015. In that letter, Metro proposed removal of the Prime Industrial Overlay Zone from a number of Port of Portland (Port)-owned properties in the vicinity of Smith and Bybee Lakes and the Rivergate Industrial District.

The Port objects to removal of the Prime Industrial Overlay Zone from Port owned properties, as proposed by Metro, for a number of reasons. For clarity, the original maps provided by Metro have been labeled "POP Property" as appropriate and are attached. Specifically:

- The Port as the owner of these properties has full ownership and management authority and therefore is the appropriate party to suggest future zoning for the properties in question;
- Metro's proposal impacting the Port properties in question was made without consulting the Port;
- Metro and the Port have no IGA or other agreement allowing Metro management authority over the properties in question;
- The properties in question contain a number of key pieces of infrastructure serving the Rivergate Industrial District including roads, rail lines, power lines, mitigation sites and a pump station; and
- The Port of Portland, Metro and eight other property owners received approval of the "Smith and Bybee Wetlands Comprehensive Natural Resource Plan" from the City of Portland on March 13, 2013 (File LU 12-167334). The Plan did not grant Metro management authority over the properties in question and furthermore provided preliminary approval for a number of future development projects on the properties in question to serve the Rivergate Industrial District.

EZP
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Thank you again for the opportunity to comment on the Employment Zoning Project September 2015 Discussion Draft. We look forward to further discussion on this topic this fall.

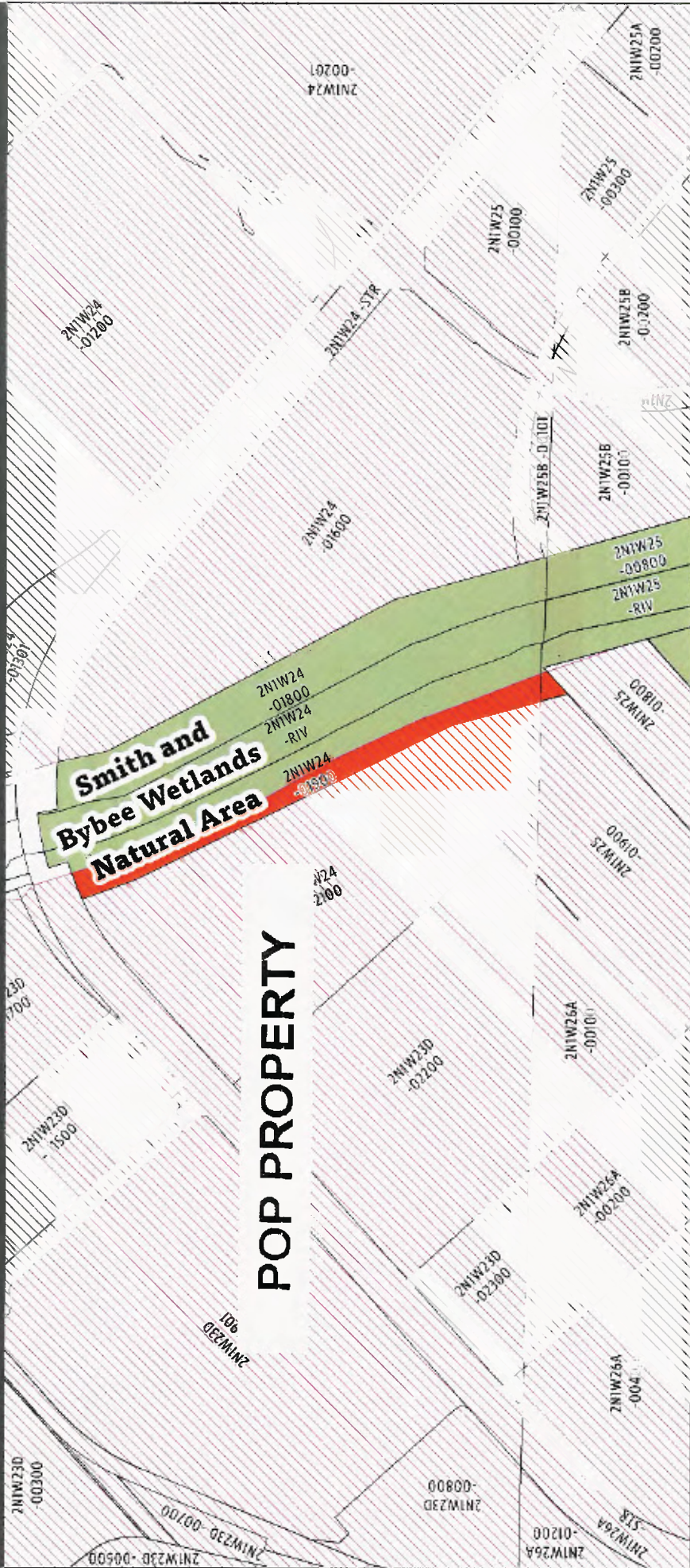
Sincerely,






A handwritten signature in black ink that reads "Tom Bouillion". The signature is written in a cursive style with a large, stylized initial "T".

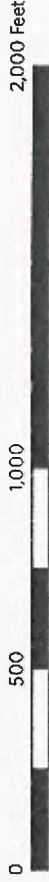
Tom Bouillion,

Planning Manager

cc: Susie Lahsene, Port of Portland
Carrie Butler, Port of Portland
Kathleen Brennan-Hunter, Metro
Paul Slyman, Metro

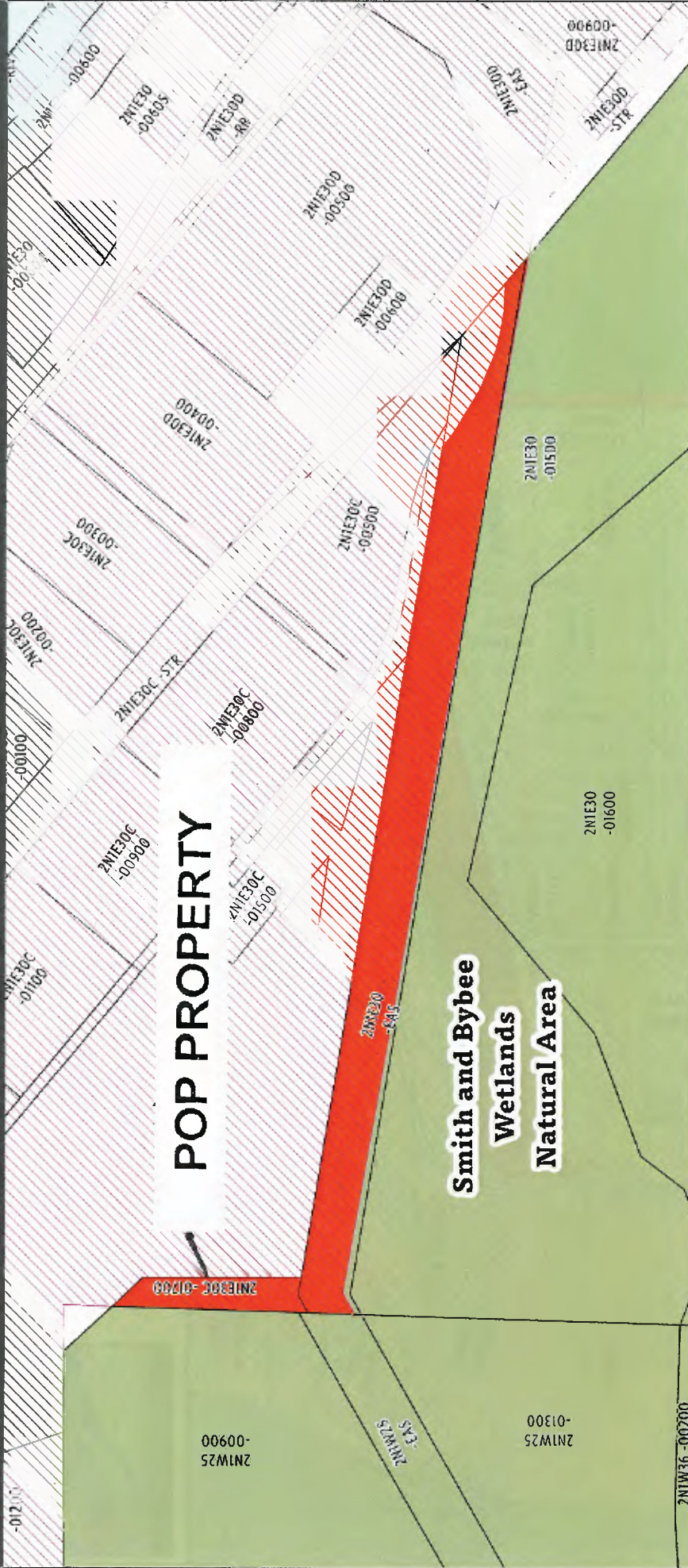
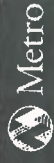


-  Proposed Prime Industrial Overlay Zone
-  Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
-  Other Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
-  Metro Owned and/or Managed Sites
-  Taxlot Parcels



2 - Smith and Bybee Wetlands Natural Area
2.48 acres

Metro comments on Portland Employment Zoning Project Proposed Draft



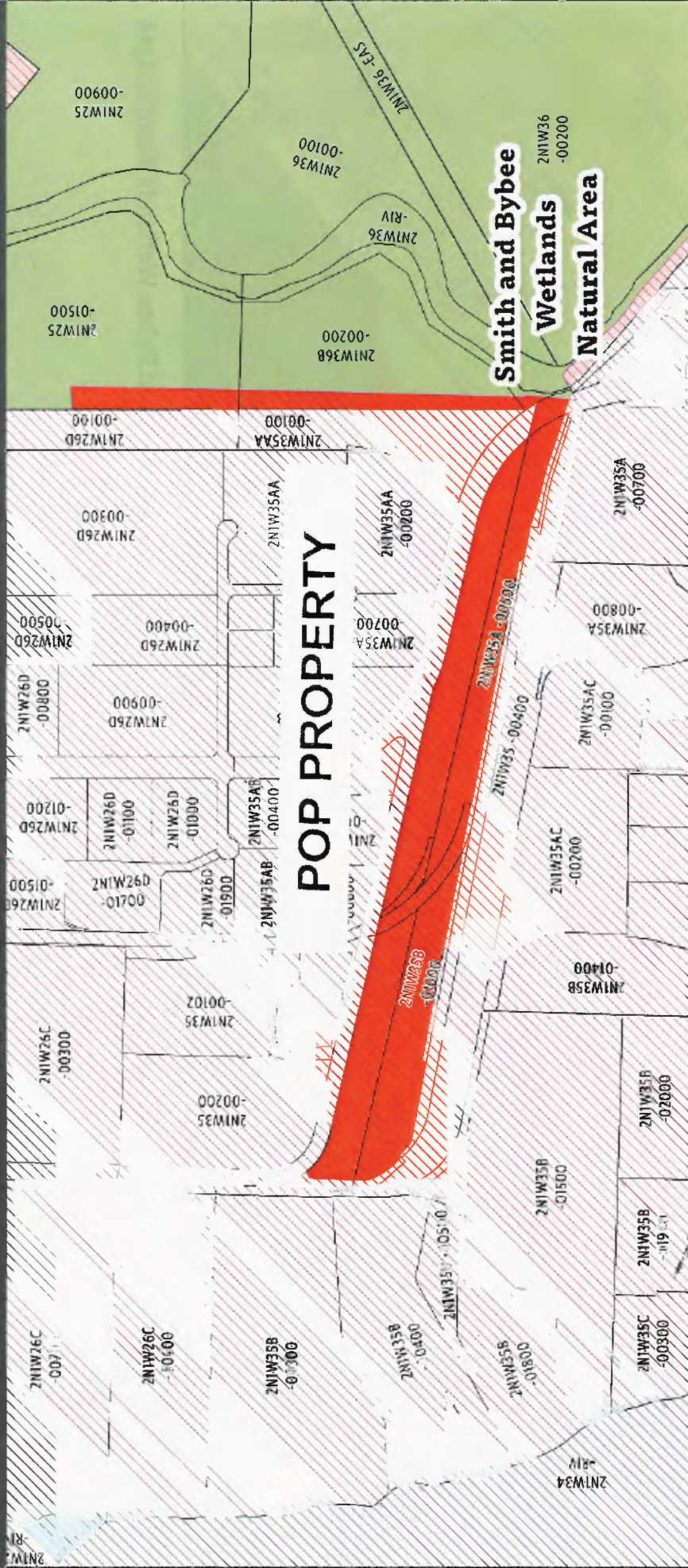
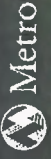
5 - Smith and Bybee Wetlands Natural Area
10.41 acres

- Proposed Prime Industrial Overlay Zone
- Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
- Other Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
- Metro Owned and/or Managed Sites
- Taxlot Parcels



METRO PLANNING CENTER
 425 KERRILL ST. SUITE 3000, PORTLAND, OR 97204
 WWW.METRO.ORG | 503.253.7272
 TEL: 503.253.7272 | FAX: 503.253.7275

Metro comments on Portland Employment Zoning Project Proposed Draft



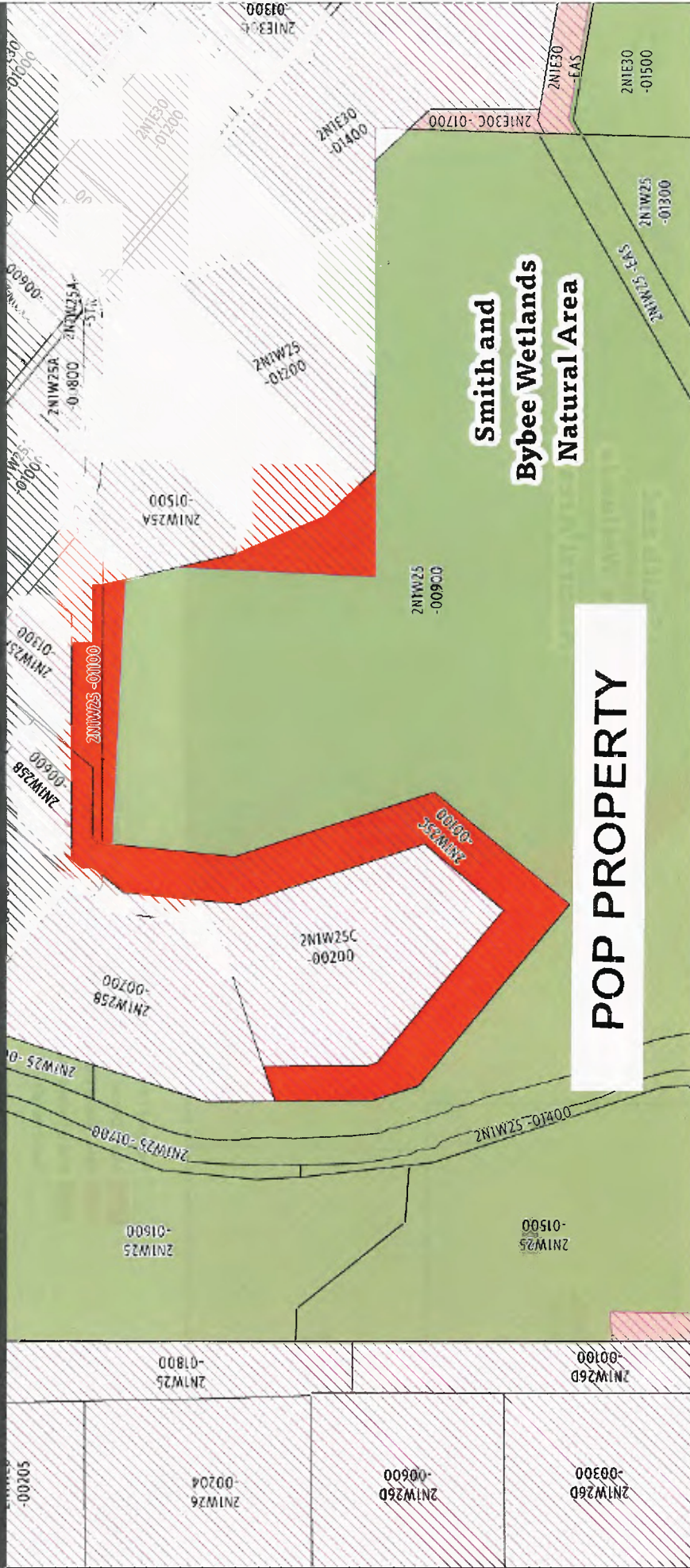
METRO RESOURCE CENTER
 415 NE WASHINGTON ST. SUITE 2000 PORTLAND, OR 97232
 TEL: 503.251.1000 FAX: 503.251.1001

- Proposed Prime Industrial Overlay Zone
- Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
- Other Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
- Metro Owned and/or Managed Sites
- Taxlot Parcels



6 - Smith and Bybee Wetlands Natural Area
 39.75 acres

Date: 10/23/2015



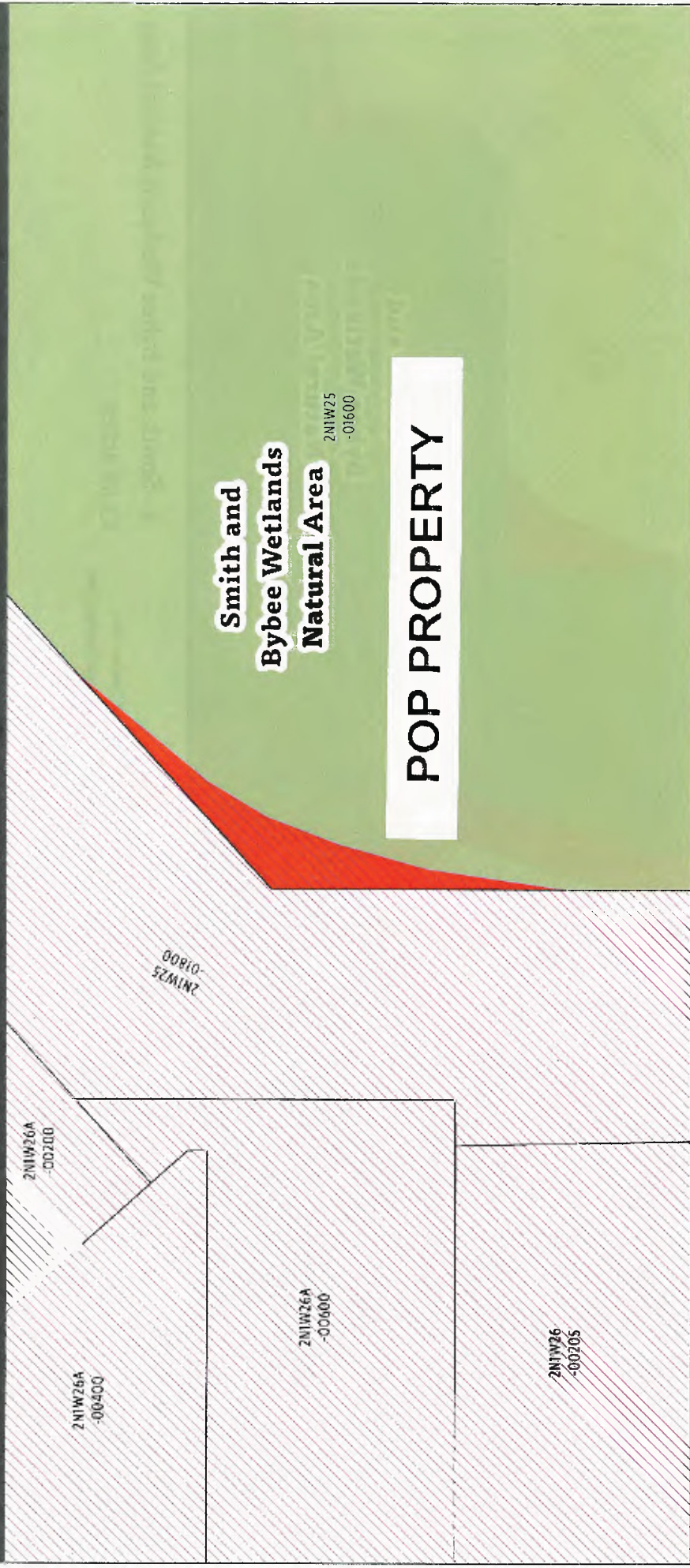
4 - Smith and Bybee Wetlands Natural Area
23.58 acres

- Proposed Prime Industrial Overlay Zone
- Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
- Other Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
- Metro Owned and/or Managed Sites
- Taxlot Parcels



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Metro comments on Portland Employment Zoning Project Proposed Draft



3 - Smith and Bybee Wetlands Natural Area
0.34 acres

Legend:

- Proposed Prime Industrial Overlay Zone
- Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
- Other Metro Owned and/or Managed areas within Proposed Prime Industrial Overlay Zone
- Metro Owned and/or Managed Sites
- Taxlot Parcels

Location map

Metro Planning Center
400 NE 15th St, Portland, OR 97232
www.metroplanning.com | 503.251.1500

Scale: 0, 350, 700 feet

Date: 10/23/2015