

**From:** Krawczuk, Dana (Perkins Coie) [mailto:DKrawczuk@perkinscoie.com]  
**Sent:** Tuesday, July 19, 2016 4:32 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Cc:** Reynolds, Allison J. (Perkins Coie) <AReynolds@perkinscoie.com>; Lauren Golden Jones <Ljones@capstone-partners.com>  
**Subject:** Zoning Composite Map Zone Change Request for 2800 NE 82nd Avenue

Please include this testimony in the record for the above referenced proceeding.

The undeveloped property at 2800 NE 82<sup>nd</sup> Avenue is the former H.G. Lavelle Landfill site. Given the historic use of the property, development requires 80+ foot piles in some areas order to reach native soil and there are ongoing methane extraction requirements. For these reasons, it is not feasible to develop the property with industrial or other uses allowed in the property's EG2 zone. For example, in the two decades, at least four development proposals of varying levels of retail have failed due to site development costs. A zone that allows retail use is a more appropriate designation for this unique site. Therefore, we request that the property be zoned CE.

Thank you for your consideration,

Dana Krawczuk

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