

October 27, 2014

Dana L. Krawczuk
DKrawczuk@perkinscoie.com
D. (503) 727-2036
F. (503) 346-2036

VIA E-MAIL (PDXCOMPPLAN@PORTLANDOREGON.GOV)

Portland Planning and Sustainability Commission
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

Re: PSC Comprehensive Plan Testimony -- Proposed Mixed Use-Urban Center Map Amendment for Lloyd Plaza and 1500 NW Irving

Dear Portland Planning and Sustainability Commission:

This office represents WREH Lloyd Plaza LLC, the owner of Lloyd Plaza (1425-1435 NE Irving Street). Lloyd Plaza is developed with four buildings, and is currently designated as Central Commercial on the comprehensive plan map, and is zoned CXd. The Property's favorable zoning is selling point for potential tenants, and was a key factor in WREH Lloyd Plaza's acquisition of the Property in 2007.

Lloyd Plaza currently has two conflicting recommended comprehensive plan designations:

- The Southeast Quadrant Plan -- Lloyd Plaza is located in the "South Banfield Portal" of the Southeast Quadrant, and based upon discussions with the BPS project manager, we understand that the current thinking is "no change" to the comp plan designate in the South Banfield Portal.
- The 2035 Comprehensive Plan -- Despite Lloyd Plaza's inclusion in the Southeast Quadrant Plan, the property is also being evaluated as part of the larger Comprehensive Plan update. The draft comp plan maps propose designating Lloyd Plaza as Mixed Use -- Urban Center.

WREH Lloyd Plaza LLC, like many other property owners with the proposed "Mixed Use" comprehensive plan designation, cannot meaningfully comment on the proposed comprehensive map amendment because the Mixed Use zone has not yet been developed. It is also not possible to determine whether the proposed comp plan map amendment complies with statewide planning goals and related regulations when the intensity and type of development allowed is undefined.

The City's current schedule requires that public comments on the comprehensive plan map must be submitted by March 13, 2015, but the proposed Mixed Use zoning code will not be released until "Spring 2015." We respectfully request that the Planning and Sustainability Commission

Portland Planning and Sustainability Commission
October 27, 2014
Page 2

defer making any recommendations related to the Mixed Use comprehensive plan designation until the Mixed Use zoning code is developed.

We understand the City's time constraints related to periodic review, but the creation of a new comp plan and zoning category cannot be rushed and should not be done hastily.

Very truly yours,



Dana L. Krawczuk

DLK:dlk

cc: Josh Keene, WREH Lloyd Plaza, Inc.