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VIA EMAIL pse@portlandoregon.gov
and HAND DELIVERY

Planning and Sustainability Commission
Employment Zones Testimony
1900 SW 4th Ave., Suite 7100
Portland, OR 97201

Re: Employment Zones Testimony/Bill Naito Company

Dear Members of the Commission:

This office represents the Bill Naito Company. The Bill Naito Company owns the Montgomery Park building located in northwest Portland along with four other adjacent developed properties. Among those properties are North Parking Garage (located on the Montgomery Park site), the NACCO Warehouse, the "American Can" building, a tools and storage building, and an office building presently occupied by NBC Grimm. All of these properties have historic landmark designations.

The City Council recently affirmed the existing zoning of EX for the Montgomery Park building, the North Parking Garage, and the NACCO Warehouse.

The remainder of the sites, consisting of the "American Can" building, the tools and storage building, and the NBC Grimm office building, are proposed to be amended from IH to EG. The Bill Naito Company does not object to that change.

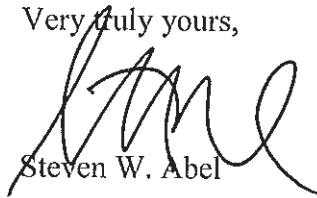
Under existing EG provisions, historic landmarks are given a FAR incentive raising the FAR from two to one. Presumably, the FAR incentive is used to make sure circumstances are such that historic resources can be fully utilized and are not put under pressure for demolition.

The revised EG zone eliminates any FAR limitation and thus, the policies imbedded within the historic resource FAR incentive are, in a sense, imported into the new EG provisions. We have no objection to that, as long as the existing historical resource status at the property continues to be recognized for purposes of incentives.

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Since the rezoning the EG will retain at least a two-to-one FAR (and is, in fact, unlimited) on the EG properties, the Bill Naito Company has no objection to the proposed zone change.

Very truly yours,

A handwritten signature in black ink, appearing to read "S. Abel", written over the typed name "Steven W. Abel".

SWA:sm

cc: Marc Fazio, Bill Naito Company