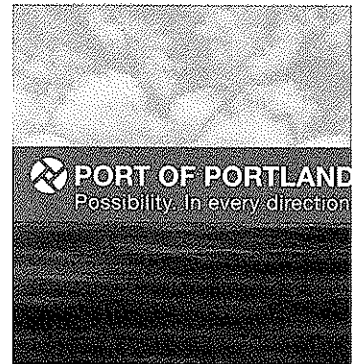


Mission: To enhance the region's economy and quality of life by providing efficient cargo and air passenger access to national and global markets.



September 4, 2009

Ted Wheeler, Chair
Multnomah County Board of Commissioners
501 SE Hawthorne Boulevard
Portland, Oregon 97214

Chair Wheeler and Members of the County Board of Commissioners:

Thank you for the opportunity to comment on the recommendations for urban reserve area designations in Multnomah County.

The Port of Portland is interested in the Metro reserves process because of the long term implications to the economy and livability of our region. Urban reserve designations will be critical in ensuring an adequate industrial land supply to meet the needs of the region, projected to grow to over 3.6 million residents over the next 50 years.

The mission of the Port of Portland, which includes Multnomah County in its three-county service area, is to enhance the region's economy and quality of life by providing efficient cargo and air passenger access to national and global markets.

Related to this economic development mission, the Port has been keenly involved in ensuring an adequate supply of industrial land exists in our region for job growth opportunities. Examples of Port involvement in the regional industrial land supply discussion include managing all three phases of the Regional Industrial Lands Study (RILS) beginning in 1998; active participation in Metro's 2004 Urban Growth Analysis and Report and most recently, participation on Metro's Employment Coordination and Advisory Committee (ECAC) advising staff on the employment lands for the 2009 Urban Growth Report.

The Port believes that evaluation criteria developed by Metro in 2004, with input from the Port, local governments and other stakeholders, as well as criteria elicited in expert interviews conducted by Metro in spring of 2009, most accurately identifies those areas suitable as future industrial land to be brought into the UGB. These criteria generally include:

- Freeway access within three miles of an interchange via an arterial street, no intermediate conflicting uses such as residential, schools and high traffic generating commercial uses;
- I-5, I-84 and I-205 access, particularly for distribution uses, with I-5 being most important;
- Access and proximity to multimodal freight infrastructure (rail, marine and air cargo);
- Proximity to other industrial uses (clustering potential);
- Slopes of less than 5%;
- Potential for property aggregation into large acreage industrial sites; and
- Work force access.

Ted Wheeler
September 4, 2009
Page 2

With this perspective in mind, we believe one of the nine reserve discussion areas under consideration for Multnomah County offers good potential for future industrial uses. The other areas have less potential for future industrial uses, either due to topography, transportation access, limited amount of acreage or other factors.

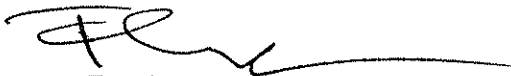
This recommended area are those portions of #4-West of Sandy River nearest to the US 26 corridor. Although this area is some distance from I-84, it has good potential for property aggregation into large acreage industrial sites and potential for clustering based on future industrial development of the Springwater Industrial area in Gresham.

For these reasons, we urge consideration of a portion of area #4-West of Sandy River for urban reserve designation to preserve the opportunity to provide industrial land for job growth over the next 40-50 years to the County and region. While the designation of areas as urban reserves does not guarantee that those areas will eventually come on line as industrial land, designation of areas as rural reserves will effectively preclude any potential for those areas to come on line as industrial land and precluding any job growth there for the next 40-50 years.

One other area, #1 Government Island, is recommended to have neither an urban nor a rural reserve designation. As the primary property owner in the area, we support this recommendation so as to not preclude the possibility of a new transportation corridor from being considered across the island sometime in the next 40-50 years.

We appreciate your consideration of our recommendation for reserve area designations in Multnomah County.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Imeson', with a long horizontal flourish extending to the right.

Tom Imeson,
Public Affairs Director

cc : Regional Reserves Steering Committee-Core 4
Karen Schilling, Planning Director-Land Use Planning Section, Multnomah County