

August 14, 2017

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AUG 14 2017

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VIA HAND DELIVERY

LAND CONSERVATION
AND DEVELOPMENTUrban and Rural Reserves Specialist
Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301**Re: Objections to Adoption of Urban and Rural Reserves in Metropolitan Portland
(Metro Ord. No. 17-1405, Clackamas County Ord. No. 06-2017 and Multnomah
County Ord. No. 1246)**

Dear Urban and Rural Reserves Specialist:

This office represents Metropolitan Land Group ("MLG") the owner of approximately 38 acres in the "Lower Springville Road Area" (Area 7) of Multnomah County (the "Property"), which is a component of the larger 9D Study area. The purpose of this letter is to file written objections with the Department of Land Conservation and Development ("DLCD") to the adoption of the Urban and Rural Reserve designations in the metropolitan Portland by the Metro Council ("Metro") and the Counties of Clackamas and Multnomah (together, the "Counties") as referenced in the joint and concurrent submittal by these government agencies to DLCD dated June 15, 2017 (the "Decision"). Please place this letter, together with the attached earlier submittals to Metro and Multnomah County, in the official record for this matter before both the DLCD and, if assigned, the Land Conservation and Development Commission ("LCDC").

The legal deficiencies we identify in factual support, analysis and erroneous interpretations inherent within the Decision and its related findings are substantive, extensive and range from both re-adoption of errors first adopted with the original reserve proposal as well as new errors committed on remand. For the reasons enumerated below, we respectfully request that the Department and Commission remand the legal deficiencies identified herein.

The Decision Must Consider Differences between MLG's Property and other Lower Springville Road Area Properties

The Court of Appeals directed DLCD to "meaningfully explain why its considerations of the factors" yielded a designation for all land within an area. In re-adopting the analysis for the Lower Springville Road Area (Area 7) and Area 9D as a whole without additional explanation or study, Metro and Multnomah County again erred by failed to analyze the properties within this diverse area, including MLG's property, to adequately explain why a designation of Rural Reserve was appropriate for the all of the properties within this area, notwithstanding the wide

variation in site characteristics within the study area as a whole. As discussed at length in our prior written testimony to date including our earlier objection submittal dated July 14, 2010, MLG's property differs markedly from other properties within Area 7 and the larger study area and a designation of Rural Reserve is not appropriate given these specific distinctions. We, therefore, object to Metro's and Multnomah County's designation for this property without the more detailed analysis required pursuant to the Court's ruling. By failing to conduct the required analysis for the reserve areas, Metro and the Counties, and now the Department and Commission, cannot be confident that these designations comply with applicable reserves designation criteria and therefore cannot determine that they "best achieve" the desired outcome, as noted below.

The Decision Fails to Demonstrate that it "Best Achieves" the Required Planning Objectives

Under OAR 660-027-0005(2) Metro is required to designate Urban and Rural Reserves only after determining whether the balance of such designated Reserves across the region "best achieves livable communities, the viability and vitality of the agricultural and forest industries and protection of the important natural landscape features that define the region for its residents."

The Decision's findings erroneously conclude that the proposed Urban and Rural Reserves designations, in their entirety, best achieves these objectives. Metro's conclusion that the "best achieves" standard is met is not supported by an adequate factual base, nor by analysis which supports this required conclusion of compliance. Metro fails to take into account substantive changes in factual and legal circumstances that have occurred since the original adoption of reserves, including the loss of 3,210 acres of urban reserves in Washington County pursuant to HB 4078, disincorporation of Damascus, the loss of Hayden Island for future employment use. Further, the record includes overwhelming evidence that the Stafford Area is, by all available evidence in the record, highly unlikely to urbanize during the planning period given the demonstrable opposition from the cities of West Linn, Lake Oswego and Tualatin and unilateral delegation to these cities of all decisions relating to serviceability and governance via an intergovernmental agreement. Metro's interpretation and application of the "best achieves" standard is, therefore, inconsistent with the purpose and intent of SB 1011 and implementing administrative rules, and Metro's own findings that the Decision will ensure an adequate supply of urbanizable land during the planning period, as required under the "best achieves" criterion, is not supported by substantial evidence in the record.

The Decision Must Account for the Overall Reserves Changes Under HB 4078

Contrary to Metro's Decision, HB 4078, which resulted in a reduction of 3,210 urban reserves acreage, did not, as a matter of law, override or otherwise fulfill Metro and the Counties' obligation to apply and demonstrate compliance with the "best achieves" standard. Metro cannot simply assume that the legislature expected Metro to propose the same reserves designations on remand for the region as a whole in light of its full-scale changes to the

Washington County reserves. Rather, the clear loss of future urbanizable lands, coupled with the absence of measures taken to ensure that the “best achieves” standard nonetheless is met, must be acknowledged and resolved through corresponding Urban Reserves designation, which is not accomplished by this Decision.

The Decisions’ Urban Reserve Designations Will Not Meet the Area’s Employment and Population Needs

Metro’s designation of urban reserves is not sufficient to meet the region’s employment and population needs over the planning period, resulting in a decision that does not “best achieve” the objectives of the reserves requirements.

Metro and the Counties unreasonably assume that designation of chosen Urban Reserve areas will provide sufficient land to meet the region’s employment and population needs over the planning period. However, Metro’s analysis regarding certain areas is fundamentally flawed, and it fails to consider the substantial evidence in the record, as noted above, that the designated Urban Reserves area in the Stafford Basin (Area 4A-C) is not likely to be available for areas as urban development during the 50-year planning period. Specifically, Metro makes the errors described below in its assumptions and Reserve designations.

Reliance on the 2014 Urban Growth Report is Misplaced Due to Changed Circumstances

Metro argues that it is entitled to rely on the 2014 UGR when making its decisions regarding needed land for employment and population growth during the reserves planning period. (Record 28) In general, we agree that this planning document is a useful forecasting tool and reliance on its conclusions is warranted in many circumstances. However, certain important facts and circumstances have changed between the UGR analysis and related conclusions and the recent Decision, that must be incorporated into Metro’s analysis and conclusions relating to the obligation to provide an adequate urbanizable land supply during the planning period.

Two key circumstances which the Decision fails to account for are the loss of West Hayden Island as expected employment land and the disincorporation of the former City of Damascus. In 2014 the Port of Portland withdrew its consent to annexation of roughly 800 acres of land on West Hayden Island, including 300 acres of expected employment land after a multi-year planning effort collapsed for numerous reasons including untenable mitigation requirements, which leaves this land area unavailable for future urban employment needs. The UGR does not account for this loss of future viable employment land and the Decision did not adjust its projections for Urban Reserve needs specific to employment lands to account for this deficit.

The Decision Does Not Account for the Disincorporation of Damascus

Metro appears to rely on the existence of the former City of Damascus and its continued governance authorities in the 2014 UGR to support its decision to designate areas around Damascus as Urban Reserves that will be served by Damascus in the future. However, the former City of Damascus disincorporated in 2016, and Metro has projected that the eastern portion of what was formerly Damascus will have RRFF5 zoning, or only rural development expectations. As evidenced by its disincorporation, the area that formerly comprised the City appears under any analysis to be highly unlikely to urbanize, despite years of concerted effort which has now concluded.

Despite these circumstances, the Decision designates 5,440 acres of Urban Reserves located east and south of Damascus, and appears to expect these areas to be incorporated into the City of Damascus, which will now not occur due to its disincorporation. For instance, Metro's supplemental findings for the Damascus South Urban Reserve (Area 2A) state: "Analysis and Conclusions: Designation of the Damascus South Urban Reserve area is a logical extension of the City of Damascus, providing additional opportunity for housing and employment uses. Portions of this area are already located in the City of Damascus. Additional areas were identified as important developable urban land in the Damascus Concept Plan," and "Addition of the eastern part of this Urban Reserve will facilitate the provision of sewer to the existing urban area within the City of Damascus. ClackCo Rec. 795- 796." (Record 34-35). The Decision fails to explain how these findings can still be accurate after the disincorporation of Damascus. Even if these findings were intended to infer that the lands adjacent to the former City would urbanize through annexation into other nearby cities, the record shows that the remaining nearby cities of Gresham and Happy Valley have expressed their unwillingness to annex these portions of Clackamas County due to geographic infrastructure constraints, making the provision of water and sewer prohibitively expensive. (Record 295-296) Therefore, it appears unlikely that these Urban Reserve areas will urbanize, leaving a considerable shortfall of urban land during the planning period and, once again, a documented failure to meet the "best achieves" criterion.

Future Urbanization of Stafford Is Unlikely Due to Cities' Control of the Urbanization Process

Metro also makes unsupportable conclusions regarding the future urbanization potential of the 4,700 acres in Areas 4A-C within the collective Stafford area during the planning period. A key issue identified on remand by the Court of Appeals was the large amount of evidence submitted by the cities of Tigard, West Linn and Lake Oswego (the "Cities") regarding the inability for transportation infrastructure in the region to adequately serve the Stafford areas ("Factor 3") during the planning period. The Court remanded, stating that DLCD must consider and respond to this overwhelming evidence when determining if the Stafford area should be designated as Urban Reserves.

Metro's argument responding to the Cities evidence in regards to Factor 3 is that the Cities' transportation planning forecasts and statements regarding inability to provide infrastructure to Stafford cannot be relied upon because the Cities' transportation planning will only consider

services needed for the Stafford area after this area is designated as an Urban Reserve. Metro refers to this as a “chicken and egg” problem, but it is better classified as an unduly optimistic and factually groundless argument that “if we designate, the infrastructure will come.” (Record 64) In practice, Metro’s argument impermissibly removes Factor 3 from consideration in designating an urban Reserve Area. Metro argues that it is free to dismiss any evidence provided by a City that does not project an area can adequately be served because the City’s projections are based on the area not currently requiring services. Under this argument, a determination that an area can be served under Factor 3 can be made in all circumstances, despite any evidence to the contrary. Despite Metro’s insistence that city infrastructure plans and forecasting are unimportant for an Urban Reserve designation, in many of its other findings Metro nonetheless relies upon statements from cities and ODOT that urban services can be provided as evidence to support an Urban Reserve designation. (Record 33, 37, 46)

In the case of Stafford, Metro’s insistence that the Cities’ planning and forecasts should be ignored is particularly alarming. Not only have the Cities presented evidence that transportation infrastructure will not be adequate to serve the Stafford area, but the Cities have also stated that they will not be willing to provide service to the Stafford area. (Record 1275-1291; 1488-1636). Furthermore, the Intergovernmental Agreement (“IGA”) between the Cities and Metro give the Cities control over the timing of adding Stafford areas to the UGB, annexing Stafford into the Cities and providing services. (Record 96-100) Nothing in the IGA obligates the Cities to agree to inclusion of the Stafford area in the UGB or city boundaries at any point during the planning period. Nonetheless, Metro concludes with little or no evidentiary support, and contrary to the clear weight of the record, that because urbanization of Stafford can proceed on the Cities’ timeframe, that the Cities will, at some point during the planning period, change their policy direction and decide to provide urban types and levels of urban services to the designated Stafford I. With all of the evidence pointing to the contrary, it is unclear how Metro can plausibly reach this conclusion and a documented explanation is required.

Based upon the available evidence that the Stafford area, as designated, cannot reasonably be expected to urbanize due to the Cities’ ongoing and unequivocal disinterest in providing governance including adequate urban services over the urbanization process, Metro cannot reasonably conclude that designation of the 4,700 acres in Stafford as Urban Reserve will be available for future urbanization. If these areas do not urbanize, despite the label of Urban Reserve, designation of these areas in lieu of other serviceable lands, precludes a defensible finding that the Decision will “best achieve” the planning needs of the region because it will leave the region unable to meet its expected employment and population needs during the planning period.

Conclusion

The Urban Reserve designation of the Stafford Areas 4A-C and the areas expected to be beyond any governance by the former city of Damascus, the loss of West Hayden Island as future

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available employment land and the 3,210-acre shortfall created by SB4850 the Metro proposal effectively ensure that the Decision will provide for far less urbanizable land than is acknowledged to be required to meet the area's urban land needs through the 50 year planning period. Notwithstanding the policy-based mapping of Urban Reserve acreage, Metro cannot reasonably argue based upon the available record that these Urban Reserve designations will best achieve the documented urbanizable needs of the region. By designating lands that are unlikely to urbanize due to the lack of services and governance even with an Urban Reserve designation as Urban Reserves, Metro is ensuring that the region's urban land needs will not be adequately met during the planning period. Given these analytical and evidentiary flaws, the only practical solution under the applicable statutory and implementary rule provision is to remand the Decision to Metro and the Counties to include alternate lands designated Urban Reserves which, in fact, will be available for urban uses as needed during the planning period.

Thank you for your attention to these objections.

Very truly yours,



Steven L. Pfeiffer
Allison J. Reynolds

SLP/AJR:gmt

cc: Paulette Copperstone, Metro
Michael Cerbone, Multnomah County
Mike McCallister, Clackamas County
Client

enlc: Letter to Metro
Letter to Multnomah County

ENCLOSURES

May 10, 2017

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VIA EMAIL

Chair Deborah Kafoury
Board of Commissioners
Multnomah County
501 SE Hawthorne Boulevard
Suite 600
Portland, OR 97214-3587

Re: Multnomah County Ordinance No. 1246 (Urban and Rural Reserves)

Dear Chair Kafoury and County Commissioners:

This office represents Metropolitan Land Group ("MLG"), the owner of approximately 38 acres of property in the "Lower Springville Road Area" of Multnomah County ("Property"). This letter is written in opposition to Multnomah County Ordinance No. 1246 ("Ordinance"), which is scheduled for consideration by the Board of Commissioners on second reading at tomorrow's meeting.

The deficiencies in the Ordinance and its related findings are extensive and range from both re-adoption of errors first adopted with the original reserves proposal to new errors committed for the first time on remand.

As an example of re-adopted errors, the County again wrongfully designates the Property as a rural reserve. This decision reflects poor policy and poor planning and misconstrues the law for reasons already discussed exhaustively on the record.

There are new errors too. For example, the County erroneously concludes that its error in analyzing and explaining how the reserves factors apply to Area 9D can be addressed by adoption of new findings without modification of any reserves designations. This is not the case because the County's entire analytical approach is flawed by grossly generalizing the characteristics of certain portions of Area 9D to the entirety of Area 9D, which leads to incorrect conclusions about the appropriate reserve designations for at least portions of this area.

Further, the County's error has the cascading effect discussed in the staff report because it is repeated throughout the County. By failing to conduct the correct analysis for Area 9D and other reserve areas, the County does not even know whether it has applied the correct reserves designations to properties in the County. A reassessment of all reserves is needed to ensure confidence in and defensibility of the outcome.

Additionally, the County's process is flawed and prejudices the substantial rights of MLG by not allowing the submittal of new evidence on remand when the evidence relied upon by the County from the record is now years-old and thus out of date. The County needs to and should want to open up the process to allow consideration of new evidence pertaining to reserves designations.¹

The County also errs by adopting as its own the findings adopted by Metro and Clackamas County in support of their reserves ordinances. By adopting Metro's findings, and submitting those as the region's joint findings to DLCD, the County is complicit in the errors first made by these partner agencies.

The errors in the Metro and Clackamas County findings include the following:

- Metro's designation of only 23,031 acres of urban reserves is not sufficient to meet the region's employment and population needs over the planning period, resulting in a decision that is inconsistent with applicable reserves administrative rules.
 - Metro's designation of urban reserves is not supported by an adequate factual base because it erroneously relies upon the 2014 Urban Growth Report. That report is based upon flawed reasoning, including the unreasonable projection of urban development of the former city of Damascus and an unreasonable reliance upon the documented economic downturn in the region beginning in 2007.

¹ See Recital I. of the Ordinance, which states that “* * * the Board remains open to considering all arguments in support of or opposition to this ordinance, including any part thereof and any designation therein.”

- Metro's own findings and evidence state that the designated amount of urban reserve acreage is deficient over the 50-year planning period previously selected by Metro and its regional partners.
- Metro selectively acknowledges some changes in facts, but fails to take into account additional factual and legal changes that have occurred since the original adoption of reserves, including the loss of over 3,000 acres of urban reserves in Washington County, disincorporation of Damascus, the loss of Hayden Island for future employment use, and Metro's own documented conclusion that the region lacks an adequate supply of large-lot industrial land. Taken together, these documented circumstances undermine Metro's conclusion that the proposed supply of urban reserve acreage is adequate.
- The identified urban reserve acreage in the Stafford area, which constitutes approximately one-quarter of all urban reserves in the Metro region, will not urbanize within the planning period in light of the legitimate policy concerns expressed on the record by both the cities of Tualatin and West Linn and residents of the Stafford Hamlet. More specifically, the unequivocal positions expressed by the cities effectively preclude any finding that urbanization of the proposed Stafford urban reserve area, including the provision of urban levels of facilities and services, can reasonably be expected to occur. As a result, this area will become "Damascus II," an area of "phantom" acreage that is not actually available to serve the region's employment and residential needs.
- The findings erroneously conclude that the proposed urban and rural reserves designations, in their entirety, best achieves livable communities, the viability of the agricultural and forest industries, and protection of the important natural landscape features that define the region for its residents.
 - Contrary to the findings, Metro, Clackamas County, and Multnomah County are proposing to adopt a "new joint designation" of reserves, as contemplated by the Court of Appeals in *Barkers Five, LLC v. Land*

Conservation and Development Commission, 261 Or App 259, 323 P3d 368 (2014) because no such joint designation is currently in place in these two counties due to the remand. As a result, Metro and these counties are obligated to address the “best achieves” standard in conjunction with this “new joint designation.”

- Contrary to the findings, HB 4078, which resulted in a reduction of 3,000 urban reserves acreage, did not, as a matter of law, override or otherwise fulfill Metro and the counties’ obligation to apply and demonstrate compliance with the “best achieves” standard. In fact, the legislative history for HB 4078 refutes the Findings on this point. The -12 amendments to HB 4078 proposed to add a provision stating that the reserves designations would meet the “best achieves” standard; however, the Legislature did not adopt this amendment. The decision not to adopt this amendment and not to directly address the “best achieves” standard in HB 4078 confirms a legislative intent to leave this issue to further action by Metro and the counties.
- The interpretation and application of the “best achieves” standard in the findings is inconsistent with the purpose and intent of SB 1011, the implementing administrative rules, and the findings themselves given that it does not result in an adequate supply of needed employment land during the planning period.
- As explained above in response to the “amount of land” standard, the urban reserves designated in the Stafford area are effectively “phantom” acres that will not urbanize within the planning period due to the legitimate policy concerns expressed by hamlet residents and adjacent cities.
- Metro’s conclusion that the “best achieves” standard is met is not supported by an adequate factual base and is undermined by evidence in the record.

Chair Deborah Kafoury
Multnomah County Board of Commissioners
May 10, 2017
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Until Multnomah County and its regional partners address these issues, the designation of reserves by Metro and the counties will be subject to further legal challenge. Please include a copy of this letter in the official record for this matter. Thank you for your consideration of this testimony.

Very truly yours,



Steven L. Pfeiffer

SJK

cc: Board Clerk (via email)
Mr. Jed Tomkins (via email)
Client (via email)

March 16, 2017

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VIA HAND DELIVERY

Metro President Tom Hughes
Metro Councilors
Metro Regional Services
600 NE Grand Avenue
Portland, OR 97232-2736

Re: Metro Ordinance No. 17-1397 (Urban and Rural Reserves)

Dear Council President Hughes and Metro Councilors:

This office represents Metropolitan Land Group, the owner of approximately 38 acres of property in the "Lower Springville Road Area" of Multnomah County. This letter is written in opposition to Metro Ordinance No. 17-1397 ("Ordinance"), which is scheduled for consideration by the Metro Council at today's meeting.

Metro's Ordinance and related findings are deficient for the following reasons:

- Metro's designation of only 23,031 acres of urban reserves is not sufficient to meet the region's employment and population needs over the planning period, resulting in a decision that is inconsistent with applicable reserves administrative rules.
 - Metro's designation of urban reserves is not supported by an adequate factual base because it erroneously relies upon the 2014 Urban Growth Report. That report is based upon flawed reasoning, including the unreasonable projection of urban development of the former city of Damascus and an unreasonable reliance upon the documented economic downturn in the region beginning in 2007.
 - Metro's own findings and evidence state that the designated amount of urban reserve acreage is deficient over the 50-year planning period previously selected by Metro and its regional partners.

Council President Tom Hughes

Metro Councilors

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- Metro fails to take into account additional factual and legal changes that have occurred since the original adoption of reserves, including the loss of over 3,000 acres of urban reserves in Washington County, disincorporation of Damascus, the loss of Hayden Island for future employment use, and Metro's own documented conclusion that the region lacks an adequate supply of large-lot industrial land. See attached. Taken together, these documented circumstances undermine Metro's conclusion that the proposed supply of urban reserve acreage is adequate.
- The findings erroneously conclude that the proposed urban and rural reserves designations, in their entirety, best achieves livable communities, the viability of the agricultural and forest industries, and protection of the important natural landscape features that define the region for its residents.
 - Contrary to Metro's draft Supplemental Findings, HB 4078, which resulted in a reduction of 3,000 urban reserves acreage, did not, as a matter of law, override or otherwise fulfill Metro and the counties' obligation to apply and demonstrate compliance with the "best achieves" standard.
 - Metro's interpretation and application of the "best achieves" standard is inconsistent with the purpose and intent of SB 1011, the implementing administrative rules, and Metro's own findings given that does not result in adequate supply of needed employment land during the planning period.
 - Metro's conclusion that the "best achieves" standard is met is not supported by an adequate factual base, and the attached documentation further undermines Metro's conclusion.
- Metro's findings are deficient and do not adequately respond to the remand by the Court of Appeals and the Land Conservation and Development Commission because Multnomah County has not reconsidered and re-applied the reserves designation factors to Area 9D and determined the effect of that analysis on the designation of reserves in Multnomah County in its entirety.

Council President Tom Hughes
Metro Councilors
March 16, 2017
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Until Metro addresses these issues, the designation of reserves by Metro and the counties will be subject to further legal challenge. Please include a copy of this letter in the official record for this matter. Thank you for your consideration of this testimony.

Very truly yours,



Steven L. Pfeiffer

SJK

Enclosures:

Regional Industrial Site Readiness – 2014 Inventory Update
Land Availability Report: Limited Options (2012)

cc: Mr. Roger Alfred (via email) (w/encls.)
Mr. Ted Reid (via email) (w/encls.)
Client (via email) (w/encls.)

MACKENZIE.

DESIGN DRIVEN | CLIENT FOCUSED

REGIONAL INDUSTRIAL SITE READINESS

2014 Inventory Update

Submitted
September 2014

Project Number
2110160.03



MACKENZIE
Since 1960

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REGIONAL INDUSTRIAL SITE READINESS – 2014 Inventory Update

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PROJECT MANAGEMENT TEAM AND SPONSORS

Business Oregon - Sierra Gardiner and Mike Williams

Metro - Ted Reid and John Williams

NAIOP Oregon Chapter - Kirk Olsen

Oregon Department of Land Conservation and Development – Jennifer Donnelly and Tom Hogue

Port of Portland - Lise Glancy and Keith Leavitt

Portland Business Alliance – Marion Haynes and Raihana Ansary

**CONSULTANT TEAM**

Mackenzie – Todd Johnson, Project Manager; Gabriela Frask; Brent Nielsen; and Matthew Butts

EXECUTIVE SUMMARY

This report is an update to the 2011 *Regional Industrial Site Readiness Project* of large (25+ acres) industrial sites within the Portland metropolitan area Urban Growth Boundary (UGB) and select urban reserves¹. The project is a partnership of Business Oregon, Metro, NAIOP - Commercial Real Estate Development Association Oregon Chapter, Oregon Department of Land Conservation and Development, Port of Portland, and the Portland Business Alliance, with cooperation from local governments and private property owners. This update is intended to inform local, regional, and state efforts to ensure an adequate supply of development-ready large industrial sites for traded-sector job creation.

Portland-Metro's Traded Sector, a 2012 Value of Jobs Report issued by Portland Business Alliance, found that on average a traded-sector worker in the Portland metropolitan area earns 42% more than a local-sector worker in the Portland metropolitan region. Promoting traded-sector job creation also spurs the local economy with a multiplier of 2.5 local-sector jobs created for each high-skilled traded-sector job. The production of traded-sector goods (i.e., manufacturing) remains a backbone of Portland metropolitan area's employment. Manufacturing jobs provide higher wages and better benefits than non-manufacturing jobs, particularly for those workers without a high school or college degree. The availability of large and market-ready industrial sites is critical to expanding and attracting traded-sector businesses and growing middle-income jobs key to a prosperous region.

This update intends to:

1. inventory and track changes in the region's large lot industrial site supply;
2. analyze movement of sites from varying states of site readiness;
3. inform policy makers on activity, such as policy changes or infrastructure investments, that have increased the supply and/or readiness of development-ready sites; and
4. support policy and investment decisions required to ensure an adequate supply of development-ready large industrial sites to support economic growth.

The development-readiness tiers used in this inventory are based on those established during the 2011 project:

Tier 1: Development-ready within 180 days of application submittal (i.e., projects can receive all necessary permits; sites can be served with infrastructure and zoned and annexed into the city within this timeframe).

ACTIONS THAT MADE SITES MORE DEVELOPMENT-READY	
Local and state legislative actions ²	2
Changes in property owner willingness to transact	2
Environmental constraint mitigation	2
Infrastructure investments	5

Tier 2: Likely to require 7-30 months to become development-ready.

Tier 3: Likely to require over 30 months to become development-ready.

Tier 1 sites are the only sites generally considered recruitment-ready for businesses expanding or locating in the Portland region. In a globally competitive environment, businesses increasingly require compressed timelines for

¹ Although this inventory does not include sites within rural areas of these three counties that are outside the UGB and selected urban reserves, these sites are important to the region's economic prosperity.

² Legislative actions include Urban Growth Boundary (UGB) expansion, annexation, zoning, and concept planning.

decision making and development. While not considered marketable for most recruitments, Tier 2 could be feasible for expansions of existing businesses and for speculative development for investors. Tier 3 sites are viewed as being non-competitive in the market, and are therefore unavailable for business expansion and recruitment without significant investments, changes in regulatory compliance, or land price discounted by property owners.

Findings

Of the 54 sites in the 2014 inventory:

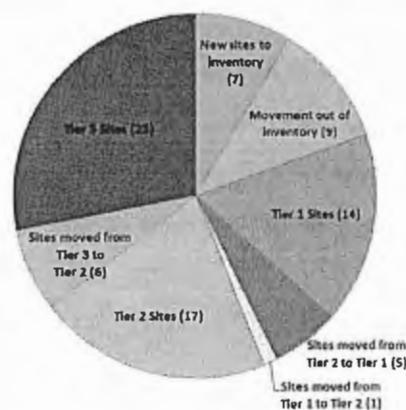
- There are 14 Tier 1 sites; 17 Tier 2 sites; and 23 Tier 3 sites.
- Seven new sites were **added** to the inventory since 2011.
- Nine sites were **removed** from the inventory since 2011:

ACTIVITY RESULTING IN INVENTORY REMOVAL	
User designated ³ :	1
Program changes ⁴ :	2
Construction and development:	3
Local and state legislative actions:	3
Total:	9

- Three of these sites are currently being developed and projected to result in \$38 million in investments and 416 new jobs when construction is complete⁵; one of the sites is being used as a temporary parking lot⁶ for Intel's Ronler Acres Campus expansion.
- Since this June 2014 inventory was completed, three additional Tier 1 sites have been absorbed in the market⁷.

- Five sites moved up from Tier 2 to Tier 1.
- Six sites moved up from Tier 3 to Tier 2.
- Large industrial sites face multiple development constraints, including: required state and local legislative actions⁸, inadequate infrastructure and transportation⁹, land assembly needs, natural resources mitigation, brownfield remediation, and property owners not willing to transact.

Total Sites and 2011-2014 Inventory Movement



³ User designated sites are sites owned and held for future expansion of existing regional firms and not available to the general market.

⁴ Current property owners have designated these sites to meet long-term operational needs. As a result, these sites are no longer available to the general market.

⁵ **Site 11:** Portland International Airport in Portland has two buildings under construction totaling 491,200 square feet with a \$28.5 million investment and 141 projected distribution and logistics jobs available in late 2014 (Port of Portland). **Site 40:** Pacific Realty in Tualatin has two buildings under construction totaling 100,000 square feet with a \$9.5 million investment and 275 projected distribution and logistics jobs available in 2015 (PacTrust). **Site 44:** Intel Corporation in Hillsboro was previously used as a staging area and is now a temporary parking lot for the D1X and D2X fabrication plants at the Intel Ronler Acres Campus with investment of \$1 billion (Intel).

⁶ Intel received land use approval for a temporary parking lot until 2023 at which point the property may be redeveloped.

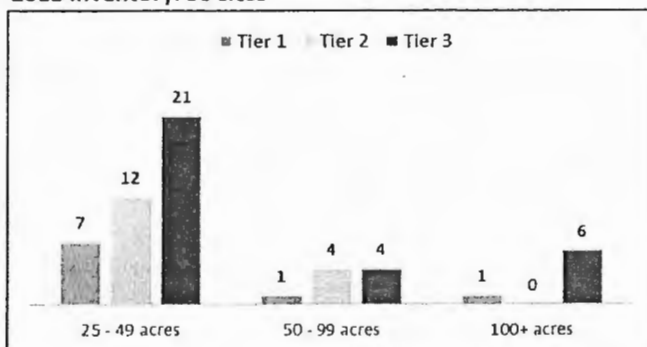
⁷ **Site 13:** Specht Properties in Portland; **Site 46:** Development Services of America (Westmark site) in Hillsboro; **Site 114:** Colwood Ltd Partnership in Portland.

⁸ Local and state legislative actions include UGB expansion, annexation, zoning, and concept planning.

⁹ Infrastructure includes water, sewer, and stormwater utilities.

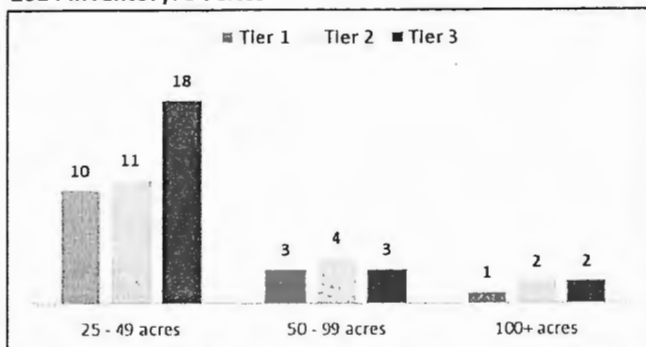
The following charts and tables compare site net developable acreage changes between the 2011 and 2014 inventories.

2011 Inventory: 56 sites



	2011 Inventory	2014 Inventory
Tier 1	9	14
Tier 2	16	17
Tier 3	31	23
Total	56 sites	54 sites

2014 Inventory: 54 sites



	2011 Inventory	2014 Inventory
25-49 acres	40	39
50-99 acres	9	10
100+ acres	7	5
Total	56 sites	54 sites

The increase in Tier 1 sites in the 2014 inventory is a result of the addition of three new sites to the inventory¹⁰ and five sites upgraded from Tier 2¹¹, offset by the market absorption of three Tier 1 sites. Of the 14 Tier sites, only seven have broad market appeal.

Of the 11 sites that moved up a tier, seven sites required investment in infrastructure and mitigation.

- Two sites moved up a tier due to mitigation of environmental constraints.¹²
- Five sites received transportation/infrastructure investments, totaling approximately \$39.5 million.¹³

Four of the sites which moved up a tier were able to do so without significant investment in infrastructure.

- Two sites had a change in the property owner's willingness to transact and were upgraded to Tier 2.¹⁴
- Two sites were taken out of urban reserves and brought into the UGB by House Bill 4078 in 2014.¹⁵

¹⁰ Site 111: Weston Investment – an aggregated site; Site 113: Henningsen Cold Storage – increased in site acreage due to decision to vacate dedicated right-of-way and building demolition for future development; and Site 114: Colwood Ltd Partnership – open space rezoned to industrial.

¹¹ Site 13: Specht Propertlines Inc.; Site 22: Port of Portland – GVBW West; Site 29: Clackamas County Development Agency; Site 50: Shute North; Site 52: Shute South.

¹² Site 13: Specht Properties and Site 29: Clackamas County Development Agency.

¹³ Sites 18 and 19: Troutdale Reynolds Industrial Park Phase 2 - The Port has expended \$2.5M in planning and design to permit the infrastructure for Phase 2. \$8 million in regional transportation funding was approved for the local roads, along with a transfer of \$6 million in funding from the State-funded Troutdale interchange project and \$1.1 million from the City of Troutdale; Site 29: Clackamas County Development Agency - \$1.1 million in State Immediate Opportunity Fund and Clackamas County funding was used to improve local road access to the site. An additional \$1.8 million in County funds paid for extension of 120th Avenue; Sites 50 and 52: Shute Road North and South - \$8 million in regional transportation funding and \$10 million transfer of I-26/Brookwood interchange savings was used to pay for the construction of nearby local road improvements. The City of Hillsboro contributed \$1 million dollars for water infrastructure and planning for sewer line pump station and extension.

¹⁴ Site 23: Mt. Hood Community College and Site 47: Cranford.

¹⁵ Site 101: Vanrose Farms and Site 104: Meek Subarea.

Conclusions

- The Portland region's supply of large industrial sites over 25 net developable acres has decreased since 2011.
- There have been positive impacts in site readiness from investments in infrastructure, mitigation and local and state legislative actions. Movement between tiers is largely due to infrastructure investments, and environmental constraint mitigation (7 sites).
- Supply continues to be most limited for larger sites of 50 acres or more.
 - There is only one 100-plus acre Tier 1 site in the region. Larger sites are more complex and take patience to acquire and develop.
- Sites with multiple property owners require aggregation. This is a key issue to supplying larger sites to the market affecting a third of the Tier 2 and Tier 3 sites in the inventory (13 sites).
- There are multiple market-readiness site constraints for other sites in the pipeline.
- Over half of the Tier 2 and Tier 3 sites require local and state legislative actions such as annexation zoning, completion of concept planning, or addition to the urban growth boundary (23 sites).
- Between 40% and 60% of Tier 2 and Tier 3 sites have transportation, infrastructure, and/or environmental mitigation constraints (17-25 sites).
- While brownfield redevelopment affects only six large industrial sites, three industrial sites are located in the Portland Harbor Superfund site which will add significant costs, time, and brownfield redevelopment challenges and require coordinated strategies.
- While investments in infrastructure, changes in ownership willingness to transact, and legislative actions have improved the quality of sites in the inventory, with 11 sites moving closer to market readiness; site readiness is not occurring at a pace sufficient to keep up with demand.¹⁶

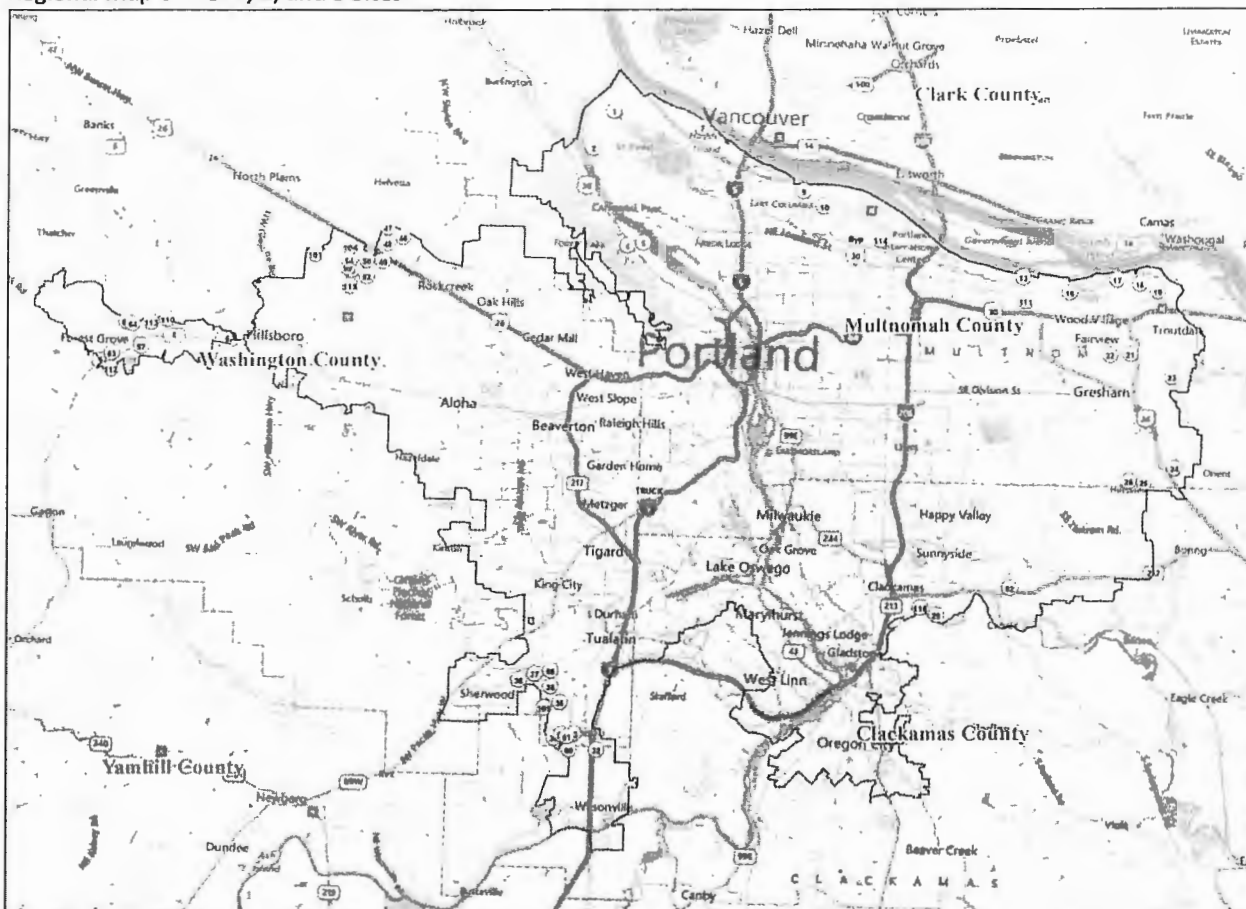
As the economy continues to recover and demand increases due to business growth and investment, additional strategies to increase the continued supply of land will be needed. In order to provide the required land supply to meet projected 2035 population and employment growth within the Metro UGB¹⁷, create middle income jobs to address income disparity, and achieve a sustainable tax base critical to public services¹⁸, state and regional policymakers must work from an accurate and practical employment land inventory and prioritize policy actions and investments to address industrial site readiness, aggregation, infrastructure, environmental constraint mitigation, legislative actions, and industrial brownfield identification and mitigation. Regular updates to the inventory support the region's traded-sector prosperity and job creation efforts allow tracking of progress in efforts to maintain a supply of sites and help target investments and policy decisions to ensure an adequate supply of development-ready industrial sites. With reduced federal funds, the region will need to be more strategic about investments required to move sites to market ready sites to support these goals.

¹⁶ The inventory shows an overall decrease in the total number acres and total number of sites, and a 26% decrease in Tier 3 sites over the two and a half year period.

¹⁷ The draft 2014 *Metro Urban Growth Report* forecasts 85,000 to 440,000 additional jobs and 300,000 to 485,000 additional people inside the Metro urban growth boundary by the year 2035.

¹⁸ State personal income taxes and local property taxes.

Regional Map of Tier 1, 2, and 3 Sites



Note: Additional maps are available in Appendix B of this report.

Source: Mackenzie

PROJECT SUMMARY

Project Purpose

The *2011-12 Regional Industrial Site Readiness Project* assessed the Portland region's supply of development-ready large industrial sites, a critical part of a strategy to retain and attract traded-sector jobs. *Portland-Metro's Traded Sector*, a 2012 Value of Jobs Report issued by Portland Business Alliance, found that on average a traded-sector worker in the Portland metropolitan area earns 42% more than a local-sector worker in the Portland metropolitan region. In an income tax dependent state such as Oregon, these high wage traded-sector jobs generate more revenue for critical services like schools, health care, and social services than local-sector jobs. Traded-sector jobs have a multiplier effect throughout the economy, with an additional 2.5 local-sector jobs created for each traded-sector job. Manufacturing is the backbone of the Portland metropolitan area's traded-sector employment. Manufacturing jobs provide employment opportunities for those without a high school or college degree. The availability of market-ready industrial lands is critical for growing a prosperous traded-sector economy and middle-income jobs.

Because the Portland region must compete with other metropolitan areas for these traded-sector jobs, it must have an adequate inventory of development-ready large industrial sites for expanding and attracting companies. This report is an update to the 2011 inventory which described the supply and market-readiness of large (25 acres and larger) industrial sites in the Portland metropolitan region¹⁹. For purposes of this study, only vacant, industrially zoned or planned lands within the Portland metropolitan Urban Growth Boundary (UGB) and select Urban Reserves were analyzed. The 2014 inventory utilized the same methodology that was developed during the 2011-2012 Project.

The original project was conceived partly in response to Metro's *2009 Urban Growth Report*, which identified a shortage of large industrial sites in the region and the need to replenish large industrial sites as they are developed. The original project report was produced by Mackenzie in partnership with Business Oregon, Metro, NAIOP - Commercial Real Estate Development Association Oregon Chapter, Port of Portland, and the Portland Business Alliance whose representatives served as the Project Management Team (PMT).

The 2011 inventory created in Phase 1 of this *Regional Industrial Site Readiness Project* provided a community-wide understanding of the supply of vacant large industrial lands, the time and investment needed to get land development ready, and the severity of development constraints. While the 2011 report and this update are limited in scope to industrial lands within the Metro UGB and urban reserves, several communities have replicated the work for other locations, most notably Clackamas County's county-wide work in 2013-14²⁰.

Phase 2 of the 2011-12 project analyzed the development readiness of 12 sites, identifying a development scenario, constraints to development, costs for on- and off-site developments, and economic benefits derived from such development. This analysis highlighted the significant economic benefit that would result from development, with a significant share of benefit accruing to the State through personal income taxes. The findings supported the passage of Senate Bills 246 and 253 in 2013, designed to provide State financial assistance for local site readiness and due diligence work.

¹⁹ The *Regional Industrial Site Readiness Project* examines vacant, industrially-zoned, or planned lands within the Portland metropolitan area's UGB and selected urban reserves that are suitable for large industrial development by new firms moving to the region, development companies who develop business and employment centers, or support the growth of existing firms. The study identified and documented user-owned sites held for future use, but excluded these from the detailed analysis because these sites were not available to the general marketplace. Rural areas of Clackamas and Washington counties outside the Metro UGB were not included in this analysis.

²⁰ <http://cmap.clackamas.us/ccss/>

As with the 2011 inventory, the 2014 inventory update focuses on the quality of land and how ready it is for development versus the quantity of gross acres. The inventory is intended to be maintained and updated on a regular basis to reflect market changes, development, investments, and actions to move sites to market. It will also help to inform continued local and private sector efforts to increase site readiness, legislative actions to fund the site readiness, and due diligence programs, and Metro's 2014 *Urban Growth Report* and 2015 Growth Management Decision. The *Urban Growth Report* assesses the region's long-range industrial site inventory and, as such, has a broader perspective than this inventory, which focuses on site-readiness for short- and medium-term job creation opportunities. The common theme of both the Urban Growth Report and this inventory is that the public and private sectors need to work cooperatively to make sites available for private sector job creation.

The inventory update reflects conditions as of June 2014. Seven new sites have become available to the market and nine sites from the 2011 inventory are no longer available to the market. This report summarizes the findings of the 2014 inventory and highlights changes from the October 2011 inventory to show movement within the market and the impact of recent legislative changes.

2014 INVENTORY

Background on the Update

The 2011 inventory identified available land for traded-sector employment expansion and attraction within the Metro UGB. Since the 2011 inventory was completed, there have been many changes to the inventory, including market activity as shown on Table 9. The PMT initiated this inventory update to reflect those changes and provide data for Metro's *2014 Urban Growth Report*. The PMT recommends future inventory updates on a similar cycle.

The 2014 inventory update assessed sites over 25 net developable acres to identify development-ready sites (Tier 1) and sites that need additional work and investment (Tier 2 and Tier 3). The 2014 inventory update did not analyze the size of investments needed to move Tier 2 and Tier 3 sites to development-ready status. Clackamas and Washington counties are undertaking detailed site assessments using the methodology developed in Phase 2 of the *2011-12 Regional Industrial Site Readiness Project*.

The inventory update provides a database of industrial sites to support the region's economic development efforts. The database lays a foundation for the work of local jurisdictions, Greater Portland Inc., Metro, the Port of Portland, and the State, to grow the region's job base through market absorption of Tier 1 sites, make investments in site readiness, and bring Tier 2 and Tier 3 sites to Tier 1 status.

Mackenzie and the PMT evaluated sites using similar criteria and metrics as companies or developers would use, rather than limiting analysis to existing parcels or tax lots. A site in this inventory could be a single owner parcel or multiple adjacent parcels that can be combined into a single site; combined parcels could include adjacent parcels in the same ownership and/or in multiple ownerships. This update is also important because trends and changes can be examined since the previous inventory, not solely the quantity of land. It assesses legislative actions and market changes to understand the transformation of sites. It is anticipated that in future updates of the inventory additional data points will help identify trends that may further inform policymakers.

Tiering Criteria and the Process to Score the Sites

The tiering system utilized in this inventory update was based on development readiness criteria established during the 2011-2012 project. The tiers are based on industry standards and mirror the recruitment/development timeframe used by the State's Industrial Site Certification Process. The tiers are defined as follows.

- Tier 1** Sites have over 25 net developable acres and are development-ready, or can be development-ready, within 180 days (six months). It is anticipated that no, or minimal, infrastructure or brownfield remediation is necessary and that due diligence and entitlements could be provided and/or obtained within this time period. A Tier 1 site does not have a use restriction and is currently on the market for sale or lease, or the ownership is willing to transact within 180 days. Sites in this tier would generally qualify for Business Oregon's Industrial Site Certification program.
- Tier 2** Sites have over 25 net developable acres and require additional actions that would take between seven to 30 months to be counted as development-ready. The seven to 30 month timeframe is for sites that are less competitive for expansions and recruitment, but may still be of some interest to more patient users/developers. These sites may have deficiency issues with regard to infrastructure or may require brownfield remediation, annexation, and additional local and state legislative actions that are assumed to take more than six months. Additionally, these sites may have a marine or aviation use restriction that limits, but does not eliminate, their market opportunity. These sites are

currently on the market for sale or lease, or the property owner is willing to transact. If the property owners' willingness to transact is unknown, the site may still be considered a Tier 2 site. Should the site be in multiple ownerships, an agreement to aggregate within 30 months must be in place.

Tier 3 Sites have over 25 net developable acres and require the most cost and time to deliver a development-ready site. Tier 3 sites include those that require 30 months or more to be development-ready and represent the least competitive sites from an expansion, recruitment, or a speculative development perspective. In addition to the criterion for Tier 2, these sites may or may not be currently for sale or lease, or the owner may or may not be willing to transact. In a small number of cases, sites are in Tier 3 because required information was not available at the time this report was published.

Table 1 below shows the tiering criteria developed and used by the PMT and consultant team to tier the sites.

Table 1: Inventory Tiering Criteria

	25 net developable acres	Use Restriction	Brownfield Remediation	Annexation Required	Sewer, Water, & Storm	System Mobility	Currently for Sale or Lease		Willingness to Transact
Tier 1	Within six (6) months	No	No or Within six (6) months (Score of A)	No	A or B	A or B	Yes	OR	Yes
Tier 2	Within 7-30 months	Yes or No	Within 7-30 Months (Score of B)	Yes or No	A, B, or C	A, B, or C	Yes	OR	Yes or Unknown
Tier 3	>30 months	Yes or No	>30 months (Score of C)	Yes or No	A, B, or C	A, B, or C	Yes or No	OR	Yes or No or Unknown

Source: Mackenzie

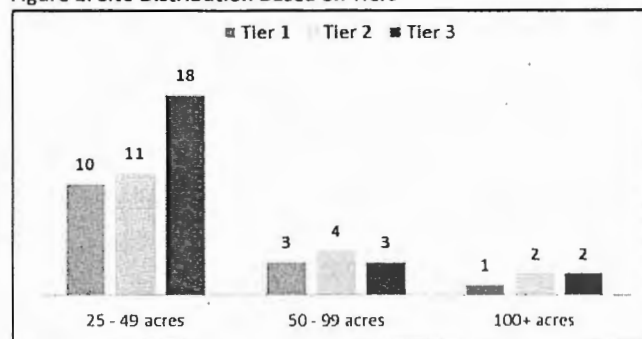
2014 INVENTORY UPDATE FINDINGS

Development Readiness

Industrial sites in the region are in varying states of readiness, requiring regulatory approvals (development permitting, environmental resource mitigation), local discretionary actions (concept planning, annexation, zoning), infrastructure (sewer, water, transportation), site/property owner aggregation, and brownfield remediation.

The study finds that the region has a limited supply of large industrial land readily available to attract and grow employers needed for the region to prosper, particularly sites of 50 net developable acres or more. Net developable acres are gross acres less wetlands, floodplain, 10%+ slopes, streams, and other development constraints that limit development. Figure 1 represents the findings of the regional inventory as of June 2014.

Figure 1: Site Distribution Based on Tiers



Source: Mackenzie

The study found the following.

14 Tier 1 sites

Available for facility construction within 180 days

There are 14 Tier 1 “market-ready” sites available for development opportunities in the near term, mostly in the 25 to 49 acre range. Tier 1 sites total approximately 650 net developable acres.

17 Tier 2 sites

Available for facility construction between seven and 30 months

Tier 2 mid-term sites require additional investment and policy actions to be market-ready. Of the 17 Tier 2 sites totaling approximately 1,100 net developable acres, four of these sites require property owner assembly.

23 Tier 3 sites

Available for facility construction beyond 30 months

There are multiple challenges to address to bring these 23 Tier 3 sites to market. Investment and actions required to move these sites forward include site aggregation, brownfield remediation, wetland mitigation, transportation/infrastructure improvements, and annexation. Nine of the Tier 3 sites (40%) require property owner assembly. Net developable acres in Tier 3 totals approximately 1,300 acres.

50-plus and 100-plus acre size sites

There is a limited supply of 50-plus and 100-plus acre sites in the Portland region. With respect to 100-plus acre sites, the study found:

- One Tier 1 site: Site 21: Gresham Vista Business Park (owned by Port of Portland)
- Two Tier 2 sites: Site 104: Meek Subarea site and Site 101: Vanrose Farms/Bert & Bernie LLC (Hillsboro)
- Two Tier 3 sites: Site 7: West Hayden Island and Site 10: SW Quad (both owned by the Port of Portland)

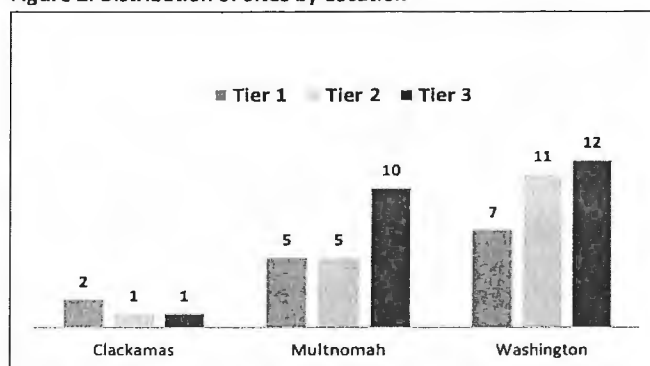
Tier 2 and 3 Development Constraints

There are multiple development constraints impacting the 40 Tier 2 and Tier 3 sites as outlined in the table below. Parcel aggregation is an issue affecting 25% of the sites in the inventory. More than 50% of the Tier 2 and Tier 3 sites require local and state legislative action and 45% of Tier 2 and Tier 3 sites have significant site infrastructure constraints.

Tier 2 and Tier 3 Development Constraints	
Brownfield clean up:	6
Natural Resources:	18
Infrastructure (water, sewer, storm utilities):	17
Transportation:	25
Land Assembly:	13
Local and State Legislative Actions:	23
Willingness to Transact	
No:	10
Unknown:	6

Note: Most sites may have multiple constraints

Figure 2: Distribution of Sites by Location



Source: Mackenzie

Tier 1, 2, and 3 Site Results

The 2014 update is based on the best available public information available to the consultant as of June 2014. The inventory of industrial sites in the Portland region will change over time; as such, this inventory is a snapshot in time. Changes to this inventory update are based on better information, such as wetland delineations; site surveys; property owner conversations; new properties coming on the market; properties in the inventory coming off the market due to transactions; a change in tier status based on investment or other actions; and other issues, such as an increase in property owner willingness to transact or other user designation.

The inventory update identifies 54 large industrial sites in the Metro UGB and selected urban reserves (Figure 2). Of these 54 sites in the inventory, 14 sites (26%) are Tier 1; 17 sites (31%) are Tier 2; and 23 sites (43%) are Tier 3 sites. Many of the Tier 3 sites have significant barriers to market readiness and may not be able to be aggregated as a site at all. The complete inventory of sites detailing all of the data prepared for each site, their location in the region, and their tiers can be found in Appendix A with regional maps found in Appendix B.

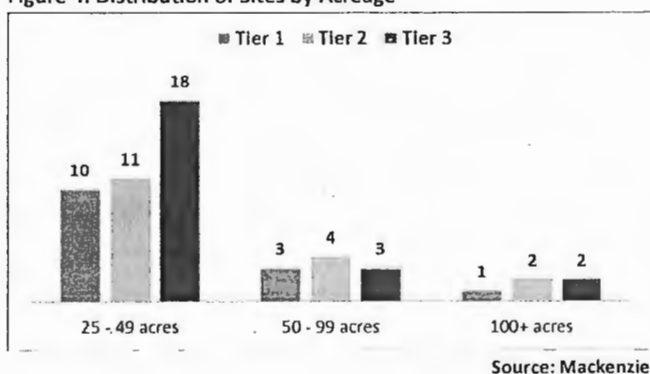
TIER AND SITE DISTRIBUTION BY COUNTY				
Tier/Acres	Clackamas	Multnomah	Washington	Total
Absorbed by the Market	0	1	2	3
Tier 1	2	5	7	14
25-49 acres	2	3	5	10
50-99 acres	0	1	2	3
100+ acres	0	1	0	1

Tier/Acres	Clackamas	Multnomah	Washington	Total
Tier 2	1	5	11	17
25-49 acres	1	2	8	11
50-99 acres	0	3	1	4
100+ acres	0	0	2	2
Tier 3	1	10	12	23
25-49 acres	1	8	9	18
50-99 acres	0	0	3	3
100+ acres	0	2	0	2
TOTAL	4	20	30	54

Tier 1 Sites

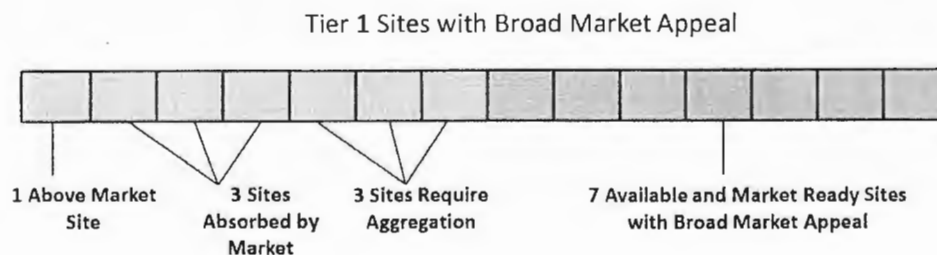
Of the 14 Tier 1 sites, seven are in Washington County, five are in Multnomah County and two are in Clackamas County (Figure 3). The number of larger sites is limited as approximately 70% of the Tier 1 sites are in the 25-49 acre range. There are only three 50-acre sites and one 100-acre site that are Tier 1.

Figure 4: Distribution of Sites by Acreage



In addition to development-readiness, there are a handful of economic factors that drive the suitability of industrial sites for immediate development. A closer look at the 14 Tier 1 sites (Table 2) reveals that the number of sites attractive to a broad range of potential traded-sector companies is even smaller. Of the 14 Tier 1 sites, there are seven sites that meet standard market requirements. Three sites have multiple owners and a potential user must aggregate these sites themselves. One site is currently for sale at an above market price for industrial development. It is unclear if, or when, the

current owner will align the asking price with current industrial market pricing. Three sites that have been absorbed by the market since June 2014²¹.



Over 85% of the Tier 1 sites are in Multnomah or Washington County²². Because the inventory only includes sites within the Portland metropolitan UGB or select urban reserves, industrial sites located in rural Washington

²¹ Site 13: Specht Properties in Portland; Site 46: Development Services of America (Westmark site) in Hillsboro; Site 114: Colwood Ltd Partnership in Portland.

County and Clackamas County, such as Banks, Canby, Sandy, Molalla, and Estacada are not included in this inventory²³. However, these sites are an important component of the regional economy. Table 3 details the Tier 1 sites.

²² Approximately 40% of Multnomah County is within the Metro UGB; 17% of Washington County; and 5% of Clackamas County.

²³ <http://cmap.clackamas.us/ccss/>

Table 3: Tier 1 Site Summary

Site ID	Owner/Site	Location	County	Gross Acres	Net Developable Acreage	Number of Tax lots	Number of Owners	Currently for Sale/Lease	Willing to Transact
13	Specht Properties Inc.	Portland	Multnomah	28.11	26.52	3		S	
21	Port Of Portland GVB - East	Gresham	Multnomah	115.98	115.01	5		S/L	
22	Port Of Portland GVB - West	Gresham	Multnomah	87.79	67.84	3		S/L	
29	Clackamas County Development Agency	Clackamas	Clackamas	61.93	40.00	11		S/L	
32	Ralph & Shirley Elligsen	Wilsonville	Clackamas	33.42	30.20	2		S	
46	Development Services Of America (Westmark Site)	Hillsboro	Washington	30.02	30.02	1		S	
48	Dewayne Wafford (Baker/Bindewald Site)	Hillsboro	Washington	46.06	44.58	1		S	
49	Majestic Realty Company	Hillsboro	Washington	75.11	62.75	9		S/L	
50	Shute North (Berger/Moore Trust/Boyles Trust)	Hillsboro	Washington	73.31	55.00	5	3	S	
52	Shute South (Berger Properties/Moore Trust)	Hillsboro	Washington	42.91	42.91	2	2	S	
57	Merix Corporation	Forest Grove	Washington	34.25	29.71	1		S	
111	Weston Investments and CCF Oregon LLC	Gresham	Multnomah	34.99	26.00	2	2	S	
113	Henningsen Cold Storage	Forest Grove	Washington	28.57	26.44	3			YES
114	Colwood LTD Partnership	Portland	Multnomah	47.55	39.42	1		S	

Note: It is assumed that if a property is currently listed for sale or lease, the property owner is willing to transact.

Source: Mackenzie

Tier 2 Sites

The analysis found 17 Tier 2 sites within the Metro UGB. The bulk of these sites are in Washington or Multnomah County with only one site in Clackamas County. The number of large sites in Tier 2 is limited, with four sites that are between 50-99 acres and two 100-plus acre sites.

The few large sites in Tier 2 face significant challenges to become market-ready, including the need to build infrastructure (roads and sewer), mitigate wetlands, and assemble parcels currently under multiple ownerships. Many of these sites have multiple development constraints that limit their marketability. The inventory update did not identify specific constraints at each site, but the list of potential constraints includes environmental clean-up, infrastructure upgrades, property owner aggregation, annexation, wetland/floodplain fill. Of the 17 Tier 2

sites, four require aggregation and eight require local and state legislative actions, such as UGB expansion, annexation, zoning, and concept planning.

Generally, the constraints to readiness for Tier 2 sites are less extensive than Tier 3 sites, requiring less time and lower costs than the majority of the Tier 3 sites. Tier 2 sites present the best opportunity to focus resources to bring more sites to market. Table 4 details the Tier 2 sites.

Table 4: Tier 2 Site Summary

Site ID	Owner/Site	Location	County	Gross Acres	Net Developable Acreage	Number of Tax lots	Number of Owners	Currently for Sale/Lease	Willing to Transact
1	Port of Portland (Rivergate)	Portland	Multnomah	51.44	51.21	4		L	
9	Port of Portland (NE Marine Drive & 33rd Avenue)	Portland	Multnomah	66.74	62.70	1		L	
18	Port of Portland (Trip - Phase 2)	Troutdale	Multnomah	42.67	30.18	3		S/L	
19	Port of Portland (Trip - Phase 2)	Troutdale	Multnomah	80.53	80.34	2		S/L	
23	Mt Hood Community College	Troutdale	Multnomah	38.45	37.40	3			Yes
38	Biles Family LLC	Sherwood	Washington	39.60	30.89	1		S	
47	Julian & Sharon Cranford	Hillsboro	Washington	28.51	27.29	1		S	
54	5305 NW 253RD Avenue LLC	Hillsboro	Washington	38.49	28.59	1			N/A
55	Spokane Humane Society & SpokanAnimal Care	Hillsboro	Washington	45.49	36.00	1			Yes
56	East Evergreen Site	Hillsboro	Washington	70.74	61.00	9	7	S	Yes
62	Rock Creek Site	Happy Valley	Clackamas	40.83	36.82	5	2	S	Yes
63	Woodburn Industrial Capital	Forest Grove	Washington	26.17	25.01	1		S/L	
66	Kenneth Itel	Tualatin	Washington	46.25	30.25	2			Yes
101	Vanrose Farms and Bert & Bernie LLC	Hillsboro	Washington	271.64	224.83	2	2		Yes
104	Meek Subarea Site	Hillsboro	Washington	268.02	257.42	8	7		Yes
112	Hally Haworth	Forest Grove	Washington	38.19	36.15	2			Yes
115	SolarWorld	Hillsboro	Washington	46.23	46.23	1		S	

Note: It is assumed that if a property is currently listed for sale or lease, the property owner is willing to transact.

Source: Mackenzie

Tier 3 Sites

The analysis found 23 Tier 3 sites within the Metro UGB and selected urban reserves. While all but one of the Tier 3 sites are inside the UGB or select urban reserve sites, this category of sites has multiple and significant constraints to overcome to get to market-readiness. Similar to the other tiers, the number of larger Tier 3 sites is also limited, with three sites that are between 50-99 acres and two 100-plus acre sites.

Nine of the Tier 3 sites (nearly 40%) require aggregation of parcels in separate ownerships. Ownership ranges from two owners for the Woodfold site in Forest Grove (Site 64) and the Davis Family Trust & Taghon site in Cornelius (Site 110) to up to 16 owners for the Coffee Creek site #1 in Wilsonville (Site 33). Five of these nine sites have more than three ownerships. The more owners involved, the more complex and lengthy the aggregation process.

More than two-thirds (15) of the sites in Tier 3 will require some kind of local or state legislative actions such as UGB expansion, annexation, zoning and concept planning to become development-ready. Examples include sites that are outside the current UGB and West Hayden Island, which is inside the UGB but subject to a lengthy planning and annexation process that is likely to include significant mitigation requirements. If approved for development, the West Hayden Island site is at least seven years away from readiness due to permits, mitigation, and infrastructure requirements. There are also two sites on the edge of the UGB with tax lots that are partially inside the UGB and partially outside of the UGB included in this study. This split of urban and rural land creates a legislative challenge as only lots within the UGB are allowed to develop to urban use and intensity. Development to urban intensities includes a prohibition on partitioning of these lots to a size inconsistent with rural land uses and zoning. For the purpose of this study, only the portions of the tax lots inside the UGB are included as a site. Oregon Department of Land Conservation and Development is currently engaged in a process to fix this legislative issue.

Another issue affecting five Tier 3 sites is brownfield contamination. Three of these sites are located in the City of Portland adjacent to the Willamette River Superfund designation and have significant development issues, risk, and uncertainty.

Three of the Tier 3 sites (15%) are currently operating as active quarries with gross site acreage varying from 26 to 85 to 300 acres. These sites have been mined for decades and as a result are significantly sloped due to excavation.

Providing a market perspective on the quality of sites is a major objective of this analysis. Market-readiness requires first and foremost, a willingness to enter into a transaction by the property owner. However, simply a lack of willingness to transact, or a lack of information of a willingness to transact, was not a reason to exclude a site in the inventory. Of the 23 Tier 3 sites, 16 (nearly 70%) either lack a willingness to transact or the information was unable to be determined as part of this study. Slightly over 20% of the Tier 3 sites (four sites) are currently, or could be, available to the general market, as the property owner is willing to enter into a transaction. Only 13% (three sites) are currently listed for sale on the market. Table 5 provides a complete list of the Tier 3 sites.

Table 5: Tier 3 Site Summary

Site ID	Owner/Site	Location	County	Gross Acres	Net Developable Acreage	Number of Tax lots	Number of Owners	Currently for Sale/Lease	Willing to Transact
2	Time Oil Company	Portland	Multnomah	51.10	39.40	7			Yes
4	ESCO Corp	Portland	Multnomah	37.62	29.92	6	3		N/A
5	Atofina Chemicals INC	Portland	Multnomah	59.76	47.25	6			N/A
7	Port of Portland (West Hayden Island)	Portland	Multnomah	472.00	300.00	3			Yes
10	Port of Portland (SW Quad)	Portland	Multnomah	209.69	206.47	5			Yes
16	Michael Cereghino	Gresham	Multnomah	41.63	25.00	5		S	
17	Port of Portland (Trip - Phase 3)	Fairview	Multnomah	34.14	30.00	1		S/L	
24	Jean Johnson	Gresham	Multnomah	37.17	33.82	1			N/A
25	Lester Jonak Jr.	Gresham	Multnomah	34.19	27.07	1			N/A
26	Michael & Ardele Obrist	Gresham	Multnomah	33.51	33.51	2			N/A
33	Coffee Creek Industrial Area - Site 1	Wilsonville	Washington	89.59	84.70	21	16		No
34	Kennedy/Fitzpatrick/ Vanleeuwen	Wilsonville	Washington	52.88	25.50	3			N/A
35	Tonquin Industrial Area	Tualatin	Washington	49.52	34.32	8	7		Yes
36	Tigard Sand & Gravel Site	Tualatin	Washington	301.08	25.00				No
37	Orr Family Farm LLC	Sherwood	Washington	96.26	77.00	1			No
59	Coffee Creek Industrial Area - Site 2	Wilsonville	Washington	45.07	44.49	12	7		No
60	Coffee Creek Industrial Area - Site 3	Wilsonville	Washington	28.82	26.22	10	6		No
61	Coffee Creek Industrial Area - Site 4	Wilsonville	Washington	46.57	42.37	12	8		No
64	Woodfold-Marco MFG Inc. (East Oak Street)	Forest Grove	Washington	27.67	25.06	2	2		No

Site ID	Owner/Site	Location	County	Gross Acres	Net Developable Acreage	Number of Tax lots	Number of Owners	Currently for Sale/Lease	Willing to Transact
65	Woodford-Marco MFG Inc. (West Oak Street)	Forest Grove	Washington	53.66	52.97	5			No
109	Morse Bros. Inc.	Tualatin	Washington	83.68	25.00	7			No
110	Davis Family Trust & Remi Taghon	Cornelius	Washington	49.01	40.21	10	2		Yes/No
111	Northwest Sand & Gravel Inc.	Unincorporated	Clackamas	26.2	25.10	6	1	S	

Source: Mackenzie

Note: "YES/NO" is for a property with two owners – one willing to transact and one not willing to transact. Additionally, it is assumed that if a property is currently listed for sale or lease, the property owner is willing to transact.

Additional Sites

There are several dozen industrially designated sites that are not included in this inventory update. These sites fall into three categories.

1. The parcel/site is greater than 25 gross acres, but when constraints (environmental or restrictive zoning/overlay) are taken into consideration, the net developable acreage falls below 25 acres. (See Table 6)
2. The parcel/site is owned by a company that is **part of an existing campus/development** and the company has future expansion plans. This vacant land is not currently available to the market for another prospective user. The site is partially vacant but reserved for expansion. (See Table 7)
3. The parcel/site is owned by a company that has **future development plans**; therefore the site is not currently on the market for a prospective user. The site is fully vacant and land banked for new development. (See Table 7)

Although these sites do not appear in the 2014 inventory in this report, they are still an important portion of the region's industrial land supply. Appendix C provides regional maps of these sites.

Sites with Less Than 25 Net Developable Acres

There are 16 parcels and/or sites in this study that have 25 gross acres, but do not have 25 net developable acres. However, these sites are still part of the region's inventory of industrial land as they may be developable for smaller users. These sites are identified in Table 6 below, but are not included in the 2014 inventory because they did not meet the criteria of this study.

Table 6: Parcels or Sites with Less Than 25 Net Developable Acres

Owner	Location	Gross Acreage	Approximate Net Developable Acres	Notes
McCormick & Bassili Investments LLC	Happy Valley (HWY 212 & 162nd)	33.98	7.5	Environmental constraints result in <25 net developable acres – according to Clackamas County
Weaver Russell	Happy Valley (HWY 212 & 162nd)	34.19	3.5	Environmental constraints result in <25 net developable acres – according to Clackamas County
Fazio	Portland (East of NE MLK & Gertz)	34.96	22	Existing drainage ditch bisects site into a 21.5 acre site; net developable acres in largest development parcel is less than 25 acres
Graphic Packaging	North Portland (Marine Drive & Portland)	26.26	2.75	Environmental constraints result in <25 net developable acres
Catellus	Portland (N of Airport and 185th)	31.99	3.5	Environmental constraints result in <25 acres remaining (wetlands and floodplain)
Langer Family	Sherwood (TS Road & Adams)	56.48	< 25	Public utility district overlay on site results in <25 net developable
Orwa Sherwood LLC	Sherwood (T/S Road & Adams)	50.25	6	Bisecting road results in <25 net developable acres
Fred Fields property	Tigard (Hall and Hunziker)	35.6	<25	Environmental constraints result in <25 net developable acres (market/site knowledge)
David Young	Wilsonville (S of Boeckman W of I5)	33.9	0	Significant Resource Overlay Zone environmental constraints – according to City of Wilsonville
Gary Walgraeve	Tualatin (Herman Road & 118th)	54.95	14.5	Environmental constraints result in <25 net developable acres – according to City of Tualatin
Edward Wager	Tualatin (T/S Road & 124th)	32.14	13	Environmental constraints result in <25 net developable acres – according to City of Tualatin
Joe Bernert Tow Inc.	Wilsonville (Wilsonville Road & Boones Ferry)	31.18	13.5	Significant Resource Overlay Zone – according to Wilsonville
Rock Creek aggregate site	Happy Valley (Rock Creek Blvd & SE 172nd Avenue)	25.03	21.04	Slope constraints
Powin Pacific Properties LLC	Tualatin (T/S Road & 115th)	29.47	13.45	Wetlands and stream on site
Port of Portland	Portland (NE 33rd; South of Marine Drive)	28	23	Drainage ditches result in <25 net developable acres
Port of Portland	Portland (South of SW Quad)	67.5	0	Reserved for open space/wetlands mitigation. Land is not greater than 25 net developable acres – according to Port of Portland

Owner	Location	Gross Acreage	Approximate Net Developable Acres	Notes
Port of Portland	Fairview (South of site 17)	100	0	Reserved for open space/wetlands mitigation. Land is not greater than 25 net developable acres – according to Port of Portland
Port of Portland	Troutdale (East of Troutdale Reynolds Industrial Park site 20)	64	0	Reserved for open space/conservation. Land is not greater than 25 net development acres – according to Port of Portland
Xerox (2 parcels)	Wilsonville (East of Interstate 5)	95.81	34.1	Remaining 34.1 acres are reserved for future on site environmental mitigation for the Xerox campus and not developable

Source: Mackenzie

User Owned and User Designated Sites

This analysis also excluded land-banked parcels that are owned and held for future expansion by existing regional firms. These parcels are an important part of the regional industrial land inventory, but since they are being held by their current owners for future development, they are not considered to be available to the general market, which is the focus of this study. There are 25 user-owned sites with at a minimum 25 net developable acres that are being held for future development in this study (Table 7). Twelve (12) of these sites are vacant (for future use) with 25 or more net developable acres; and 13 are partially vacant (buildings on site/part of existing campus), but still have a minimum of 25 acres vacant for future expansion.

Table 7: User Owned and User Designated Sites

Owner	Location	Gross Acreage	Vacant Acreage	Vacant: for future use	Partially Vacant: in use	Notes
N Pacific Union Conference Association SDA	Gresham (Foster & Tillstrom)	66.9	66.9	X		Reserved for future use/development
Providence Health	Happy Valley (HWY 212 & 162nd)	49.7	49.7	X		Reserved for future use/development
Intel (Future parking lot)	Hillsboro (Cornell & Cornelius Pass)	47.36	47.36	X		Reserved for future use/development (parking lot)

Owner	Location	Gross Acreage	Vacant Acreage	Vacant: for future use	Partially Vacant: in use	Notes
Legacy Health Services	Hillsboro (Cornell & Cornelius Pass)	28.95	27.3	X		Reserved for future use/development (easement on site)
Intel	Hillsboro (West Union & Cornelius Pass)	72.54	68.4	X		Reserved for future use/development
Port of Portland (PIC WEST)	Portland (NE Alderwood Drive)	69.45	58.96	X		Future relocation site for PDX rental cars
Port of Portland	Troutdale (East of site 17)	34	32.7	X		Vacant; reserved for utility use (substation) – according to Port of Portland
Port of Portland	Hillsboro (NW Evergreen Road)	71.81	67.69	X		Brought into UGB in 2014 with House Bill 4078; reserved for future Hillsboro Airport use (airport restrictions)
Port of Portland	Hillsboro (NW Evergreen Road and 264th)	39.22	34.15	X		Inside Hillsboro Airport fence, and included in FAA Airport Layout Plan; reserved for aviation related development only
Mentor Graphics	Wilsonville (S of Boeckman E of I5)	43.4	43.4	X		Reserved for future use/development - split from main campus by public street; Significant Resource Overlay Zone on site and wetlands
Phight LLC	Tualatin (T/S Road & 118th)	28.8	28.8	X		Reserved for future use/development
BT Property LLC (UPS)	Gresham (NE 185th and NE Portal Way)	51.45	51.45	X		Reserved for future use/development
Clackamas CDA	Clackamas County (I205/82nd)	32.2	32.1		X	Excess land - in use and not available – according to Clackamas County
Great American TVR	Clackamas County (I205/82nd)	49.35	47.5		X	Communication towers and infrastructure on site
State of Oregon (3 parcels)	Clackamas County (I205/Hwy 212)	232	97		X	In use and not available – according to Clackamas County
Nacco Materials Company	Fairview (Marine & Blue Lake Road)	78.7	58.7		X	Excess land; some environmental constraints on site
Microchip Technology (Formerly Linde)	Gresham (Glisan & 223rd)	137	75		X	Not available – according to City of Gresham
Mutual Materials	Gresham (Hogan Road)	86.08	56.8		X	Excess land: currently in use

Owner	Location	Gross Acreage	Vacant Acreage	Vacant: for future use	Partially Vacant: in use	Notes
Novellus Systems Inc.	Tualatin (SW Tualatin Road & SW 108th)	58.4	27.46		X	Excess land: currently in use
PGE Portland	Gresham (Powell & E of 182nd)	72.13	62.8		X	Reserved for future use and not available
Genentech (entire campus)	Hillsboro (Evergreen & Brookwood)	75.3	60		X	Reserved for future use and not available
Tokyo Ohka Kogyo	Hillsboro (Evergreen & Brookwood)	38.89	28.5		X	Reserved for future use and not available
Intel (Ronler Acres)	Hillsboro (Shute Road)	111.7	61		X	Reserved for future use and not available
PGE Portland	North Portland (St Helens)	63.1	43.9		X	Excess land currently in use
Cookin (Siltronic)	Portland (St Helens Road)	79.27	38.6		X	Reserved for future use and not available

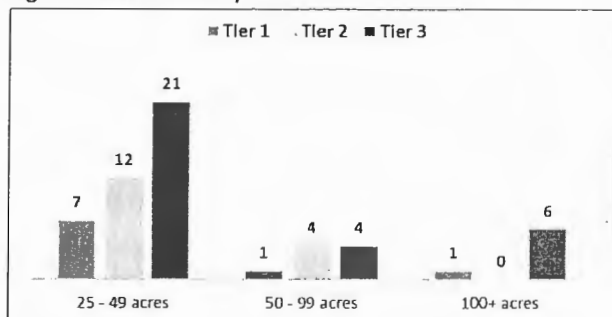
Source: Mackenzie

Changes from 2011 Inventory to 2014 Inventory

Movement In and Out of the Inventory

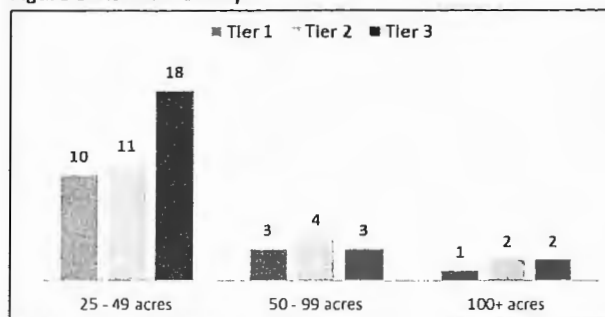
The 2011 inventory included 56 sites, compared to the 2014 inventory of 54 sites. The breakdown among tiers is shown in Figure 5 and 6 below. Nine sites were removed from the inventory, including three sites that are being developed or used for construction staging. Seven sites were added to the inventory. The number of Tier 1 sites has increased by six sites; Tier 2 sites increased by one site; and Tier 3 sites decreased by eight sites. Of the Tier 1 sites, only seven of the sites meet standard development criteria.

Figure 5: 2011 Inventory



Source: Mackenzie

Figure 6: 2014 Inventory



Source: Mackenzie

Movement between Tiers

From 2011 to 2014, there has been significant movement between the tiers. The 2014 update found 11 sites that moved up a tier; five Tier 2 sites became Tier 1 sites and six Tier 3 sites became Tier 2 sites in the 2014 update. The table below shows movement between the tiers in the past two and a half years. The majority of movement between tiers is a result of environmental mitigation and infrastructure investments.

Table 8: Movement in the Inventory

	2014 Inventory	Remain from 2011	Upgraded from 2011	Added Sites in 2014
Tier 1	14	6	5 (previously Tier 2 site)	3
Tier 2	17	8	6 (previously Tier 3 site)	3 ²⁴
Tier 3	23	21	-	2
TOTAL	54	35	11	7

Of the 11 sites that moved up a tier:

- Five sites are located in Hillsboro, five sites are located in the East Multnomah County submarket, and one site is located in Portland.
- Six sites are in private ownership and five sites are in public ownership three (3) sites owned by the Port of Portland, one site owned by Mount Hood Community College, and one site owned by Clackamas County Development Agency.

Seven of the 11 sites that moved up a tier required investment in infrastructure and mitigation.

- Two sites moved up a tier due to environmental constraint mitigation.²⁵
- Five sites received transportation/infrastructure investments.²⁶

²⁴ One of the three new Tier 2 sites is site number 1 (Port of Portland - Rivergate). In 2011, this was a Tier 1 site; however, due to the listing of the streaked horned lark species, the site requires mitigation and is no longer developable within a 6 month timeframe. Environmental mitigation required is a 7-30 month process which drops the site from Tier 1 to Tier 2.

²⁵ Site 13: Specht Properties and Site 29: Clackamas County Development Agency.

²⁶ Sites 18 and 19: Troutdale Reynolds Industrial Park Phase 2, Site 22: Gresham Vista Business Park West, and Sites 50 and 52: Shute Road North and South.

Additionally, of the 11 sites that upgraded a tier, four were able to do so without significant investment in infrastructure.

- Two of the sites experienced a legislative change, and were taken out of urban reserves and brought into the UGB.²⁷
- Two of the sites had a change in the property owner willingness to transact, and therefore were upgraded to Tier 2.²⁸

Sites Deleted from the Inventory

Using the methodology developed during the 2011 inventory project, the team removed nine sites, resulting in a total of 54 sites in the June 2014 inventory. The tables below show which 2011 inventory sites are no longer on the inventory with an explanation of why. Between the *2011 and 2014 Regional Industrial Land Inventory Report*, nine sites and approximately 400 estimated net developable acres were removed from the inventory. In contrast, the seven sites added to the 2014 inventory accounted for approximately 240 acres.

Table 9: 2011 Inventory Sites Removed from 2014 Inventory

Site ID	Owner/Site	Location	County	Gross Acres	Net Developable Acres	Sale/Lease/Transact (2011)	Development and/or Action
Tier 1 Sites							
11	Port of Portland (PIC East)	Portland	Multnomah	43.50	41.18	L	Currently under construction; results in less than 25 developable acres
44	Intel Corporation	Hillsboro	Washington	31.39	31.39	S	Currently used as a paved/gravel parking lot and staging area for Intel
Tier 2 Sites							
40	Pacific Realty Associates	Tualatin	Washington	26.80	26.80	S/L	Currently under construction; results in less than 25 developable acres
67*	Port of Portland (PIC West)	Portland	Multnomah	69.45	58.96	L	Held by Port of Portland for future relocation of rental cars at PDX ²⁹

²⁷ Site 101: Vanrose Farms and Site 104: Meek Subarea

²⁸ Site 23: Mt. Hood Community College and Site 47: Cranford

²⁹ With passenger volumes increasing to 15 million in 2013, the timeframe for the relocation of the rental cars at Portland International Airport has shortened, necessitating the removal of this site from the inventory.

Site ID	Owner/Site	Location	County	Gross Acres	Net Developable Acres	Sale/Lease/Transact (2011)	Development and/or Action
68*	Port of Portland (Hillsboro Airport)	Hillsboro	Washington	39.22	34.15	L	Port of Portland Hillsboro Airport planning has changed, requiring this site for future airport use only
Tier 3 Sites							
6	McCormick & Baxter Creosoting	Portland	Multnomah	42.39	33.39	No	Designated for University of Portland expansion and development (City of Portland approved conditional use master plan)
15*	BT Property LLC (UPS)	Gresham	Multnomah	51.45	49.45	No	Owner has decided to develop site for future use
28	James & Mollie Siri	Happy Valley	Clackamas	26.40	25.26	No	Dedication along SE 172nd results in less than 25 developable acres
100	Holzmeyer Richard Henry	Forest Grove	Washington	111.37	100.12	N/A	Designated from urban reserves to rural reserves during Grand Bargain; no longer eligible to be included in inventory

* This site was removed from the 2011 inventory as it is no longer available to the general market; however, it now appears on Table 7: User Owned and User Designated Sites

Sites Added to the Inventory

Using the methodology developed during the 2011 inventory project, the team found seven new sites to add to the inventory and removed nine sites, resulting in a total of 54 sites in the June 2014 inventory. The table below shows which 2011 inventory sites are no longer on the inventory with an explanation of why. Approximately 240 estimated net developable acres were added in the same time period with seven newly identified sites. The net decrease of large industrial site acreage in the metro-region is an estimated 160 net developable acres.

Table 10: Sites Added to the 2014 Inventory

Site ID	Owner/Site	Location	County	Gross Acres	Net Developable Acres	Sale/Lease/Transact (2014)
Tier 1 Sites						
111	Weston Investments and CCF Oregon LLC	Gresham	Multnomah	34.99	26.00	S
113	Henningsen Cold Storage	Forest Grove	Washington	28.57	26.44	Yes
114	Colwood Ltd Partnership	Portland	Multnomah	47.55	39.42	S
Tier 2 Sites						
112	Hally Waworth	Forest Grove	Washington	38.19	36.15	Yes
115	SolarWorld	Hillsboro	Washington	46.23	46.23	S
Tier 3 Sites						
110	Davis Family Trust & Remi Taghon	Cornelius	Washington	49.01	40.21	Yes/No
116	Northwest Sand & Gravel INC	Unincorporated	Clackamas	26.2	21.10	S

2014 Inventory Update Conclusions

The 2014 industrial land inventory analysis finds that Portland metropolitan area's supply of large industrial sites has decreased over the past two and a half years. Supply continues to be most limited for sites of 50 acres or more, consistent with the 2011 inventory. The sites that are available are concentrated in the Columbia Corridor in Multnomah County, Hillsboro, and Wilsonville/Tualatin in Washington County. The location distribution reflects previous local and regional land use planning decisions to maintain a compact regional form.

Larger sites are more complex and take patience to acquire and develop. Parcel aggregation is a key issue to supplying larger sites to the market, affecting 25% of the sites in the inventory.

While this analysis has identified the available sites, and at a high level outlined the challenges that exist to bringing Tier 2 or 3 sites to development-ready status, the timeframes in the analysis assume that the jurisdictions, property owners, land-use regulatory bodies, and potential interveners are all working in support of the site's development and that appropriate public investments will be made to move these sites to market.

It is important to note that this inventory is a snapshot in time. As Tier 1 sites are absorbed by the marketplace, the expectation is that Tier 2 sites will continue to move to Tier 1 status and Tier 3 sites will continue to move to Tier 2. The inventory should be updated over time to ensure that the database of market-ready industrial sites is current, helps identify and prioritize required site readiness investments, and supports the region's recruitment and expansion efforts.

The experience of state and regional economic development experts indicates that accomplishing our region's traded-sector industrial retention, expansion, and recruitment strategy depends in part on the availability of an adequate supply of well-located, market-priced, and developable large industrial sites. The inventory can be used as a reference for monitoring and tracking changes of absorption of industrial land in the region, and can also be used by the public sector as the basis for making informed land use and investment decisions around the supply, regulation, and market readiness of industrial lands.

NEXT STEPS

The 2011-12 *Regional Industrial Site Readiness* project found that many large industrial sites in the region are not development-ready, impacting the region's ability to meet forecasted job growth requirements³⁰, and potentially causing the region to miss business growth, recruitment opportunities, and the jobs and payroll they represent. The 2014 inventory update reinforces the importance of continued state and regional focus on the market-readiness of large industrial sites within the region. The well-paying jobs provided by traded-sector industries will help Oregon achieve economic prosperity, reduce income disparity, and secure funding for public services and amenities.

Regional policymakers have acknowledged the importance of a development-ready supply of large industrial sites in local and regional land use planning documents, such as Metro's 2014 *Urban Growth Report* and separate local comprehensive plan updates, and should retain a policy focus on identifying and prioritizing funding to move industrial sites within the region to market. In addition to this work, the PMT has identified five next steps that could be helpful in the region and statewide.

Improvements to Regulatory Processes that Reduce Uncertainty for Firms Seeking Sites

Existing permitting processes sometimes add uncertainty and extend development timelines to the extent that targeted industry employers may choose sites in other regions, states, or countries. Options could include alignment of federal, state, regional, and local permitting processes; allowing wetland permitting and mitigation occur prior to identifying a site user; prioritizing technical assistance and funding; and dedication of staff with industrial development expertise within state permitting agencies. In addition, a regional focus on environmental mitigation strategies to support industrial development is appropriate (wetland banks, technical assistance). Although brownfield remediation is an issue, which affects a smaller number of larger industrial sites, industrial to industrial brownfield remediation is a significant challenge facing the region with remediation costs two to four times the sale price of industrial land³¹. Portland Harbor superfund sites have even greater costs challenges and require special focus. The state and region should consider incentives and regulatory relief to move these sites to productive industrial uses.

Expansion of and Support for Existing Business Development Programs

Existing state programs like Industrial Site Certification, Regionally Significant Industrial Areas, Immediate Opportunity Fund, Special Public Works Fund, and the brownfield programs deserve ongoing support and increased funding. Business Oregon and the Metro Regional Solutions Team should continue to collaborate on strategic efforts and prioritize site-specific work, leveraging Business Oregon programs to address the array of infrastructure and development constraints in the region.

Creation and Funding of New Capital and Financial Tools

New or refined tools are needed to address the upfront costs of capital investments for transportation, sewer, water, brownfield cleanup, wetlands mitigation, and site aggregation. Because of the personal income tax benefits that accrue to the state when large firms locate here, the state could play a role in providing upfront capital for industrial land site preparation.

³⁰ The draft 2014 *Metro Urban Growth Report* forecasts 85,000 to 440,000 additional jobs and 300,000 to 485,000 additional people inside the Metro urban growth boundary by the year 2035.

³¹ *Metro Brownfield Scoping Project and Portland Brownfield Assessment* – Maul, Foster & Alongi, Inc. 2012.

In 2013, the Oregon Legislature approved enabling legislation for two sources of state funding for industrial site readiness (Senate Bill 246 and Senate Bill 253), but did not provide funding for these programs. To support the region's job growth requirements identified in the draft *2014 Urban Growth Report*, state funding for these two new Industrial Site Readiness Programs should be pursued, including due diligence assessments and forgivable loans to address the broad range of industrial site readiness constraints.

To address the limited supply of larger industrial sites and assembly challenges affecting 25% of sites in the inventory, the region should develop new tools to support the acquisition and aggregation of industrial lands needed for "game changer" traded-sector investments (e.g., Coffee Creek in Wilsonville, North Hillsboro industrial lands). The region should also retain a policy focus on identifying sources of infrastructure funding to meet the region's \$21-47 billion³² in infrastructure funding needs.

Completion of Due Diligence Work on Sites

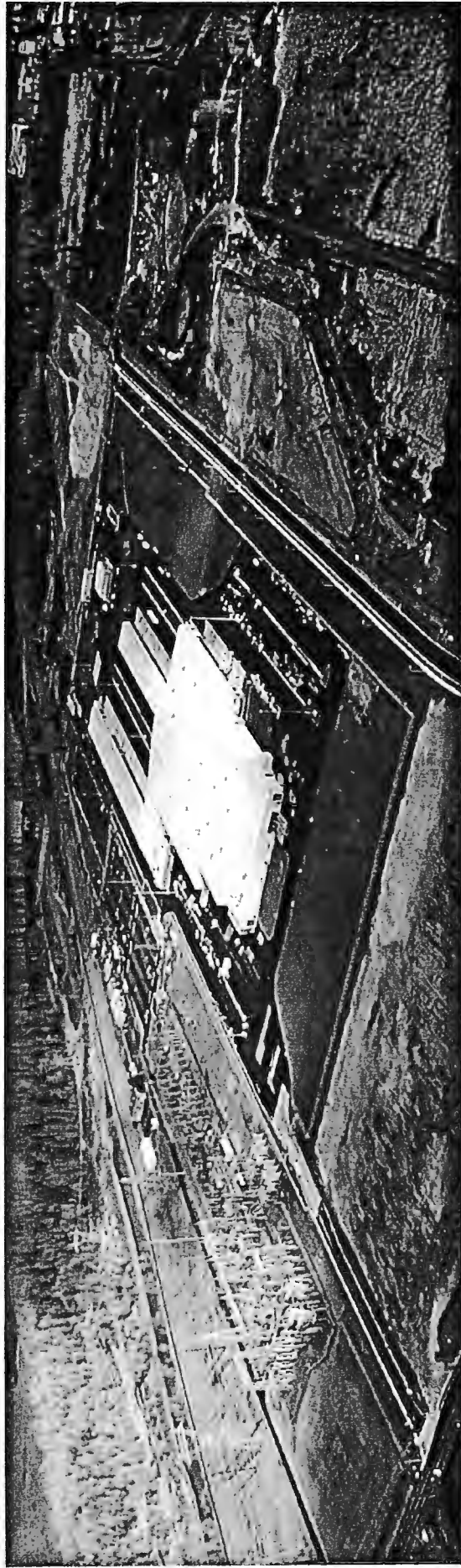
Continued work on industrial site due diligence (such as identifying needed infrastructure improvements, scoping environmental cleanup, understanding the scale of wetlands, and producing preliminary cost estimates for brownfield and wetland mitigation) will help to remove uncertainty surrounding sites. A relatively small investment in due diligence work could catalyze accelerated site preparation and prioritize scarce funding.

Regular Update of the Inventory and Completion of Follow Up Studies

Since the June 2014 inventory was completed, three Tier 1 sites have been absorbed into the market³³. Regular updates to this inventory and due diligence on sites could significantly benefit the region's economic development efforts. Statewide application of this methodology could benefit other regions.

³² *Regional Infrastructure Analysis*, Metro July 2008

³³ **Site 13:** Specht Properties Inc. in Portland; **Site 46:** Development Services of America (Westmark site) in Hillsboro; **Site 114:** Colwood Ltd Partnership in Portland.



LAND AVAILABILITY | LIMITED OPTIONS

An analysis of industrial land ready for future employers

2012

About this report

This report examines the current and near-term supply of large industrial sites available to accommodate the expansion of existing employers and recruitment of potential new employers to the Portland-metro region. The project was conceived partly in response to Metro's 2009 Urban Growth Report analysis that identified a shortage of large-lot industrial sites in the region and in recognition of the need for a mechanism to replenish large-lot industrial sites as they are developed.

The report was produced by Group Mackenzie in partnership with the Portland Business Alliance, Port of Portland, Business Oregon (an Oregon state agency), NAIOP Oregon Chapter (a commercial real estate development association) and Metro.

1 The Regional Industrial Lands Inventory examined vacant, industrially-zoned or planned lands within the Metro urban growth boundary and selected urban reserves that are suitable for large lot industrial development by new firms moving to the region or to accommodate the growth of existing firms that do not hold land for future expansion. The study identified and documented user-owned sites held for future use but excluded these from the detailed analysis.

Why land availability matters

The Value of Jobs Coalition believes that quality of life begins with a good job and that a thriving economy creates the foundation for quality schools, healthy parks and happy families.

According to a study sponsored by the coalition, in the late 1990s, the Portland-metro region's wages and incomes fell below the national average and have stayed there. Other peer regions have passed us by in terms of income level and employment. The coalition is sponsoring a series of studies to take a closer look at our economy to see what our region's economic needs and issues are.

There are a number of factors that help a metro region's economy thrive – an educated workforce, sound infrastructure, a coordinated transportation system and available land to grow and attract employers, to name a few. This analysis examines one ingredient of regional economic health: the readiness of large-lot industrial lands.

A consistent inventory of sites is a key requirement for meeting market demand, either by expanding local employers or attracting new employers to our region. This analysis shows, however, that

we have a supply of industrial land that is not readily available to attract and cultivate the types of catalytic employers that will help our region's ability to grow and thrive.

Our region has a land use history to be proud of, and we take a measured approach to development. Most of the large-lot sites that will become available for industrial development within the foreseeable future are inside the existing Metro urban growth boundary (UGB) or urban reserves. Advancing the readiness of those sites improves our economic competitiveness, maximizes the efficient use of existing infrastructure and reduces outward pressure on the UGB.

We hope the information in this report will start a conversation among public- and private-sector leaders to help move public policy in a direction that enhances our quality of life by creating well paying jobs and laying the foundation for innovative tools that grow employers in, and attract employers to, our region.

A focus on industrial lands

While this analysis could have looked at a variety of employment land types, it focuses specifically on large industrial sites. Metro has identified a shortage of these sites in the regional industrial lands inventory. Many of the region's largest and often highest-paying industrial firms are located on parcels 25 acres or more in size.

Such firms include high-tech manufacturing (Intel Corporation and Genentech), heavy manufacturing (Vigor Industrial, Gunderson, Freightliner), research and development labs (Oregon Health & Sciences University) and firms that support other business such as warehouses and shipping terminals. These employers create products or services that are sold outside of Portland-metro and bring new dollars into the region. These businesses are commonly referred to as "traded-sector" employers. With these employers come good, family-wage jobs and tax revenues that support critical public services such as schools, health care and law enforcement.

The state of Oregon, the Portland-Vancouver region, the city of Portland and most of the region's counties and cities all identify a similar universe of traded-sector business as the centerpiece of their economic development strategies.² A successful strategy includes retention and growth of existing businesses as

² See for example: *Business Oregon's Strategic Plan May 2009*; *Comprehensive Economic Development Strategy for the Portland-Vancouver Metropolitan Region 2010-2011 Update*; *City of Portland Economic Development Strategy, A Five Year Plan for Promoting Job Creation and Economic Growth, 2009*.

“We’re competing globally to retain, expand and recruit traded-sector companies and the quality, jobs and wages they bring. The window of opportunity to win major investment is often short and very competitive. Building an inventory of shovel-ready sites is a key ingredient to positioning the Greater Portland region for long-term job creation.”

Sean Robbins, Chief Executive Officer,
Greater Portland Inc.

well as the recruitment of new traded-sector businesses. Although not all traded-sector firms require large parcels, nationally or globally scaled firms that can have a significant impact on regional economic growth – such as Intel, Genentech and Freightliner – do require large parcels.

The experience of state and regional economic development experts indicates that accomplishing our region's industrial retention, expansion and recruitment strategy depends on the immediate availability of an adequate supply of well-located, market-priced and readily developable large-lot industrial lands.

BY THE NUMBERS:

5.

Number of broadly attractive 25-acre or larger sites available for industrial development within 180 days.

1.

Number of 50-acre or larger sites available for immediate development within 180 days.

1.

Number of 100-acre sites available for immediate development within 180 days.

0.

Number of 100-acre sites available for development between seven and 30 months.

35%.

Percentage of the region's total payroll that came from the traded sector in 2007

\$14,600.

Average additional wage earned by workers in traded-sector jobs vs. non-traded-sector jobs.

65,500.

Number of jobs at firms located on parcels of 25 acres or more.

50%.

Percentage of all industrial land development in the past 20 years that took place during two, three-year peaks of development (1996-1998) and (2006-2008).

Why the focus on traded-sector clusters?

Traded-sector employers export goods and services from the region and import revenue into the region. In the Portland region, many of these traded-sector firms are manufacturers. Economic development strategies focus on these traded-sector employers because they pay higher wages and can increase the wealth of the community.

A 2010 analysis by ECONorthwest for the Value of Jobs Coalition, *2010 Check-Up on the Portland-Region's Economic Health*, found that the average Portland-metro traded-sector wage was \$53,000 in 2007, \$14,600 greater than the average non-traded-sector wage. The analysis also found that traded-sector jobs accounted for 28 percent of the region's total jobs and 35 percent of total payroll. According to a Business Oregon analysis in 2008, the average wage for the High Technology cluster was \$82,000.³

The wealth generated by these traded-sector jobs circulates in the community, ultimately supporting supplier or service companies and neighborhood businesses. Larger traded-sector firms also seed entrepreneurs who spin out to create start-up firms that grow into larger firms. This process is what produces the economic clusters that are vital to the economic success of the region. Traded-sector firms also support public services directly and indirectly with higher wage jobs and taxable incomes, resulting in funding for schools, social services, parks and other critical public services.

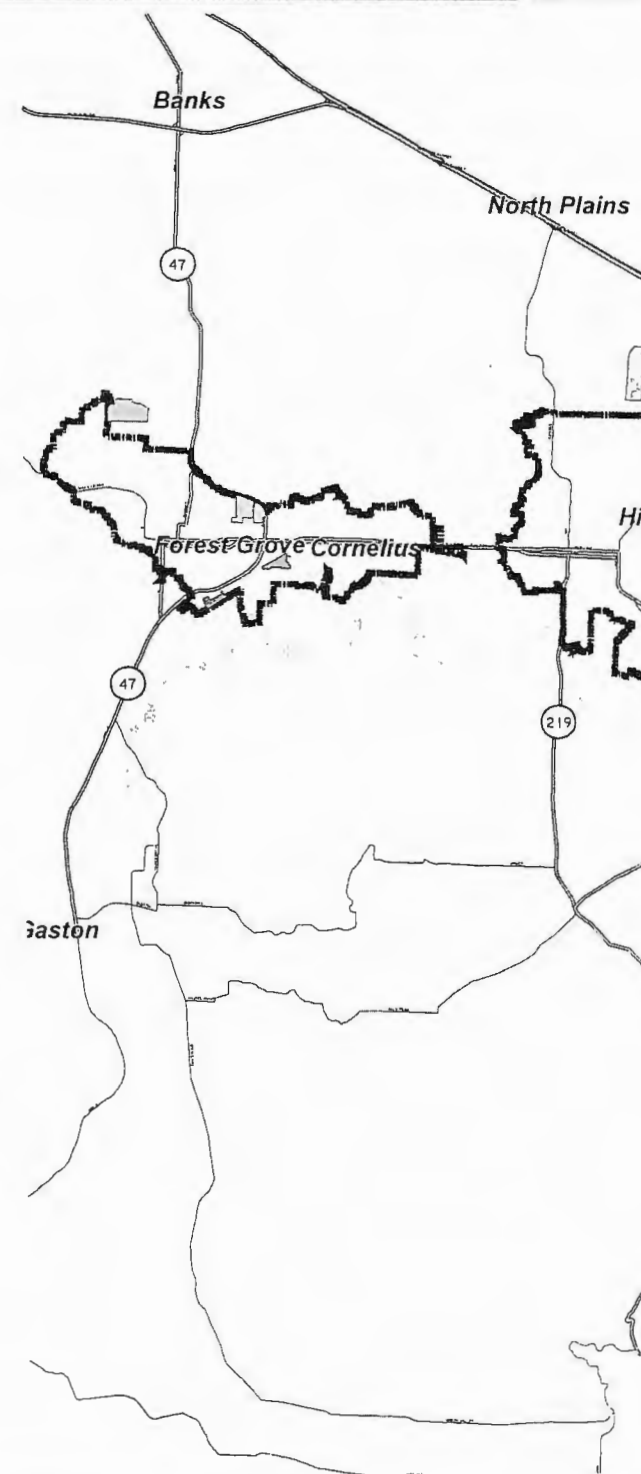
This land inventory analysis provides a snapshot of the industrial land supply inside the Metro UGB and selected urban reserves established in mid-2011. The inventory can be used as a reference for monitoring and tracking changes and absorption of industrial land in the region and can also be used by Portland-metro municipalities as the basis for making informed land use and investment decisions around the supply, regulation and market readiness of industrial lands.

The market-based approach

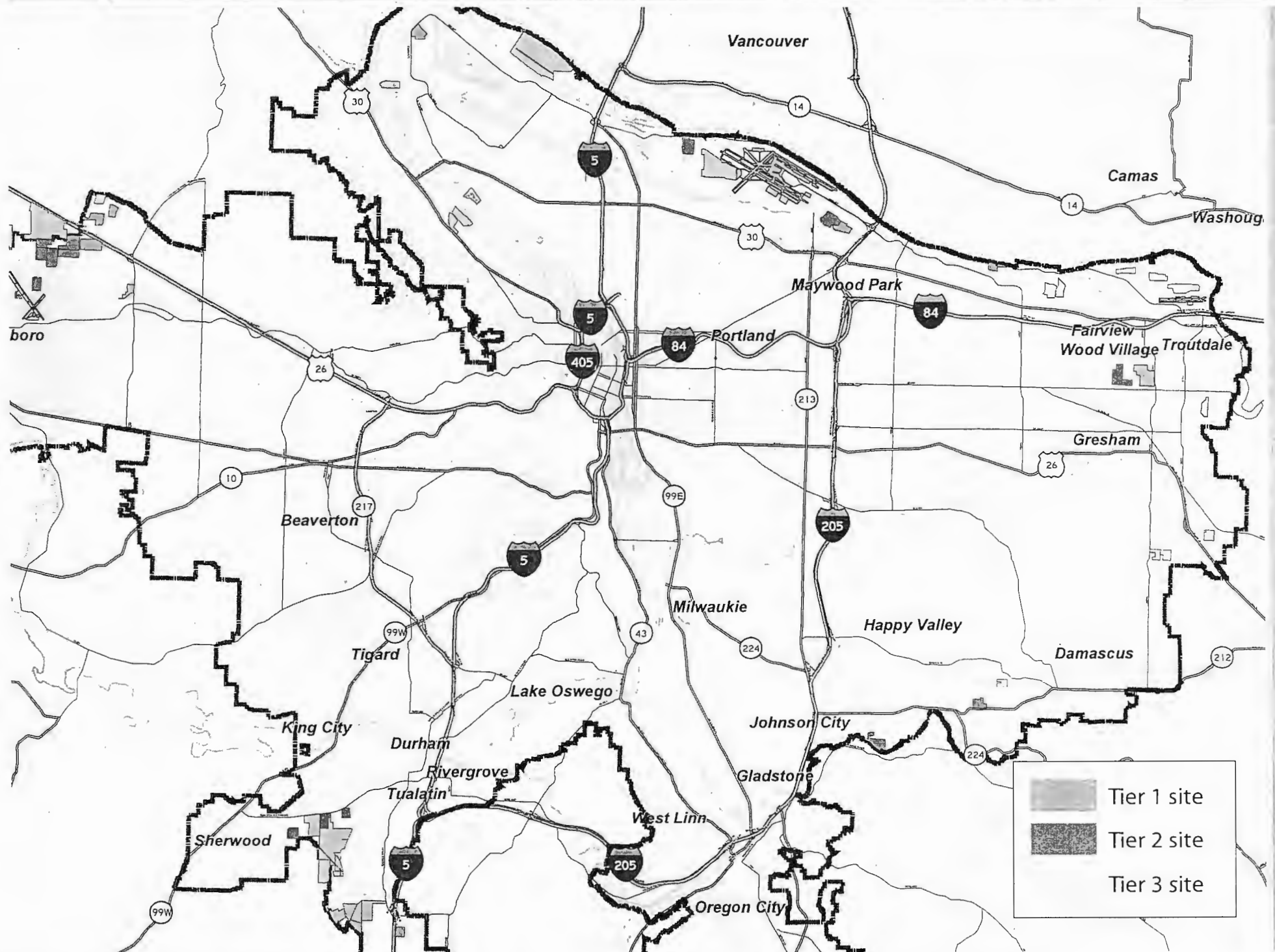
This analysis started with a simple question: **What is the inventory of market ready sites this region needs to be competitive in a global marketplace and successful in attracting large traded-sector firms to locate or expand here?**

Business Oregon has extensive experience recruiting national and international traded-sector businesses into the state and the Portland-metro region. Their experience is that the majority of employers considering whether to locate in the region require sites where they can break ground within 180 days of site selection.

It is also important for the region to offer a number of potential sites for employers to choose from in order to receive serious consideration by site selectors. The fewer the number of sites available for immediate development, the lower the odds are that the region will be able to meet the new employer's requirements.



³ www.oregon4biz.com/dev/www/BOR/The-Oregon-Advantage/Industry/



What about Clark County?

Could the Portland-metro industrial land readiness issue be addressed by looking north to Clark County? Not according to a report recently issued by the Columbia River Economic Development Council, which found only 13 sites are available and it would take up to 12 to 18 months to get permits in place for construction. The report noted that the shortage of readily available land has already led some businesses to look elsewhere to grow, and could hamper the community's economic recovery, according to local leaders.⁴

What do large-lot industrial developments add to the regional economy?

A 2010 Metro report found that 60 employers located on parcels of 25 acres or more accounted for more than 8 percent of the region's total employment in 2006 or 65,500 jobs.⁵ A Business Oregon analysis of recent recruiting efforts found the economic impact per acre of large-lot developments varies depending on the type of company and ranges from \$200,000 per acre for warehouse and distribution centers to \$1.4 million per acre for clean tech manufacturing.

⁴ "Few places to build jobs," *The Columbian*, Tuesday, January 10, 2012.

⁵ Metro 2009-2030 Urban Growth Report, Appendix 4, January 14, 2010

Based on experience, Business Oregon has identified the characteristic minimum parcel size and other site requirements for most cluster recruitment targets. Most of these cluster industry recruitments require net developable sites of at least 25 acres with a number of clusters, such as globally scaled high tech, requiring much larger sites.

This analysis focuses on the net developable acreage, as some sites have a high number of gross acreage but limited area that would be suitable for an employer to build a facility.

To identify the inventory of market-ready sites in the region, the project applied a series of filters from the perspective of potential employers. Starting with Metro's 2009 Buildable Lands Inventory, supplemented with information from local jurisdictions throughout the region, the analysis identified parcels with the following characteristics:

- Inside the UGB or in selected urban reserves
- Zoned, planned, or, in the case of urban reserves, suitable for industrial uses
- Containing at least 25 net buildable, vacant acres after accounting for constraints such as wetlands, flood plains and slope
- Not set aside by existing firms for future expansion opportunities

Using Business Oregon and industry expertise, the parcels identified through this initial process were further analyzed as to their market readiness using sufficiency of infrastructure and transportation facilities, brownfield or environmental issues, need for land assembly, need for annexation and availability for lease or sale.

This more refined analysis resulted in an inventory of existing or potential industrial sites that were assigned a tier based on market readiness or estimated length of time before they can be developed. Tire 1 sites could be shovel ready within 180 days (six months). With sufficient resources and expeditious jurisdiction approvals, Tier 2 sites could be development ready in seven to 30 months. Sites that will require more than 30 months to be ready for development were designated Tier 3.⁶

⁶ The Value of Jobs Coalition is working with the Regional Industrial Lands Study partners on a second phase of this analysis that will examine the costs and benefits of moving Tier 2 and Tier 3 sites into the Tier 1 level of readiness.

What the numbers show

Tier 1 Sites

The analysis found that there are only nine sites in the UGB that are both 25 net acres or larger and can be developed within 180 days. Washington County has five of these sites, followed by three in Multnomah County and one in Clackamas County.⁷ The number of very large sites is even more limited. There is only one 50-acre and one 100-acre site in Tier 1.

Beyond shovel-ready availability, there are a handful of economic factors that drive the suitability of industrial sites for immediate development. A closer look at the nine Tier 1 sites reveals that the number of sites attractive to a broad range of potential traded-sector cluster companies is even smaller. Of the nine sites, two are for lease only, which is typically less desirable to potential users who, anticipating significant capital investments, want to own rather than lease.

It is also more difficult to secure financing for a land lease versus a fee-simple ownership project.

Another Tier 1 site is of an irregular shape and would require an unusual development footprint, possibly increasing costs and precluding market-accepted building design.

One last factor is, of course, price. One site is currently for sale at a price that is much higher than industrial development could support and it is unclear when, if ever, the current owner will align the asking price with current industrial market pricing.

The net result is only five Tier 1 sites that can meet the business retention, expansion or recruitment criteria for a broad range of potential users.

Figure 1: Distribution of sites by acreage

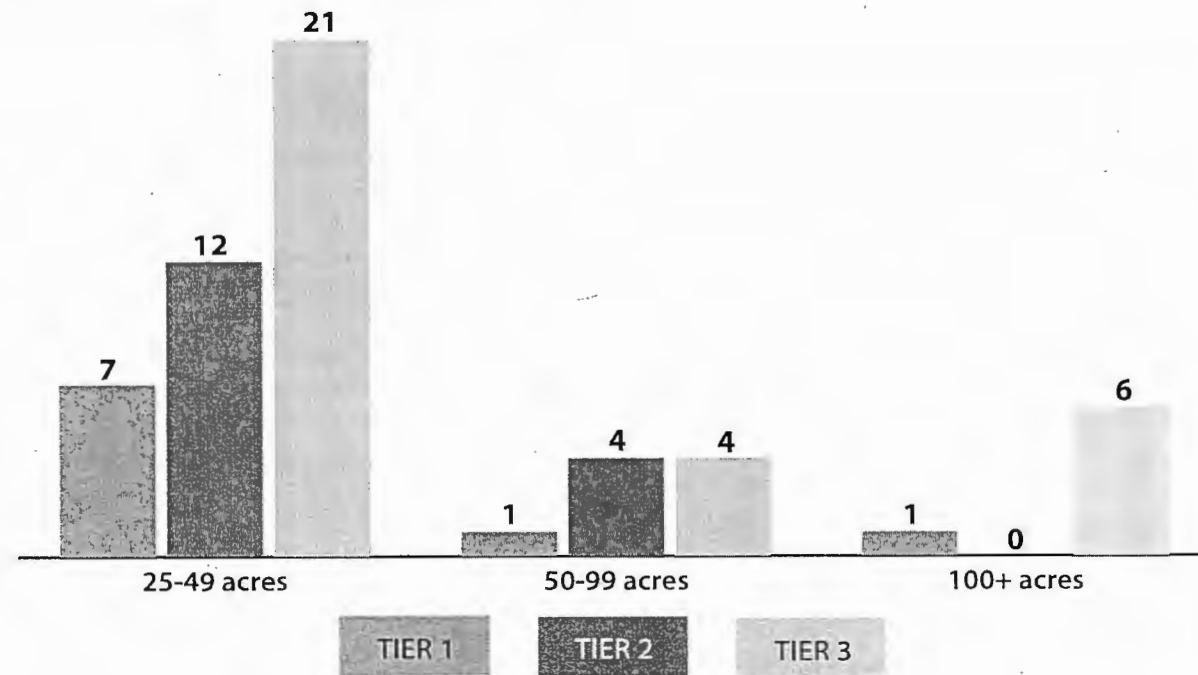


Figure 2: Tier 1 sites that meet development criteria

TIER 1 SITES		9
Lease only		-2
Irregular shape		-1
Above market price		-1
TOTAL SITES		5

⁷ This analysis only included the area within the Metro UGB, or adjacent urban reserves. It did not examine industrial sites outside the Metro boundary.

It is important to recognize that, for site selectors, these requirements are the absolute minimum requirements for a location to even be considered. Meeting these requirements is like reaching first base in a baseball game: all significant, potential employers require much more than simply meeting the minimum threshold. To make it all the way home, many factors must fit for the transaction ultimately to work and result in hiring.

The smaller the inventory of sites that meet even the minimum requirements, the less the region's odds are of successfully making it to first base, let alone hitting a home run and successfully recruiting the employer. Given the region's lagging wages and incomes, it should be our goal to increase our opportunities for success by ensuring that we have a variety of development ready sites.

“No one wants to go to their company president with only one possible site.”

Peter Bragdon, senior vice president of legal and corporate affairs for Columbia Sportswear, in reference to his experience with site selection.

Tier 2 and 3 sites

The analysis found 16 Tier 2 sites (seven to 30 months from shovel ready) and 31 potential Tier 3 sites (more than 30 months to shovel ready) within the UGB and selected urban reserves. The bulk of these sites are in either Washington or Multnomah counties. Here again, the number of larger sites is very constrained. Tier 2 has no 100-plus acre sites, and only four 50-plus acre sites. Tier 3 has only four potential 50-plus acre and six potential 100-plus acre sites.

The few large sites in Tier 2 and 3 face significant challenges to becoming ready, including the need to complete brownfield clean up, build infrastructure such as roads and sewers, remediate wetlands and assemble parcels currently under multiple separate ownerships.

Ten of the potential Tier 3 sites would require aggregation of parcels in separate ownership, and ownership ranges from two owners up to 17 owners, depending on the site. The more owners involved, the more complex and lengthy the development process would be. Twenty of the sites in Tiers 2 and 3 will require some kind of state, regional or local action such as concept planning, annexation or UGB expansion to become development ready.

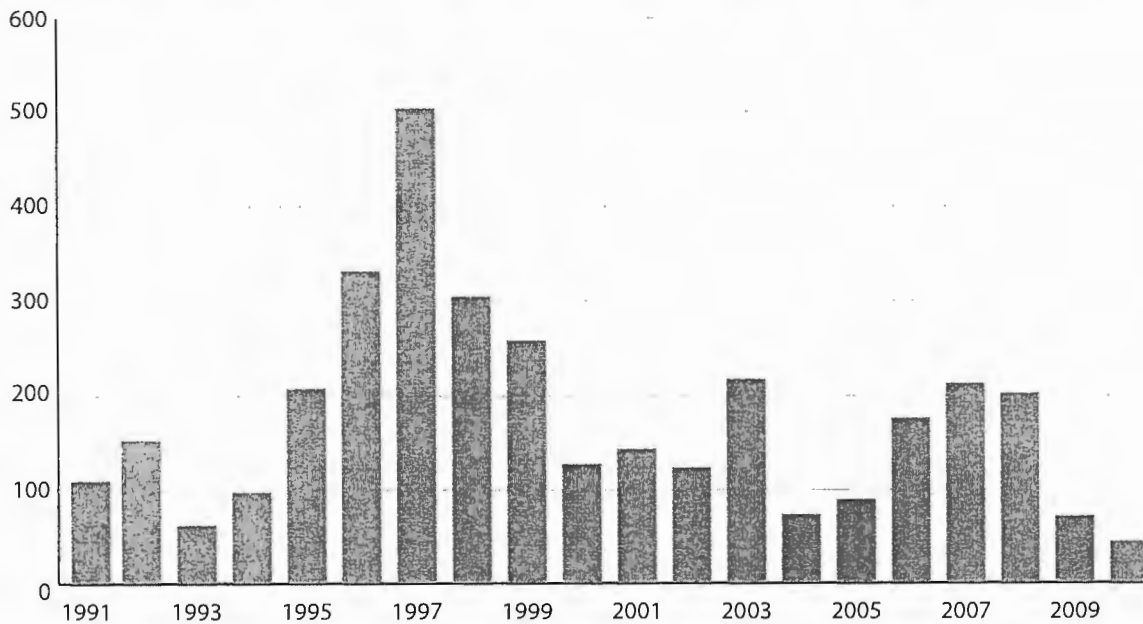
All of these steps can be challenged through the land-use process. Thirty-one of the Tier 2 and 3 sites face multiple challenges. The table to the right shows the variety of challenges faced by sites in the pipeline.

Figure 3: Tier 2 and 3 potential development constraints

	TOTAL
Legislative Actions	20
Infrastructure	19
Transportation	18
Not willing to transact	18
Land Assembly	14
National Resources	13
Brownfield/Cleanup	8

The largest sites face tremendous challenges and limitations. One is West Hayden Island, which has extensive environmental limitations associated with future marine terminal development and will require annexation into the city of Portland. Three sites are outside the current urban growth boundary and one is limited to aviation-oriented, lease-only development. In sum, there are very few of the largest sites currently available and the supply of future large sites is equally or even more constrained.

Figure 4: Estimated industrial land consumption in acres, 1991-2010



Demand for land

Being market ready is critical as industrial land development is very cyclical. According to an analysis by Business Oregon and NAIOP, the majority of the demand for industrial lands comes in short bursts. Fifty percent of all industrial land acres developed in the study area over the past 20 years came during two three-year peak periods of development (1996-1998) and (2006-2008).⁸ If the region does not have developable sites ready to go when the

growth cycle hits, it will miss the opportunity for significant job and income expansion for a decade or more. How our region grows jobs and improves wages and incomes depends on getting these sites ready for employers. The goal of this inventory study is to move conversations forward so our region can better coordinate, recruit and grow the number of traded-sector employers and grow jobs.

Land-banked parcels

The analysis excluded land-banked parcels (owned and held for future expansion by existing firms) and sites with structures comprising more than 25 percent of the land area for redevelopment. While land banked parcels may become available for recruitment in the future, there is currently no way to judge if or when this might occur. Redevelopment of occupied parcels may be possible but is generally not broadly attractive to targeted cluster industry companies due to uncertain timing and costs that can greatly exceed current market rates for industrial land in other parts of the country or world. Additional analysis of redevelopment costs and opportunities was outside the scope of this analysis.

⁸ 2011 Industrial Lands Policy Paper: Large Lot Supply & Demand, Business Oregon (Source: Costar, NAIOP). Analysis of industrial construction square footage reported in Costar for all parcel sizes converted to acreage assuming an average 30 percent coverage ratio.

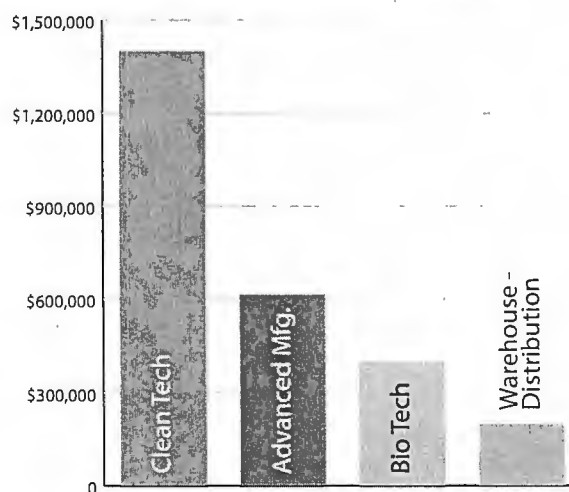
Conclusions

The industrial land inventory analysis confirms that Portland-metro's market-ready supply of large-lot industrial lands for targeted traded-sector employer expansion and recruitment is limited, particularly for potential developments that require 50 acres or more.

The sites that are available are concentrated in the Columbia Corridor of Multnomah County and around Hillsboro in Washington County, limiting the potential to more broadly distribute job opportunities within the Portland-metro area.

While this analysis has identified the available sites and, at a high level, outlined the challenges that exist to bringing Tier 2 or 3 sites to shovel-ready status, the timeframes in the analysis assume that the jurisdictions, property owners, land-use regulatory bodies and potential interveners are all working in support of the potential employer and the site's development.

Figure 5: Economic impact per acre



Source: 2011 Industrial Lands Policy Paper: Large Lot Supply & Demand, Business Oregon

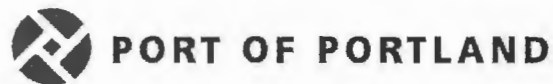
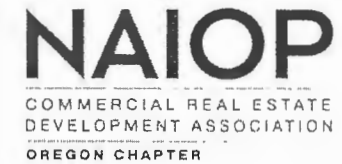
The tier designations assume the "best case" and do not reflect issues that could significantly delay development such as unidentified wetlands or brownfields, opposition from interest groups, or requests from local jurisdictions for additional planning or design reviews. Any one of these factors could dramatically extend the timeframe for these sites to become market ready.

“Our dwindling inventory of available industrial lands is making it difficult to respond to companies interested in expanding their operations into Oregon. We need to find strategies to make potential sites shovel ready so we can compete, not just for recruitment, but for expansion and retention of the great companies we already have.”

Tim McCabe, Director, Business Oregon

Future analysis, known as Phase 2 of this study, will look at the costs and benefits of getting these sites ready and what the potential impact of successful recruitments or expansions could be in terms of jobs, incomes and taxes generated and improving the Portland-metro region's quality of life.

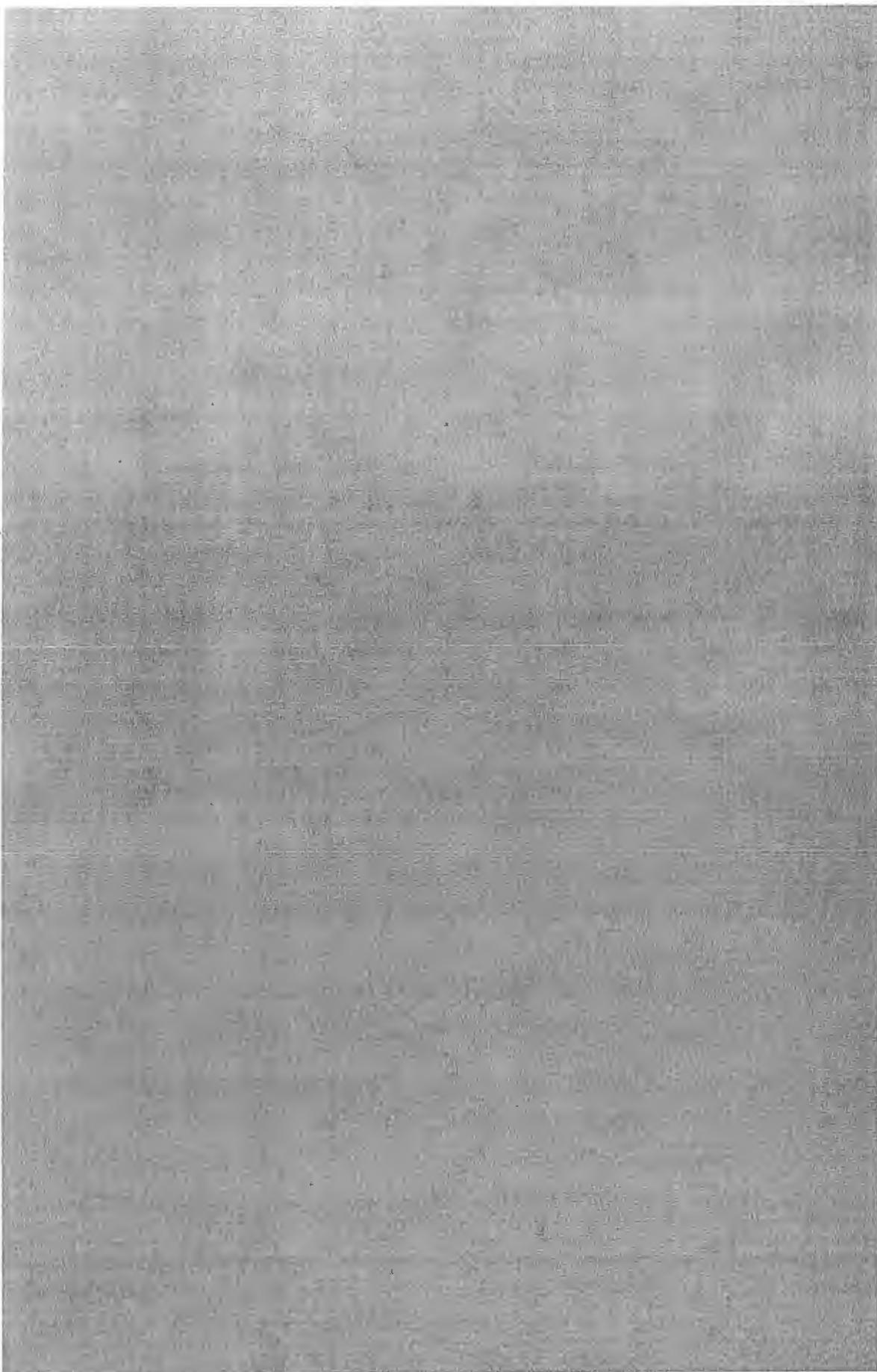
Partners



About the Value of Jobs Coalition

The Value of Jobs Coalition is based on the premise that in order to have a prosperous, healthy Portland region with a good quality of life, we need more private-sector jobs. The coalition began with an economic study in the fall of 2010, which uncovered troubling economic data about the Portland-metro region. A number of other studies have followed that highlight the region's economic opportunities and challenges. Find out more at:

www.valueofjobs.com.



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