

City of Portland, Oregon Bureau of Development Services Land Use Services

FROM CONCEPT TO CONSTRUCTION

STAFF REPORT AND RECOMMENDATION TO THE DESIGN COMMISSION

| CASE FILE: | LU 15-234503 DZM AD PC # 15-144264 |
|-------------------|---|
| | OHSU Patient Housing & Parking Garage [Blk 28], & |
| | Center for Health and Healing South [Blk 29], & |
| | Two story skybridge across SW Whitaker Street |
| REVIEW BY: | Design Commission |
| WHEN: | <u>January 7, 2015</u> at 1:30 PM |
| WHERE: | 1900 SW Fourth Ave., Room 2500A |
| | Portland, OR 97201 |

Please note: Rescheduled Hearing date for January 7, 2015.

Bureau of Development Services Staff: Tim Heron 503-823-7726 / Tim.Heron@portlandoregon.gov

GENERAL INFORMATION

| Applicant: | Elaine Dabrowski, OHSU Design And Construction 3181 SW Sam Jackson Park Rd, Csb210 Portland, OR 97239 |
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| | Brian Newman, OHSU 3181 SW Sam Jackson Park Rd, Pp22e Portland, OR 97239-3098 |
| Representative: | David Staczek & Kristina Thomsen, ZGF Architects 1223 SW Washington Ave Portland, OR 97205 |
| Site Address: | 3410 SW Bond Ave [Block 28] & 3485 SW Bond Avenue [Block 29], & 3303 SW Bond Avenue [Block 25] |
| Legal Description: | LOT 3, WATERFRONT SOUTH; LOT 7, WATERFRONT SOUTH; LOT 8 WATERFRONT SOUTH |
| Tax Account No.: | R882450150, R882450350, R882450150, R882450350, R882450150, R882450350 |
| State ID No.: | 1S1E10AC 00303, 1S1E10AC 00307, 1S1E10AC 00303, 1S1E10AC 00307, 1S1E10AC 00307 |
| Quarter Section: | 3330 |
| Neighborhood: Business District: | South Portland NA., contact Jim Gardner at 503-227-2096. South Portland Business Association, contact Kevin Countryman at 503-750-2984. |

| District Coalition: | Southwest Neighborhoods Inc., contact Leonard Gard at 503-823-4592. |
|---------------------------|--|
| Plan District: Zoning: | Central City - South Waterfront CXd, Central Commercial with design overlay |
| Case Type: | DZM, AD – Design Review with Modification and Adjustment Requests |
| Procedure: | Type III, with a public hearing before the Design Commission. The decision of the Design Commission can be appealed to City Council. |

Proposal:

The Center for Health and Healing [CHH] South is an integral part of the Knight Cancer Challenge that will create a new model for cancer research, clinical trials and treatment.

There are two new full-block buildings subject to this review, and a two-story skybridge that will connect the previously approved and constructed CHH North [Block 25]. Block 29 will be an ambulatory care facility, and Block 28, a patient housing tower with structured parking - totaling nearly 720,000 gsf on two blocks of the South Waterfront, and will establish the next two increments of the six block OHSU Commons.

Block 28, the Patient Housing and Parking Garage structure, with a total of 341,437 gsf on 11 levels, will include a mix of functions that support CHH North and CHH South. The ground floor will include the Guest Housing lobby, urgent care, conference center, loading dock and support functions and access to parking. Materials moving to and from the loading dock to CHH South and CHH North will utilize the tunnel level below SW Bond which connects to the P2 level of the existing parking garage and new service elevators to the buildings. The loading dock and access to parking have been located away from SW Curry to provide a buffer for neighbors to the south. One of the special functions of the program is Guest Housing which will provide lodging, meals and support to pediatric and adult patients and families that come to OHSU from around the state for treatment. The facility will include a lobby at the ground floor and common functions including dining, a resource library and conference space at the terrace level. The terrace level, at the roof of the garage, will include a large children's play area and a separate, more tranquil, exterior space for adults. The top 4 floors of the building will provide a total of 76 rooms and support spaces with two room types to choose from. The parking garage, with access from SW Whitaker will provide 687 spaces on five floors starting at the second level of the building to maximize the amount of area for active uses at grade.

Block 29 will be the site for the new Center for Health and Healing South (CHH South), a 15 story, 378,160 sf ambulatory surgical center and clinic building. The new structure will sit above the existing 3 level, below grade parking structure that was built as part of the Center for Health and Healing North (CHH North).

The new building on Block 29 will act as an extension and expansion of CHH North [Block 25] and include in its construction, a **two-story skybridge connection** across SW Whitaker Street, with approximately 35-feet clearance. The existing CHH North will have 7 existing and new operating rooms, and the new building will add 10 Operating Rooms [ORs] and all the required support space, including central sterile processing and extended stay floors. In order to share services, staff and equipment, the two surgical centers will act together as one and will be located on the same floor (level 4) of the two adjacent buildings. The programs will be connected by a sky bridge that spans NW Whitaker Street. The sky bridge will connect the surgical centers on level 4, and

will also provide a critical connection on level 3. All Diagnostic Imaging will remain in CHH North and all the central sterile and laboratory functions will be in the new CHH South. The bridge connection at the third level is critical for patient access to services in both buildings.

The lower floors of CHH South will house the ambulatory surgical center, and the upper floors will provide general clinics, the Knight Cancer Institute, clinical trials, infusion suites and offices. CHH South will also include a new central utility plant that will serve CHH North, CHH South and Block 28. **CHH South will be connected to Block 28 via an underground utility tunnel at the P2 level of the existing garage** that will allow the passage of utilities, services and materials.

The ground floor of CHH South will incorporate a main entry and covered patient drop on SW Curry Street, and an entry on SW Whitaker, connecting at grade to CHH North. The main registration, retail pharmacy, and blood draw areas will be located on the ground floor along with the dining area and a coffee kiosk. An interior promenade will run the entire length of the east side of the ground floor providing a connection from Caruthers Park, through CHH North to CHH South.

The exterior materials for both buildings and the new skybridge structure are proposed to be high quality with durable finishes for long life and ease of maintenance. For Block 29, CHH South, the primary exterior materials are high performance glass and shaped metal panels in shades of silver metallic. The mullions vary in depth and spacing on the exterior to highlight and articulate the composition of the massing. Shaped louvers at the mechanical level will add texture to the elevations continuing the vertical expression of the facades and screen all mechanical equipment, intakes and exhausts.

The two story skybridge that will connect Block 29, the CHH South across SW Whitaker Street to Block 25, CHH North, will be of the same palette as CHH South, with similar clear glazing, spandrel glazing and vertical metal ribs.

For Block 28, Patient Housing and Parking Garage will have a related palette with shaped metal panels in varying depths, widths and slightly different colors to highlight the massing of the Guest Housing. A smooth metal panel with a metallic finish similar to Block 29 will contrast the textured Guest Housing skin and emphasize adjacent vertical elements articulating the massing. The parking garage will be wrapped with Z shaped 12" deep painted metal panels with their angled faces oriented toward Caruthers Park to eliminate views of the interior of the garage while keeping it open for natural ventilation.

The ground floors of both buildings will have painted steel and glass canopies to protect pedestrians and transition the scale of the buildings to the ground level. The sidewalks will be articulated with varying concrete finishes meeting city design standards.

Modifications requested through Design Review [33.825.040]

Block 28, Patient housing and parking garage

- 1. Modification request to <u>33.510.220 Ground Floor Windows</u> along SW Whitaker Street to reduce the required clear glazing into active area requirement of 50% linear frontage [110-feet] and 25% area [495 SF] to 10% for both requirements [22-feet & 198 SF].
- 2. Modification request to <u>33.510.225 Ground Floor Active Uses</u> along SW Curry Street to reduce the 25-foot minimum depth requirement for 50% of the frontage [110-feet] to 38% [84-feet].

- 3. Modification request to <u>33.510.225 Ground Floor Active Uses</u> along SW River Parkway to reduce the 25-foot minimum depth requirement for 50% of the frontage [100-feet] to 42% [84-feet].
- 4. Modification request to <u>33.510.267 Parking in the South Waterfront Subdistrict</u> [Ground floor Active Use required per 33.510.225] to reduce the 50% required [110-feet] to 10% [22-feet] along SW Whitaker Street.

Block 29, Center for Health and Healing South

- 5. Modification request to <u>33.266.310.F Loading Standards</u>, Forward Motion requirement to allow rear motion loading along SW Moody Avenue.
- 6. Modification request to <u>33.510.205</u>, <u>Map 510-3 Height</u> to increase the 75-foot height limit for the building podium to 85-feet.
- Modification request to <u>33.510.215 Required Building Lines</u> along SW Curry Street to reduce the minimum 50% frontage requirement [98-feet] to 9% [19feet].
- 8. Modification request to <u>33.510.225 Ground Floor Active Uses</u> along SW Moody Avenue to reduce the 25-foot minimum depth requirement for 50% of the frontage [100-feet] to 36% [72-feet].
- 9. Modification request to <u>33.510.225 Ground Floor Active Uses</u> along SW Bond Avenue to reduce the 25-foot minimum depth requirement for 50% of the frontage [100-feet] to 42% [84-feet].

Adjustment requests [33.805]

Block 28, Patient housing and parking garage

1. Adjustment request to <u>33.510.261</u>, <u>Map 510-9 Parking Access Restricted Streets</u> to allow loading access along SW River Parkway.

Block 29, Center for Health and Healing South

2. Adjustment request to <u>33.266.310 Loading Standards</u> to waive the loading requirement for this building.

Because the proposal is for new development in the South Waterfront subDistrict of the Central City Plan District, Design Review is required.

Relevant Approval Criteria:

In order to be approved, this proposal must comply with the approval criteria of Title 33. The relevant approval criteria are:

- Central City Fundamental Design Guidelines
- South Waterfront Design Guidelines
- 33.805 Adjustments
- 33.825.040 Modifications Requested through Design Review

ANALYSIS

Zoning: The <u>Central City Plan District</u> implements the Central City Plan and other plans applicable to the Central City area. These other plans include the Downtown Plan, the River District Plan, the University District Plan, and the Central City Transportation management Plan. The Central City plan district implements portions of these plans by adding code provisions which address special circumstances existing in the Central City area. The site is within the South Waterfront Sub District of this plan district.

The Central Commercial (CX) zone is intended to provide for commercial development within Portland's most urban and intense areas. A broad range of uses is allowed to reflect Portland's role as a commercial, cultural and governmental center. Development is intended to be very intense with high building coverage, large buildings, and buildings placed close together. Development is intended to be pedestrian-oriented with a strong emphasis on a safe and attractive streetscape.

The Design Overlay Zone [d] promotes the conservation, enhancement, and continued vitality of areas of the City with special scenic, architectural, or cultural value. This is achieved through the creation of design districts and applying the Design Overlay Zone as part of community planning projects, development of design guidelines for each district, and by requiring design review. In addition, design review ensures that certain types of infill development will be compatible with the neighborhood and enhance the area.

Land Use History: City records indicate that prior land use reviews include:

- 1. <u>VZ 122-63:</u> Non-illuminated sign storage in an 'S' zone.
- 2. <u>PC 7550:</u> Adoption of zone changes recommended by the Macadam Corridor Study.
- 3. <u>EA 02-114882 PC:</u> Type III Subdivision to create nine lots, an open space riverfront tract, and public r-o-w for a grid street system.
- 4. <u>LU 02-124581 AD, GW:</u> Greenway Review for Interim Site Preparation and Adjustment to defer Greenway improvements.
- 5. <u>FP 02-128184 SU, GW:</u> Final Plat Approval to create the blocks proposed by EA 02-114882 PC.
- 6. <u>LU 03-117500 GW:</u> Improvements and temporary activities related to the development of two subdivisions that received tentative approval in September and December of 2002 (LU 02-116252 SU GW and LU 02-128184 SU GW).
- 7. LU 03-154778 DA: Design Advice Request for development of Block 25 & Block 30.
- 8. <u>LU 03-171715 DZ, GW:</u> Design review and greenway review approval for excavation and construction activities within the "South Waterfront Greenway Area" of the affected parcels. Construction activities are associated with the subdivision construction related with the South Waterfront development, as well as with construction activities for buildings to be built on the lots just west of the greenway. The elements of this proposal are related to the development of two subdivisions that received approval in 2002 (LU 02-116252 SU GW & LU 02-128184 SU GW).
- 9. <u>EA 03-176864 PC:</u> Pre-application Conference for Design Review and Central City Parking Review approval for Center for Health and Healing North [Block 25] and underground parking [Block 29] connected under the SW Whitaker Street ROW.
- 10. <u>LU 04-004682 DZM</u>: Design Review approval for OHSU River Campus 1 [Block 25 Center for Health and Hearing North & Block 29 underground parking].
- 11. <u>LU 05-125472 PR</u>: approval of 812 surface parking spaces dispersed among South Waterfront Blocks 24 and 28 and "Unit B Schnitzer OHSU Campus".
- 12. <u>LU 05-181180 DZM</u>: Design Review approval for LU 05-125472 PR related accessory structures [light poles, parking booths, shuttle shelters, and restroom].
- 13. <u>EA 15-123301 DA:</u> Design Advice Request for Blocks 28 & Blocks 29 Patient Housing and Parking Garage, Center for Health and Healing [CHH] South Ambulatory Hospital, and two story skybridge connecting to Block 25 CHH North.
- 14. <u>EA 15-144264 PC:</u> Pre-application Conference for Blocks 28 & Blocks 29 Patient Housing and Parking Garage, Center for Health and Healing [CHH] South Ambulatory Hospital, and two story skybridge connecting to Block 25 CHH North.

Agency Review: A "Notice of proposal in Your Neighborhood" was mailed **November 25, 2015**. The following Bureaus have responded with no issue or concerns:

- Water Bureau
- Fire Bureau
- Site Development Section of BDS

- The Bureau of Environmental Services responded with comments: Exhibit E-1 has additional details.
- The Bureau of Transportation Engineering responded with comments: Exhibit E-2 has additional details.

Neighborhood Review: A Notice of Proposal in Your Neighborhood was mailed on **November 25, 2015**. No written responses have been received from either the Neighborhood Association or notified property owners in response to the proposal.

ZONING CODE APPROVAL CRITERIA

(1) DESIGN REVIEW (33.825)

Chapter 33.825 Design Review Section 33.825.010 Purpose of Design Review

Design review ensures that development conserves and enhances the recognized special design values of a site or area. Design review is used to ensure the conservation, enhancement, and continued vitality of the identified scenic, architectural, and cultural values of each design district or area. Design review ensures that certain types of infill development will be compatible with the neighborhood and enhance the area. Design review is also used in certain cases to review public and private projects to ensure that they are of a high design quality.

Section 33.825.055 Design Review Approval Criteria

A design review application will be approved if the review body finds the applicant to have shown that the proposal complies with the design guidelines for the area.

Findings: The site is designated with a design (d) overlay zone; therefore the proposal requires Design Review approval. Because of the site's location, the applicable design guidelines are the Central City Fundamental Design Guidelines and the South Waterfront Design Guidelines, and the South Waterfront Greenway Design Guidelines for sites with a greenway [g] overlay zone.

Central City Plan Design Goals

- 1. Encourage urban design excellence in the Central City;
- **2.** Integrate urban design and preservation of our heritage into the development process;
- **3.** Enhance the character of the Central City's districts;
- **4.** Promote the development of diversity and areas of special character within the Central City;
- **5.** Establish an urban design relationship between the Central City's districts and the Central City as a whole;
- 6. Provide for a pleasant, rich and diverse pedestrian experience for pedestrians;
- **7.** Provide for the humanization of the Central City through promotion of the arts;
- **8.** Assist in creating a 24-hour Central City which is safe, humane and prosperous;
- **9.** Ensure that new development is at a human scale and that it relates to the scale and desired character of its setting and the Central City as a whole.

South Waterfront Design Goals

The South Waterfront Design Guidelines and the Greenway Design Guidelines for the South Waterfront supplement the Central City Fundamental Design Guidelines. These two sets of guidelines add layers of specificity to the fundamentals, addressing design issues unique to South Waterfront and its greenway.

The South Waterfront Design Guidelines apply to all development proposals in South Waterfront within the design overlay zone, identified on zoning maps with the lowercase letter "d". These guidelines primarily focus on the design characteristics of buildings in the area, including those along Macadam Avenue, at the western edge, to those facing the greenway and river.

The Greenway Design Guidelines for the South Waterfront apply to development within the greenway overlay zone, identified on zoning maps with a lowercase "g". These design guidelines focus on the area roughly between the facades of buildings facing the river and the water's edge.

South Waterfront Design Guidelines and Central City Fundamental Design Guidelines

The Central City Fundamental Design and the South Waterfront Design Guidelines and the Greenway Design Guidelines for South Waterfront focus on four general categories. (A) Portland Personality, addresses design issues and elements that reinforce and enhance Portland's character. (B) Pedestrian Emphasis, addresses design issues and elements that contribute to a successful pedestrian environment. (C) Project Design, addresses specific building characteristics and their relationships to the public environment. (D) Special Areas, provides design guidelines for the four special areas of the Central City.

Staff has considered all guidelines and has addressed only those guidelines considered applicable to this project.

| Please note: The following issues, as related to specific Design Guidelines and | |
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| Modifications not yet met, are detailed in the "boxed text" findings below: | |
| Block 28-Parking Garage and Patient Housing | |
| Issue 1: SW Whitaker Street frontage and related street corners activation | |
| (Design Guidelines A1, A7, A8, B1, C1 & C7; & Modification Requests 1 & 4.) | |
| Issue 2: Parking garage screening. | |
| (Design Guidelines C4, C4-1, C5) | |
| Block 29-Ambulatory Hospital | |
| Issue 3: SW Curry Street required building line frontage. | |
| (Design Guidelines A7, A8, B1, B5; & Modification Request 7) | |
| Issue 4: NW corner of SW Moody Avenue and SW Whitaker Street activation. | |
| (Design Guidelines A7, A8, B1, C7, C9; & Modification Request 8) | |
| Issue 5: Signage details. | |
| (Design Guidelines C13) | |

A1. Integrate the River. Orient architectural and landscape elements including, but not limited to lobbies, entries, balconies, terraces, and outdoor areas to the Willamette River and Greenway. Develop access ways for pedestrians that provide connections to the Willamette River and Greenway.

A1-1. Develop River Edge Variety. Vary the footprint and façade plane of buildings that face the Willamette River to create a diversity of building forms and urban spaces adjacent to the greenway. Program uses on the ground level of buildings adjacent to the greenway and to accessways linking the greenway with the interior of the district that activate and expand the public realm. Design the lower stories of buildings within the greenway interface to include elements that activate uses and add variety and interest to the building facades.

Findings for A1, A1-1: The lobbies and waiting areas serving the upper floors of Block 29 have been positioned at the southeast corner of the tower to capture views of the river and Mt. Hood. The glassy facades of the north/south sky bridge at levels

three and four will also allow views of the river and greenway. Similarly, the east and west lounge areas of the Guest Housing will provide views of the river and West Hills. At the southern corners of the Guest Housing two-story winter gardens capture views of the river and Caruthers Park.

Exterior terrace areas on both Blocks also provide important visual connections to the river and Caruthers Park. On Block 29 the south facing public terrace will overlook the park and provide river views between existing buildings. On Block 28 the large terrace space above the parking will provide an important amenity for pediatric and adult patients and their families. The terrace will be a visual amenity for residents of the Mirabella and take advantage of the southern exposure.

While aspects of the proposal mentioned above meet these guidelines, there are still two critical areas of Block 28, the Parking Garage and Patient Housing building that do not. Specifically, the use of stair tower columns that anchor the NW and NE corners of this building lessen the potential of these corners not only at the ground level of the building, but at every level above them, particularly the patient housing levels where views of the river could be enhanced with more active uses at these corners. Were the stair towers to be pulled away from the corners, 20-feet or more in either direction from the corner for example, more active uses such as office or retail at the ground floor, elevator lobbies at the parking levels, and corner activating reception and lobby areas for the patient housing levels, would enhance visual access to the river and better meet these guidelines.

These guidelines are therefore <u>not yet</u> met.

A2. Emphasize Portland Themes. Emphasize Portland Themes. When provided, integrate Portland-related themes with the development's overall design concept.

Findings: The development builds on Portland's most important themes. Building orientation and program placement provide meaningful connections to nature with views of the river, Mt. Hood and the West Hills. The transparent ground floors of both buildings invite interaction between interior spaces and the pedestrian zone. Storm water will be captured and treated on site. Casual exterior interaction spaces are included at the southwest and southeast corners of Block 29 where the public will have access to food and beverages. Interior and exterior public art will be incorporated as part of the project. Convenient access to transit on adjacent streets will connect the site with the rest of downtown and the region.

This guideline is therefore met.

A3. Respect Portland Block Structures. Maintain and extend the traditional 200-foot block pattern to preserve the Central City's ratio of open space to built space. Where superblock exist, locate public and/or private rights-of-way in a manner that reflects the 200-foot block pattern, and include landscaping and seating to enhance the pedestrian environment.

Findings: The development of Blocks 28 and 29 respects the structure and character of Portland city blocks. Although programmatic needs pushed for a superblock solution, the design team focused on keeping the existing Center for Health & Healing (CHH North) and CHH South separate to conform to the traditional block size with the introduction of the two story skybridge connection to Block 25 – Center for Health and Healing North. Both buildings are built to the property lines and activated with appropriate ground floor uses and large areas of

glazing. Rain and sun protection for pedestrians will be provided around the perimeter of both blocks.

This guideline is therefore met.

A4. Use Unifying Elements. Integrate unifying elements and/or develop new features that help unify and connect individual buildings and different areas.
A4-1 Integrate Ecological Concepts in Site And Development Design. Incorporate ecological concepts as integral components of urban site and development designs.
A4-2 Integrate Stormwater Management Systems in Development. Integrate innovative stormwater management systems with the overall site and development designs.

Findings: Continued use of established standards for the South Waterfront will unify this project with existing development. City standard sidewalks and street trees will continue the pedestrian zone to the south and east and will include district standard street lighting and street furniture consistent with CHH North. The exterior colors and materials will complement those used for CHH North and other existing development in the District.

A primary goal of this development is to achieve a minimum of LEED Gold with a potential path to Platinum. The buildings will feature high performance facades with external insulation and rain screen envelopes. Energy efficient glazing will respond to the various building orientations. Low maintenance, water efficient landscape elements at the fifth floor terraces will incorporate on-site water retention and filtering. On Block 29, limiting glazing on the south facades to will reduce energy consumption.

On Block 28 operable windows for the guest Housing will provide fresh air and individual control for patient and family comfort. Multipurpose sun rooms and the southern corners will provide airy, bright spaces for users. The large terrace area at the roof of the garage will provide rich landscape materials that retain and clean storm water.

Storm water will be managed on-site for both buildings. Infiltration areas have been integrated in the terrace landscapes to clean water before it is discharged. Pedestal paver systems at the terraces will drain to the landscape filtration areas.

These guidelines are therefore met.

A5 Enhance, Embellish and Identify Areas. Enhance an area by reflecting the local character within the right-of-way. Embellish an area by integrating elements in new development that build on the area's character. Identify an area's special features or qualities by integrating them into new development.

A5-1. Consider South Waterfront's History and Special Qualities. Consider emphasizing and integrating aspects of South Waterfront's diverse history in new development proposals. When included in the development proposal, integrate works of art and/or water features with site and development designs.

Findings: The construction of Blocks 28 and 29 will complete two additional increments of the six block OHSU Commons that will ultimately link the South Waterfront with the river and development to the north. District standard street signage and lighting will continue the character of previous development. The architecture, materials and detailing of both blocks will build on the aesthetic developed for the aerial tram with metal and glass used in a clean, simple way with

attention to detail and craftsmanship. For the Guest Housing portion of Block 28, vertical folded metal panels of differing widths, depths and colors will reflect the industrial past of the adjacent shipyards.

The design of Block 28 and 29 responds to the special qualities of the South Waterfront by capturing views to the river, Caruthers Park and adjacent land forms from the interior spaces and terraces of the buildings. The history of the area is reinforced by the choice of exterior materials and colors and the articulation and expression of the exterior. On Block 29 the folded metal panels and extended fins of the window mullion system recall the steel framework and hulls of liberty ships that were dismantled on the adjacent waterfront. On Block 28 the shaped painted metal panels of the Guest Housing also recall the industrial, maritime history of the District.

This guideline is therefore met.

A7. Establish and Maintain a Sense of Urban Enclosure. Define public rights-of-way by creating and maintaining a sense of urban enclosure.

A8. Contribute to a Vibrant Streetscape. Integrate building setbacks with adjacent sidewalks to increase the space for potential public use. Develop visual and physical connections into buildings' active interior spaces from adjacent sidewalks. Use architectural elements such as atriums, grand entries and large ground-level windows to reveal important interior spaces and activities.

Findings: The design of both sites will continue to build on the scale and massing of typical Portland city blocks providing edges and definition to the right-of-ways. Active ground floor uses for both blocks on SW Caruthers and SW Bond, above the 50% requirement, will energize the streetscape and enhance the pedestrian experience. The main building lobby for Block 29 extends the entire length of SW Bond with continuous glazing linking the exterior with the interior. This will complete the important link from development to the south to the tram station. Exterior dining space at the corner of SW Moody and SW Curry will activate the street and provide views of the park. On Block 28, entrances into the Guest Housing, retail space at midblock, and the conference center will add life to the street. The parking garage elevator core at the southwest corner of Block 28 will provide additional activity and a visual connection to the park.

While aspects of the proposal mentioned above meet these guidelines, there are still critical areas that need further design and consideration.

Block 28-Parking Garage and Patient Housing's SW Whitaker Street frontage • and related street corner activation. As discussed above in Findings for A-1 Integrate the River, the NW and NE corners of Block 28 have stair tower entrances, and not more active use areas such as offices or retail that promote important visual connections to interior spaces from adjacent ground floor sidewalks. What compounds the issue for Block 28's SW Whitaker frontage are that these non-active use also count against required Standards for Ground Floor Windows [Modification Request #1] and Required Active Use Area [Modification Request #4] for this frontage, which is already compromised by the garage entrance to the above grade parking, and a 60-foot long bike storage area fronting the street which does not meet the standard either. Were the ground floor program for Block 28's frontage to be reconfigured to provide more active use area at the corners as discussed above in Design Guideline A1 above, and the bike storage area swapped with more active, and standard compliant, office or retail space, these guidelines would be better met and the two Modification

requests either significantly reduced or eliminated.

- <u>Block 29-Ambulatory Hospital's SW Curry Street required building line frontage</u>. While the applicant and PBOT agree the preferred frontage for vehicular drop-off is SW Curry Street, the current configuration of the ground level building walls appears to be a less than urban response by eroding its ground floor at the street corners to enhance vehicular sightlines and movement into the drop off area. Were the design to return to the originally proposed ground plane response at the July 30, 2015 Design Advice Request Hearing #2 [See Exhibit 110], a stronger urban enclosure and pedestrian emphasis would exist at both street corners along SW Curry Street, the Modification Request #7 to Required Building Line would be reduced, and a stronger ground floor storefront response to SW Caruthers Park would be provided.
- Block 29-Ambulatory Hospital's NW corner of SW Moody Avenue and SW • Whitaker Street activation. The applicant has stated that several electrical vaults are required to service the Ambulatory Hospital's electrical needs at the ground floor level of Block 29's NW corner. However, while the applicant has provided display window area along this electrical room's frontage, integrated with a prominent clear glazed storefront system and a minimum 3'-0" display window area depth to allow for more substantial display opportunities, Modification Request #8 to Ground Floor Active Floor Area remains, and is substantially shy at 36% of the required 50% active area frontage for SW Moody Avenue. This is a high visibility corner for the a major urban street in South Waterfront and as such should be active and much more than inactive display cases. Were the ground floor program for Block 29's frontage be reconfigured to provide more active use area at this corner, such as locating the electrical room further interior of the building and providing a more active, and standard compliant, office or retail space, these guidelines would be better met and the Modification request either significantly reduced or eliminated.

These guidelines are therefore <u>not yet</u> met.

A9. Strengthen Gateways. Develop and/or strengthen gateway locations.

Findings: This project will shape a new gateway from the south to the OHSU Commons. This has been accomplished by locating both the primary south building entrance to Block 29 and the parking garage elevator lobby for Block 28 at the corner of SW Curry and SW Bond. Both elements will have articulated glass facades providing views to the interior and added security for Caruthers Park and the adjacent sidewalks.

This guideline is therefore met.

B1. Reinforce and Enhance the Pedestrian System. Maintain a convenient access route for pedestrian travel where a public right-of-way exists or has existed. Develop and define the different zones of a sidewalk: building frontage zone, street furniture zone, movement zone, and the curb. Develop pedestrian access routes to supplement the public right-of-way system through superblocks or other large blocks.

Findings: The project will reinforce the primary pedestrian systems in both directions. In the north/south direction a more developed connection to the aerial tram will flow along the east side of the lobby of Block 29 reaching Caruthers Park and the existing development to the south. In the east/west direction another

increment of the connection to the river will be established on the north side of Block 28 by virtue of the SW Whitaker Street sidewalk improvements.

However, as cited above in Design Guidelines A7 Establish and Maintain a Sense of Urban Enclosure, and A8 Contribute to a Vibrant Streetscape, the following areas of concern remain:

- Block 28-Parking Garage and Patient Housing's SW Whitaker Street frontage;
- Block 29-Ambulatory Hospital's SW Curry Street Required Building Line frontage; and
- Block 29-Ambulatory Hospital's NW corner of SW Moody Avenue and SW Whitaker Street activation.

All these areas involve street frontages that do not meet Zoning Code Standards, triggering Modification Requests 1, 4, 7 and 8. All of these frontages offer sub-par mitigation either in the form of ground floor bike storage [along SW Whitaker Street for Block 28], display windows [along SW Moody Avenue for Block 29], or a recessed vehicular drop-off area [along SW Curry Street for Block 29].

While aspects of these frontages meet other design guidelines, their inherent function and operations are not uses that promote active human engagement at the street level that reinforce and enhance the pedestrian system as this guideline requires.

- Bike storage, while useful, is not typically associated with an "Active Use", such as retail spaces or building entrance lobbies, nor is it recognized by the Zoning Code as an active use. Were an active use area be programmed in this space, relocating the bike storage area more internal to the building, this guideline would be better met.
- Display windows, while they meet the Ground Floor Windows requirement of the Zoning Code, do not meet the Active Use requirement. This particular frontage also wraps the corner onto SW Whitaker Street with display windows, and why this NW corner of Block 29, along with the Modification Request 8, is highlighted as an area of concern. Were an active use area to be located at this corner of the block, this guideline would be met.
- Lastly, a high volume vehicular drop-off along SW Curry Street, a Central City Pedestrian District street, introduces two curb-cuts along this frontage. Multiple curb-cuts along one 200-foot long sidewalk corridor presents obstacles to pedestrian movement that could be otherwise mitigated. Options discussed could be to internalize the drop-off [utilizing existing curb-cuts for below grade parking for instance], or further reduce the vehicular frontage and presence by increasing the building's active storefront presence along SW Curry Street. This would also reduce the related Modification Request 7 to Required Building Lines.

With additional design development of the ground floor program of both Blocks 28 and 29 as described above, this guidelines could better met.

This guideline is therefore <u>not yet</u> met.

B1-1. Facilitate Transit Connections. Orient the main entrances of buildings at streets served by public transit to conveniently and directly connect pedestrians with transit services.

Findings: The sites have great connections to the streetcar line that runs on SW Moody and SW Bond providing convenient travel for patients, families and staff within downtown Portland. The design of the streetscape including paving patterns,

street trees, signage and furnishings will enhance connections between the streetcar stops and building entrances and other destinations in the South Waterfront.

This guideline is therefore met.

B2. Protect the Pedestrian. Protect the pedestrian environment from vehicular movement. Develop integrated identification, sign, and sidewalk-oriented night-lighting systems that offer safety, interest, and diversity to the pedestrian. Incorporate building equipment, mechanical exhaust routing systems, and/or service areas in a manner that does not detract from the pedestrian environment.

Findings: Pedestrian circulation at the street level will be clearly defined to protect pedestrians. On Block 28, access points to parking and loading will have paving that is differentiated to highlight areas of potential conflicts with vehicles. The same is true of the drop off for Block 29 where paving changes and bollards will inform drivers and protect pedestrians. South Waterfront standard street lighting and spill from interior active uses will illuminate sidewalks.

The intake and exhaust for the major mechanical systems of Block 29 have been located at the fifth floor and rooftop mechanical level to minimize fumes and noise that could affect pedestrians. The parking garage on Block 28 is naturally ventilated and is at least 16 feet above the sidewalk.

This guideline is therefore met.

B2-1. Incorporate Outdoor Lighting That Responds to Different Uses. Place and direct exterior lighting to ensure that the ground level of the building and associated outdoor spaces are well lit at night. Integrate exterior lighting so that it does not detract from the uses of adjacent areas. When appropriate, integrate specialty lighting within activity nodes at interfaces of accessways and the greenway.

Findings: Outdoor lighting will be used to highlight various pedestrian areas and functions on both Blocks while eliminating light pollution to the night sky. For CHH South on Block 29, the drop off will be illuminated with down lights from the wood ceiling and the travel lanes for vehicles will be defined by illuminated bollards at the sidewalk edge. Linear down lights will be included in the steel and glass canopies parallel to the building faces. This will provide additional light and security at the pedestrian zone. Additional down lights will also brighten the main entrances to the building and the recessed dining terrace. Lighting will emphasize building signage at the south façade and building entrances. South Waterfront standard streetlights will continue the district lighting theme around all four sides of both Blocks.

On Block 28 linear fixtures integrated in the storefront canopy design will illuminate the pedestrian zone and increase safety. These fixtures will highlight the entrance to the Guest Housing lobby and the parking garage elevator cores. Linear fixtures will also illuminate the loading dock face to provide greater visibility and safety.

This guideline is therefore met.

B4. Provide Stopping and Viewing Places. Provide safe, comfortable places where people can stop, view, socialize and rest. Ensure that these places do not conflict with other sidewalk uses.

Findings: The southwest corner of Block 29 will be recessed to provide a covered exterior area for dining and relaxation across from Caruthers Park. Additional tables

and chairs will be located on SW Bond adjacent to the south lobby entrance. There will be a public terrace at the southeast corner of the fifth floor that will provide views of the river and park.

Block 28 will have a large open terrace at the roof level of the parking garage for pediatric patients and adult patients with their families. For security reasons these spaces will be segregated and not available to the public. A covered viewpoint at the southwest corner of the podium will provide a viewpoint and quiet space for adult patients.

This guideline is therefore met.

B5. Make Plazas, Parks and Open Space Successful. Orient building elements such as main entries, lobbies, windows, and balconies to face public parks, plazas, and open spaces. Where provided, integrate water features and/or public art to enhance the public open space. Develop locally oriented pocket parks that incorporate amenities for nearby patrons.

Findings: The podium massing of Block 29 will provide definition, scale and interest to Caruthers Park. The tower was located to the north to allow a buffer for the park. The south elevation of the podium will incorporate enhanced materials and detailing to achieve an artful backdrop for the park while highlighting the drop off on SW Curry. Additionally, a 90-foot long outdoor employee balcony area, adjacent to the Staff lounge and kitchen, has been provided at the 3rd floor level. This added feature will provide visual interest to the building façade from the park, as well as activate the elevation at this 3rd floor level with hospital staff throughout the day, offering an unobstructed view of Caruthers Park and its various users.

While aspects of the proposal meet this guideline, a highly used vehicular drop-off along a Central City Pedestrian District street across from a major City Park, introduces a less than urban response by eroding its ground floor at the street corners to enhance vehicular sightlines and movement into the drop off area. Were the design to return to the originally proposed ground plane response at the July 30, 2015 Design Advice Request Hearing #2 [See Exhibit 110], a stronger urban enclosure and pedestrian emphasis would exist at both street corners along SW Curry Street, the Modification Request #7 to Required Building Line would be reduced, and a stronger ground floor storefront response to SW Caruthers Park would be provided.

This guideline is therefore <u>*not yet*</u> *met.*

B6. Develop Weather Protection. Develop integrated weather protection systems at the sidewalk-level of buildings to mitigate the effects of rain, wind, glare, shadow, reflection, and sunlight on the pedestrian environment.

Findings: Metal and glass awnings will be provided along the major pedestrian routes for both blocks. They will be a minimum of 6 feet deep and at an appropriate height to protect pedestrians.

This guideline is therefore met.

B7. Integrate Barrier-Free Design. Integrate access systems for all people with the building's overall design concept.

Findings: The ground floor elevations of both blocks have been carefully positioned

to minimize the need for stairs or ramps at the exterior of the buildings. In addition these floor elevations maximize the ceiling heights of the active ground floor uses and minimize the difference between floor elevations and the adjacent sidewalks. At the southwest corner of Block 29 the elevated dining terrace overlooking Caruthers Park will have two wide steps to transition from the sidewalk elevation to the terrace level. The accessible route to this area will be on the interior of the building.

This guideline is therefore met.

C1. Enhance View Opportunities. Orient windows, entrances, balconies and other building elements to surrounding points of interest and activity. Size and place new buildings to protect existing views and view corridors. Develop building façades that create visual connections to adjacent public spaces.

Findings: Interior program elements have been carefully located to take advantage of views to and from the site. On Block 29 the lobbies on the tower floors are located on the southeast corner of the building to take advantage of views to the park, the river and Mt. Hood. Terraces at the fifth floor will offer the public, patients and staff compelling views of the park and river between existing buildings. The sky bridge connection to CHH North will also provide views toward the river and the West Hills.

While aspects of the proposal mentioned above meet these guidelines, there is still a critical area that needs further design and consideration.

As discussed above in Findings for A-1 Integrate the River regarding Block 28-Parkig Garage and Patient Housing building, the use of stair tower columns that anchor the NW and NE corners of this building along SW Whitaker Street lessen the active use potential of these corners not only at the ground level of the building, but at every level above them, particularly the patient housing levels where views of the river to the east, and views of the west hills to west, could be enhanced with more active uses at these corners. Were the stair towers to be pulled away from the corners, 20-feet or more in either direction from the corner, more active uses such as elevator lobbies at the parking levels, and corner activating reception and lobby areas for the patient housing level, which would enhance visual access to the river and the west hills and better meet this guideline.

This guideline is therefore <u>not yet</u> met.

C2. Promote Quality and Permanence in Development. Use design principles and building materials that promote quality and permanence.

Findings: The exterior materials for both buildings will be high quality with durable finishes for long life and ease of maintenance. For Block 29 the primary exterior materials are high performance glass and crisp edged, shaped metal panels in shades of silver metallic. The mullions vary in depth and spacing on the exterior to highlight and articulate the composition of the massing. Shaped louvers at the mechanical level will add texture to the elevations continuing the vertical expression of the facades and screen all mechanical equipment, intakes and exhausts. The materials, massing and articulation will complement the design of CHH North while giving the building a crisp, light and airy appearance.

Block 28 will have a related palette with shaped metal panels in varying depths, widths and slightly different colors to highlight the massing of the Guest Housing. A smooth metal panel with a metallic finish similar to Block 29 will contrast the textured Guest Housing skin and emphasize adjacent vertical elements articulating

the massing. The parking garage will be wrapped with Z shaped 12" deep painted metal panels with their angled faces oriented toward Caruthers Park to eliminate views of the interior of the garage while keeping it open for natural ventilation.

The ground floors of both buildings will have painted steel and glass canopies to protect pedestrians and transition the scale of the buildings to the ground level. The sidewalks will be articulated with varying concrete finishes meeting city design standards. Street furniture will be of high quality materials and construction to allow for a long life span.

This guideline is therefore met.

C4. Complement the Context of Existing Buildings. Complement the context of existing buildings by using and adding to the local design vocabulary.
C4-1 Develop Complementary Structured Parking. Develop, orient and screen structured parking to complement adjacent buildings, reduce automobile pedestrian conflicts and support pedestrian movement.

Findings: The applicant has responded to the context of existing buildings by carefully shaping the massing of the buildings. On Block 29 the tower was placed in the middle of the block to allow room for views from CHH North. It was also held back from the south façade to provide a transition and buffer for Caruthers Park. The Guest Housing floors were located at the north face of Block 28 to provide the Mirabella with an appropriate buffer and to bring south light to the terrace level.

Locating access to parking on Block 28 from SW Whitaker and loading from SW River Parkway was a direct response to comments from area residents gathered at several open houses. Residents of the Mirabella were particularly concerned about access from SW Curry for either function due to their parking and loading access currently located on the same street.

Materials and colors for both buildings were chosen to work with the existing palette of CHH North and other buildings in the neighborhood while achieving architectural diversity in the expanding District. The metal and glass colors of Block 29 are clean and crisp, avoiding the dark spandrel panels of CHH North.

The parking garage on Block 28 has been elevated to maximize the amount of active ground floor uses on the block. The garage will serve multiple buildings and will include parking for Guest Housing patients and families, ambulatory and staff. The 200' by 220' block dimensions allowed a layout with four drive aisles incorporating one way loops up and in and down and out. The 54' long spans eliminate columns protruding into the parking stalls. These characteristics will create a garage that is intuitive and safe to use.

The perimeter of the garage will have upturned beams to 42 inches above the floor on the flat portions of the plates at the north and south facades. This will provide fall protection, the vehicle barrier and will block headlights from shining into adjacent buildings. On the east and west facades perimeter concrete curbs will provide the same advantages as the upturned beams. Lighting for the interior of the garage will be shielded to prevent hot spots when viewed from adjacent sites.

The skin of the garage has been crafted to respond to views from adjacent sites. A series of 12 inch deep Z shaped vertical metal fins with their angled legs perpendicular to important sight angles will block views of cars while allowing natural ventilation through the garage. The shape, length, spacing and color of the

fins allow the garage facades to be composed and articulated to compliment the architecture of the building.

However, there are also aspects of the parking garage structure and screening that do not meet these design guidelines.

While staff agrees the proposed design uses features and materials that compliment the building architecture, it is the overall scale and proportion of the 5-story tall, approximately 160-180 foot wide application of the metal fin screening feature that gives the garage structure a uniform and monolithic scale that is uncharacteristic, and does not compliment, the surrounding buildings in the district. While the program of these levels is vehicular parking, the response of the building skin should reflect the smaller scale and proportions of the surrounding building's context and scale: office or residential facades.

This can be accomplished in a variety of ways: wrapping the exterior of the building with programmed active uses such as additional residential units and/or offices; incorporating more traditional building exterior materials and forms into the exterior screening such as the solid colors of the patient housing above, windows and/or balconies; or a combination of both. With these additional design considerations incorporated, these design guidelines would be better met.

These guidelines are therefore <u>not yet</u> met.

C5. Design for Coherency. Integrate the different building and design elements including, but not limited to, construction materials, roofs, entrances, as well as window, door, sign, and lighting systems, to achieve a coherent composition.

Findings: Integrating the various functional elements of the Block 29 program was a challenge given the differing room size and desired layouts at the perimeter of the podium and tower floor plates. This was accommodated by varying the spacing of glass and metal panels on the exterior to accommodate a number of different functional requirements while articulating the vertically oriented skin in a compelling way.

On Block 28 the structural system had to accommodate two different room modules on the north and south sides to achieve the required room mix. The solution incorporates a window system with component parts that work with both modules. Operable windows are provided for each room. The use of shaped metal panels in varying widths, depths and slightly different colors ties the upper massing together and articulates the facades. The skin of the parking garage contrasts the Guest Housing by using a different Z shaped panel that provides natural ventilation and screens views form critical locations around the site. This is particularly important when viewing the building from Caruthers Park or the Mirabella. Horizontal and vertical "cuts" in the garage skin add interest to the composition. The garage façade is broken at the corners to reduce the scale and reintroduce the materials and articulation of the Guest Housing and ground floor program components.

However, as stated with Findings for C4 Compliment the Context of Existing Building and C4-1 Develop Complimentary Structured Parking above, the large scale composition of the 5-story tall by 160-180 foot wide vertical fin parking screening features does not yet appear adequately integrated with the first floor and upper story housing units design. Additional design consideration could include incorporating active uses such as additional residential units and/or offices along the exterior of the building, incorporating more traditional building exterior materials and forms into the exterior such as the solid colors of the patient housing above, windows and/or balconies, or some combination of both.

This guideline is therefore <u>not yet</u> met.

C6. Develop Transitions between Buildings and Public Spaces. Develop transitions between private development and public open space. Use site design features such as movement zones, landscape element, gathering places, and seating opportunities to develop transition areas where private development directly abuts a dedicated public open space.

Findings: The tower massing of Block 29 was held back from the south property line to provide a buffer for Caruthers Park. The south elevation of the podium level is articulated to highlight the pedestrian entrance at the southeast corner and the drop off at the middle of the block. The change of materials and enhanced detailing of the skin will form an appropriate backdrop and northern boundary for Caruthers Park.

On Block 28 the massing of the Guest Housing floors is placed at the north property line to provide appropriate space for the patient terrace and to achieve a visual buffer for residents of the Mirabella.

This guideline is therefore met.

C7. Design Corners that Build Active Intersections. Use design elements including, but not limited to, varying building heights, changes in façade plane, large windows, awnings, canopies, marquees, signs and pedestrian entrances to highlight building corners. Locate flexible sidewalk-level retail opportunities at building corners. Locate stairs, elevators, and other upper floor building access points toward the middle of the block.

Findings: The main building entrances for Block 29 are located at the northeast and southeast corners of the building creating a linear lobby connecting the tram and CHH North with Caruthers Park and the neighborhood to the south. These glassy facades will encourage visual connections between the sidewalk and interior spaces. At the southwest corner the ground floor is set back to create a slightly elevated dining terrace overlooking the park.

On Block 28 the primary parking garage elevator core and stair are located at the southwest corner to provide a convenient connection to the front door of CHH North. Pedestrian traffic to and from the garage will enliven the street and provide easy access to the ground floor active uses that stretch along the building faces on SW Bond and SW Curry. A second garage core is located at the southeast corner to provide convenient connections to future OHSU development to the east. The Guest House lobby and core are placed at the northwest corner to allow easy access to CHH North and CHH South and to establish a street presence for the housing program.

However, while aspects of the proposal meet this design guideline, three corners along SW Whitaker Street do not yet meet this guideline. As already discussed above in Findings for A-8 Contribute to an Active Streetscape, the NW and NE corners of Block 28-Parking Garage and Patient Housing have stair tower entrances that are not considered active use areas like offices or retail space that promote visual connections to interior spaces from adjacent ground level sidewalks. What compounds the issue for Block 28's SW Whitaker frontage are that these noncompliance uses also count against minimum required standards for Ground Floor Windows [Modification Request #1] and Required Active Use Area [Modification Request #4] for this frontage, which is already compromised by the garage entrance to the above grade parking, and a 60-foot long bike storage area fronting the street which does not meet the standard either.

Similarly, the NW corner of Block 29-Ambulatory Hospital is reserved for display window area screening a large electrical room. While the display window depth of 3-feet provides flexibility for well programmed display uses, and the exterior cladding is integrated with an otherwise matching storefront system design, the static nature of this important corner is a missed opportunity. Additionally, this corner also requires Modification Request #8 to Ground Floor Active Floor Area, and is substantially shy at 36% of the required 50% active area frontage for SW Moody Avenue.

Were the ground floor program for these corners be reconfigured to provide more active use area, and the bike storage area and electrical room swapped with more active, and standard compliant, office or retail space, these guidelines would be better met and the three related Modification requests either significantly reduced or eliminated.

This guideline is therefore <u>*not yet*</u> *met.*

C8. Differentiate the Sidewalk-Level of Buildings. Differentiate the sidewalk-level of the building from the middle and top by using elements including, but not limited to, different exterior materials, awnings, signs, and large windows.

Findings: The sidewalk levels of both buildings will be enhanced by varying concrete finishes and scoring patterns. In addition, street trees and furniture will reduce the scale of the buildings and provide places for casual interaction. Painted steel and glass canopies will articulate the ground floor facades and provide weather protection for pedestrians.

This guideline is therefore met.

C9. Develop Flexible Sidewalk-Level Spaces. Develop flexible spaces at the sidewalk-level of buildings to accommodate a variety of active uses.

Findings: The southern ground level of Block 29 will include the main building entrance, drop off and a recessed dining terrace. The entrance connects to a linear lobby that spans the entire length of the east façade linking pedestrians to the south entrance of CHH North. These are all active ground floor uses that will provide vitality to the streets and neighborhood. Tall floor-to-floor heights will create inspiring spaces that are highly visible and easily accessible from the exterior. These spaces can accommodate change but are expected to remain part of the building infrastructure for many years.

On Block 28 building facilities support and office functions are part of the ground floor active uses at the perimeter of the building. These functions include a conference center on SW Curry and a future urgent care clinic on SW Bond. Additional open office spaces are located on SW River Parkway on both sides of the loading dock. Floor elevations have been set to allow entrances at a number of locations around the perimeter. Twelve foot ceiling heights will provide long term flexibility for these spaces. While aspects of the proposal meet this guideline, Block 29-Ambulatory Hospital's NW corner of SW Moody Avenue and SW Whitaker Street does not currently meet this guideline. As cited in the Findings above for A8 Contribute to a Vibrant Streetscape, while the applicant has provided display window area along this electrical room's frontage, integrated with the prominent clear glazed storefront system and a minimum 3'-0" display window area depth to allow for more substantial display opportunities, Modification Request #8 to Ground Floor Active Floor Area remains, and is substantially shy at 36% of the required 50% active area frontage for SW Moody Avenue. Were the ground floor program for Block 29's frontage be reconfigured to provide more active use area at this corner, such as locating the electrical room further interior of the building and providing a more active, and standard compliant, office or retail space, these guidelines would be better met and the Modification request either significantly reduced or eliminated.

This guideline is therefore <u>not yet</u> met.

C10. Integrate Encroachments. Size and place encroachments in the public right-ofway to visually and physically enhance the pedestrian environment. Locate permitted skybridges toward the middle of the block, and where they will be physically unobtrusive. Design skybridges to be visually level and transparent.

Findings: The primary encroachment for the project is the two level skybridge connecting the third and fourth floors of CHH South with CHH North. This is a critical element of the project connecting the surgery suites and recovery spaces in both buildings on level four. On level three, diagnostic imaging in CHH North will be linked to sterile processing, lab and lockers in CHH South. The bridge is located on the east building face to avoid the existing MRI's in CHH North and to link the vertical circulation systems of both buildings. Both levels of the bridge will have a glass dividing wall in the center separating sterile functions and patient transport on the west side from patient, family and staff circulation to the east. The lower five feet of this wall will be frosted glass to allow light to pass through but screen views of patients being transported to and from treatment. The upper portion of this wall will be clear glass to provide views through the bridge from the street. The structure of the bridge is designed as light as possible with the floors hung from girders at the roof level spanning the street between the buildings.

This guideline is therefore met.

C11. Integrate Roofs and Use Rooftops. Integrate roof function, shape, surface materials, and colors with the building's overall design concept. Size and place rooftop mechanical equipment, penthouses, other components, and related screening elements to enhance views of the Central City's skyline, as well as views from other buildings or vantage points. Develop rooftop terraces, gardens, and associated landscaped areas to be effective stormwater management tools.

Findings: The fifth floor of Block 29 will provide two rooftop exterior spaces. To the south a terrace accessible to the public will be located overlooking Caruthers Park. This space will include tables and chairs for interaction and a meandering path through the landscape for quiet contemplation. To the north, a terrace for staff will provide a secluded space for breaks and lunch.

On Block 28, the roof of the parking garage will offer a landscaped space for use by pediatric patients and their families and a separated exterior space for adult patients. A play area for children will be included within a rich, drought tolerant landscape. A garden trellis adjacent to the common floor of the Guest Housing will

provide shade and transition the scale of the building to the landscape. A viewpoint at the southwest corner of the terrace will provide a quiet space for adults overlooking the park.

This guideline is therefore met.

C12. Integrate Exterior Lighting. Integrate exterior lighting and its staging or structural components with the building's overall design concept. Use exterior lighting to highlight the building's architecture, being sensitive to its impacts on the skyline at night.

Findings: Exterior lighting is an important component in creating compelling pedestrian spaces and highlighting important architectural features. On Block 29 the drop off ceiling and canopy will include down lights to illuminate the drive lanes and sidewalk areas. Downlights will also be used at the recessed area at the southwest for exterior dining and the main entrance at the southeast corner. Signage elements will also be illuminated at the building entrances. The fifth floor terraces will have indirect landscape lighting to create a warm, inviting ambiance while protecting the night sky from light pollution. Linear fixtures will be integrated in the ground floor canopies to provide additional illumination to the pedestrian zone. Additional lighting at the existing garage ramp will minimize conflicts with pedestrians.

On Block 28, canopy lighting will also be included for sidewalk zones and to highlight building entrances for guest housing, urgent care and the conference center. Lighting at the parking garage entrance and loading dock will provide additional safety and security. Landscape lighting at the terrace level will allow pediatric patients and adults to enjoy the outdoor space at night. Fixtures will be selected to eliminate light pollution. Parking garage lighting will have shields to prevent hot spots when viewed from the surrounding neighborhood.

This guideline is therefore met.

C13. Integrate Signs. Integrate signs and their associated structural components with the building's overall design concept. Size, place, design, and light signs to not dominate the skyline. Signs should have only a minimal presence in the Portland skyline.

C13-1 Coordinate District Signs. Consider the development of a master sign program that integrates the sign system with the development's overall design.

Findings: Signage is integrated in the building and streetscape design of both Blocks. On Block 29 the primary sign identifying OHSU is part of the entrance canopy design on the south side of the building. Smaller signs identify the entrance and exit lanes of the drop off. The primary building entrances at the northeast and southeast corners of the building will include building identification for efficient way finding. An illuminated building sign with the OHSU logo will be placed at the southwest corner of the mechanical penthouse facing northbound Interstate 5 and SW Macadam. Parking access and egress will also be clearly identified at the ramp to the existing parking garage on SW Whitaker.

On Block 28 a sign identifying Guest Housing has been incorporated in the design of the storefront at the entrance to the lobby. Signage identifying the urgent care clinic and conference center will also be part of the storefront system. At the parking entrance from SW Whitaker the garage entrance and exit lane signs will be set back in a metal signage panel set back slightly from the face of the building. The signage for Blocks 28 and 29 will build on the best attributes of existing signage at CHH North. A master signage plan will be developed to guide the eventual build out of the six block OHSU Commons. The goal will be to safely guide visitors to and from the site while creating a distinct image for OHSU that compliments the character of the South Waterfront.

While signs less than 32 square feet are not subject to design review approval, there are signs shown on the buildings that exceed 32 square feet, and detailed drawings such as sections, attachment details, and lighting have not been provided to evaluate against this design guideline.

These guidelines are therefore <u>not yet</u> met.

[2] MODIFICATION REQUESTS (33.825)

33.825.040 Modifications That Will Better Meet Design Review Requirements:

The review body may consider modification of site-related development standards, including the sign standards of Chapters 32.32 and 32.34 of the Sign Code, as part of the design review process. These modifications are done as part of design review and are not required to go through the adjustment process. Adjustments to use-related development standards (such as floor area ratios, intensity of use, size of the use, number of units, or concentration of uses) are required to go through the adjustment process. Modifications that are denied through design review may be requested as an adjustment through the adjustment process. The review body will approve requested modifications if it finds that the applicant has shown that the following approval criteria are met:

- **A.** Better meets design guidelines. The resulting development will better meet the applicable design guidelines; and
- **B. Purpose of the standard.** On balance, the proposal will be consistent with the purpose of the standard for which a modification is requested.

Block 28, Patient housing and parking garage

 Modification request to <u>33.510.220 Ground Floor Windows</u> along SW Whitaker Street to reduce the required clear glazing into active area requirement of 50% linear frontage [110-feet] and 25% area [495 SF] to 10% for both requirements [22-feet & 198 SF]

33.510.220 Ground Floor Windows

A. Purpose. In the Central City plan district, blank walls on the ground level of buildings are limited in order to:

- Provide a pleasant, rich, and diverse pedestrian experience by connecting activities occurring within a structure to adjacent sidewalk areas;
- Encourage continuity of retail and service uses;
- Encourage surveillance opportunities by restricting fortress-like facades at street level; and
- Avoid a monotonous pedestrian environment.
- The plan district modifications to the base zone standards for ground floor windows are intended to promote ground floor windows in a larger number of situations than in the base zones and to provide additional flexibility in meeting the standard.

Findings: On Block 28, the SW Whitaker elevation provides 10% of its length and 10% of its area up to 9' in qualifying ground floor window frontage. Non qualifying additional ground floor glazing on this façade (stairs and bike storage) bring these totals to 58% of the length and 51% of the area. In planning the ground floor special attention was given to internal functions and glazing of the SW Bond and SW Curry facades due to their proximity to the streetcar and the Mirabella to the south. SW Bond has 72% of its length and 64% of its area to 9' in windows. SW Curry has 93% of its length and 83% of its area to 9' in glazing. SW River Parkway has 53% of its length in glazing and 47% of its area up to 9'.

A. Better meets design guidelines. The resulting development will better meet the applicable design guidelines.

Applicable Design Guidelines include: A8 Contribute to a Vibrant Streetscape and B1 Reinforce and Enhance the Pedestrian System. Placing active functions with additional glazing on SW Bond, SW Curry and SW River Parkway enlivens these

sidewalks and facades of Block 28. Additional glazing above that required by this standard and active uses on SW Bond, SW Curry and SW River Parkway will provide activity and interest for pedestrians. Safety and security will also be enhanced with more eyes on the street. Non qualifying glazing on SW Whitaker allows visual connections with active internal functions and helps to mitigate the deficiency on this street.

B. Purpose of the standard. On balance, the proposal will be consistent with the purpose of the standard for which a modification is requested.

The purpose of the standard is to provide transparency and add life to the ground floor facades. Although only a portion of the Whitaker ground floor elevation qualifies technically, were the additional glazing for the exit stairs and bike parking qualify, this façade would be within the requirements. In addition the other three facades on more important pedestrian streets have ground floor windows well above this requirement.

Staff agrees that the aggregate of window area above the required minimum across all facades is a positive aspect to the building's overall ground level experience at the street. And additional clear window area into non-compliant areas such as into the bike storage room and stair wells does provide some visual interest, as opposed to a solid wall for instance. However, the specific experience of the pedestrian along SW Whitaker Street does not take these other block frontages into consideration. SW Whitaker Street is also in alignment with a proposed accessway to the river, indicating that there is a desired focus for pedestrian use of this street. Ultimately though, the ground floor program for Block 28's frontage can be reconfigured to provide more active use area at the corners, and the bike storage area relocated and replaced with more active, and standard compliant, office or retail space. With these changes the guidelines would be better met, as would the intent of the purpose statement, and the Modification request either significantly reduced or eliminated.

Therefore, this Modification is <u>not yet</u> met.

Block 28, Patient housing and parking garage

- 2. Modification request to <u>33.510.225 Ground Floor Active Uses</u> along SW Curry Street to reduce the 25-foot minimum depth requirement for 50% of the frontage [110-feet] to 38% [84-feet].
- Modification request to <u>33.510.225 Ground Floor Active Uses</u> along SW River Parkway to reduce the 25-foot minimum depth requirement for 50% of the frontage [100-feet] to 42% [84-feet].

Note these findings are addressed concurrently.

33.510.225 Ground Floor Active Uses

A. Purpose. The ground floor active use standards are intended to reinforce the continuity of pedestrian-active ground-level building uses. The standards are also to help maintain a healthy urban district through the interrelationship of ground-floor building occupancy and street level accessible public uses and activities. Active uses include but are not limited to: lobbies, retail, residential, commercial, and office.

Findings: This request is to reduce the Ground Floor Active Use on SW Curry Street. The ground floor design of Block 28 qualifies as Active Ground Floor Uses for 74' of 220' on SW Curry Street. An active conference center as well as open office space combine to make up another 124' of active use but don't meet the qualification of 25' deep space required for active use. When combined together this

is a total of 198' of 220' of active use on SW Curry Street which would more than satisfy the requirement. As a whole the four frontages provide a total of 552 linear feet of non-qualifying active use in 840 feet of perimeter façade which equates to 67%.

A. Better meets design guidelines. The resulting development will better meet the applicable design guidelines.

SW Curry Street

The applicable Design Guidelines are A8 Contribute to a Vibrant Streetscape and C7 Design Corners that Build Active Intersections. The corner of SW Bond and SW Curry will be an active pedestrian space linking the ground floor lobby of Block 29 and the Lobby of the Patient and Guest Housing, Urgent Care and the Conference Center on Block 28. Combining all of these active uses together totals 342' of 420' of active use on these two streets.

SW River Parkway

This request is to reduce the Ground Floor Active Use on SW River Parkway. The ground floor design of Block 28 qualifies as Active Ground Floor Uses for 19' of 220' on SW River Parkway. Open office spaces along SW River Parkway combine to make up another 83' of active use but don't meet the qualification of 25' deep space required for active use. When combined together this is a total of 102' of 200' of active use on SW Curry Street which would satisfy the requirement. As a whole the four frontages provide a total of 552 linear feet of non-qualifying active use in 840 feet of perimeter façade which equates to 67%. Design Guideline A8 Contribute to a Vibrant Streetscape applies. SW River Parkway will be an active pedestrian space as shown by the adjacent active use space for 102' of the 200' frontage.

B. Purpose of the standard. On balance, the proposal will be consistent with the purpose of the standard for which a modification is requested. SW Curry Street

The purpose of this standard is to promote active uses at the ground level to create life and visual activity. 74' of 220' meet the requirement on SW Curry Street due to the parking garage lobby and the requirement that active use space be 25' deep. The additional open office space and conference center along SW Curry Street that is not 25' deep active use would otherwise provide 198' of 220' as active use street frontage.

SW River Parkway

The purpose of this standard is to promote active uses at the ground level to create life and visual activity. 19' of 200' meets the requirement on SW River Parkway due to the loading dock and the requirement that active use space be 25' deep. If we consider the additional open office space along SW River Parkway that is not 25' deep we have 102' of 200' as active use.

These Modifications are therefore met.

Block 28, Patient housing and parking garage

 Modification request to <u>33.510.267 Parking is the South Waterfront Subdistrict</u> [Ground floor Active Use required per 33.510.225] to reduce the 50% required [110feet] to 10% [22-feet] along SW Whitaker Street.

33.510.225 Ground Floor Active Uses

A. Purpose. The ground floor active use standards are intended to reinforce the continuity of pedestrian-active ground-level building uses. The standards are also to help maintain a healthy urban district through the interrelationship of ground-floor

building occupancy and street level accessible public uses and activities. Active uses include but are not limited to: lobbies, retail, residential, commercial, and office.

Findings: On SW Whitaker 34' of 220' meet the criteria due to the parking garage entrance, elevator cores and stairs, mechanical space and a very active bike storage with exterior access requirements. Open office space and a likely very active bike storage/parking combine to make up an addition 74 linear feet of non-qualifying active use space as it is not 25' or is not included in the list of active use spaces making the total 108' of 200' active use. As a whole the four frontages provide a total of 552 linear feet of non-qualifying active use in 840 feet of perimeter façade which equates to 67%. SW Whitaker is not a designated as an active use street but this requirement is triggered by a fact that we have a parking garage and the other three sides of the block, particularly SW Bond and SW Curry across from the Mirabella will benefit from the additional active ground floor uses. SW Whitaker is primarily an internal OHSU Commons street with existing access to loading and parking on Block 29.

A. Better meets design guidelines. The resulting development will better meet the applicable design guidelines.

Design Guidelines that apply include: C4 Compliment the Context of Existing Buildings and A8 Contribute to a Vibrant Streetscape. The building facades and functions across from the Mirabella on SW Curry Street are a sensitive issue with residents. Parking access has been located on SW Whitaker on the opposite side of the block to mitigate this issue. This reduced the opportunity for active ground floor uses on the SW Whitaker frontage. Loading has been located on SW River Parkway to reduce noise and congestion for adjacent neighbors. Putting additional nonqualifying active ground floor uses above the 50% requirement on SW Bond and SW Curry responds to the context of existing buildings. Additional non-qualifying active ground floor uses above the 50% requirement on SW Bond and SW Curry will enhance these important pedestrian streets.

B. Purpose of the standard. On balance, the proposal will be consistent with the purpose of the standard for which a modification is requested.

The standard is intended to promote active ground floor uses particularly when no tenants have been defined at the time of design review and construction. The OHSU program is very extensive and fills the ground floor plan. Emphasis has been given to enlivening pedestrian connections along SW Bond, SW Curry and SW River Parkway. SW Whitaker is primarily an internal OHSU Commons street and has more of the parking access and service functions than the other more public building faces. The additional active uses provided around the other ground floor facades and the added glazing on the Whitaker façade helps meet the intent of this standard. If the bike storage and shop were to qualify for active use the proposal could gain an additional 50' and would have 108' linear feet of active use and nearly meet the 50% or 110' standard for this block.

As discussed in Modification #1 above for Ground Floor Windows for SW Whitaker Street, the specific experience of the pedestrian along SW Whitaker Street does not take these other block frontages into consideration. SW Whitaker Street is also in alignment with a proposed accessway to the river as well, indicating that there is a desired focus for pedestrian use of this street, not a vehicular or utilitarian focused street as proposed. Ultimately though, the ground floor program for Block 28's frontage can be reconfigured to provide more active use area at the corners, and the bike storage area relocated and replaced with more active, and standard compliant, office or retail space. With these changes the guidelines would be better met, as would the intent of the purpose statement, and the Modification request either significantly reduced or eliminated.

This Modification is therefore <u>not yet</u> met.

Block 29, Center for Health and Healing South

5. Modification request to <u>33.266.310.F Loading Standards</u>, Forward Motion requirement to allow rear motion loading along SW Moody Avenue.

33.266.310 Loading Standards

A. Purpose. A minimum number of loading spaces are required to ensure adequate areas for loading for larger uses and developments. These regulations ensure that the appearance of loading areas will be consistent with that of parking areas. The regulations ensure that access to and from loading facilities will not have a negative effect on the traffic safety or other transportation functions of the abutting right-of-way.

Findings: This request is to waive the forward motion loading requirement for the ambulance bay on SW Moody. Through work with PBOT and BDS it was determined that the best location for an ambulance bay to serve Block 29 would be on SW Moody with back-in access and forward motion egress. Ambulance traffic at this ambulatory facility will be primarily for transporting patients in distress to the main OHSU campus. There will be very little inbound ambulance traffic to the site. SW Curry, across from the park, was not a good choice for an ambulance bay and SW Bond is an access restricted street and would conflict with the streetcar line. SW Whitaker is already congested with the existing loading dock and parking access for CHH North and was also seen as an inappropriate location. A drive through solution caused congestion on the egress street and took up a large area on the ground floor needed for patient services. Locating the ambulance bay on SW Moody with back-in for access and forward motion for egress will meet the intent of the standard and preserve the character of the other streets surrounding the site.

A. Better meets design guidelines. The resulting development will better meet the applicable design guidelines.

Design Guidelines that apply are: B1 Reinforce and Enhance the Pedestrian System and B2 Protect the Pedestrian. Allowing back-in access and forward motion egress to the ambulance bay will enhance the pedestrian system by minimizing the impact of ambulance traffic to and from the site. It will also preserve ground floor area for vital patient services and amenities. Locating the ambulance bay on SW Moody with back-in access and forward motion egress will protect pedestrians by keeping this function off of the other busy streets and sidewalks. The sidewalk will be clearly marked to minimize conflicts with pedestrians. Enunciators will also warn pedestrians of ambulance movement.

B. Purpose of the standard. On balance, the proposal will be consistent with the purpose of the standard for which a modification is requested.

The intent of this standard is to reduce conflicts with light rail and streetcar and to promote pedestrian safety. Working with PBOT and BDS it was determined that SW Moody was the best location for the ambulance bay due to the sensitivity of Caruthers Park, the streetcar alignment on SW Bond and the congestion that exists on SW Whitaker. The ambulance service at this location will be for transport of patients to the main the main OHSU campus. There will very little inbound ambulance traffic to CHH South. Head-in and head-out ambulance circulation took up an inordinate amount of the ground floor plan and put traffic on congested or sensitive streets. Back-in access and head-out egress for occasional ambulance

traffic to the site poses little conflict for streetcar or pedestrians and meets the intent of this standard.

This Modification is therefore met.

Block 29, Center for Health and Healing South

6. Modification request to <u>33.510.205</u>, <u>Map 510-3 Height</u> to increase the 75-foot height limit for the building podium to 85-feet.

33.510.205 Height

A. Purpose. The maximum building heights are intended to accomplish several purposes of the Central City Plan. These include protecting views, creating a stepdown of building heights to the Willamette River, limiting shadows on public open spaces, ensuring building height compatibility and step downs to historical districts, and limiting shadows from new development on residential neighborhoods in and at the edges of the Central City.

Findings: The site falls within the Central City Plan district. The height limit is 250' for Block 29 (33.510.205, Map 510-3) - with a height opportunity of 325' with a design modification (33.510.205.G, Map 510-16). The design of the buildings meets applicable height standards with two exceptions that modifications are being requested for.

First, the parapet of the podium level is below the 75' height limit as measured from the high point around the site. For safety reasons OHSU would like to have a 44" high glass guardrail to preserve views and prevent falls at the perimeter of the terraces. This would be set back from the face of the building by 10' in the general landscaped areas and move closer to the perimeter where public viewing areas are included. Portions of these glass guardrails would project above the 75' height limit. An adjustment is requested for the glass guardrails to exceed the 75' height limit. Because the glass guardrails will not block view corridors from neighboring sites or add to the visual mass of the building this meets the intent of the standard.

Second, at the public terrace on the southeast corner of the fifth floor overlooking Caruthers Park, a trellis is proposed to provide sun and rain protection. This light garden structure would exceed the 75' height limit, at approximately 85', and also requires a modification. The light structure of the trellis would not block views from surrounding sites or add visual mass to the building due to its open frame design. The trellis is 25' wide in the east/west direction and 50' long.

A. Better meets design guidelines. The resulting development will better meet the applicable design guidelines.

Design Guidelines that apply are: A1 Integrate the River, B4 Provide Stopping and Viewing Places, B5 Make Plazas, Parks and Open Spaces Successful, B6 Develop Weather Protection, and C11 Integrate Roofs and Use Rooftops. The public terrace on the fifth floor will provide a great interaction space and viewpoint overlooking the river and Caruthers Park. The glass guardrails and open structured trellis will enhance the use and enjoyment of this publically accessible space. The terraces will offer a variety of amenities for patients, families, staff and the public. The glass guardrails will provide safety and maximize views from all the terrace areas. The trellis will offer sun and rain protection making the publically accessible terrace on the fifth floor an inviting space to stop and enjoy inspiring views. The glass guardrail proposed will maximize views while providing appropriate fall protection. They will also provide weather protection in a windy environment. The trellis will

provide sun and rain protection for the public terrace at the fifth floor on Block 29. The glass guardrails at the perimeter of the landscaped terraces will provide wind protection for users. The trellis will offer sun and rain protection to the publically accessible terrace on the fifth floor overlooking the park. The south facing public terrace at the fifth floor will provide a dramatic open space overlooking Caruthers Park with views toward the river, Mt. Hood and the west hills. The proposed modifications help the project meet all of these guidelines.

B. Purpose of the standard. On balance, the proposal will be consistent with the purpose of the standard for which a modification is requested.

The intent of the standard is to limit height to preserve views of the river and west hills in the east/west direction. The open frame trellis is a modest addition at the SE corner of the building, and the glass guardrail being proposed will be transparent and meet the intent of this standard.

This Modification therefore merits approval.

Block 29, Center for Health and Healing South

7. Modification request to <u>33.510.215 Required Building Lines</u> along SW Curry Street to reduce the minimum 50% frontage requirement [98-feet] to 9% [19-feet].

33.510.215 Required Building Lines

A. Purpose. Required building lines are intended to enhance the urban quality of the Central City plan district.

Findings: Block 29 extends to the street lot line along 100% of Whitaker, 100% of SW Moody, 94% SW Bond and 28% along SW Curry due to the recessed drop off. A modification is requested for the SW Curry Street lot line. Locating an appropriate sheltered drop off for the Ambulatory Tower was a significant challenge due to the access restriction on SW Bond and the volume of existing traffic on SW Moody. SW Whitaker was also not a viable option due to the existing CHH North loading dock and access to the existing parking garage. For drop off, SW Whitaker would only work as a two way street to get the drop off on the passenger side for Block 29. Studies showed that traffic volumes would not allow two way traffic on SW Whitaker until SW Bond and SW River Parkway are extended to the north. This is not expected to happen for 10 to 15 years. With existing auto circulation patterns around the site a curb side drop off on Curry forced vehicles to loop around Caruthers Park to drop off and then loop around again to go to parking. This would adversely impact traffic in the neighborhood. The only viable option to serve this fragile patient population is a recessed drop off on SW Curry Street.

The design of the SW Curry street ground floor drop off incorporates a facetted entry façade that carves back below the building from the southwest corner of the building to the southeast corner. This design intends to invite pedestrians to walk along the glassy building walls next to the dining and lobby spaces as well as providing an outdoor, protected eating terrace. This also provides shelter and a direct link to the ground floor entrances. Providing a recessed walkway inboard of the drop off, from corner to corner, intends to draw pedestrians into the site and minimize conflicts with automobiles.

A. Better meets design guidelines. The resulting development will better meet the applicable design guidelines.

Design Guidelines that apply are: A7 Establish and Maintain a Sense of Urban Enclosure, A8 Contribute to a Vibrant Streetscape, B1 Reinforce and Enhance the

Pedestrian System, B2 Protect the Pedestrian, and B6 Develop Weather Protection. The proposal includes a tall one story recessed drop off for patients on SW Curry which pulls back the ground floor exterior wall. The upper floors of the podium meet the property line and define the southern face of the building and provide an edge and sense of enclosure for Caruthers Park and the adjacent streets. The ground floor recess will be defined by continuous clear glazing which will provide views to the activities and services on the ground floor. The proposal includes two options for the sidewalk space between the entrance and exit of the drop off. One is an art installation and the other is a landscape enhancement. Either solution will create visual interest along SW Curry. The sidewalk along SW Curry will be differentiated to mark the entrance and exit to the recessed drop off. In addition, the sidewalk will also continue behind the drop off zone next to the faceted building face to provide a second pedestrian path with no conflicts with vehicles. The path of vehicles crossing the sidewalk will be clearly delineated and the second pedestrian path behind the drop off will provide a second safe path for pedestrians. The primary reason for the drop off is to provide weather protection for fragile patients coming for treatment. The proposal allows vehicles to get off of the busy streets and safely deliver patients to the facility.

B. Purpose of the standard. On balance, the proposal will be consistent with the purpose of the standard for which a modification is requested.

The purpose of the standard is to provide urban enclosure, activity and definition to the street and city grid system. Although the ground level is pulled back to create a recess for the drop off, the height and scale of the podium face at the south property line will provide appropriate definition at the property line. Although the ground floor glazing is recessed it will allow views of activities and services within the building.

While some of the aspects of the proposal meet the criteria as cited above, the current configuration of the ground level building walls appears to enhance a less than urban response by eroding its ground floor at the street corners to enhance vehicular sightlines and movement into the drop off area, not necessarily for ease of pedestrian movement. Were the design to return to the originally proposed ground plane response from the July 30, 2015 Design Advice Request #2 [See Exhibit 110], a stronger urban enclosure and pedestrian emphasis would exist at both street corners along SW Curry Street, and a stronger ground floor storefront response to the urban pedestrian experience would be provided.

Therefore this modification is <u>not yet</u> met.

Block 29, Center for Health and Healing South

8. Modification request to <u>33.510.225 Ground Floor Active Uses</u> along SW Moody Avenue to reduce the 25-foot minimum depth requirement for 50% of the frontage [100-feet] to 36% [72-feet].

33.510.225 Ground Floor Active Uses

A. Purpose. The ground floor active use standards are intended to reinforce the continuity of pedestrian-active ground-level building uses. The standards are also to help maintain a healthy urban district through the interrelationship of ground-floor building occupancy and street level accessible public uses and activities. Active uses include but are not limited to: lobbies, retail, residential, commercial, and office.

Findings: This request is to reduce the Ground Floor Active Use on SW Moody. The ground floor design of Block 29 qualifies as Active Ground Floor Uses for 73' of 198'

on SW Moody. Exit stairs, an ambulance bay and a large electrical room that can be located nowhere else due to PGE vaults prevent the SW Moody façade from meeting the standard. Although not required, active uses are provided on 99' of 198' on SW Whitaker. SW Curry provides 195' of 198'. Taken together, all the building faces provide 413' of active use area over 768' of perimeter for a total of 54%. This additional area better meets this standard.

A. Better meets design guidelines. The resulting development will better meet the applicable design guidelines.

The following Design Guidelines apply: C4 Compliment the Context of Existing Buildings, A8 Contribute to a Vibrant Streetscape, and C7 Design Corners that Build Active Intersections. On SW Whitaker the project is providing 99' of additional ground floor use across from the main entrance to CHH North. This will benefit both sides of the street and create a lively corner enhancing pedestrian traffic between the buildings and through the neighborhood.

B. Purpose of the standard. On balance, the proposal will be consistent with the purpose of the standard for which a modification is requested.

The purpose of this standard is to promote active uses at the ground level to create life and visual activity. 73' of 198' meet the requirement on SW Moody due to exit stairs, the ambulance bay and the electrical service space at the corner of SW Moody and SW Whitaker. Although not required, additional active ground floor uses have been provided on SW Whitaker across from the south entrance to CHH North which will be an active pedestrian area between the buildings.

As discussed above in Modifications #1 and #4 for Ground Floor Windows and Active Use Area reductions for SW Whitaker Street, the specific experience of the pedestrian along SW Moody Avenue does not take these other block frontages into consideration. The applicant has stated that several electrical vaults are required to service the Ambulatory Hospital's electrical needs at the ground floor level of Block 29's NW corner. However, while the applicant has provided display window area along this electrical room's frontage, integrated with the prominent clear glazed storefront system and a minimum 3'-0" display window area depth to allow for more substantial display opportunities, this frontage is substantially shy at 36% of the required 50% active area frontage for SW Moody Avenue. Were the ground floor program for Block 29's frontage be reconfigured to provide more active use area at this corner, such as locating the electrical room further interior of the building and providing a more active, and standard compliant, office or retail space, these guidelines would be better met, the intent of the purpose statement fulfilled, and the Modification request either significantly reduced or eliminated.

This Modification is therefore <u>not yet</u> met.

Block 29, Center for Health and Healing South

 Modification request to <u>33.510.225 Ground Floor Active Uses</u> along SW Bond Avenue to reduce the 25-foot minimum depth requirement for 50% of the frontage [100-feet] to 42% [84-feet].

33.510.225 Ground Floor Active Uses

A. Purpose. The ground floor active use standards are intended to reinforce the continuity of pedestrian-active ground-level building uses. The standards are also to help maintain a healthy urban district through the interrelationship of ground-floor building occupancy and street level accessible public uses and activities. Active uses include but are not limited to: lobbies, retail, residential, commercial, and office.

Findings: This request is to reduce the Ground Floor Active Use for SW Bond. The ground floor design of Block 29 qualifies as Active Ground Floor Uses for 42' of 200' on SW Bond. The building features a linear lobby that is 18' deep along SW Bond that will link CHH North to the ground floor services and south entrance of CHH South. It is also an internal link to Caruthers Park. The space will be active and inviting and will provide amenities such as a coffee bar, seating and a retail pharmacy. Although not required, active uses are provided on 99' of 198' on SW Whitaker. SW Curry provides 195' of 198'. Taken together, all the building faces provide 413' of active use area over 768' of perimeter for a total of 54%.

A. Better meets design guidelines. The resulting development will better meet the applicable design guidelines.

Design Guidelines that apply are: A8 Contribute to a Vibrant Streetscape and C7 Design Corners that Build Active Intersections. The corner of SW Whitaker and SW Bond will be an active pedestrian space linking the ground floor lobbies of CHH North and CHH South. 99' of active ground floor use at this important intersection will better meet this guideline. Additional active ground floor uses at the corner of SW Whitaker and SW Bond adjacent to the south entrance to CHH North and the north entrance to CHH South will help achieve a vibrant crossroad for pedestrians.

B. Purpose of the standard. On balance, the proposal will be consistent with the purpose of the standard for which a modification is requested.

The purpose of this standard is to promote active uses at the ground level to create life and visual activity. Although the SW Bond elevation has the depth to meet the criteria on only 42' of the elevation the linear lobby connecting CHH North with the services and main entrance of CHH South will be a colorful and vibrant space. This will also serve as an important internal connection to Caruthers Park. Although not required, additional active ground floor uses have been provided on SW Whitaker across from the south entrance to CHH North which will be an active pedestrian area between the buildings.

This Modification is therefore met.

[3] ADJUSTMENT REQUESTS (33.805)

33.805.010 Purpose

The regulations of the zoning code are designed to implement the goals and policies of the Comprehensive Plan. These regulations apply city-wide, but because of the city's diversity, some sites are difficult to develop in compliance with the regulations. The adjustment review process provides a mechanism by which the regulations in the zoning code may be modified if the proposed development continues to meet the intended purpose of those regulations. Adjustments may also be used when strict application of the zoning code's regulations would preclude all use of a site. Adjustment reviews provide flexibility for unusual situations and allow for alternative ways to meet the purposes of the code, while allowing the zoning code to continue to provide certainty and rapid processing for land use applications.

33.805.040 Approval Criteria

The approval criteria for signs are stated in Title 32. All other adjustment requests will be approved if the review body finds that the applicant has shown that either approval criteria A. through F. or approval criteria G. through I., below, have been met.

The following adjustments are requested:

Block 28, Patient housing and parking garage

1. Adjustment request to <u>33.510.261</u>, <u>Map 510-9</u> Parking Access Restricted Streets to allow loading access along SW River Parkway.

Block 29, Center for Health and Healing South

2. Adjustment request to <u>33.266.310 Loading Standards</u> to waive the loading requirement for this building.

Adjustment Request #1, Block 28, Patient housing and parking garage:

1. Adjustment request to <u>33.510.261</u>, <u>Map 510-9</u> Parking Access Restricted Streets to allow loading access along SW River Parkway.

A. Granting the adjustment will equally or better meet the purpose of the regulation to be modified; and

Findings: Access to loading on Block 28 is currently allowed on SW Curry and SW Whitaker. During several open houses and testimony at two DAR's, local residents expressed their desire that no access to loading or parking be located on SW Curry. This was particularly true for residents of the Mirabella who have living units directly across the street. The concern was noise at all hours and lights during the night. Their other concern was for congestion. Access to parking and loading for their complex is located directly across the street on SW Curry. The delay of ambulance trips to and from their designated loading area was also a concern. Locating the combined loading dock on SW River Parkway will eliminate these concerns and residents have been vocal in their support of this idea. This approach will also internalize loading access to the six block OHSU Commons campus when it is completed in the future. This proposal better meets the intent of Parking Access Restricted Streets map.

This approval criterion is met.

B. If in a residential zone, the proposal will not significantly detract from the livability or appearance of the residential area, or if in a C, E, or I zone, the proposal will be consistent with the desired character of the area; and

Findings: Combining the loading dock for both blocks on SW River Parkway will keep this potentially noisy function away from neighboring residential areas. Residents of the Mirabella have clearly expressed a preference for this solution at numerous open houses.

This approval criterion is met.

C. If more than one adjustment is being requested, the cumulative effect of the adjustments results in a project which is still consistent with the overall purpose of the zone; and

Findings: This submission requests adjustments for allowing the Block 29 loading dock to be combined with the loading function on Block 28 and for loading to be allowed on SW River Parkway. The combination of the two adjustments will reduce truck traffic in the neighborhood and keep noise and activity away from adjacent residential development.

This approval criterion is met.

D. City-designated scenic resources and historic resources are preserved; and

Findings: There are no city-designated scenic or historic resources on this site.

This criterion does not apply.

E. Any impacts resulting from the adjustment are mitigated to the extent practical; and

Findings: The combined loading facility will have differentiated paving at the sidewalk to minimize conflicts with pedestrians as well as enunciators. Frosted glass doors will screen views of the docks when not in use

This criterion is met.

F. If in an environmental zone, the proposal has a few significant detrimental environmental impacts on the resource and resource values as is practicable;

Findings: This site is not within an environmental zone. This criterion does not apply.

Adjustment Request #2, Block 29, Center for Health and Healing South:

2. Adjustment request to <u>33.266.310 Loading Standards</u> to waive the loading requirement for this building.

33.266.310. Loading Standards

A. Purpose. A minimum number of loading spaces are required to ensure adequate areas for loading for larger uses and developments. These regulations ensure that the appearance of loading areas will be consistent with that of parking areas. The regulations ensure that access to and from loading facilities will not have a negative effect on the traffic safety or other transportation functions of the abutting right-of-way.

A. Granting the adjustment will equally or better meet the purpose of the

regulation to be modified; and

Findings: This proposal combines the required loading docks for both Block 28 and Block 29 in a single facility on Block 28 with service access from SW River Parkway. Materials will flow to and from Block 29 by way of a tunnel connection below SW Bond. For Block 29 service access is restricted on SW Bond. SW Curry, across from Caruthers Park, is an inappropriate location for loading. SW Moody and SW Whitaker are too congested to adequately accommodate loading. The centralization of loading for both buildings will provide operational efficiencies for OHSU and reduce congestion in the neighborhood. The location on SW River Parkway will place the loading dock within the OHSU Commons away from other neighborhood activities. At the central facility 2 bays will be provided for each building with the required depth, width and height. OHSU is on record from the prior DAR's stating that this centralized loading bay can also serve future developments, like the buildings to the N, NE and E of Block 28. Design Commission and Staff are very supportive for the trade-offs achieved between negative impacts of one large loading facility versus the more detrimental impacts of an individual loading area on each block that results in multiple curb cuts and multiple back-of-house areas.

This criterion is met.

B. If in a residential zone, the proposal will not significantly detract from the livability or appearance of the residential area, or if in an OS, C, E, or <u>I zone</u>, the proposal will be consistent with the classifications of the adjacent streets and the desired character of the area; and

Findings: Combining the loading bays for both blocks on SW River Parkway will keep this potentially noisy function away from neighboring residential areas. Residents of the Mirabella have clearly expressed a preference for this solution at numerous open houses. And again, OHSU has stated this central loading facility could accommodate future buildings' loading needs for the buildings to the N, NE and E of Block 28.

This criterion is met.

C. If more than one adjustment is being requested, the cumulative effect of the adjustments results in a project which is still consistent with the overall purpose of the zone; and

Findings: This submission requests adjustments for allowing the Block 29 loading dock to be combined with the loading function on block 28 and for loading to be allowed on SW River Parkway. The combination of the two adjustments will reduce truck traffic in the neighborhood and keep noise and activity away from adjacent residential development.

This criterion is met.

D. City-designated scenic resources and historic resources are preserved; and

Findings: There will be no negative impact on these resources.

This criterion is met.

E. Any impacts resulting from the adjustment are mitigated to the extent practical; and

Findings: This proposal reduces traffic and noise impacts in the neighborhood by combining the loading dock into one central location.

This criterion is met.

F. If in an environmental zone, the proposal has as few significant detrimental environmental impacts on the resource and resource values as is practicable; or

Findings: The project is not in an environmental zone.

This criterion does not apply.

DEVELOPMENT STANDARDS

Unless specifically required in the approval criteria listed above, this proposal does not have to meet the development standards in order to be approved during this review process. The plans submitted for a building or zoning permit must demonstrate that all development standards of Title 33 can be met, or have received an Adjustment or Modification via a land use review prior to the approval of a building or zoning permit. Staff Report & Recommendation for LU 15-234503 DZM, AD - CHH South, Patient Housing/Parking Garage, & Skybridge Page 37

CONCLUSIONS

The design review process exists to promote the conservation, enhancement, and continued vitality of areas of the City with special scenic, architectural, or cultural value. While there are many aspects of the proposal that meet or exceed the Design Guidelines and the Zoning Code standards, staff has identified four primary areas of concern [Issues 1-4], and one area in need of additional information [Issue 5].

The outstanding issues to be resolved are:

Block 28-Parking Garage and Patient Housing

Issue 1: SW Whitaker Street frontage and related street corners activation.

Design Guidelines and Modifications not yet met:

A1-Integrate the River

A7-Establish and Maintain a Sense of Enclosure

A8-Contribute to a Vibrant Streetscape

B1-Reinforce and Enhance the Pedestrian System

C1-Enhance View Opportunities

C7-Design Corners that Build Active Intersections

Modification Request 1 – Ground Floor Windows along SW Whitaker Street

Modification Request 4 – Ground Floor Active Use along SW Whitaker Street

Issue 2: Parking garage screening.

Design Guidelines not met:

C4-Complement the Context of Existing Buildings

C4-1-Develop Complementary Structured Parking

C5-Design for Coherency

Block 29-Ambulatory Hospital

Issue 3: SW Curry Street required building line frontage.

Design Guidelines and Modification not yet met:

A7-Establish and Maintain a Sense of Enclosure

A8-Contribute to a Vibrant Streetscape

B1-Reinforce and Enhance the Pedestrian System

B5-Make Plaza, Parks and Open Space Successful

Modification Request 7 - Required Building Lines along SW Curry Street

Issue 4: NW corner of SW Moody Avenue and SW Whitaker Street activation.

Design Guidelines and Modification not yet met:

A7-Establish and Maintain a Sense of Enclosure

A8-Contribute to a Vibrant Streetscape

B1-Reinforce and Enhance the Pedestrian System

C7-Design Corners that Build Active Intersections

C9-Develop Flexible Sidewalk Level Spaces

Modification Request 8 - Ground Floor Active Use along SW Moody Avenue

Issue 5: Signage details.

Design Guideline not yet met: C13-Integrate Signs.

With additional design development and changes to the proposal, Staff could recommend approval. However, at this time, Staff recommends denial.

Staff Report & Recommendation for LU 15-234503 DZM, AD - CHH South, Patient Housing/Parking Garage, & Skybridge Page 38

TENTATIVE STAFF RECOMMENDATION

(May be revised upon receipt of new information at any time to the Design Commission decision)

Staff is *recommending denial* of the <u>Design Review</u> and <u>Modifications</u> (1-Ground Floor Windows, 4-Ground Floor Active Use, 7-Required Building Line, & 8 –Ground Floor Active Use) at this time based on the unresolved items and necessary revisions and details stated in the conclusion section above.

Staff is *recommending approval* of the Eco-roof Bonus [PZC 33.510.210] Floor Area of 57, 374 sq.ft. per the Bureau of Environmental Services certification.

Staff is *recommending approval* of the following Modifications:

Block 28, Patient housing and parking garage

- <u>Modification request 2</u>: to <u>33.510.225 Ground Floor Active Uses</u> along SW Curry Street to reduce the 25-foot minimum depth requirement for 50% of the frontage [110-feet] to 38% [84-feet].
- <u>Modification request 3</u>: to <u>33.510.225 Ground Floor Active Uses</u> along SW River Parkway to reduce the 25-foot minimum depth requirement for 50% of the frontage [100-feet] to 42% [84-feet].

Block 29, Center for Health and Healing South

- <u>Modification request 5</u>: to <u>33.266.310.F Loading Standards</u>, Forward Motion requirement to allow rear motion loading along SW Moody Avenue.
- <u>Modification request 6</u>: to <u>33.510.205</u>, <u>Map 510-3 Height</u> to increase the 75-foot height limit for the building podium to 85-feet.
- <u>Modification request 9</u>: to <u>33.510.225 Ground Floor Active Uses</u> along SW Bond Avenue to reduce the 25-foot minimum depth requirement for 50% of the frontage [100-feet] to 42% [84-feet].

Staff is *recommending approval* of the following Adjustments:

Block 28, Patient housing and parking garage

• <u>Adjustment request 1</u>: to <u>33.510.261</u>, <u>Map 510-9</u> Parking Access Restricted Streets to allow loading access along SW River Parkway.

Block 29, Center for Health and Healing South

• <u>Adjustment request 2</u>: to <u>33.266.310 Loading Standards</u> to waive the loading requirement for this building.

Procedural Information. The application for this land use review was submitted on September 10, 2015, and was determined to be complete on **October 26, 2015**.

Zoning Code Section 33.700.080 states that Land Use Review applications are reviewed under the regulations in effect at the time the application was submitted, provided that the application is complete at the time of submittal, or complete within 180 days. Therefore this application was reviewed against the Zoning Code in effect on September 10, 2015.

ORS 227.178 states the City must issue a final decision on Land Use Review applications within 120-days of the application being deemed complete. The 120-day review period may be waived or extended at the request of the applicant. In this case,

the applicant waived the 120-day review period, as stated with Exhibit A.1. Unless further extended by the applicant, **the 120 days will expire on: September 9, 2016.**

Some of the information contained in this report was provided by the applicant. As required by Section 33.800.060 of the Portland Zoning Code, the burden of proof is on the applicant to show that the approval criteria are met. The Bureau of Development Services has independently reviewed the information submitted by the applicant and has included this information only where the Bureau of Development Services has determined the information satisfactorily demonstrates compliance with the applicable approval criteria. This report is the recommendation of the Bureau of Development Services with input from other City and public agencies.

This report is not a decision. The review body for this proposal is the Design Commission who will make the decision on this case. This report is a recommendation to the Design Commission by the Bureau of Development Services. The review body may adopt, modify, or reject this recommendation. The Design Commission will make a decision about this proposal at the hearing or will grant a continuance. Your comments to the Design Commission can be mailed, c/o the Design Commission, 1900 SW Fourth Ave., Suite 5000, Portland, OR 97201 or faxed to 503-823-5630.

You will receive mailed notice of the decision if you write a letter received before the hearing or testify at the hearing, or if you are the property owner or applicant. You may review the file on this case by appointment at our office at 1900 SW Fourth Ave., Suite 5000, Portland, OR 97201. Please call the file review line at 503-823-7617 to schedule an appointment.

Appeal of the decision. The decision of the Design Commission may be appealed to City Council, who will hold a public hearing. If you or anyone else appeals the decision of the Design Commission, City Council will hold an evidentiary hearing, one in which new evidence can be submitted to them. Upon submission of their application, the applicant for this land use review chose to waive the 120-day time frame in which the City must render a decision. This additional time allows for any appeal of this proposal to be held as an evidentiary hearing.

Who can appeal: You may appeal the decision only if you write a letter which is received before the close of the record for the hearing, if you testify at the hearing, or if you are the property owner/applicant. Appeals must be filed within 14 days of the decision. An appeal fee of \$5,000.00 will be charged (one-half of the application fee for this case).

Additional information on how to file and the deadline for filing an appeal will be included with the decision. Assistance in filing the appeal and information on fee waivers are available from the Bureau of Development Services in the Development Services Center, 1900 SW Fourth Ave., First Floor. Neighborhood associations recognized by the Office of Neighborhood Involvement may qualify for a waiver of the appeal fee provided that the association has standing to appeal. The appeal must contain the signature of the Chair person or other person_authorized by the association, confirming the vote to appeal was done in accordance with the organization's bylaws.

Neighborhood associations, who wish to qualify for a fee waiver, must complete the Type III Appeal Fee Waiver Request for Organizations Form and submit it prior to the appeal deadline. The Type III Appeal Fee Waiver Request for Organizations Form contains instructions on how to apply for a fee waiver, including the required vote to appeal.

Recording the final decision.

If this Land Use Review is approved the final decision must be recorded with the Multnomah County Recorder. A few days prior to the last day to appeal, the City will mail instructions to the applicant for recording the documents associated with their final land use decision.

• A building or zoning permit will be issued only after the final decision is recorded.

The applicant, builder, or a representative may record the final decision as follows:

- By Mail: Send the two recording sheets (sent in separate mailing) and the final Land Use Review decision with a check made payable to the Multnomah County Recorder to: Multnomah County Recorder, P.O. Box 5007, Portland OR 97208. The recording fee is identified on the recording sheet. Please include a self-addressed, stamped envelope.
- In Person: Bring the two recording sheets (sent in separate mailing) and the final Land Use Review decision with a check made payable to the Multnomah County Recorder to the County Recorder's office located at 501 SE Hawthorne Boulevard, #158, Portland OR 97214. The recording fee is identified on the recording sheet.

For further information on recording, please call the County Recorder at 503-988-3034 For further information on your recording documents please call the Bureau of Development Services Land Use Services Division at 503-823-0625.

Expiration of this approval. An approval expires three years from the date the final decision is rendered unless a building permit has been issued, or the approved activity has begun.

Where a site has received approval for multiple developments, and a building permit is not issued for all of the approved development within three years of the date of the final decision, a new land use review will be required before a permit will be issued for the remaining development, subject to the Zoning Code in effect at that time.

Zone Change and Comprehensive Plan Map Amendment approvals do not expire.

Applying for your permits. A building permit, occupancy permit, or development permit must be obtained before carrying out this project. At the time they apply for a permit, permittees must demonstrate compliance with:

- All conditions imposed here.
- All applicable development standards, unless specifically exempted as part of this land use review.
- All requirements of the building code.
- All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions and regulations of the city.

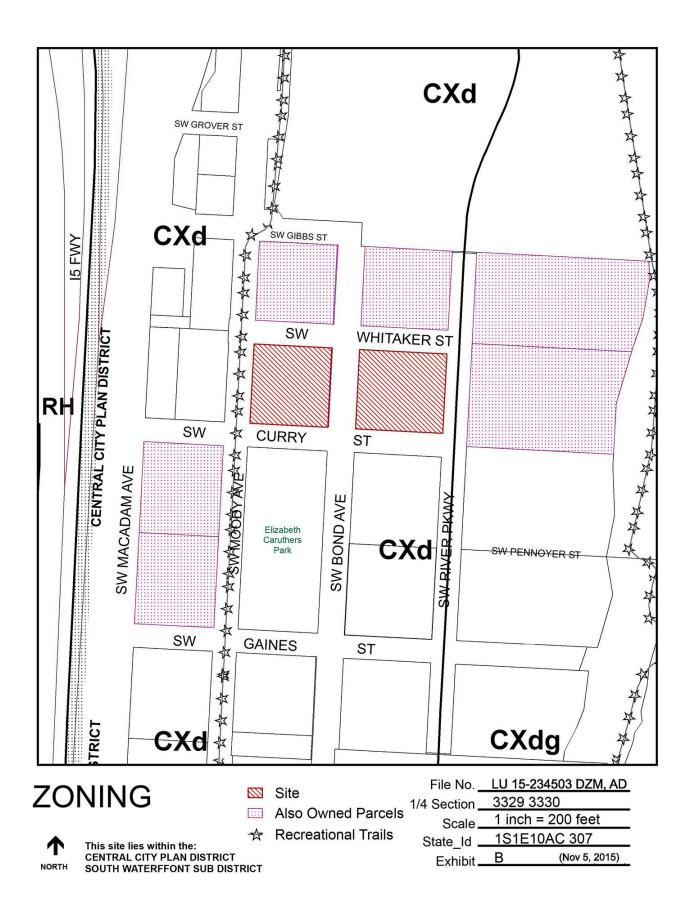
The Bureau of Development Services is committed to providing equal access to information and hearings. Please notify us no less than five business days prior to the event if you need special accommodations. Call 503-823-7300 (TTY 503-823-6868).

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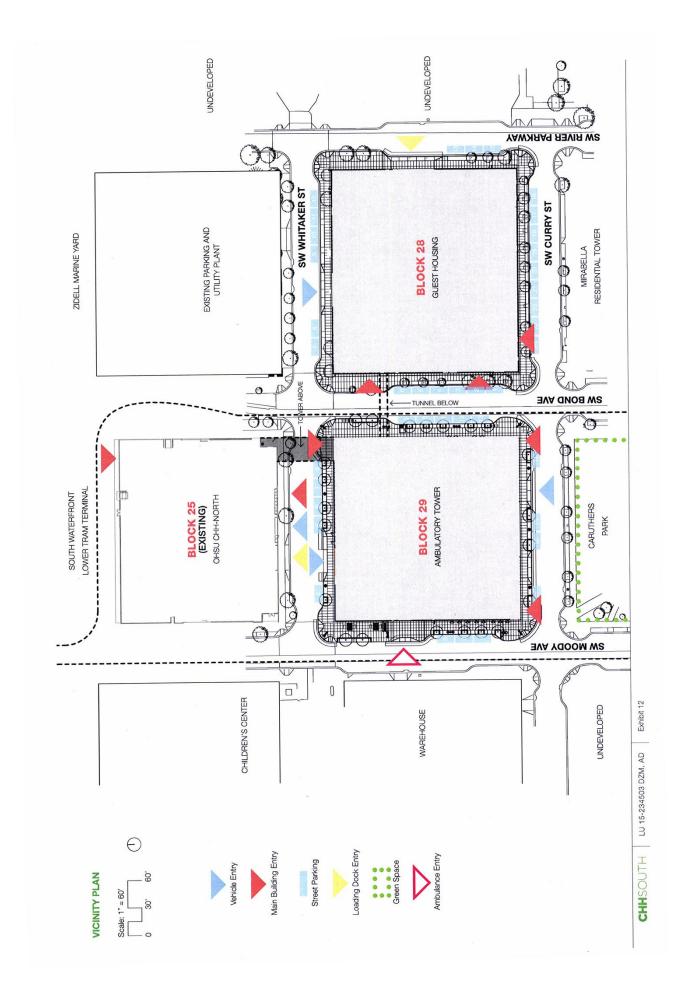
Tim Heron December 15, 2015

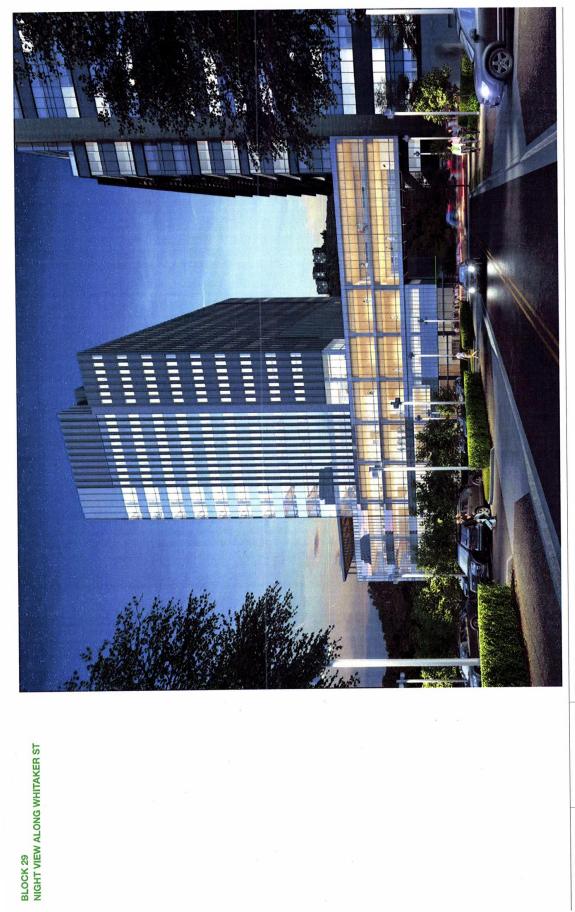
EXHIBITS – NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement & Drawings
 - 1. September 22, 2015 120-day waiver signed
 - 2. October 13, 2015 Revised Submittal Narrative and Drawings [Partially complete]
 - 3. October 23, 2015 Response to Floor Area Calculations and Transfer [Complete]
 - 4. November 30, 2015 Final submittal for January 7, 2015 Hearing
- B. Zoning Map (attached)
- C. Plan & Drawings
 - 1. 300. Site Plan, Elevations, Sections, Renderings (some attached)
- D. Notification information:
 - 1. Request for response
 - 2. Posting letter sent to applicant
 - 3. Notice to be posted
 - 4. Applicant's statement certifying posting
 - 5. Mailed notice
 - 6. Mailing list
- E. Agency Responses:
 - 1. Bureau of Environmental Services
 - a. RFC Response
 - b. RFR Response
 - c. December 1, 2015 Ecoroof Certification Letter
 - 2. Bureau of Transportation Engineering and Development Review
 - a. RFC Response
 - b. RFR Response
 - 3. Water Bureau
 - 4. Life Safety
 - 5. Fire Bureau
 - 6. Site Development Review Section of BDS
- F. Letters [none received]
- G. Other
 - 1. Original LUR Application
 - 2. October 10, 2015 Incomplete Letter
 - 3. October 22, 2015 Still-Incomplete Letter and Issues to Consider
- H. Design Commission January 7, 2016 Hearing

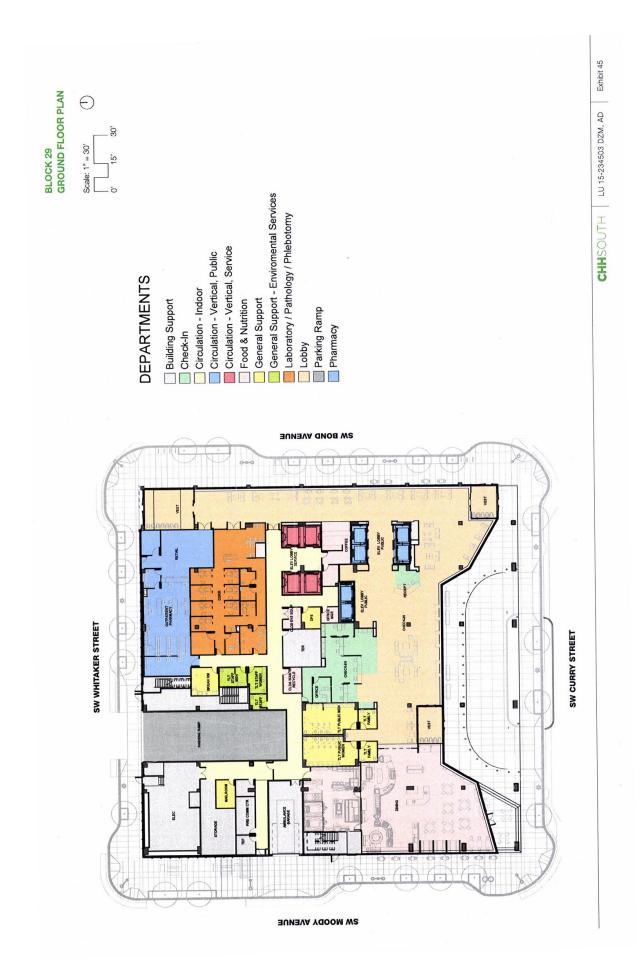






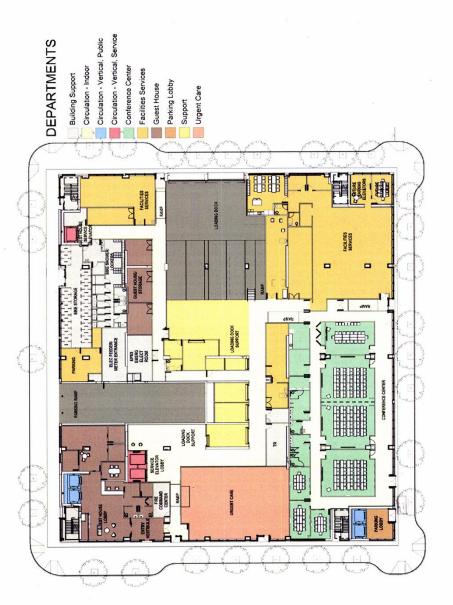


CHHSOUTH LU 15-234503 DZM, AD Exhibit 44









CHHSOUTH LU 15-234503 DZM, AD Exhibit 172

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