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**MAP REFINEMENT PROJECT
2017-10-24 TESTIMONY**

I. GENERAL INFORMATION

OWNER

YOSHIDA REAL ESTATE HOLDINGS XVIII LLC

ARCHITECT

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LOCATION

836 and 904 SW GIBBS ST
PORTLAND, OR 97239
17,300 SF [BY TITLE]

State ID

1S1E09AC 7600 + 7700 + 7500

Property ID

R327749 + R327729 + R247266

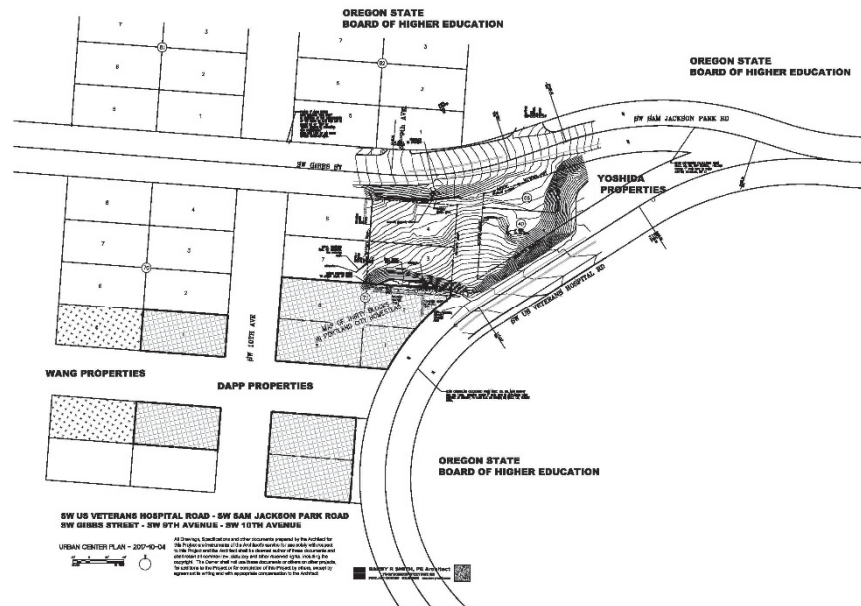
NEIGHBORHOOD

HOMESTEAD

REVIEW

Urban Center Designation CM2
Zoning Map Consolidation

- **PROPOSAL** The proposal is to map the neighborhood adjacent to **33.555 Marquam Hill District Plan [HILL]** with a **16. Mixed Use – Urban Center [CENTER]** designation. This allows greater flexibility to capture density incentives on these odd shaped, steeply sloping sites. Since adoption of the **2035 Comprehensive Plan [2035]** the demand in for housing and retail sales and services in this neighborhood has grown exponentially. Tools and flexibility that comes with the designation provides better public safety.
- **SITE AND VICINITY** The site is transition from the Oregon Health & Sciences campus along SW US Veterans Hospital Road to the north and east to the private residential area to the west on SW Gibbs Street.



SITES CURRENTLY UNDER CONSIDERATION BY BRSRA

II. QUESTIONS FOR PLANNING AND SUSTAINABILITY COMMISSION

1. Please cite any required street dedication requirements and include the sidewalk corridor configuration/street section to be followed.
2. Please cite Transit Street or Pedestrian District improvement requirements.
3. Please provide timing of the zoning conversion to 2035
4. Please cite submission requirements for proposed zoning map reconsideration
5. Please hold record open for 14 days.

III. APPLICABLE CRITERIA

Goal

Goal 10.A Land use designations and zoning.

Effectively and efficiently carry out the goals and policies of the Comprehensive Plan through the land use designations, Zoning Map and the Zoning Code.

The Comprehensive Plan Map is one of the Comprehensive Plan's implementation tools. The map includes land use designations which are used to carry out the Comprehensive Plan. The land use designation that best implements the goals and policies of the Plan is applied to each area of the city. This section contains general descriptions of the land use designations.

FINDING: 2035 defines in specific detail development requirements and proposes Code amendments to implement its goals. New data is available from that used in the 2035 data base. With new data, the **Map Refinement Project [PROJECT]** can more effectively and efficiently carry out the 2035 goals and policies [GOAL].

The PROJECT draft for the neighborhood adjacent to the HILL does not have the tools necessary to meet the GOAL. The type of Pattern Area, its general use and growth intensity, its level of public services and levels of constraint warrant greater flexibility.

Each description includes:

Type of Place or Pattern Area for which the designation is intended.

FINDING: The neighborhood adjacent to the HILL includes Open Space, Single Family, Multi Dwelling and Mixed Uses. The Pattern Area is pedestrian dependent. Unimproved pedestrian areas prevent the Pattern Area from fulfilling sustainable GOALS.

On street and off street parking is saturated. The Pattern Area lacks affordable housing and depends on substandard neighborhood housing and remote housing dependent on Single Occupancy Vehicle Transportation [SOV] trips.

Since the collection of the 2035 data set, traffic congestion tipped from near capacity to overcapacity. The constrained street system that accesses the HILL is now stressed at its collection roads and feeder highways. Polluting emissions increase.

Since the collection of the 2035 data set, housing demand has increased faster than anticipated. Housing supply continually falls behind demand. Since the collection of the data set **33.245 Inclusionary Housing** is in effect and the first inclusionary housing projects have been approved.

The neighborhood lacks adequate sales and services to support the GOAL. Demand from the HILL is not being supported in the neighborhood requiring more SOV trips for sales and services. Tools included in the CENTER designation will help remedy this.

General Use and intensity expected within the area

FINDING: The HILL is dominated by education, health and sciences institutions. The combined campuses grew without adequate tools to meet the GOAL required by 2035. The general use and intensity of the HILL is constrained. The limited neighborhood resources are not adequately meeting demand.

Since the collection of the 2035 data set, employment intensity on the HILL has increased beyond projections. New foundations and institutes have been created. Neighborhood housing, sales and services are not meeting the GOAL.

Level of public services provided or planned

FINDING: The HILL mitigates deficiencies in meeting 2035 requirements by providing superior public services. It has high capacity transit, frequent service and infrastructure. With flexibility, the neighborhood has capacity to provide a broad range of commercial, public service and housing options.

Tools provided by the CENTER allow greater flexibility to meet the demand of the institutional employment uses. Tools encourage private improvements to meet the GOAL.

Level of Constraint

FINDING: The HILL is constrained by topography. The neighborhood is made of sensitive environmental areas, steep topography and has limited access. Dependency on SOV overwhelms public services in the constrained area.

A CENTER designation for the neighborhood's Open Space, Single Family, Multi Dwelling and Mixed Use zones provides additional flexibility and public protection necessary to meet the GOAL.

Policy 10.1 Land use designations

Apply a land use designation to all land and water within the City's Urban Services Boundary. Apply the designation that best advances the Comprehensive Plan goals and policies.

FINDING: The PROJECT draft does not correctly convert zoning map designations provided in the **Mixed Use Zones Project [MUZ]** and 2035. And due to increased HILL demand and neighborhood constraints, additional tools are needed to meet the GOAL.

Applying a CENTER designation to the neighborhood adjacent to the HILL provide additional tools to meet the GOAL. Given the HILLS constraints the tools allow a sustainable pedestrian district to absorb demand.

- 1. Open Space.** *This designation is intended for lands that serve a recreational, public open space or ecological function, or provide visual relief. Lands in this designated are primarily publicly owned but can be in private ownership. The corresponding zone is OS*

FINDING: The HILL and adjacent neighborhood are part of the Terwilliger Boulevard Parkway project. The open space network supports a high demand for recreation, visual relief and ecological preservation. It is easily accessed via the pedestrian network.

Constraints like topography, limited vehicular access, odd shaped streets and lots, environmental overlays, unimproved rights of way, traffic and lack of SOV parking prevent the Open Space from fulfilling the GOAL. Tools in the CENTER designation provide additional flexibility and protection to better fulfill the GOAL. The tools promote pedestrian oriented development required by the CENTER designation. Completing a sustainable pedestrian district linking to the Open Space meets the GOAL.

- 6. Single Dwelling – 5000.** *This designation is Portland's most common pattern of single-family development, particularly in the city's inner neighborhoods. It is intended for areas where urban public services, generally including complete local street networks and access to frequent transit, are available or planned. Areas within this designation generally have few or very minor development constraints. Single dwelling residential will be the primary use. The maximum density is generally 8.7 units per acre. The corresponding zone is R5.*

FINDING: Single dwelling sites in this designation in the neighborhood adjacent to the HILL act as transitions from Open Space and less dense designations with environmental overlays to Multi Dwelling designated sites. Demand from the HILL has resulted in non-conforming residential uses and single dwelling residential use is scarce. In the neighborhood single dwelling structures are used as:

Group Living Facility. *A structured or structures that contain sleeping areas and at least one set of cooking and sanitary facilities that is used as a residence for Group Living uses.*

The GOAL of **6. Single Dwelling – 5000** is not met. Tools in the CENTER designation help transition sites in this designation back to single dwelling residential uses. Accessory Dwelling Units [ADU] and two primary dwelling units on 5000 SF corner lots are encouraged. The CENTER Multi Dwelling and Mixed Use sites better capture density opportunities absorbing pressure from the HILL demand.

10. Multi Dwelling – 1,000. *This designation allows multi-dwelling development. The scale of development is intended to reflect the allowed densities while being compatible with nearby single dwelling residential. The designation is intended in areas near, in and along centers and corridors and transit station areas where urban public services, generally including complete local street networks and access to frequent transit are available or planned. Areas within this designation generally do not have development constraints. The maximum density is generally 43 units per acre but may be as much as 65 units per acre in some situations. The corresponding zone is R1.*

FINDING: The neighborhood adjacent to the HILL does not capture available dwelling capacity. Despite constraints the designation is at a CENTER where superior urban public services are provided.

In order to overcome constraints the CENTER designation tools have to be applied. Flexibility allows greater opportunities to capture available dwelling capacity. Private improvement of public spaces occurs when this happens.

2035 two dimension criteria is not flexible enough to meet the complex sites adjacent to the HILL. By luck of nineteenth century planning, many sites are in a traditional Portland grid pattern but on steeply sloping lots. Others intersect winding, hill climbing roads. The three dimensional tools in the CENTER designation allow Multi Dwelling projects to better meet the GOAL.

16. Mixed Uses – Urban Center. *This designation is intended for areas that are close to the Central City and within Town Centers where urban public services are available or planned. The designation allows a broad range of commercial and employment uses, public services and a wide range of housing options. Areas within this designation are generally mixed-use and very urban in character. Development will be pedestrian oriented with a strong emphasis on design and street level activity and will range from low to mid rise in scale. The range of zones and development's scale associated with the designation are intended to allow for more intense development in core areas of centers and corridors near transit stations while providing transitions to adjacent residential areas. The corresponding zones are CM1, CM2, CM3 and CE. The designation is generally accompanied by a design overlay zone.*

FINDING: The neighborhood adjacent to the HILL is close to Central City and is in an identified Town Center with superior public services. The HILL has a high demand for employment. The neighborhood has a wide range of housing options.

Constraints limit housing, sales and services. The CENTER designation provide tools for flexibility to better meet the GOAL. Without the designation, housing, sales and services are pushed to the margins of the boundary stressing already over capacity SOV dependent transportation.

As a CENTER sustainable pedestrian orientation is achievable. Without it the underperforming, unsafe pedestrian portions of the network will remain.

Commercial Parking in the CENTER needs to be encouraged. Since on street and off street parking capacity is saturated, short term commercial parking is needed in the CENTER to support sales and services. Using advanced technologies like hailing, shared vehicles, short term hire and autonomous driverless vehicles [ADV] vehicular transportation in reduced new parking areas can be provided. Off hour parking permits allow residential use of commercial parking areas. Advanced technologies allow more parking capacity in less amounts of space. Data suggests 85% of off hour parking is used by residents of privately improved frontages.

Under capacity parking is a bigger problem on the HILL than over capacity commercial parking. Data shows the general area of a parking space, including access aisles is 350 SF. Current

market rate studio apartments are as small as 367 SF. Data shows it is much more valuable to produce housing than parking. The CENTER still needs private transportation to connect the Central City. New technologies combined with flexible tools in the CENTER designation make that transportation meet the GOAL.

IV. POLICIES

V. REMARKS

1. In order to meet the GOAL, the CENTER designation for the neighborhood adjacent to the HILL, the Zoning Map and Zoning Code have to be amended. The PROJECT is an effective and efficient method to make these changes. Using separate Judicial and Quasi-judicial proceedings is inefficient and may not be effective any time soon.
2. The CENTER boundary provided with this testimony needs to be vetted and corresponding MAP amendments, including Design Overlay zones, applied as a part of the PROJECT.
3. Vacating existing rights of way should be prohibited.
4. Expedited subdivision and planned developments should be allowed.
5. 85% of privately developed on street parking should count towards any off street parking requirement of the subject case.
6. 85% of privately developed Open Space should count toward any Open Space and/or landscape requirement of the subject case.
7. Required dedicated right of way should count toward any FAR calculation of the subject case.
8. ADU's in the CENTER should be allowed to be 1,200 SF in habitable area.

END OF TESTIMONY