



Memorandum

To: Staci Monroe and Stacey Castleberry, BDS
Portland Design Commission

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Subject: Case File: LU 20-102914 DZM GW (formerly LU 19-225732 DZM GW)
Response to Portland Parks and Recreation and Urban Greenspaces Institute
Comments

Project No.: 019050.100

The following responses are provided to address Land Use Review Comments from the Design Commission, Portland Parks and Recreation testimony, and the Urban Greenspaces Institute letter by Mike Houck from the December 12 Design Review hearing. Design Commission comments regarding building design will be addressed under separate cover by the project architects, WDG and HLR.

Additionally, the project team met with Portland Parks and Recreation on January 7, 2020 to review greenway concerns and the revised plans that were in progress at the time. Portland Parks and Recreation followed up with a letter dated January 17, 2020 that summarizes and comments on the items that were discussed. This memorandum includes responses to that letter as well.

Design Commission Comments on the Greenway (December 12, 2019)

COMMENT: *Commission supported the concerns identified in the Staff Report. Refer to this document for when making project revisions.*

RESPONSE: This memorandum and the Greenway Narrative are intended to respond to the concerns identified in the Staff Report.

COMMENT: *Written testimony from Urban Greenspaces should be referred for future revisions as the Commission supported the concerns it identified.*

RESPONSE: This memorandum addresses comments from Urban Greenspaces. See below.

COMMENT: *Greenway design reads as a backyard to the eastern blocks. Should read as Portland's front yard inviting the public and be pedestrian friendly.*

RESPONSE: The Greenway design has been revised to remove private patios and connector walks within the Greenway to create more of a public pedestrian feel.

COMMENT: *Greenway belongs to the public & should not include elements for private use. The building footprint needs to be adjusted to allow the private elements to occur outside the setback.*

RESPONSE: The building footprints have been adjusted to the west.

COMMENT: *Private pathways are not supported within the greenway setback. Reducing and limiting to building egress could be considered, but would need to be studied to show that it is minimal and demonstrates that it meets the greenway guidelines.*

RESPONSE: All patios and associated collector walks have been removed from the Greenway setback.

COMMENT: *Proposal needs layered lush landscaping between the public (greenway) and private spaces (patio, pathway).*

RESPONSE: See Exhibits C.109-C.113 for greenway landscaping plans.

COMMENT: *Amount & location of lawn as proposed is a non-starter. Need to minimize lawn to small areas. Lawn was discouraged within and east of subarea 2.*

RESPONSE: All lawn area previously specified within the Greenway has been removed. All subareas within the Greenway, as currently designed, meet the planting requirements of Chapter 33.510.253. A proposed alternative design incorporating small areas of lawn, as requested by Portland Parks & Recreation, has been included for Design Commission review and discussion. See Exhibit C.117.

COMMENT: *Plaza space at Lowell reads as a private, but it should convey that it is public. Materials, shape, and connection to the greenway need to be redesigned. Connection to the greenway trail needs to be emphasized as a public pedestrian connection. Treatment could be similar to the interface of Abernethy at the greenway.*

RESPONSE: This space has been revised to be more similar to the Abernethy approach. A paved public pedestrian accessway connects to the bike path using similar materials to those proposed for Abernethy. The Block 44 building area is physically separated from the public pedestrian area via small wall and steps.

COMMENT: *Remove trees at terminus of Lowell so not to block view of the river to be consistent with the terminus of east-west accessways at the greenway.*

RESPONSE: See Exhibits C.109-C.113 for greenway landscaping plans.

COMMENT: *Shape of the [Abernethy] overlook should be studied to see if a more fluid shape would be more coherent given the more sinuous design of the bike & pedestrian paths and landscaping elements in the greenway.*

RESPONSE: This has been removed from the plans.

COMMENT: *Concrete pier could be a connection to the history of the past to meet guideline A5-1. Study if it can be retained and repurposed (also supported by Parks).*

RESPONSE: The applicant and its consultants have evaluated the existing concrete pier. See Appendix C for an evaluation of the feasibility of improving the pier to meet current building codes.

Portland Parks and Recreation Testimony (dated December 12, 2019)

COMMENT: *Not opposed to some lawn.*

RESPONSE: All lawn area previously specified within the Greenway has been removed. All subareas within the Greenway, as currently designed, meet the planting requirements of Chapter 33.510.253. A proposed alternative design incorporating small areas of lawn, as requested by Portland Parks & Recreation, has been included for Design Commission review and discussion. See Exhibit C.117.

COMMENT: *Need more time to work with applicant.*

RESPONSE: Coordination with Alamo Manhattan has included meetings, phone calls, and emails. Alamo Manhattan has received input and made adjustments accordingly.

COMMENT: *More substantial gesture at concrete pier needed to allow public to access it and get closer to the water.*

RESPONSE: This option has been studied. The concrete pier does not meet current building code requirements, especially related to seismic requirements. See Appendix C of the narrative. The pier is surrounded by liquefiable soils in all directions, preventing the ability to anchor the pier in a feasible fashion. However, the applicant has added an overlook to the project to address the concerns noted.

COMMENT: *Need to look at trail connection at south end to make sure it works well.*

RESPONSE: Agreed. Applicant has proposed a revised trail connection geometry where the new bike trail and pedestrian trail join to connect to the single trail on the adjacent property to the south. See C.131 through C.133 and Exhibit C.103. We would appreciate any input on the design based on Park Bureau experience along the existing greenway trail system.

COMMENT: *Ground improvement plans needed.*

RESPONSE: GeoDesign has provided a memo and exhibit on the preliminary ground improvement (buttress) design along the Greenway. See Appendix B of the narrative. The limits of the ground improvement are shown on the resubmitted Design Review and Greenway Review exhibits. See Sheets C.131 through C.133.

COMMENT: *More work with applicant on easements is needed.*

RESPONSE: Reference to easements for the Willamette Greenway trail as approved by LU 17-160442 LDS AD has been added.

COMMENT: *The approved subdivision requires public easements on SW Lane, SW Lowell, SW Abernathy, and the Greenway Tracks.*

RESPONSE: These easements approved by LU 17-160442 LDS AD will be finalized as a part of the platting process, which will occur before building permits are granted.

COMMENT: *Need to ensure consistency with fixtures and furniture in the greenway to the north.*

RESPONSE: The revised plans utilize the same Greenway pedestrian light, the same two (2) colors of pavers on malls, the same benches, the same pedestrian bridges, and same finishes on planters as used on Greenway to the north. See Exhibit C.106.

Urban Greenspaces Institute Letter by Mike Houck (dated December 12, 2019)

COMMENT: *We are concerned with the applicant's plan to "armor" the riverbank and recommend that soil bioengineering be required that would promote significant creation and enhancement of fish and wildlife habitat. The staff report raises serious concerns about lack of detail regarding habitat improvements, "While applicant mentions large woody debris to enhance fish habitat, none is shown on site plans....there is no description of materials to be used to stabilize the riverbanks" and how applicant "will enhance riparian habitat and native fish habitat in shallow water."*

RESPONSE: A more thorough response has been incorporated into the narrative, beginning on Page 13.

COMMENT: *There is also insufficient information regarding plantings above ordinary high water. We want to see substantial planting of native trees and shrubs and trees above ordinary high water, at least the density at South Waterfront.*

RESPONSE: The walking trail has been moved to the west to maintain a minimum clearance of 10' from the top of bank. The area between the walking trail and 3' above ordinary low water is 100% planted with native shrubs and ground cover. Woody debris, allowing for planting pockets, is intermixed with rip-rap to allow for native plant cover. The area above ordinary high water and the pedestrian trail has been densely planted with native shrubs (primarily 1 gallon, 12" o.c.) and groundcover. Native trees, at a ratio of 1 tree per 400 s.f., are grouped throughout subarea 2. See landscape plans.

COMMENT: *The applicant's landscaping plan does not provide for the density or diversity of habitat that would meet the requirement of "creating and enhancing habitat and encouraging a structurally diverse and ecologically valuable greenway."*

RESPONSE: The landscaping plans (Exhibits C.103-C.116) have been updated to address this comment. Additional description has been provided in the narrative.

COMMENT: *We disagree with the applicant's statement that replacing native plantings with lawn would not adversely affect habitat values. Applicant's proposal to offset the extensive use of lawn by heavier plantings between the greenway and residences flies in the face of the fact that residents will remove plantings they perceive obstructing their views as has occurred repeatedly throughout the river's South Reach, south of the project area.*

RESPONSE: All lawn area previously specified within the Greenway has been removed. All three (3) subareas within the Greenway, as currently designed, meet the planting requirements of Chapter 33.510.253 Greenway Overlay Zone in South Waterfront Subdistrict. See Exhibit C.117.

COMMENT: *The applicant's proposal to provide landscaping for less than 9,000 square feet when the standards require landscaping of 27,000 square feet in Subarea 2 is unacceptable. We agree with staff's response that this would "represent a significant loss of potential habitat for birds and other wildlife."*

RESPONSE: Current plans meet or exceed the subarea landscaping requirements. See Exhibit L.002.

COMMENT: *There is insufficient information to ascertain how the applicant will, "better ensure a clean and healthy river for fish, wildlife, and people" with regard to restoration and future condition of riparian and aquatic habitat.*

RESPONSE: The narrative response has been revised to provide additional information. See page 13.

COMMENT: *We disagree with staff's response to use of lawn as a "literal" response to "embrace the river as Portland's "front yard." There is no reason that use of native trees and shrubs might just as easily, and more appropriately "embracing" the Willamette River as the essential natural resource within the context of the proposed development.*

RESPONSE: All lawn within the Greenway has been removed and replaced with approved planting. See Sheets L.002 and L.003.

COMMENT: *Regarding stormwater management we urge the applicant to replicate the approach taken at South Waterfront with regard to the creation of large, lush bioswales between the development and greenway to provide for stormwater management and a buffer between development and the greenway. We agree with staff's observation that the applicant has not met the standard to "better provide for stormwater management."*

RESPONSE: The stormwater management plan and site design have been revised to include two swales for treatment instead of the filter strips. A conveyance channel will be provided between the bicycle and pedestrian paths to capture and convey water to the swales. See Exhibits C.132 and C.133 for location of these facilities and Appendix A to the narrative for a revised stormwater management plan.

COMMENT: *We concur with the Bureau of Environmental Services recommendations to remove the derelict pilings and other structures in the shallow water areas, laying the bank back to at least 5:1 slope that will allow for successful revegetation and planting with native trees and shrubs.*

RESPONSE: The narrative has been revised to more thoroughly respond to this comment. See page 15.

COMMENT: *With regard to landscaping requirements in Subareas 2 and 3 and the median between the trails, we agree with staff's statement that planting slightly over 9,000 square feet is not sufficient to meet the standard requirement of planting a minimum of 11,274 square feet.*

RESPONSE: The areas of subarea 2 and 3 (minus trails and connections) are proposed to be planted in excess of 80% and will meet the requirements of Chapter 33.510.253. See Exhibit C.115 for table of subarea planting.

COMMENT: *We adamantly oppose patios being situated in the greenway setback. We would oppose any non-greenway specific development within the 100-foot setback.*

RESPONSE: All patios and associated collector walks have been removed from the Greenway setback. (Reference River Blocks set sheets: C.01, C.50, & C.103)

COMMENT: *We strongly support stepping down building heights immediately adjacent to the greenway and feel there should be a buffer area of bioswales and plantings between the buildings and greenway so that buildings are not sited up against the greenway. We adamantly oppose patios being situated in the greenway setback. We would oppose any non-greenway specific development within the 100-foot setback.*

RESPONSE: See the Design Review submittal for responses to building heights. All private patios and associated collector walks have been removed from the Greenway setback. See Exhibits C.01, C.50, & C.103.

COMMENT: *One non-greenway related comment: The sidewalk bounding the western edge of the development is currently incredibly pedestrian unfriendly. We would hope that the development would result in improvements to the pedestrian environment adjacent to SW Bond Avenue.*

RESPONSE: SW Bond Avenue is proposed to have sidewalk improvements consistent with the subdivision approval. This will generally create a 13-foot wide sidewalk along the frontage improvement. These improvements are part of the separate Public Works package that will be approved as part of the Subdivision land use approval.

Additional PP&R Comments (dated January 17, 2020)

These comments were provided in response to the January 7 meeting between the applicant and PP&R.

COMMENT: Match the existing Greenway design. *Design materials, finishes, and fixtures should match those in the existing, built section of the Greenway to the north. This includes site furnishings, light poles and fixtures, handrails, seating, signage, paving, retaining wall treatment (caged gabions), plant materials, and other features.*

RESPONSE: Plan submitted utilizes the same Greenway Light, the same two (2) colors of pavers on malls, the same benches, the same pedestrian bridges, and same finishes on planters as used on Greenway to the north. See Exhibit C.106.

COMMENT: *Provide a small lawn area or two. The approved 2004 Greenway Development Plan (GDP) calls for two lawn areas in this two-block stretch of the mile-long Greenway. Lawns provide critical people habitat space and room for people to walk on a natural surface without damaging plants. The lawn should be where it is allowed by right, in subarea zone 3. We disagree with the Design Commission that it should be removed as lawn is an important design component of the larger Greenway (not just the one block to the north, the area between Lane St and Gaines St, but the full mile-long stretch from Spaghetti Factory to the Marquam Bridge). If lawn is not provided, people will trample other groundcovers and native plants, endangering the overall intent of the planting plan (habitat and people-use areas) and creating eyesores and maintenance problems. We respectfully request that the Design Commission honor and consider the 2004 GDP, the result of many years worth of community input and professional design work.*

RESPONSE: The 2010 South Waterfront Greenway Design Guidelines (GDG) incorporate and supersede the 2004 GDP. Per Chapter 33.851.B.2, conformance with Section IV of the GDG, which includes conformance with some components of the GDP, is optional and has not been selected by the applicant. In addition, BDS staff and the Design Commission have directed the applicant to remove the proposed lawn area from the Greenway design. Two (2) small lawn areas have been proposed for consideration during design review. These still allow 80% planting compliance for all three subareas. See Exhibit C.117.

COMMENT: *An overlook is still needed. Since the 2004 GDP called for three overlook areas on this property, and since Alamo Manhattan has removed the single previously proposed overlook at Abernethy Street due to flood plain zone issues, it is all that more urgent to provide a close to the water access area for the public. We recommend that Alamo Manhattan conduct a quick feasibility study of what it would take to either rehabilitate the existing concrete abutment just north of Lowell St, or to remove and replace it in kind so that an overlook area can be provided, also as envisioned in the 2004 GDP. Since it is not required by code, this type of improvement is likely eligible for public funding, either through Parks SDCs or other City-managed funds, so having a rough estimate of cost would be helpful to make that decision. We are checking on eligibility and potential funding sources. PP&R staff do not believe the elements described to restrict people from accessing this area are sufficient, and that the current design will create a public safety hazard. Staff also note that if nothing is done to stabilize the concrete structure now, it will likely eventually fall into the river, creating further public safety and ecological risk to the Willamette River. What is the plan to stabilize this maritime remnant in the next 10 years if it is not repaired or replaced in-kind? What would it's [sic] eventual deterioration over time do to the stability of the bank and upland development?*

RESPONSE: As noted above, the 2004 GDP has been incorporated into and superseded by the 2010 GDG, and conformance with Section IV of the GDG is optional and is not being pursued by the applicant.

The Applicant and its consultants have conducted significant study of the concrete pier. The Applicant has also received input from the City, as well as state and federal agencies. The applicant has determined that the pier is stable in its static state. However, the pier does not meet current building codes. The pier is surrounded by liquefiable soils, preventing the ability to anchor the pier in any feasible way. As a result, the pier cannot be feasibly upgraded to meet current codes, which prevents its use in this project. See Appendix C of the narrative. However, in response to the comment on the need for an overlook, the Applicant has added one on the north side of the site in its current submission.

Additionally, the applicant has placed fencing along the exterior greenway path (which is a significant distance from the pier), that will protect the public from falling off the pier.

COMMENT: *PP&R also supports and recommends enhanced planting in the plan, especially since Alamo Manhattan indicated they are trying to achieve just the Greenway code minimum. If only minimum planting is provided, this segment of the Greenway will look less attractive than the Greenway to the north. Therefore, PP&R supports additional trees, shrubs, and other riparian-appropriate plantings to supplement the current plan. These "above and beyond" plantings could be eligible for Parks SDC or other public funds.*

RESPONSE: The applicant is meeting Greenway code minimum where possible and is requesting Greenway Review for those standards that can't be met – specifically, for improvements that are not required by or identified by the Greenway code. The Greenway code minimum is intended to provide an attractive and consistent Greenway landscaping design, and by meeting those standards, the applicant will be providing an attractive Greenway area. All three subareas exceed minimum requirements per section 33.510.253E.5.f.

COMMENT: *PP&R supports and appreciates Alamo's revisions since the December 12 Design Commission Review hearing, including keeping development out of the 100 foot from top of bank setback (eliminating all paved paths, patios, and structures in this area), ecological enhancements to the bank below ordinary high water (including adding woody debris, also called for in the 2004 GDP), and design enhancements at the end of SW Abernethy Street.*

RESPONSE: Noted.

COMMENT: *PP&R supports the 10-foot wide ped path, and the 12-foot wide bike path to match the existing paths to the north.*

RESPONSE: The applicant has requested greenway review for a 10-foot pedestrian pathway.