

March 5, 2020

VIA EMAIL ([Staci.Monroe@portlandoregon.gov](mailto:Staci.Monroe@portlandoregon.gov)) ([Stacey.Castelberry@portlandoregon.gov](mailto:Stacey.Castelberry@portlandoregon.gov))

Portland Design Commission  
1900 SW 4th Ave.  
Portland, OR 97201

Re: Alamo Manhattan Blocks 41 and 44  
LU 20-102914 DZM AD GW  
PC #19-225732

Dear Commission Chair Livingston and Commission Members:

This firm represents Mmes. Mary Henry de Tessan and Yvonne Meekcoms, the owners of residential units within the Atwater and the Meriweather West, other South Waterfront high-rises. The Design Commission should deny this proposal for the reasons set forth below, as well as the numerous reasons identified in the staff report. Locating hulking, massive cube-shaped towers abutting the river is incompatible with the existing built context and violates a number of the applicable design guidelines. These defects are fundamental and require a complete re-examination of the tower design on Blocks 41 and 44.

As an introduction, the Design Commission should keep in mind that after two Design Advice reviews along with substantial feedback from staff and the Commission at a hearing in January, the Block 41 and 44 towers still fail to satisfy a great many more design guidelines than they meet. These failures, including responding to context, setback and tower design coherency and activation of the public realm, are significant. Electing to now proceed under the fairly similar 2017 standards without modifying the design in any measurable way suggests that this applicant is unwilling to take the bold steps needed to elevate the proposals to the level necessary to satisfy the standards. Instead, an emerging pattern of doing as little as possible suggests a hope that the Design Commission will tire of this review and elect to erode the high-quality design called for in the guidelines rather than mandating compliance as required for South Waterfront. We urge the Design Commission to consider the following critical flaws.

First, a number of the design guidelines call for development that recedes from the greenway. See Design Guideline A1-1. More specifically, D2 requires "Graduate building heights from the western boundary down to the water." Guideline A5 calls for enhancing and embellishing the

character of the area. The natural river shoreline - a character defining feature of the area – recedes in a westerly direction as it moves further to the south. As a result, applying uniform riverfront setbacks, the Blocks 41 and 45 development must similarly erode such that it steps back from the river to the same degree allowing the Atwater and the Meriweather buildings to extend further to the east.<sup>1</sup> The Top of Bank Setback Exhibit in the application at App 46 shows that comparable high-rise tower structures are setback between 120 to 164 feet. The Blocks 41 and 45 development appear to be set back less than 100 feet from the top of the bank. The result is to cramp and constrain the greenway compromising the character of the area.

Further, a guideline requiring that building heights graduate as buildings move toward the river, D2, is not satisfied with proposal that locates 250-foot tall buildings along the river and 74 foot tall buildings on Blocks 42 and 45 further to the west. Building heights are to step down toward the river. Therefore, in order to satisfy Guideline D2, the towers must be located inland on Blocks 42 and 45 with shorter buildings along the river.

Second, high-rise development within South Waterfront is not characterized by towers that extend the full length of the property in any direction. For example, in addition to enjoying a significant setback from the river, the Atwater tower recedes substantially back from SW River Parkway as well. The result of these narrow, more elegant, sculptural pencil-towers is that they protect views for other tower residents further to the north or inland. The same is true with the divided Meriweather East and West Towers. By contrast, the bulky, blockish designs for the Block 41 and 45 towers create high-rise walls extending the full width from SW River Pkwy to the river blocking views of the river for everyone to the north and northwest. This approach not only cuts off existing views, it is inconsistent with the light, airy and engaging design aesthetic that characterizes South Waterfront design.

In addition to limited tower massing, tower design in the South Waterfront is characterized by graceful, sculptural and sleek tower designs that engage the pedestrian directly below as well as when viewed from the east side of the river. In contrast, the Block 41 and 44 towers stand as heavy, monolithic cubes. As the Design Commission pointed out, the tower designs are overly similar and lack “a big idea and strong concept.” These towers are not interesting to look at either from the ground or from a distance. Simplifying the design with different corner treatments or materials remains woefully inadequate to acknowledge and support the high-quality, rich design aesthetic of South Waterfront. Again, the failure to take the initiative to engage and enhance the design of an area is a fundamental flaw that pervades this project.

Third, the design guidelines call for integration of “ecological concepts” into the development. Guideline A4-1. Notwithstanding the removal of the green roofs, staff concludes that this standard is met because the stormwater planters and artificial turf will provide “an ecological function.” Guideline A4-1 requires more than just some degree of green development. Rather,

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<sup>1</sup> Although the Osprey has smaller 100 – 116 ft setbacks from the river, these smaller setbacks that may have been appropriate for a six-story building are not instructive for a 250’ building.

the Guideline requires that the conservation component be “integral” to the design. The provision of stormwater planters, which would otherwise be required by BES in any event, is not only an insufficient ecological concept, it is not an “integral” part of the design.<sup>2</sup> This meager response to the environmental obligations is only further compromised by the significant encroachment of this buildings into the Greenway setback area.

Transitioning to the ground floor, numerous design standards call for activation of the public realm which, as staff notes, is impossible with the amount of ground-floor residential proposed. Guideline A1-2 requires locating active uses along the river and along public areas accessing the river. Residential development is proposed for the full-length of the river-frontage proposed for both buildings as well as a majority of the Abernethy Street pedestrian way creating essentially dead facades on the ground floor. This failure cannot be satisfied by simply “encouraging” more active uses. Active uses, such as libraries, grocery stores, community centers and day cares must be provided to engage and attract the public to engage with these buildings. Staff and Design Commission have raised this concern on at least three occasions and no meaningful response has been provided.

Similarly, Design Guidelines B4 and B5, as well as Greenway Design Standards 1-3, require the provision of safe and comfortable plazas and open spaces that are successful. On two occasions, the Design Commission and staff have instructed the applicant that the paseo, including the plaza, between the two buildings and the development within the Greenway, including the “overlook” at the end of Abernethy are not inviting and will not support public enjoyment of the river and yet the applicant remains unwilling or unable to make these changes required to satisfy these numerous guidelines.

Further, a number of other city bureaus have expressed substantial concerns about this project, particularly with regard to the stormwater solutions and bank-stabilization measures necessary to address flood hazard concerns. These defects are germane to this review because the Design Commission must determine that the Statewide Planning Goals are satisfied including Goal 5, requiring consideration of whether new development could adversely affect a water resource, Goals 6 and 7, requiring compliance with local, state and federal water quality and natural hazard standards, Goal 11, requiring adequate public services such as sewers and stormwater facilities, and Goal 12, requiring a determination of whether the existing facilities are adequate to serve this development and Goal 14, protection of the Willamette River Greenway, are satisfied. The City’s template findings in response to these goal requirements are insufficient to show that compliance, based on the impacts resulting from these specific development proposals, will be achieved.

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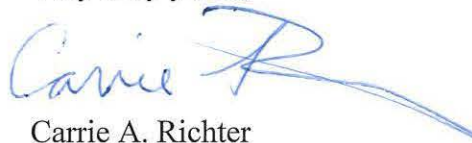
<sup>2</sup> The Bureau of Environmental Services finding that the proposal does not satisfy the minimum sanitary sewer and stormwater managements requirements further undermines any claims that this project will further any environmental objectives.

Finally, South Waterfront Greenway Review, ZC 33.851.300, requires development that will “better enhance the natural, scenic, historical, economic and recreational qualities of the greenway.” As staff notes, the provision of a pedestrian and multi-modal trail and restoration of the riverbank are the very minimum that the design guidelines require and entirely fail to exceed the standard requirements to better enhance the Greenway environment. Again, this failure to demonstrate how the proposed design will “better” provide the Greenway qualities identified requires denial.

In conclusion, this applicant has been working for over nine months on this development and yet, the proposal nevertheless fails satisfy the vast majority of the applicable design guidelines and Greenway Review standards. An applicant bears the burden of producing evidence necessary to establish compliance with the applicable approval standards. It is not incumbent on either the Design Commission or city staff to design this project, particularly where this applicant has so missed the mark. Designing from the dais is not only inconsistent with Zoning Code requirements, it is bad public policy. Designing projects for an applicant wastes limited public resources in terms staff time, disrespects the Commission’s volunteer commitment and disregards the good-faith effort of concerned neighbors to stay engaged in the process.

The evidence suggests that this applicant is not serious about developing context-appropriate, high-quality development that is sensitive to the special scenic and natural characteristics of the South Waterfront. The applicant standards are not met and as a result, I respectfully request that you deny this application.

Very truly yours,



Carrie A. Richter

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cc: Clients