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Portland Design Review Commission
% Staci Monroe
City of Portland Bureau of Development Services
1900 SW Fourth Avenue
Portland, Oregon

Regarding: Case File - LU 20-102914 DZM GW AD, Alamo Manhattan Blocks & Greenway

Dear Commissioners:

I will not be able to attend your March 5 Hearing on the Alamo Manhattan Blocks due to travel, but offer this letter as testimony. I concur with the many details raised in the staff report, but also continue to take issue with the east-west dimension of the towers.

As I have previously commented the east-west scale of the towers proposed for the riverfront blocks is too massive and out of context. Existing towers in the District, particularly at the riverfront blocks, tried to meet the 'point tower' examples used when the District was being developed. Permeability of views has been a major criteria in planning the South Waterfront District and a major concern of many studies and reports. While there has been some flexibility in interpretation, the towers proposed go way beyond, stretching from lot line to lot line in the east west direction - casting broad shadows and broadly blocking views from existing buildings as well as 'angled' viewpoints in the west hills. This is clearly not the intent of the studies and resulting guidelines established for the District.

The earlier advisory review noted on page 16 of that staff report that the proposal 'does not meet guidelines,' noting that it was important to set the edges of the towers back from the Greenway and River Parkway. Your most recent review seemed to accept the 'slab' towers. You were right initially.

Key guidance I reference are the 'fundamental' central city design guideline regarding enhancing views. From the South Waterfront plan, here are some key phrases:

- 'carefully designed to incorporate human-scale elements and **tremendous** river views'
- 'the **Willamette River** and Greenway are the focus of the district'
- 'provide physical and **visual** connections the the Willamette River from both the district and the adjoining neighborhoods''**limit building height to 50'** on the portion of the site that is within 50' of the centerline of **designated street corridors**'.

The current staff report notes criteria as "C1. **Enhance View opportunities. ... Size and place new buildings to protect existing view and view corridors...**" I take issue with the conclusion that this criteria has been met. Quoting the discussion from this staff report:

"While there is no maximum east-west tower dimension in the district, a lot of towers in the district do not extend the full length of the east-west block dimension and they are set back in varying depths from River Parkway. At the 8/29/19 DAR, the majority of the Commission recognized these setback of the towers to the north as providing a view corridor along River Parkway and supported a similar response on the towers of Blocks 41 and 44." Bravo!

Unfortunately the staff report continues... "At the 12/12/19 hearing, the applicant and staff presented information that several of the towers on the blocks to the north along River



Parkway actually come down to the ground and are not setback. Given this information the majority of the Commission accepted the tower locations.” I believe this is in error because none of the other river front blocks to the north extend the entire ‘buildable’ east west dimension of the lot — as does the proposal for Blocks 41 and 44. This conclusion is also in error because it ignores the current context, i.e. the sensitivity of views to the South from those existing towers.

This is not about density or the number of units. The width of the towers could increase somewhat under current guidelines (including the ‘inside’ of the ‘L’ tower on block 44) to allow the same square footage with a profile more consistent with context and guidelines above.

The picture above illustrates the importance of River Parkway as a view corridor. The towers as currently planned, without any setbacks from River Parkway, would block the river view of hundreds of south facing units in the Atwater, Meriwether, the John Ross and Ardea almost entirely, as well as a southerly view from other areas of the City. The ‘L’ shape of the most southern tower makes this worse.

The reapplication process, ‘cleaning’ the record and avoiding the eco-roof requirement, is also quite suspect. For the record, I have attached my earlier letters concerning this development.

Concluding, I ask the Commission to require the development team to resize the location and footprint of the towers to allow a setback from River Parkway and a more creative response to the Willamette Greenway. Thank you for the opportunity to comment.

Neil & Annette McFarlane

attachments:December 5, 2019 letter, August 28, 2019 letter

