

MEMORANDUM

DATE: August 13, 2014
TO: Karl Lisle and Kathryn Hartinger, Bureau of Planning and Sustainability
FROM: Kirstin Greene, AICP, Managing Principal, Facilitator
CC: Katherine Schultz and Karen Williams, West Quadrant Stakeholder Advisory Committee Co-Chairs
RE: Updated West Quadrant Plan Minority Reports

It has been an honor to work with you to facilitate the West Quadrant Stakeholder Advisory Committee (SAC) process. According to the SAC Charter, we strive for consensus in our recommendations and decision-making. Through a 16 meeting process, SAC members considered a great many shared and specific recommendations for the West Quadrant. Members participated honestly and fairly, commenting constructively and specifically throughout the process.

In light of the time allowed for such a complex and diverse quadrant, we were not able to reach consensus on all matters. In the case of the final recommendation of the draft West Quadrant Plan, we took votes according to levels of comfort or acceptance as described in the Charter:

1. One (green) indicates full support for the proposal as stated.
2. Two (yellow) indicates that the participant agrees with the proposal as stated, but would prefer to have it modified in some manner in order to give it unconditional support. Nevertheless, the member will fully support the consensus even if his/her suggested modifications are not supported by the rest of the group because the proposal, taken as a whole, is worthy of support, as written.
3. Three (red) indicates refusal to support the proposal as stated.

Final member votes are as follows:

- **One/green:** Doreen Binder, Hermann Colas, Jr, Jessica Engelmann, Jason Franklin, Patricia Gardner, Greg Goodman, Patrick Gortmaker, Cori Jacobs, Tamara Kennedy-Hill, Nolan Lienhart, Jeff Martens, John Petersen, Dan Petrusich, John Russell, Katherine Schultz, Mary Valeant, Karen Williams (17)
- **Two/yellow:** Brian Emerick, Sean Hubert, Keith Liden, Marvin Mitchell, Valeria Ramirez (5)
- **Three/red:** Jeanne Galick, Steve Pinger, Bob Sallinger (3)

The reasons members expressed concerns with the plan or voted not to support the plan are included in the final, meeting #16 summary. Members voting in the minority were encouraged to submit minority reports for consideration by the Planning and Sustainability Commission. Three reports were received by the extended date of noon, August 8, 2014. Several SAC members additionally expressed support for elements of these positions. I have summarized these communications here, and attached all comments received.

- I. **SAC Member Jeanne Galick Minority Report:** SAC member Jeanne Galick submitted the enclosed minority report addressing:
 - Building heights at the Morrison and Hawthorne bridgeheads
 - South Waterfront actions and reference to the North Macadam Plan
 - The Willamette Greenway and its treatment through the entire study area/Central City
 - Boulevard treatment of Naito Parkway through downtown
 - Support for Big Ideas including the Green Loop, redesign of Naito Parkway, Freeway capping, updating the historic inventory, creating a “times square” at Burnside,

quantifiable benchmarks for sustainability and environmental goals and creating development incentives for historic preservation and environmental restoration at the river and uplands

Ms. Galick also recommends adding a City Goal to *establish the next generation of parks and green spaces that will support a healthy, growing population and urban wildlife.*

- II. **SAC Members Galick and Sallinger Minority Report:** SAC members Jeanne Galick and Bob Sallinger remain disappointed in the draft plan, in particular from an environmental perspective. In particular, they find that the plan fails to set meaningful objectives, and does not adequately link existing adopted City Natural Resource Plans to the West Quadrant goals, targets and actions. They include specific recommendations for the following elements:
- Salmon recovery
 - Green infrastructure
 - Regulatory requirements for green roofs/green factor
 - Riverbank restoration
 - Climate change preparation
 - Tree canopy targets
 - Tom McCall Park River Access and Riverbank Restoration
 - Other design issues related to Tom McCall Waterfront Park
 - Low carbon development
 - Stakeholder process

Additional support: SAC member Steve Pinger wrote today to express his and NWDA's support for their positions, particularly with respect to air quality and low carbon development, including conservation of existing buildings. Mr. Pinger individually expressed support for Ms. Galick and Mr. Sallinger's recommendations for stakeholder engagement processes. His email is included in this document.

- III. **SAC Member Steve Pinger Minority Report:** Mr. Pinger's report, submitted by the Northwest District Association Planning Committee, of which he is a member focuses on building height. His report addresses context and background, excessive headroom associated with development capacity, urban form, public benefit, street environment and character, equity and affordability and a series of specific recommendations in the following areas.
- Height bonus policy
 - Floor to Area Ratio (FAR) transfer policy
 - Central City-wide goals
 - Providing alternative building height concepts

Mr. Pinger's report includes a series of annotated street level views of comparative building heights and street environments for staff and Planning and Sustainability Commission review.

Additional support: SAC members Jeanne Galick, Jim Gardner and Brian Emerick emailed statements of support. Ms. Galick indicated support in particular relating to height concerns for the West End, Old Town/Chinatown and Goose Hollow. Mr. Gardner emailed support for the minority report and its focus on height, in particular for the bridgehead areas. Mr. Emerick also emailed support for the full NWDA minority report with respect to building heights.

Thank you for your time on this important process, and your consideration of these thoughtful opinions. I can be reached at 503.278.3453 and kirstin.greene@coganowens.com if you would like to discuss any aspect of this memo.

Kirstin Greene

From: Kirstin Greene
Sent: Wednesday, August 13, 2014 10:02 AM
To: Kirstin Greene
Subject: FW: minority report for West Quad

From: Jeanne Galick [<mailto:galick@europa.com>]
Sent: Friday, August 01, 2014 1:02 PM
To: Lisle, Karl
Subject: minority report for West Quad

First, I want to join the rest of the committee in thanking staff for their hard work. It's a tremendous undertaking and staff has always exhibited courtesy and forbearance, encouraged thoughtful participation while shepherding the committee through the process. The co-chairs and moderator excelled on keeping discussions focused and inclusive. And it was a pleasure and an honor to work with such a dedicated group.

Meeting 16 should have been an easy, congratulatory last session. Instead the plan had changed so much that I could not in good conscience endorse it. Many things were lost in the reorganization. Or, if not lost, changed, diluted or very difficult to find. It was a very different document than the previous 15 meetings and one in which we should have had a chance to give input. And, in fact, 3 members did not endorse this iteration plan and a few others endorsed with reservations.

I will be joining Bob Sallinger of Portland Audubon Society in a minority report that addresses environmental and sustainability issues. Below is my minority report on other key issues.

BUILDING HEIGHTS - DOWNTOWN:

UD8: Increase allowed maximum building heights in the vicinity of the Morrison and Hawthorne bridgeheads (up to 325") / Map 1B, Building Heights

This 300% increase to allowable height overturns a primary, long-standing city policy of stepping building heights down to the river. The bedrock 1988 comp plan made lowering heights down to the river a fundamental downtown policy for economic success, public health and civic attraction. (*"Stepping development down to the Willamette River is a fundamental concept from the Downtown Plan. It assures a growing supply of new office space with views to the river and the mountains beyond. Preservation of these view opportunities significantly enhances the marketability of the downtown and other Central City locations as office sites along the proposed high density spine. The step down also produces a layered effect to the skyline which enhances the appearance of the city and its attractiveness to investment. The step down to the river also enhances the flow of air in the Willamette Valley which helps to disperse air pollution in the Central City."*)

There is no compelling reason for changing this policy. The stepping-down to the river policy has served our city extremely well. It assures an expansive openness along the Waterfront Park, unhindered by tall building shadows. It also opens up downtown – providing views into the city rather than a barrier. It keeps the adjacent properties along the waterfront at a human scale which will harmonize well with the larger idea of making Naito a pedestrian-friendly boulevard.

Redevelopment at the bridgeheads is *not* dependent on additional height. This was confirmed by Ron Paul who is trying to develop a permanent farmers market at the bridgehead.

Redevelopment at the bridgeheads is *not* dependent on additional height. This was confirmed by Ron Paul who is trying to develop a permanent farmers market at the bridgehead.

Allowing this massive increase in height sets an alarming precedent. How will it truly be confined to a limited area? Already, in this plan, there are countless arguments for removing “spot” or location-centric zoning.

SOUTH WATERFRONT

EN-1: Reinsert “**Enhance the river bank and shallow water to maintain and improve fish and wildlife habitat**” (remove “where feasible”)

EN-2: Reinsert “**Integrate riparian habitat enhancements on the bank with enhanced upland habitat**”

The adopted North Macadam Plan called for a restored river and uplands planted with native plants and trees. Somehow this was diluted to “Where feasible, enhance the river bank and shallow water to maintain and improve fish and wildlife habitat” (EN-1 in June, 2014) and by July, even that was gone. The July plans says to look at Appendix A but my copy does *not* have anything for South Waterfront in Appendix A. Both EN-1 and EN-2 need to be part of the South Waterfront District Plan.

Staff said that many environmental and sustainability policies and goals were put into the comp plan but this leaves their implementation schedules up in the air. And, how do they relate to a particular district if these policies and goals are not included or even referred to? Perhaps this could be resolved in part by including a list of universal policies (i.e. bird-friendly design) that each district of the West Quad adheres to so there is no doubt that they apply. But implementation still needs to be addressed.

WILLAMETTE GREENWAY

By removing these sections from the West Quad plan because of possible duplication, their absence implies that they are *not* part of the plan when in fact the river and greenway are major features in 5 districts. Each district has unique river features and relationships to the water. Overwhelmingly, residents want to enhance the river environment. Appendix A does *not* include river/greenway issues. They need to be added back in.

DOWNTOWN

* **Replace TR-13** with: Study the feasibility of remaking Naito Parkway into a boulevard that will serve as both a destination and green, urban entry to Waterfront Park. The current text asks for a feasibility of closing Naito during evenings and/or weekends. This misses the idea of a boulevard completely. In fact, it would turn Naito into an auxiliary fairground that events could spill out of the park and use.

- Add UD-11: Study the feasibility of creating an urban destination/boulevard on Naito Parkway

- EN-1. It is ironic that the Waterfront Park illustration on p.19 shows a multi-level Waterfront Park with a lot of trees but EN-1 only calls for “adding native plants *where it complements other uses*.” Repeatedly, people have asked for more variety in the Park so it can function as something more than a fairground. The addition of trees would help a great deal. (and different levels would discourage geese). Since Waterfront Park is deemed the number one priority, why is the planning process (UD-3) 6-20 years out. Consider moving that timeline to 2-5 years.

BIG IDEAS:

It was gratifying to see a Big Ideas section added to the plan. The Green Loop is a wonderful idea and Waterfront Park is rightfully the number one item. However, these big and committee-supported ideas were not included and should be.

- Redesigning Naito Parkway as a boulevard, making it both a destination and a green, urban entry into the park. Peter Frye submitted some intriguing examples.
- Freeway capping in 2 locations – connecting Goose Hollow to West End and extending the South Park Blocks at Portland State and over the freeway.
- Updating inventory of historical buildings and writing stronger regulations for preservation
- Creating a “Times Square” on Burnside
- Setting quantifiable benchmarks for sustainability and environmental goals (i.e. like the 33% tree canopy goal)
- Creating new development incentives for both historic preservation and river (and uplands) restoration.

CITY GOAL:

- **Add:** Establish the next generation of parks and greenspaces that will support a healthy, growing population and urban wildlife

Respectfully,
Jeanne E. Galick, Graphic Design
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Portland, OR 97219
503 245 6293
galick@europa.com
www.galickgraphicdesign.com

Date: August 8, 2014

Re: Minority Report for Central City Plan--West Quadrant

To: Portland Planning and Sustainability Commission

From: Bob Sallinger and Jeanne Galick

Dear Members of the Planning and Sustainability Commission,

Please accept following minority report submitted by Committee Members Bob Sallinger and Jeanne Galick regarding the Central City West Quadrant Plan. While there are many laudable aspects to the plan and we appreciate the extensive work that went into it, neither of the signers of this letter felt the plan as written was sufficient to endorse at the final stakeholder meeting. We hope that this minority report will be useful in remedying both substantive and process concerns associated with this plan.

Overview:

From an environmental perspective, the West Quadrant Plan is a major disappointment. Although the committee met 16 times over the course of more than 15 months, the environmental objectives and actions contained within this plan for the most part never advanced beyond vague aspirations. When it comes to the environment, the reader is left with little indication of what the city wants to accomplish or how it intends to achieve these objectives. While other cities are developing highly ambitious green strategies, Portland appears to be increasingly living off its green reputation. There is little in this plan that gives any confidence that Portland will maintain its leadership position in green initiatives in the coming decades.

Staff has indicated to us that much of the environmental work will be conducted in the coming months and that there simply was not adequate time or resources available to get the work done during the stakeholder process. While we appreciate the workload borne by city staff, it is important realize that the stakeholders that participate in these processes also have limited resources and that our time is also valuable. After 45 hours of stakeholder meetings plus workshops and open houses, it is disappointing to hear that the city did not allocate adequate resources to fulfill its obligations. Digging down deep on environmental issues (or other issues) after the stakeholder process is completed and the final draft has been already been approved by the committee marginalizes these concerns and undermines the very purpose of convening a broad stakeholder group---discussing and integrating different objectives and perspectives into a single coherent vision.

Fails to Set Meaningful Objectives:

The plan fails to set meaningful objectives in terms of air and water quality, climate change mitigation, riverbank restoration and enhancement, sustainable stormwater management or environmental justice objectives. The one area where specific objectives are outlined is tree canopy targets within the districts. However staff was never able to produce a methodology regarding how these targets were derived or how they relate to the overall tree targets for the city contained in the City's Urban Forest Management Plan. We have been informed that this methodology will be produced in the coming months, but this begs the question of where the targets contained in the draft approved by committee two weeks ago actually came from.

Fails to Link to Already Adopted City of Portland Natural Resource Plans

The City of Portland has adopted a variety of natural resource plans including the Watershed Management Plan, Urban Forest Management Plan and Climate Change Action Plan which embody citywide strategies, goals and objectives for protecting and restoring our natural environment. In our opinion, these plans should provide the foundation for natural resource objectives contained within area, district and quadrant level plans. However both in the Northeast Quadrant Plan and the West Quadrant Plan, BPS appeared to be approaching natural resource issues entirely de novo. We would urge the city to use already adopted natural resource plans as foundational documents from which to layer in natural resource objectives in the Central City Plan rather than attempting to recreate the wheel.

Specific Recommendations:

Salmon Recovery: It has been more than a decade since the City passed a resolution committing to assisting in the recovery of federally listed salmon and steelhead¹. The Central Reach in Portland, whose west bank lies within the West Quadrant boundaries, represents some of the most inhospitable salmon habitat in the entire Willamette River System. However, the plan virtually ignores salmon beyond specifying that it will identify 2-3 sites, including the Hawthorne Bowl, for restoration. We recommend that the city consult with NOAA Fisheries and other salmonid experts to specifically determine what needs to occur in the Central District to support salmonid passage through the Central City. We also recommend adding specific actions in each of the districts that border the river (Pearl, Old Town/ Chinatown, Downtown, South Downtown/ University, South Waterfront) that identify both specific habitat restoration projects as well as educational features (fish windows, public art, educational displays, etc.) that raise awareness of the role the city plays in the lifecycle of these fish. Salmonid impacts and recovery should also be highlighted in the various supporting sections of the document including the historical, previous planning and existing conditions chapters.

We also urge the City to closely review the draft Biological Opinion ("biop") recently released by NOAA Fisheries in response to Audubon Society of Portland et al v. Federal Emergency Management Agency.

¹ <http://www.portlandonline.com/auditor/index.cfm?a=24570&c=29147>

This draft biop makes it clear that current floodplain development practices in Oregon are jeopardizing the continued existence of listed salmonid species and provides “reasonable and prudent alternatives” to avoid violating the terms of the Endangered Species Act. The Central City Plan provides an opportunity to get ahead of the curve in terms of anticipating future federal regulations to protect salmonids passing through downtown Portland. We understand that some BPS staff have already been briefed on this biop.

Green Infrastructure: The West Quadrant Plan states in several places that the city should “increase” the use of green infrastructure such as green roofs, green walls, tree canopy, green streets, bioswales, etc. (for example: see pages 174 and 175). The Plan also includes a placeholder that it will develop targets for vegetative cover (see page 175). However, other than tree canopy targets, the plan contains no specificity and no actions within the individual districts associated with these objectives. Instead, green infrastructure is relegated to a series of vague actions in a “Central Citywide Policies” section that was haphazardly added at the very end of the stakeholder process and which contains virtually meaningless actions such as “identify tree planting opportunities and plant trees.” The Plan needs to include specific green infrastructure targets and actions for each of the individual districts. The reader should gain a clear understanding of what actions will be implemented on the ground, how these will help achieve environmental benefits, and the cost savings that will be derived by taxpayers/ ratepayers. The City has been a leader in green infrastructure for nearly four decades---it has the sophistication to map out system wide green infrastructure approaches (see for example Tabor to the River²). We recommend that the same level of district wide green infrastructure planning be done for each of the districts in the Central City Plan.

Regulatory requirements for Green Roofs/ Green Factor: Action EN6 (page 175) states that the city should “consider a requirement for ecoroofs and/ or “green factor.” We would urge the city to change this action to simply “require that green roofs be required on all new buildings greater than _____ in size. We would note that the Plan locks in increased FAR and height allowances throughout much of the West Quadrant which will provide tremendous windfalls for developers and property owners. The City should be every bit as aggressive about locking in environmental obligations at the same time.

Riverbank Restoration: The plan includes a placeholder for linear feet of riverbank habitat enhancement (see page 170).³ Again we would note that after more than a year of meetings, we are disappointed that the City has produced nothing more than a one line placeholder on this critical environmental issue. We recommend that the city amend the draft to include the following:

- 1) Specifically state that it will maintain or increase current setbacks for development from the river
- 2) Develop overall quadrant targets for linear feet of riverbank enhancement

² <https://www.portlandoregon.gov/bes/47591>

³ The Plan states, “2035 Performance Target: Linear feet of riverbank enhancement: BPS will work with technical staff to establish specific targets.”

3) Include specific enhancement actions (location and number of linear feet) for each of the districts bordering the river. We would note that prior drafts actually did contain some district level actions for riverbank restoration which were removed from the final draft without explanation.⁴ Also, the plan refers to “in-water habitat” in several places. This should be corrected to reflect that fact that river restoration requires in-water, riparian and upland components.

Climate Change Preparation: It is fair to say that the plan completely misses the boat on climate change. The climate change section contained on page 174 hardly qualifies as a placeholder, let alone a meaningful attempt to wrestle with the challenges of climate change.⁵ We urge BPS to conduct a workshop with other bureaus and outside experts that crosswalks the West Quadrant Plan with the City’s Climate Change Action Plan and assess how the West Quadrant Plan can be adjusted to truly address issues such as increased potential for river flooding and urban heat island. We would also urge the city to reverse course and look for options to reduce rather than intensify development close to the banks of the Willamette.

Tree Canopy Targets: The tree canopy targets are the one area in which the plan includes some level of specificity regarding existing conditions and future targets at a district level. However, we would note that the city was never able to provide any methodology explaining how the targets were derived and how they relate to broader tree canopy objectives for the city. Last week we were informed that the methodology is still being prepared. Typically you use a methodology to derive your targets...not vice versa. Overall the targets strike as low in several of the districts. We would particularly call out Old Town/ Chinatown where the city aspires a remarkably low 10% canopy cover. The explanation we received was that Old Town/ Chinatown is an historic district and it did not historically have a lot of trees. We would respectfully suggest that designation as an historic district was meant to perpetuate environmental deficiencies and environmentally destructive practices.

Tom McCall Park River Access and Riverbank Restoration: The idea of removing part of the seawall to provide both river access and habitat restoration activities at Tom McCall Waterfront Park was raised throughout this process. However it receives only a single vague reference in the final draft. The stakeholder committee was told at the final meeting that this concept had been rejected by other city bureaus due in part to the complexity and expense of the project. We would urge the city to restore this “big idea.” Most of the “big ideas” in this plan are complex and expensive. We are disappointed that this idea was summarily discarded through offline discussions between bureaus – or, in case of Naito, translated into something that would only make it a overflow extension for events. It merits further consideration and discussion.

⁴ For example: Lost somewhere between draft 15 and 16 of the plan are two implementation items for South Waterfront that should be reinserted: EN-1: “Enhance the river bank and shallow water to maintain and improve fish and wildlife habitat” (remove “where feasible”). EN-2: “Integrate riparian habitat enhancements on the bank with enhanced upland habitat”

⁵ The plan states, “Assess, monitor and update plans, services and infrastructure in the Central City to anticipate and response to evolving climate change conditions.”

Other Design Issues related to Tom McCall Waterfront Park: Two other issues we would like to flag related to Waterfront Park include the following:

- 1) The Plan includes a proposal to triple building height allowances at the Hawthorne and Morrison Bridgeheads to 325 feet. This proposal overturns longstanding City Policy embedded in the 1988 Comp Plan of stepping down building heights towards the river. We urge the City to reconsider these new height allowances for all the reasons outlined in the 1988 Comp Plan including casting shadows over public spaces, increased air pollution (reduced air flow in downtown) and creating visual and physical barriers between the river and the downtown area.
- 2) The Plan excludes a proposal raised frequently by stakeholders to remake Naito Parkway into a pedestrian-friendly boulevard, complete with wider sidewalks, trees and other plantings, easier crossings, cafes and other small-scale enterprises. This would act as a green interface between downtown and the park and entice people to the waterfront.

Low Carbon Development: The low carbon development section on page 174 focuses primarily on new development. It is important that the city explicitly recognize that retention of existing buildings produces far less carbon than is produced by demolition and replacement; regardless of how “green” the replacement structure may be. We recommend that the low carbon development section contain language that supports the retention and renovation of existing buildings and which encourages the development of incentives and bonuses to promote renovation rather than demolition.

Stakeholder Process: We would urge the City to take a hard look at how it is conducting these types of planning processes. Increasingly the City seems to rely upon very large stakeholder committees that meet for months, and sometimes years. Committee meetings are formulaic: multiple staff presentations followed by public comment and committee feedback. Despite the extensive time commitment, there is very little opportunity to dig down deep on topics; nor are there typically more than one or two stakeholders with any real expertise on any given topic in the room. There is a tendency to superficially revisit the same topics at each meeting without every really achieving any depth. We would respectfully suggest that the city is may be mistaking “big process” for “good process.” We would make the following recommendations:

- 1) Consider a more layered approach in which stakeholders and experts on specific topics such as environment, transportation, housing, etc are brought together for one or two meetings to provide input. After various layers are developed and synthesized, a more diverse advisory group could be brought together for a few meetings to advise and critique a draft plan.
- 2) Ensure that to the degree possible, foundational information is assembled and inter-bureau coordination occurs before public advisory meetings are convened: In both the Northeast and West Quadrant processes, substantive discussion and integration of environmental objectives was delayed until the end of the process (or beyond) while stakeholders waited for BPS and BES to coordinate on these issues.
- 3) Ensure adequate spacing between meetings to allow for meaningful advance review of materials prior to meetings, especially as these processes near their conclusion: While we appreciate that the end of these types of processes are sometimes a bit frantic, the City still has an obligation to provide for meaningful review of draft documents prior to asking for a

committee vote. It is important for the city to realize that stakeholders that represent organizations or neighborhoods need adequate time not only to review final drafts themselves, but in many cases to receive input and approval from the constituencies that they represent. The one week turnaround on a majorly revised West Quad Plan was not adequate.

- 4) Capture Dissenting Viewpoints in the Report: The final report is a record of the work done by the committee. It is important that it capture significant areas of remaining controversy, disagreement or where there has been a lack of resolution...all the more so in a process such as the Central City Plan where multiple reports are ultimately going to have to be integrated into a single final plan.

Thank you for your consideration of these comments,

Bob Sallinger
Conservation Director
Audubon Society of Portland

Jeanne Galick
Willamette Greenway Advocate and SW Portland Resident

From: Steve Pinger [steve@sspdev.com]
Sent: Monday, August 11, 2014 10:58 AM
To: Kirstin Greene; katherine@gbdarchitects.com; kwilliams@carrollinvestments.com
Cc: galick@europa.com; 'Bob Sallinger'; 'Joe'; 'Lisle, Karl'; 'Eric (Planning)'; 'Anderson, Susan'
Subject: RE: West Quadrant Minority Report from Bob Sallinger and Jeanne Galick

Kristin, Katherine, Karen; I am forwarding this email to record my support, as a WQP SAC member, for the positions described in the above referenced Minority Report.

The NWDA has stated positions during the WQP process consistent with this Minority Report's positions regarding meaningful air quality objectives, particularly with respect to areas adjacent Hwy 26 and I-405, and to Low Carbon Development and the support of the conservation of existing buildings.

Individually, I agree with the Minority Report's comments regarding the Stakeholder Process.

best

Steve

-----Original Message-----

From: Bob Sallinger [<mailto:bsallinger@audubonportland.org>]
Sent: Thursday, August 07, 2014 2:25 PM
To: 'Joe'; 'Lisle, Karl'; 'Eric (Planning)'; 'Anderson, Susan'; psc@portlandoregon.gov
Cc: galick@europa.com
Subject: West Quadrant Minority Report from Bob Sallinger and Jeanne Galick

Dean Bureau of Planning and Sustainability Staff and Commissioners,

Please accept the attached minority report from Central City Plan West Quadrant Stakeholder Committee Members Bob Sallinger and Jeanne Galick. While we appreciate the work that went into this plan and agree with many of the elements contained within the plan, the environmental sections are extremely weak and substantially incomplete. We do not believe that the report as currently written is adequate to maintain Portland as a national leader on environmental issues in the coming decades. We hope that city follows through on stated commitments to fill in environmental "placeholders" distributed throughout the report and look forward to working with the city on these issues in the coming months. For now however, we view the

West Quadrant Report as incomplete and insufficient to address the environmental challenges and opportunities facing the city.

Respectfully,

Bob Sallinger
Jeanne Galick



Northwest District Association

August 8, 2014

Portland Planning and Sustainability Commission

1900 SW 4th Avenue
Portland, Oregon 97201

RE: West Quadrant Plan – Building Height Policy Minority Report

Dear Commissioners:

I am forwarding the Minority Report to the West Quadrant Plan that has been unanimously approved by the Northwest District Association Planning Committee.

The NWDA had several concerns about provisions in the plan that were more specific to the Northwest neighborhood, but felt that the central city-wide issue of building height policy was by far the most important issue to address.

It is our view that the building height policies reflected in the proposed West Quadrant Plan, as currently written, are in conflict with several of the stated goals of the adopted *CC2035 Concept Plan*, and that these policies should be reviewed and revised to better align with the direction of the underlying *Concept Plan*, and so that the updated comprehensive plan can in turn be internally consistent and avoid its current contradictions.

Building height policy is likely the most controversial element of the West Quadrant Plan, in that it is shaped by the effort to reconcile the needs of both growth and conservation, and the varied opinions surrounding these paired issues. The SAC discussion of building heights was limited by the presentation of these issues in a largely abstract fashion, in map diagrams and aerial views of models, when the relevant consideration, with regard to our ability to assess the public benefit of allowing tall buildings, is from the perspective of the pedestrian in the street environment, adjacent to these buildings. The discussion was also limited by the absence of two necessary components: first, no alternative concepts for the arrangement and distribution of building height were forwarded to the SAC for comparative review, and second, there was no critical assessment of the appropriateness, or success, of the existing building height concept, which was the assumed starting point for the single proposed concept that the SAC was shown.

We request your consideration and support of the recommendations of this report.

Best Regards,
Northwest District Association Planning Committee

Steve Pinger
member
CC2035 West Quadrant Plan SAC member

CC 2035 West Quadrant Plan – The Northwest District

Building Height Policy – Minority Report

Context and Background

Portland seems to be experiencing “its moment”, in which a significant influx of people and businesses are coming to downtown Portland, specifically because of its relaxed feel, unpretentious buildings and its neighborhoods that are rich in character and comfortable in scale. How do we appropriately plan for this apparent demand, and at the same time frame policies for not “loving (leveraging) places to death”; redeveloping them beyond all recognition, and losing forever the subtle qualities that made them such great places in the first place?

Over the last 40 years, building height policy in Portland has incrementally, but steadily, allowed increasingly taller buildings in more and more areas of the central city. In contrast, the 1972 *Downtown Plan* envisioned tall buildings concentrated solely along the 5th and 6th Avenue transit corridor, with adjacent buildings stepping down in height, not only as they approached the river to the east, but also to the west, to conserve the scale and character of the buildings and open space along the Park Avenue and 9th Avenue corridor, and of the western neighborhoods.

Excessive “Headroom”

“A recent study affirms that Portland does not need height to compensate for any foreseeable shortage of development capacity. The basis for changes in existing height allocations are therefore most likely to be driven by desired views, solar and micro-climate concerns, desires for location specific visual emphasis. More general local and city identity as well as the broader desire for urban density and synergistic economic opportunity are also considerations.”¹

The first building over 250' in Portland was built in 1965. In the ensuing 48 years, a total of 23 buildings have been built that are taller than 250':

- 3 buildings over 460',
- 6 buildings between 460' and 325'
- 14 buildings between 325' and 250'



¹ Central Portland Plan: Urban Design Assessment, p. 54

In the West Quadrant, building heights of greater than 250' are allowed on ~250 blocks, although only 23 buildings have ever been built in Portland that are greater than 250'. Building heights of greater than 325' are allowed on ~140 blocks, although only 9 buildings have ever been built in Portland that are greater than 325'.

Allowing tall buildings to be constructed throughout much of the West Quadrant *is not planning* as it does not, as a policy, direct density and development in a conscientious way toward creating a legible urban form, nor does it relieve the economic pressure on adjacent areas that provide modest rents essential to cultivate the more vibrant forms of economic experimentation that are the drivers of our future economic development.

Urban Form: Clustered or Scattered Towers?

The overabundance of allowable building height assures that tall buildings will be built far from each other, so as to not obstruct newly created views from the tall buildings, thereby maintaining the maximization of their real estate value, but also tending to overwhelm their shorter neighbors, and the experience of the adjacent street environment. These buildings are economically viable due to their isolation from each other. The absence of nearby similarly scaled buildings creates the a pattern of scattered towers, which directly contradicts the stated urban form goals that the *Downtown Plan* and the *2008 Urban Design Assessment* both endeavored to specifically address.

What is the Public Benefit?

The benefits of allowing tall buildings *are almost entirely private benefits*, accruing to property owners in the form of increased real estate values resulting from the views created from tall buildings. The public benefits of tall buildings are far less clear, although they may generate greater tax revenues than shorter buildings of similar density, but this benefit seems to be largely out-weighed by their impacts upon the quality of the everyday experience of the streets that they front.

The Street Environment and the Existing Character of Portland

There is a rising concern that elements in the urban landscape that are essential to the city's urban life and livability are being lost. These threatened elements are not simply recognized historic landmarks, but the everyday buildings and streets that create the essential look and feel of our city, visually and experientially, from its sidewalks, and the scale and character of the buildings that enclose the street, the most important public space of any city.

The *Urban Design Principles* section of the *West Quadrant Plan* describes the fundamental conceptual ideas that are guiding the creation of the plan. The *Strengthen Places* principle states, "Enhance the existing character and diversity of the West Quadrant by strengthening existing places and fostering the creation of new urban districts and experiences".²

The WQP Building Height Concept offers the following reasoning for the proposed allowable heights shown on the Building Height Concept Map: "Together the juxtaposition of existing and new development at varying heights creates an interesting

² West Quadrant Plan Draft 7/11/2014, p. 21

and dynamic environment.”³ The experience of a person on the sidewalk, however, of the juxtaposition of buildings two and three times the height of adjacent buildings is more often awkward and uncomfortable, as the tall buildings unnecessarily dominate the street enclosure.



The West Quadrant Plan proposed allowable building heights threaten, through excessive economic pressure for development, many of the imageable and iconic buildings and places that make Portland *Portland*, and are in contradiction to the adopted *CC2035 Concept Plan*, Urban Design Goals L and M.⁴

Equity and Affordability

Tall buildings are by nature inequitable; they cost more to build and more to rent and occupy, and they often replace buildings with affordable rents that provide the incubator space for new businesses. These businesses are rent sensitive. Often the result of the economic pressures exerted by height and density “headroom” is properties that are redeveloped into new, more expensive real estate, and rents that jump sharply up, but in many instances lag in their lease absorption because of a relatively shallow market for expensive lease space.

The West Quadrant Plan’s proposed allowable building heights are much greater than the heights of the existing buildings in most areas. Excessive building height “headroom”, when coupled with the underlying entitled densities, has created strong gentrifying pressures on the more affordable areas of the Central City, particularly Goose Hollow, South Pearl, the West End and South Downtown, and are in contradiction to affordable housing goals, and adopted *CC2035 Concept Plan*, Housing and Neighborhood Policies 17, 18 and 21.⁵

Recommendations

The proposed West Quadrant Plan Building Height policy creates two significant conflicts with the goals of the adopted *CC2035 Concept Plan*. First, the preponderance of sites entitled for tall buildings puts unnecessary development pressure on existing buildings and threatens the character of existing places that the Concept Plan clearly directs the quadrant plans to conserve, and secondly, tall buildings, and the entitlements for tall buildings, because of their upward pressures on real estate values, are inherently in conflict with the Concept Plan’s stated equity goals.

³ West Quadrant Plan Draft 7/11/2014, p. 28

⁴ Central City 2035 Concept Plan, p. 12

⁵ Central City 2035 Concept Plan, p. 14

These fundamental contradictions in urban economic policy seem to be playing out in many cities currently as they experience the increased desirability of urban life accompanied with more concentrated wealth; San Francisco, Vancouver, New York and London being the more extreme versions. Portland has the benefit of reflecting a less hyper form of the same forces at work, and still has the time to address these issues before they overwhelm, as has happened elsewhere, the ability to effect rational policy making.

These internal contradictions in Portland's current comprehensive planning effort, nonetheless, must be resolved, for they are fundamental and underlie this entire once in a generation effort.

Our recommendations for better aligning the *West Quadrant Plan* with the *CC2035 Concept Plan* are below:

1. Review Current Height Bonus Policy

Determine if bonus incentives are still necessary to achieve central city housing goals, and if not, allow them to sunset.

2. Review Current FAR Transfer Policy

Assess the effectiveness of FAR transfers, and the characteristics of the resulting projects relative to urban design goals.

3. Add to Central City-Wide Goals;

District Character and Scale. Retain the personality and feel of the districts by preserving the modest original buildings that they are composed of, and conserving the scale of the multi-block street enclosures that give the districts their distinct character, personality and desirability.

Coherent Urban Form. Concentrate tall buildings along the north-south transit corridor and at freeway viaducts. Avoid creating a pattern of dispersed individual towers in areas of low neighboring buildings.

Appropriate Allowable Building Heights. Establish building height allowances that are appropriate to realistic foreseeable market demands, underlying developable density and the scale of the existing neighboring context.

Street Character. Reinforce the social role of our street environments, as they are the primary component of our system of public spaces.

4. Provide Alternative Building Height Concepts

Conservation Districts. Delineate areas that require specific form-based approaches to building height policy in order to preserve and strengthen existing iconic places in the central city, per CC2035 goals, and provide alternative building height concept maps, *and street level representations of these concepts*, for comparative review, and reconciliation with *CC2035 Concept Plan* goals.

Focus Allowable Building Height. Delineate a distribution of allowable building height that more clearly accommodates the need for affordable housing and office space, and reflects a more realistic assessment of actual market demands, and provide an alternative building height concept map, *and street level representations of this concept*, for comparative review, and reconciliation with *CC2035 Concept Plan* goals.

Appendix

email to WQP staff re: initial building height discussion:

-----Original Message-----

From: Steve Pinger [mailto:s.pinger@pingerdev.com]
Sent: Tuesday, September 17, 2013 12:01 PM
To: 'karl.lisle@portlandoregon.gov'
Cc: 'West Quadrant Plan'
Subject: RE: West Quadrant SAC Monday!

hi Karl; following-up on my request for additional information on the building heights element of the workbook. If it's possible, I'd like to see:

- a map in the same format as the one on p. 9 showing the general current allowable heights. The one on p. 8 is pretty hard to read through the overlays;
- the map on p. 9 with the general allowable FARs shown;
- some descriptive street level views showing the general affect of various building heights on the street envelope and the pedestrian environment. I have attached example from the NW Master Plan process that were extremely helpful in grounding the CAC discussion of this topic. Donald Newlands model of the downtown, <http://www.nc3d.com/projects/portland-city-model.html> on the other hand, is current and detailed. I am not sure what, if any, relationship you have with him, but using their existing 3d data would certainly illuminate this discussion.

To me, the understanding of what the relative impacts of various building heights are on the public realm at the street level is *the relevant consideration*, and without some level of exploration of these impacts, the WQP SAC discussion of the building height issue is almost meaningless. I was surprised, and a bit taken back, last evening by the apparent need to secure some level of SAC buy-in on the presented building height concept with so little information offered, not much real discussion entertained, and what felt like pre-existing biases pushing for a forgone conclusion (!).

best

Steve

email to WQP staff re: building height alternative concepts, staff building height memo to SAC:

-----Original Message-----

From: Steve Pinger [mailto:steve@sspdev.com]
Sent: Wednesday, April 09, 2014 3:26 PM
To: 'Lisle, Karl'
Cc: 'Edmunds, Sallie'; 'Raggett, Mark'; 'Hartinger, Kathryn'; 'Starin, Nicholas'; 'Kirstin Greene'
Subject: RE: big ideas emerging

Karl hi; and thank you for your reply, although I think that it may miss the question that I am asking regarding the WQP process.

The allowable building height question has been controversial from the beginning of the WQP process. Most all of the other issues are far less so, and could indeed be handled, as they were,

on a "consent agenda" basis, with no particular need to debate or explore alternatives. The building heights issue, however, is much different, and in my view, needed to fully take advantage of the deliberative abilities of the SAC to sort through the complexities of this issue. Alternative concepts for organizing and managing the distribution of allowable heights needed to be presented to the SAC for a comprehensive review and evaluation. The types of alternative concepts that come to mind, off the top, are:

- concentrating height along the north/south transit spine;
 - concentrating height along the north/south and east/west transit spines;
 - concentrating height adjacent to the existing bridgeheads and viaducts;
 - concentrating height in the areas that have the greatest allowable FAR;
 - concentrating height in the existing >325' allowable areas and reducing allowable height everywhere else by 100' or so;
 - reducing allowable height everywhere by 100' or so;
- and so on.

As it was, the SAC was asked to evaluate a *single* concept, on an essentially "does anyone have a problem with this?" basis. This not only severely limited the range of the discussion, but also failed to engage the perspectives and insights of the SAC members in any sort of meaningful way around this issue, that many people in this city care a great deal about.

The Nov 7 staff memo regarding building heights, similarly, was not discussed by the SAC, and in my view was highly biased. Without going into a detailed review of the memo, I would briefly suggest that:

- it confused building height with density with regard to regional goals;
- it does not address the question of what are the *real public* benefits of tall buildings to the experience of the adjacent street environment;
- it falsely refers to tall buildings as having more design flexibility and as being more sustainable;
- it misses the conclusion regarding construction types: that tall buildings are inherently more expensive buildings, and thus less equitable.

These are not West End concerns, although they are certainly present in the West End, and perhaps most dramatically. These are city-wide concerns.

Your reply suggests to me that the "idea-generation and concept development" phases of the WQP process have concluded. I have sat through the last several SAC meetings, and waited for the outcome from the neighborhood meetings and the public open house, to see how the open issue of allowable building heights would emerge and begin to be resolved, and if a full-throated, more fully informed discussion of this issue would at last take place. Will it?

So again, building height *policy* questions aside for a moment, how can these *process* concerns be best addressed as the WQP moves forward?

best

Steve

email to AIA/APA/ASLA Urban Design Panel (unanswered) re: building heights letter to WQP SAC:

-----Original Message-----

From: Steve Pinger [mailto:steve@sspdev.com]

Sent: Tuesday, January 07, 2014 9:57 AM

To: 'Stefanie.becker@zgf.com'

Subject: UDP building heights memo

hi Stefanie;

I am on the SAC of the West Quadrant Plan, and am trying to sort out my thinking on the allowable building heights issue engendered by the central city plan update. I was hoping to get some input from the UDP, following on the points made in the building heights memo that was forwarded to the SAC in the Meeting 8 packet in November.

It seems to me that there are two fundamental questions that need to be answered with respect to this issue in order for the SAC to be able to adequately assess the appropriate position for the WQP to take in regard to building heights:

The first is, what are the actual impacts of tall buildings, of greater than 120' or so, on the nearby street environment or the adjacent public realm? Tall buildings generally tend to diminish the quantity and quality of light and air getting to the street, but what are the other, subtler impacts? Much of Portland's central city is still made up of predominately 75' buildings, so at what height do new, taller buildings begin to overwhelm the existing public environment, visually and experientially, and are we willing to allow that? Much of the benefit from tall buildings seems to be private, in the form of enhanced real estate values for building owners, but what are the real benefits to the public realm, given that stated density goals can be achieved with lower height building forms?

Secondly, given these potential impacts, what is the appropriate level of allowance for tall buildings that will both accommodate the foreseeable market, and at the same time provide for, and encourage, a coherent urban form? If we imagine that over the next 25 years, perhaps 10 buildings over 325' will be built in the central city, then how many blocks do we reasonably need to have entitled to allow for them to be built on? What is the right ratio? San Francisco has answered this question in a much different way than Seattle has. How should we? Has allowing tall buildings throughout much of the central city created the emerging development pattern of dispersed new towers that we currently have, which seems to be inconsistent with the urban form goals that have been expressed consistently from the 1974 Downtown Plan through the 2008 Urban Design Assessment, and that are predicate to our West Quadrant Plan efforts and analysis?

Any insights you can provide on these questions would be greatly appreciated.

best regards

Steve

Steve Pinger | ssp consulting llc | 503 807 3601

annotated street level views of comparative building heights and street environments;



12 West

- 266'
- 325' allowed
- 325' proposed
- 6:1 base FAR
- 9:1 max FAR w/ bonus

Crystal Hotel

- ~65'
- 325' allowed
- 325' proposed
- 6:1 base FAR
- 9:1 max FAR w/ bonus
- Historic Landmark

Jakes

- ~65'
- 325' allowed
- 325' proposed
- 6:1 base FAR
- 9:1 max FAR w/ bonus
- Historic Landmark

West End

SW Stark St. and 12th Ave.



Pittock Building

~120'
250' allowed
100' base proposed w/OSPS
9:1 max FAR

Historic Landmark

Washington and Broadway

~90'
460' allowed
460' proposed
9:1 max FAR

West End

SW Washington St. and 11th Ave.

Alder and 9th

~145'

250' allowed

100' base proposed w/ Open Space Performance Standards

12:1 base FAR

Morrison and 9th

~80'

460' allowed

460' proposed

12:1 base FAR

Galleria

~65'

460' allowed

460' proposed

8:1 base FAR

Historic Landmark



Downtown

SW Morrison St. and 9th Ave.

Taylor and 9th

~65'

150' allowed

100' base proposed w/ Open Space Performance Standards

9:1 base FAR



Taylor and 9th

~80'

150' allowed

100' proposed w/ OSPS

9:1 base FAR

Yamhill and 9th

~65'

150' allowed

100' proposed w/OSPS

9:1 base FAR

West End

SW Yamhill St. and 9th Ave.

Fox Tower

372'

150' allowed

100' base proposed w/ Open Space Performance Standards

12:1 base FAR



1000 Broadway

288'

300' allowed

460' proposed

12:1 base FAR

Wheeloon Apartments

~65'

350' allowed

460' proposed

12:1 base FAR

Historic Landmark

Downtown

SW Yamhill St. and 9th Ave.

Alder and Park

~80'

250' allowed

100' base proposed w/ Open Space Performance Standards

9:1 base FAR

Historic Landmark



Union Bank Tower

268'

460' allowed

460' proposed

12:1 base FAR

Alder and Park

~95'

460' allowed

460' proposed

12:1 base FAR

Downtown

SW Morrison St. and Park Ave.



Ladd Tower

~240'
300' allowed
250' proposed
6:1 base FAR

Carriage House

~40'
300' allowed
250' proposed
6:1 base FAR

Historic Landmark

Downtown

SW Columbia St. and Broadway

From: Jeanne Galick [galick@europa.com]
Sent: Monday, August 11, 2014 11:23 AM
To: Steve Pinger
Cc: Kirstin Greene; katherine@gbdarchitects.com; kwilliams@carrollinvestments.com; 'Bob Sallinger'; 'Joe'; 'Lisle, Karl'; 'Eric (Planning)'; 'Anderson, Susan'
Subject: Re: West Quadrant Minority Report from Steve Pinger/NWDA

On Aug 11, 2014, at 10:57 AM, Steve Pinger <steve@sspdev.com> wrote:

Kristin, Katherine, Karen;

I am forwarding this email to record my support, as a WQP SAC member, for the positions described by Steve Pinger?NWDA Minority Report in regards to the West End, Old Town/ChinaTown and Goose Hollow. The Pearl District has made it clear that they welcome increased heights and FARs.

Jeanne E. Galick, Graphic Design
7005 SW Virginia
Portland, OR 97219
503 245 6293
galick@europa.com
www.galickgraphicdesign.com

Kirstin Greene

From: Lisle, Karl [Karl.Lisle@portlandoregon.gov]
Sent: Monday, August 11, 2014 3:01 PM
To: Kirstin Greene
Subject: FW: West Quadrant Plan minority report

From: James Gardner [mailto:jimdonnachamois@msn.com]
Sent: Monday, August 11, 2014 12:25 AM
To: kwilliams@carrollinvestments.com; Katherine Schultz; Lisle, Karl
Cc: s.pinger@pingerdev.com
Subject: West Quadrant Plan minority report

Katherine, Karen, Karl,

I deeply regret that a family emergency caused me to miss the final SAC meeting. This negated my last opportunity to speak to some aspects of the West Quadrant Plan draft about which I continue to have strong concerns.

I note that last Friday, 8/8, was the deadline for SAC members to submit minority reports. However, there is no practical reason why this deadline need apply for members wishing to support other minority reports previously submitted.

I hereby formally "vote" my support for the minority report submitted by Steve Pinger and NWDA. This report contains a well-reasoned statement of my own concerns regarding the direction taken in the West Quadrant Plan draft regarding allowable building heights. Opening up large areas of downtown to very tall buildings can do nothing to improve the character of Portland streets and inner city neighborhoods. I'm especially unhappy with the height limits proposed for the bridgehead areas, not specifically mentioned in the NWDA report but certainly related in that this is another example of abandoning the concept of stepping down building heights east and west of a central downtown spine.

Again, I regret this message is coming so late. The delay was unavoidable and certainly not my preference. I look forward to seeing you all again, most likely when our draft plan is presented to the PSC.

Jim Gardner
2930 SW 2nd Ave
Portland OR 97201
503-227-2096

Kirstin Greene

From: Lisle, Karl [Karl.Lisle@portlandoregon.gov]
Sent: Monday, August 11, 2014 2:58 PM
To: Kirstin Greene
Subject: FW: NWDA Minority Report

From: Brian Emerick [<mailto:brian@emerick-architects.com>]
Sent: Monday, August 11, 2014 2:20 PM
To: Katherine Schultz; kwilliams@carrollinvestments.com
Cc: Lisle, Karl
Subject: NWDA Minority Report

West Quadrant SAC Chairs, this email is to confirm my support of the NWDA Minority report addressing building heights distributed to our group by Steve Pinger following the conclusion of our process. Please let me know if you have any questions or need a more formal show of support.

Thanks,

Brian Emerick AIA, Principal

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