



**Oregon Pacific Investment
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September 30, 2014

Mr. Andre Baugh
Chair, Portland Planning and Sustainability Commission
Planning and Sustainability Commission / Bureau
1900 SW 4th Avenue
Portland, Oregon 97204

Re: Testimony on Draft West Quadrant Plan for Public Record

Chair Baugh and Members of the Planning and Sustainability Commission:

Oregon Pacific and Investment and Development Company (“OPID”) would like to take this opportunity to provide comments for the public record regarding the Draft West Quadrant Plan. OPID owns and manages commercial and residential properties in the Central City, including two important infill development sites in the South Downtown/University District.

We thank the Commission and BPS Staff for your enormous effort in preparing the Draft Plan. We believe that the Draft Plan provides a comprehensive and cogent policy framework for more detailed work on the Central City Plan and implementing regulations. We provide below specific comments on several policies and implementation actions in the Draft Plan.

- **OPID Supports Rezoning to CXd the Area South of SW Market and West of 4th Avenue Currently Zoned RXd (Page 135, South Downtown/University, Implementation Actions, RC1)**

OPID concurs with BPS Staff and the West Quadrant Stakeholder Advisory Committee (WQSAC) that rezoning this island of RX in the middle of an otherwise CX area helps implement the higher density, mixed-use district planned for the southern end of the Transit Mall/PSU area. OPID owns an important development site in this area. The proposed rezoning would allow OPID to pursue mixed-use development opportunities that better meet the goals for the district than those allowed by RX regulations. Moreover, the rezoning eliminates the ambiguities and complexity of conforming development standards regulating the RX zone to those for the Central City Plan District. While Plan District regulations supersede base zone standards where they conflict, it is not always clear when these regulations conflict or are additive.

- **OPID Supports Increasing the Building Height Potential on Southern End of Transit Mall between SW Broadway and SW 4th Avenue (Page 135 of Plan, South Downtown/University, Implementation Actions, RC2)**

OPID Concurs with BPS Staff and WQSAC that the maximum height limits in this area should be increased to fulfill plan objectives and to be commensurate with the transit investment focused in south downtown. OPID supports the BPS recommended increases, but also realizes that future BPS work may result in adjusting the recommended height limits. If required, OPID is ready to work with BPS to further analyze the appropriate height limits for this area. OPID owns a development parcel that would be impacted by this change. From our ownership perspective, the recommended increase opens up a world of opportunity with regard to design and orientation of a building on the parcel – potentially allowing for plazas or other public-realm spaces on the site that would not otherwise be possible.

- **OPID Recommends Amending the Draft Plan for Sites between SW Broadway and SW 4th Avenue Receiving Increased Building Heights to also Incorporate Commensurate Increases in Base FAR Limits (Proposed by OPID, Not in Current Draft Plan)**

While BPS recommends increasing maximum height limits in the subject area, it did not incorporate a corresponding increase in allowable FAR. The base FAR for our site at SW 4th and College is 6:1, which can be increased to 9:1 with bonuses and transfers. At this maximum FAR, the floor area on each side of the upper-level floors would have to be impractically small to benefit fully from the increased maximum heights – and would have to command high rents, beyond what the district can command. This is why other areas of Downtown with the same height limits recommended for the subject area have base FARs in the range of 9:1 to 15:1 (12:1 to 18:1 with bonuses and transfers), substantially higher than proposed here. We suggest that the base FAR for the subject area be at least 9:1 (12:1 with bonuses and transfers).

- **OPID Supports Standardizing the Maximum Building Height Potential East of SW 4th Avenue to Naito Parkway (Page 135, South Downtown/University, Implementation Actions, RC3)**

As shown in the Draft Plan, existing height limits in the southern end of downtown between SW 4th Avenue and Naito Parkway are a maze of inconsistencies. We own the 77,000 square foot commercial center near SW 1st Avenue and Lincoln Street. This parcel has split height limits, with a 75-foot maximum at its southern end and a 100 foot maximum at its northern end. These heights compare to height limits of 225 feet for nearby properties. On past occasions, we considered redevelopment options for our parcel; those investigations concluded that there were not any practical redevelopment options at the currently approved height limits and FAR limits. This parcel immediately abuts the \$1.5 billion Portland-Milwaukie LRT. These policies will not likely be achieved on our parcel without the height and FAR increases recommended in the Draft Plan.

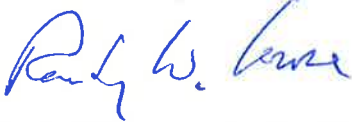
- **OPID Supports Increasing the Base FAR for the Area of South Downtown with a Current Base FAR of 2:1 to a 4:1 Base FAR (Page 135, South Downtown/University, Implementation Actions, RC5)**

OPID concurs with BPS Staff and WQSAC that the base FAR limits in this subject area must be increased to fulfill plan objectives in the south downtown area. Our parcel, immediately abutting LRT at SW 1st Avenue and Lincoln Street has a base FAR of 2:1 (bonusable to 5:1). This base FAR is the same as the minimum FAR in other sections of downtown. We have not discovered any practical redevelopment options at the current FAR/height limits for our parcel, and these limits are fundamentally inconsistent with the transit-oriented objectives connected to the Portland-Milwaukie LRT.

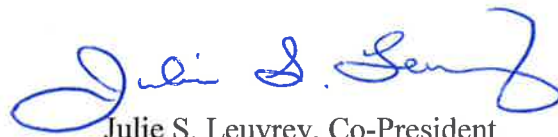
Thank you for considering our comments.

Sincerely,

OREGON PACIFIC INVESTMENT
AND DEVELOPMENT COMPANY



Randy W. Lovre, Co-President



Julie S. Leuvrey, Co-President

cc: Ms. Susan Anderson, Director, Bureau of Planning & Sustainability
Mr. Karl Lisle, West Quadrant Plan Project Manager, Bureau of Planning & Sustainability