



THE  
BOOKIN  
GROUP  
LLC

Land Use &  
Institutional  
Planning

Policy Analysis

Project  
Management

Group  
Facilitation

October 29, 2014

*André Baugh, Chair  
Portland Planning and Sustainability Commission  
c/o Bureau of Planning and Sustainability  
1900 SW 4<sup>th</sup> Avenue, Suite 7000  
Portland, Oregon 97201*

*Re: Proposed Institutional Campus Regulations*

*Dear Chair Baugh and Fellow Commissioners:*

*Thank you for the opportunity to present written testimony regarding the Institutional Campus project, part of the City's Comprehensive Plan Update.*

*I am a private land use and health care planning consultant with a specialty in program, facility and master planning for higher education and medical institutions and other large users. In my over 30 years of practice, I have prepared land use entitlements for a wide range of clients including Portland Community College, Providence Health & Services, Kaiser Permanente, Oregon Health & Sciences University, Legacy Health System, University of Portland, Portland Adventist Medical Center, National College of Natural Medicine and Kaiser Permanente. As a result, I am very familiar with the current regime for governing institutional development within the City of Portland, namely the Conditional Use Master Plans (CUMP) (Chapter 33.820) and Impact Mitigation Plans (IMP) (Chapter 33.848).*

*With regard to this project, I did some early consulting work for the Bureau of Planning and Sustainability (BPS) including preparation of white papers outlining the typical development patterns of college and medical center campuses, respectively, so that BPS staff has a better understanding of how existing Portland campuses might expand in the future. I also have served as a member of Campus Institution Zoning Update Advisory Committee.*

*Although it is still early in the process, this is a good opportunity to express support as well as concerns about the direction this institutional planning effort currently is taking.*

*1) The adoption of a new Campus Institutional (CI) Plan Designation for all existing Portland institutions of higher education and medical centers is long overdue. In addition, I support the Portland Public Schools' position that high schools should be included in this designation. Since discriminating between public and private high schools is problematic, perhaps one way to do this is to apply this new designation to any high school above a certain size, say 20 acres. The new plan designation should be applied at the very least to the institution's existing approved campus boundary plus any contiguous property in its ownership but not yet converted to institutional use.*

*2) BPS staff is proposing three complementary zone designations, Medical Center (CI-1), Urban (College) Campus (CI-2), and Residential (College) Campus (CI-3). There does not appear to be sufficient differences between the two college-related zones to warrant separate categories, since Portland's two most urban campuses, Portland State University and OHSU, are governed by plan districts and, therefore, not subject to this planning effort. Unless a more robust differentiation can be made, I would recommend collapsing the two college-designated zones into a single zone.*

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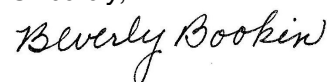
3) I strongly encourage the City to legislatively rezone all existing institutional campuses at the same time that the new plan designation is imposed, giving each institution the option to use its existing CUMP/IMP approval until it expires. Having the comprehensive plan and zoning designations consistent from the onset is preferable from the policy and legal perspectives to the BPS-proposed approach of requiring a subsequent time-consuming and costly quasi-judicial zone change process on a campus-by-campus basis. In this legislative approach, institutions could then bring in contiguous land in its current ownership as a simpler Type II Zone Change because it would bear the underlying CI plan designation. This is how the Institutional Residential (IR) plan designation works on the PCC/Cascade Campus created with the adoption of the Albina Community Plan, for example. It is also noteworthy that the underlying IR comprehensive plan designation applies to adjacent properties not in PCC's ownership but that the college may acquire, in future as an indicator to all parties of the possible future campus boundary.

4) Apparently, BPS staff disagrees with legislative re-zoning because it sees the individual quasi-judicial zone changes as a way to make an institution re-do its Transportation Impact Analysis (TIA) and Transportation Demand Management Plan (TDMP) once their current CUMP/IMP approvals expire. Perhaps the legislative re-zoning could be approved with the condition that the TIA/TDMP be updated either at the time the current CUMP/IMP approval expires or no more than a set number of years, whichever occurs first. This does not speak to the inequity of the burden borne by institutions and other conditional uses to prepare costly TIAs and TDMPs that other large by-right developments are generally not required to prepare.

5) As part of the Comprehensive Plan/Zoning Code update, I strongly urge that the current IMP regulations be eliminated, as this approach has proven to be cumbersome for both applicants and regulators to use. Under this scenario, the few outstanding approved IMPs would remain in force until they expire. I also would urge that the present CUMP regulations be retained since there are many other conditional uses – e.g., churches, schools, community service uses – that may wish to have multi-phase CU approvals. However, these regulations should be updated to streamline the substantive requirements and approval process.

Thank you for the opportunity to submit testimony on this important issue.

Sincerely,



Beverly Bookin, AICP, Senior Principal

cc: John Andrew Cole, Senior Planner, Bureau of Planning and Sustainability