



March 13, 2015

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

Dear Chair Baugh and Fellow Commissioners,

Portland Community College (PCC) is pleased to have this opportunity to comment on the City's Comprehensive Plan update. PCC *conditionally* supports the proposed Campus Institution Comprehensive Plan designation as it recognizes the substantial contribution that institutions make to the region's social, educational, cultural, and economic well-being. We respectfully request further discussion regarding the proposed zoning regulations and implementation process before finalizing this effort.

It is estimated that educational and medical institutions collectively will account for 50,000 new jobs (24 percent) in Portland by 2035¹. With 3,205 employees and more than 90,000 students, PCC is the largest higher-education institution and a top 20 employer in the state. Providing sufficient development capacity and flexibility is an important first step toward supporting our institutions, which is why PCC supports the Campus Institution designation and the policies 6.53-6.58, which outline the importance of educational institutions. The real challenge lies in the translation and implementation of the new designation.

Currently, three of PCC's four campuses, Cascade, Sylvania and Southeast, are within city limits and subject to either an Impact Mitigation Plan (IMP) or Conditional Use Master Plan (CUMP). PCC does not find sufficient incentive in the proposed regulations to re-zone its campuses for several reasons:

- 1) The re-zoning of institutional campuses may be predicated on more binding Transportation Demand Management Plans (TDMPs) than are now in force. The possible prohibition of future development based on a failure to meet mode-share targets makes planning for future growth difficult. PCC has had a district-wide TDMP in place since 1992 and recently updated it to offer a menu of strategies for each of our campuses. Our intention has been to customize this plan based on site-specific considerations and to better support PCC's and the City's Climate Action Plan. We offer our own shuttle service and strive daily to reduce our SOV rate. The City's intent is admirable, yet before implementation, a broader

¹GP6, Draft Comprehensive Plan.

discussion is needed with TriMet and the City to discuss transit service levels and capital improvement needs.

- 2) The proposed transition process from the existing IMP/CUMP approval to the new Campus Institution designation also needs additional discussion. PCC would prefer that the new zoning designation for our campuses be undertaken concurrently with the legislative imposition of the new Institutional Campus designation. For instance, PCC's Cascade Campus has more than 100,000 square feet of allowable development under the current IMP. It will take some time to reach build out. Rather than requiring a subsequent time-consuming and costly quasi-judicial zone change process, a greater incentive would be to memorialize existing development potential and streamline the proposed transition process.

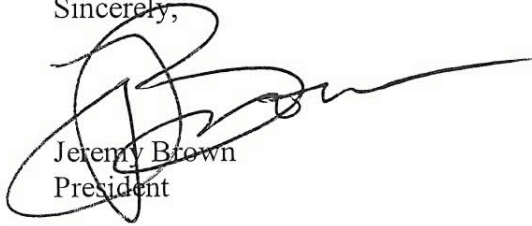
The Comprehensive Plan is also creating a Mixed Use land use designation. Subsequent application of the planned Mixed Use zones is proposed to be automatic without the requirement for an owner-initiated Type III process. We encourage the City to legislatively apply the IC base zones, the language of which is sufficient to guide growth, urban form, and campus compatibility with neighborhoods, and work with institutional partners to ensure compliance with the zone. We are asking to receive the same treatment in the new Campus Institution zone and not require a public agency such as PCC to use public money to go through an expensive and time consuming process.

- 3) The design review process is not addressed in this effort. Our experience with design review has shown the process to be cumbersome and subjective. The Cascade Campus, for example, has been subject to lengthy design review for such projects as a new surface parking lot and window replacement in a noncontributing, existing building. Some of this is due to our own IMP, which in certain instances is silent, causing us to defer to city development code. Acknowledgment of the campus setting by regulating development impacts on the adjacent neighborhood while providing more flexible allowances in the campus interior, would be beneficial to our planning and development process. We take great pride in the appearance of our campuses and seek only to improve the physical and natural experience for our users and our neighbors.
- 4) The base zone boundary is shown to be around our current property ownership. Or as outlined in our current IMP, many of the properties abutting our campuses are designated as mixed-use, in which colleges are an allowed use. However, if in the future PCC were to purchase other properties in these mixed-use zones we want to make sure we would not have to "rezone" those to Campus Institution. We have received a verbal response from City staff that we would not, however, it would be beneficial to have that stated as part of this process. As well, an adjacent property at our Southeast Center is zoned mixed-employment and precludes college use. PCC would like the properties around our campus to allow college use.

I urge the City to revisit the proposed Campus Institution regulations and seriously consider an approach that mitigates the impacts of development and preserves the livability of our neighborhoods, while also reducing the onerous and often expensive requirements of the current

zoning regulations, particularly associated with design review. I encourage the City to continue its work in refining the zoning regulations and implementation process through ongoing dialogue with institutional representatives. To this end, PCC pledges to continue its active participation in City's Campus Institution Zoning Update Advisory Committee.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeremy Brown', with a long horizontal flourish extending to the right. The signature is written over the printed name and title.

Jeremy Brown
President

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