

March 13, 2015

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Mr. André Baugh, Chair
City of Portland Planning and Sustainability Commission
City of Portland Bureau of Planning and Sustainability
1900 SW Fourth Avenue, Suite 7000
Portland, OR 97201

Re: Portland Comprehensive Plan (“Plan”) Update; Proposed Policies 6.53-6.58

Dear Chair Baugh and Members of the Commission:

This office represents Providence Health & Services—Oregon (“Providence”). I am writing on behalf of Providence to comment on proposed Plan policies 6.53-6.58 concerning Campus institutions and to offer additional comments on the Plan update concerning Campus institutions. I have attached Providence’s previous letter dated November 3, 2014.

Providence continues to support the concepts found in proposed Plan policies 6.53-6.58 for recognition of the importance of Campus institutions to the Portland economy. Providence believes, as it said in its November 3, 2014 letter, that the Plan policies should expressly provide for the following:

- The proposed Plan policies should provide for the implementing land use regulations to allow use of approved Conditional Use Master Plans (“CUMPs”) by Campus institutions, such as Portland Providence Medical Center, for existing CUMPs to be modified, and for new CUMPs to be adopted as an alternative to development under a new zoning district.
- The proposed Plan policies should expressly provide that the Campus institution Plan map designation may be achieved through either legislative, or quasi-judicial implementation. Providence believes that a legislative implementation by the City is preferable to quasi-judicial implementation for a number of reasons. However, if the City proceeds with a legislative amendment, a major institution should be able to “opt out” of the legislative amendment, or if it “opts in” to the legislative amendment, that it be allowed to continue to rely upon an approved, modified or new CUMP.
- The proposed Plan policies and mapping should be adopted concurrently with the implementing Campus institution land use regulations. The City will implement the Plan policies through land use regulations. The land use regulations as adopted may not be satisfactory to major institutions. Concurrent implementation allows major institutions the opportunity to review the land use regulations before the Plan policies are adopted.

Mr. André Baugh, Chair
March 13, 2015
Page 2

Thank you for your consideration of these comments. Please place this letter in the official file for the legislative amendment and provide me with written notice of the Commission's recommendation to the Portland City Council.

Very truly yours,



Michael C. Robinson

MCR:rsr
Enclosure

cc: Ms. Dana White (via email) (w/ encl.)
Ms. Karen Weylandt (via email) (w/ encl.)
Ms. Michelle Bernard (via email) (w/ encl.)
Ms. Marty Stiven (via email) (w/ encl.)



Real Estate and Construction

November 3, 2014

Mr. Andre Baugh, Chair
City of Portland Planning and Sustainability Commission
City of Portland Bureau of Planning and Sustainability
1900 SW Fourth Avenue, Suite 7000
Portland, OR 97201

Re: Proposed Comprehensive Plan ("Plan") Amendments; Proposed Policies 6.53-6.58

Dear Chair Baugh and Members of the Commission:

I am writing this letter on behalf of Providence Health & Services - Oregon to comment on the proposed Plan policies. The purpose of the proposed Plan policies is to recognize and support campus institutional uses, including medical centers. Providence appreciates the City's recognition of the importance of campus institutions in supporting the region's economy.

There are several issues Providence would like the Commission to consider before making a recommendation to the Portland City Council.

1. The Plan policies should expressly state that existing Conditional Use Master Plan ("CUMP") decisions remain valid pursuant to the terms of a CUMP approval.

In the case of the Providence Portland Medical Center CUMP, Providence spent a considerable amount of time seeking approval for this 10 year master plan. Providence's capital plan is based upon the CUMP approval. CUMP approvals should remain valid and unaffected by land use regulation changes. Providence does not want the Providence Portland Medical Center uses and development to become nonconforming. The proposed Plan policies should include specific implementation direction that existing CUMP decisions shall remain valid.

2. Medical institutions should have the option of retaining and using the CUMP process or seeking a quasi-judicial zoning map amendment.

The CUMP process has a number of benefits, including not constituting a post-acknowledgment amendment to the City's acknowledged land use regulations. Unless the City's Transportation System Plan ("TSP") is amended to reflect the proposed Plan policies supporting campus institutions, an applicant for a quasi-judicial map amendment will be

Mr. Andre Baugh, Chair
November 3, 2014
Page 2

required to address the Transportation Planning Rule ("TPR"). This places a substantial burden on a quasi-judicial applicant to solve what are, in many cases, region-wide transportation issues.

The proposed Plan policies should include specific direction that they may be implemented either through the CUMP process, or a quasi-judicial map amendment, at the Applicant's choice.

3. The City should adopt the proposed Plan policies and the land use regulations concurrently.

While Providence supports the proposed Plan policies acknowledging the importance of campus institutions to the region's economy, once the Plan policies are adopted and acknowledged, the City will implement those policies with land use regulations. These land use regulations as adopted may not be satisfactory to campus institutions. Therefore, because implementation is so important, the City should act on the proposed Plan policies and the implementing land use regulations concurrently so that all of the affected parties, including neighbors, have an opportunity to review and comment on the entire amendment package.

Please place this letter in the official file for this legislative amendment and provide me with written notice of the Commission's recommendation to the Portland City Council.

Very truly yours,



Dana White

Cc: Ms. Karen Weylandt (via email)
Ms. Marty Stiven (via email)
Mr. Michael C. Robinson (via email)