



April 27, 2015

Planning and Sustainability Commission
c/o Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201-5380

Re: Multnomah County Development of Block U

Chair Baugh and Commissioners:

We are writing to you on behalf of the Old Town Chinatown Community Association to support Multnomah County's request to increase the base height allowance on Block U from 75 to 105 feet and to extend the area eligible for height bonuses to include Block U. We supported this development proposal when it came before us in 2011, and continue to believe that, when completed, it will contribute positively to our neighborhood. We are, however, concerned about the precedent that this type of "spot zoning" could create and want to be very clear that we do not generally support one-off exceptions to the zoning code and height restrictions that are in place to protect and preserve our historic districts, public views of architectural treasures, and the City's visual access to the waterfront. Our support of this project is specific and unique, and should not be construed as an indication that we are not extremely concerned about preserving the height limits currently in place in our district.

We would also like to share with you that our support is conditioned on the County agreeing to work with the Old Town Chinatown Community Association to address several key concerns that we have communicated to Multnomah County and its development team. The County has agreed to enter into good faith negotiations with our Community Association and to complete a Good Neighbor Agreement that will address mutual agreement on the following issues of concern to our Association:

1. Multnomah County and its development team will engage with the Community Association in discussions about what public services and amenities will be included in the project to achieve the FAR bonuses necessary to achieve additional height over 105 feet. These amenities must benefit the neighborhood economically, improve livability, and not solely benefit the occupants of the building.
2. Multnomah County will create and facilitate a Stakeholder Advisory Committee with representatives from the Community Association, neighboring properties, and other



stakeholders in the district that will convene and provide feedback throughout the design and construction process.

3. Multnomah County and its development team will include retail use on the ground floor or otherwise contribute to 24/7 vibrancy on the block, as it is in close proximity to the train station which serves as a welcoming gateway to the City.
4. Multnomah County will not be expanding its clinical offerings at this site and its clinic will remain available by appointment-only and not on a drop in basis.
5. Multnomah County will maintain representation at OTCTCA meetings and will support and participate in neighborhood events.
6. Multnomah County and the Community Association will review the Good Neighbor Agreement annually. The OTCTCA believes that a Good Neighbor Agreement demonstrates mutual respect and cooperation between Multnomah County, neighbors, and stakeholders, paving the way for proactive problem solving.

We have some concerns about the proposed development, but we believe that the County and its team will work with the Community Association, the Portland Development Commission, the Bureau of Development Services, and the Planning Commission to address the following:

1. Parking – This remains an ongoing and critical concern in the neighborhood. We understand that County employees and clients are accustomed to a transit-oriented location so they are not expected to exacerbate the parking shortage. Rather, we are supporting this development with the understanding that the County will transfer its parking entitlements to PDC (or another entity, as appropriate) so that new, shared commercial parking may be built in the district.
2. Height and mass – The size and scale of the proposed building have the potential to overwhelm the site and obstruct site lines to the Union Station Tower and the waterfront. We are relying on BDS to utilize existing design guidelines to ensure that the building fits into the neighborhood. The Community Association will participate in that design review process as appropriate.
3. Additional social services in the neighborhood –Multnomah County relocating its STD/HIV/TB clinic in the neighborhood effectively increases services targeted at very low and no-income individuals. We support the County’s proposal nonetheless, but would like the City and County to recognize that they are siting a new service in the neighborhood and take this into account when balancing additional requests for siting services in Old Town Chinatown. Old Town Chinatown is already home to a concentration of social services. In spite of assurances by various government leaders that new services will not be sited here, this neighborhood continues to be a target for services supporting Portland’s homeless citizens. We support our



neighbors and recognize the value of the service providers who work here, but continuing to concentrate homeless services in Old Town will undermine the goals of our 5-Year Action Plan and the City's efforts to help us revitalize this culturally rich and historically significant district.

We are excited about the redevelopment of this site and the County's plans to locate its administrative headquarters in Old Town Chinatown. The County's 300-350 employees will be a welcome addition to our daytime environment and will help activate a portion of our neighborhood that would benefit from more feet on the street. These employees will also bring resources into the neighborhood that will support, and hopefully catalyze, services such as grocery stores, fresh fruit/vegetable vendors, and dining establishments coming into neighborhood. Market rate jobs and services are critical to the prosperity of Old Town Chinatown and a key emphasis in the District's Five-Year Action Plan.

In closing, we support the County's request for a base height increase to 105 feet and its request that Block U become eligible for height bonuses, keeping in mind that the historic character of our district is at the core of its unique identity and critical to its economic revitalization. We look forward to working with the County and its development team to address our concerns and create a project that will benefit its new occupants as well as the neighborhood.

Best regards,

Helen Ying, Chair
Old Town Chinatown Community Association

Zach Fruchtengarten, Co-Chair
Land Use and Design Review Committee

Sarah Stevenson, Co-Chair
Land Use and Design Review Committee