



GOOSE HOLLOW FOOTHILLS LEAGUE

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Planning and Sustainability Commission

July 24, 2016

Dear Commissioners,

The Goose Hollow Foothills League (GHFL-the neighborhood association) unanimously requests the following changes to the draft CC2035 plan.

In the Goose Hollow section:

- I. **A. Add these words to POLICY 5.GH-5--“Retain the personality and character of Goose Hollow by”.** GHFL requested this language in the previous draft. This is likely a simple oversight. Insert as such: “Identify significant historic resources within the district. **Retain the personality and character of Goose Hollow by** encouraging the preservation and rehabilitation of existing buildings that represent a wide range of architectural styles, scales and eras.”

B. Add GH historic preservation reference to Policy 5.17.
This is a simple oversight. Goose Hollow has a historic preservation policy, so GH should be added to the list.

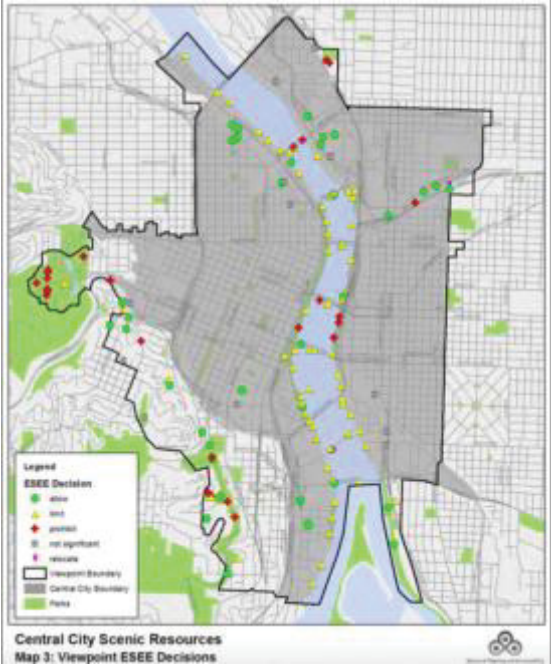
C. Remove “the Hollow” from Code RC28—On page 114, the term “the Hollow” should not be used. GHFL alerted BPS staff that all mentions of “the Hollow” should be changed to “the area near I-405” since “the Hollow” refers to all lower elevations in the neighborhood. Staff corrected this in other sections of the draft CC2035 to “the area near the stadium.” Though this is not exactly what GHFL asked for, it corrects the inaccurate use of the term “the Hollow.” So the use of the term in Code RC28 is likely a simple oversight. All uses of “the Hollow” should be removed from all sections of the CC2035 plan.
- II. **Add these words to POLICY 5.19** Historic resources and districts and **POLICY 5.20** Preservation Incentives: Retain the personality and character of Historic Resources and Districts.
- III. **We support the West End**— West End advocates are requesting 100’ heights and 7 to 1 FAR. GHFL supports the efforts of West End residents to advocate for better protection of the incredible historic architecture in the West End than the current draft provides and for lowered heights along the Park Blocks.
- IV. **In the View Corridors section:**
 - A. **On SW 10 and 12, focal points should be changed to include the downtown skyline. (This draft lists only Mt. Hood as the view, with the downtown skyline removed.)**
SW 10 International Rose Test Garden – near garden store, south point and
SW 12 Washington Park Zoo Train Station

These have been view corridors for Mt. Hood and the downtown skyline for over a century, yet downtown views will no longer be protected with this draft. Vegetation blocking downtown views can and should be managed, even though the slope is steep. These are historically and visually significant views of the downtown skyline and are primary places for tourists and Oregonians to visit. Historically, overgrown vegetation has never been a sufficient reason for removing views from protection. It is shocking that this is given as the reason for removing century-old views. Managing vegetation is an easy step that should be taken to protect views of the downtown skyline.

B. SW 14 SW Market at 20th should have a limit recommendation because it is at the top of a well-used public staircase. Other public staircases have the limit recommendation at the top. This heavily used public staircase provides Mt. St. Helens views which should be protected.

C. SW 17 Salmon Springs should be a strongly protected view corridor, as proposed in this draft. Heights should remain reduced to protect this iconic view of Portland. Some may claim that future development of jobs is economically more important than protecting this view. This rationale is flawed. This site is visited by thousands of tourists and residents. The economic value of such an important and heavily used tourist site should have the most weight when evaluating the protection of this view. The massive economic boost of tourist dollars and jobs in the tourist industry far outweigh any potential future jobs lost by protecting this view corridor.

Many currently protected views of Mt. Hood from the banks of the Willamette River have been lost in this CC2035 draft. In this page 62 map, you can see that Salmon Springs is the only red x



on the banks of the river. Salmon Springs Fountain will be the ONLY remaining view of Mt. Hood from the banks of the river when these view policies are enacted. This view is iconic to Portland's sense of place-- which is what draws tourists here. It would be a tragedy for Portland's sense of place and for Portland's robust tourist economy to lose this important last view of Mt. Hood from the banks of the Willamette.

D. SW 19 and SW 21 –SW Montgomery Drive--Both should be changed to prohibit.

Vegetation on a steep slope is not reason enough to lose iconic view corridors. These views can easily and should be preserved by managing the vegetation. Frank L. Knight "park" west of the extension of SW 19th is dedicated public parkland and can be appropriately managed to provide stunning near views of Portland's central city and Mt. St. Helens beyond.

V. Upland Views

A. The Vista Bridge view corridor to Mt. Hood— We request that 1000’ below the timberline remain visible, as it is today.

The views to Mt. Hood from the Vista Bridge are being threatened by the heights proposed in this draft.



Figure 16: View of Central City and Mt Hood from SW15 – Proposed Bonus Heights

Page 79 states: “The bottom elevation of the view corridor is set based on the height of existing buildings, rather than 1,000 ft below the timberline...With the recommended building heights the view of Mt Hood will remain as it is today...” This statement is untrue as can be seen in the pictures above and below. The view of Mt. Hood will change dramatically so that only the snowcap will be seen, where 1000’ below the timberline can be seen today. It is the contrast between timberline and snowcap that creates this dramatic view.



We ask for slightly lower heights in the center of the view corridor in order to preserve the existing views of 1000' below the timberline. It will only take a slight modification to heights to protect this iconic view.

Views from the Vista Bridge are historically important since the vistas from the Vista Bridge and SW Vista Ave were designed by the Olmsted brothers in the 1920s. Preservation of these important views has been embraced by a century of Portlanders. Also, SW Jefferson/Canyon Rd. (which the Vista Bridge spans) was "The Great Plank Road," first planked in the 1850s and an important entrance to Portland for 166 years.

Having only the very top of Mt. Hood's peak protected is an inadequate protection of this view corridor. The rationale to raise heights gives developers private profits while permanently stripping away the public amenity of this iconic Portland view. Evaluations of this view corridor should include the enormous financial benefit (tourists) and cultural benefit (Portland's sense of place) of the public amenity of this iconic Portland view. The view from the Vista Bridge is so iconic that it has come to stand for all of Portland. The most recent example is on the hit TV show *Portlandia*, where this view is the title shot.

Recommendation: View corridor should honor the goals of the 1991 protection of this view. Heights should be reduced so that 1000' below the timberline can be seen, as it is today.

B. Views toward the Vista Bridge—Keep this as a view corridor, instead of a view street which gives inadequate protection of views of the bridge. Reduce heights and require setbacks.

The currently protected view corridor to the Vista Bridge is being stripped away in this draft, and SW Jefferson is being turned into a view street. This will completely block views of the bridge, which can be seen from many points throughout the city. The proposed heights in this draft will result in a canyon of buildings along SW Jefferson (reaching 180' 6 blocks from the bridge, 140' 2 blocks from the bridge, and 50' heights allowed right next to the bridge which will block views of the arches). When fully built to the proposed heights, Portlanders will have to stand underneath the bridge or in the middle of the street to have a view of the arches. Heights must be lowered so that views of the bridge will be permanently protected. No building should ever block the view of the arches.

Views from downtown to the Vista Bridge have been a defining feature of Portland since it was built in 1925. Views from Washington Park to the Vista Bridge are also vital. John Charles Olmsted advocated protecting these views.

The 1991 Scenic Resources Protection Plan required very low heights near the Vista Bridge—with 15' beside the bridge, then 20', 30', 35', 40', then finally 45' at Jefferson and SW 17th.

City Council has already committed to preserving the view corridor to the Vista Bridge when they adopted the West Quadrant Plan-- one of its five urban design policies committed to "elevate the presence, character and role of significant public view corridors (e.g. Vista Bridge, West Hills) which define the district."

Recommendation: Views of the Vista Bridge should not be downgraded from a view corridor to a view street since this gives inadequate protection to the currently protected views of the Vista Bridge. Heights must be much lower for at least 4 blocks east of the bridge in order to allow views of the arches of the bridge to be seen from many vantage points in the city. GHFL proposes maintaining the current heights (30', 35', 40', and 45'—from the bridge to SW 17th), but recommend that the lowered heights be expanded to include the entirety of the block fronting SW Jefferson (Jefferson to SW Howards Way to the south and Jefferson to SW Madison to the north). This will prevent any building from ever blocking views of the arches of the bridge.

Setbacks: We propose that no building be higher than one story at street level along SW Jefferson/Canyon, with a 20' set back for the next story (as recommended in the 1991 Scenic Resources Protection Plan).

VI. In the Zoning section:

A. Recommendation: Add back the required residential overlay in the areas to the east and west of the stadium. This can include hotels, retirement centers, assisted living facilities, condos, or apartments with mixed use (offices, retail, restaurants, etc). The goal is to have 24 hour eyes on the ground, which adds a protective element in Goose Hollow since it is a dense urban neighborhood.

For many decades Goose Hollow has advocated for a required residential overlay in the areas to the west and east of the stadium. No GHFL board has ever advocated for the required residential overlay to be removed. During the West Quadrant SAC process, a developer who owns property in this area and will gain financially from removing this overlay and a former GHFL rep said that Goose Hollow wants this residential overlay removed. We do not. This does not represent any policy vote by any GHFL board. GHFL wants required 24 hour eyes on the ground east and west of the stadium, for which we believe a residential overlay is essential protection. We have been consistent with this goal for many decades.

GHFL has informed BPS staff that West Quadrant SAC members from Goose Hollow stated their own personal opinions which may have reflected conflicts of interest. The GHFL board has voted to strongly oppose the removal of this requirement.

VII. Ombudsman's Report

West Quadrant SAC members did not disclose their financial conflicts as required by the ombudsman—their “advice” to increase heights and relax zoning on their own properties is therefore ethically compromised and should be rejected by the PSC.

During the West Quadrant process, many members of the Stakeholder Advisory Committee advocated for their own financial interests without disclosing their financial interests. The ombudsman required SAC members to disclose financial conflicts before PSC votes on the policies that the SAC gave advice on. However, many SAC members did not disclose their financial conflicts, including one developer/property owner who owns many properties in the

West Quadrant and advocated repeatedly for increased heights on his own properties. And two other SAC members who have substantial financial interests in the West Quadrant simply sent combative emails saying that they own many properties. On page page 31 of the section that covers the ombudsman's requirements, planning staff said: "Twenty six members completed the form, two did not complete the form but sent an email that included similar information, one email bounced, and four members did not complete the form." This implies that the emails disclosed as required by the ombudsman. The emails simply made generalized statements that they own or have interests in lots of properties in the West Quadrant. Also the tables on pages 32-34 seem to indicate that those who emailed complied as requested. They did not. Other SAC members or SAC meeting attendees would have no way of knowing that numerous people advocated repeatedly for relaxed zoning or increased heights on properties they or their employer own. And the public still has no way of knowing, since these SAC members didn't disclose which properties they own as required by the ombudsman. This means that the Planning Commission is voting on policies on heights and zoning that were decided under financial and ethical conflicts.

Allowing SAC members to vote on issues that could enrich them personally is the very definition of graft.

VIII. Heights should be lowered and no bonuses should be allowed to protect historic buildings along/near SW Morrison

Nine historic buildings in Goose Hollow (along/near SW Morrison) remain threatened by 280'-325' heights (total with bonuses), which will incentivize the destruction of these buildings. Most buildings are listed on the National Register or HRI--The Tiffany Center (1410 SW Morrison), The Bronaugh Apartments (1434 SW Morrison), The Scottish Rite Building (709 SW 15th), the old Concordia Club--a Jewish social organization formed when Jews weren't allowed membership in the MAC, Arlington club, etc. (1532 SW Morrison), the Commodore Apartments (1621 SW Morrison), the Winston Apartments (1709 SW Morrison), the Historic Hamilton Arms Condos (709 SW 16th), the Lafayette Apartments (730 SW 16th), and the Hotel deLuxe (729 SW 15th). Heights should be lowered significantly on these historic buildings in order to disincentivize demolition and no bonuses should be allowed in this area.

IX. GHFL recommends that FAR transfers within Goose Hollow can only come from other properties within Goose Hollow.

We would be happy to meet with you on these issues.
Sincerely,



Tracy J. Prince, Ph.D.
President, Goose Hollow Foothills League