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City of Portland Planning & Sustainability Commission
1900 SW 4th Avenue
Suite 7100
Portland, Oregon 97201

Dear Members of the Planning & Sustainability Commission:

Portland State University has reviewed the Central City 2035 Proposed Draft and we commend the Bureau of Planning & Sustainability on a plan that will preserve the livability and sustainability of central Portland. We applaud BPS staff on their hard work and we appreciate Director Anderson's willingness to continue to explore solutions with PSU.

Please accept this letter in lieu of my attendance at the first public hearing on CC 2035. I am sorry I could not speak to you in person today, but Director of Campus Planning Jason Franklin and Director of Transportation Ian Stude will be in attendance to speak on behalf of the university.

Portland State wishes to submit comments on two topics within the plan: floor area ratio along the southern transit mall, and the transportation system plan amendments.

Floor Area Ratio

The West Quadrant Plan describes an appropriate vision for the University District/South Downtown Transit Mall, however the CC2035 Proposed Draft does not provide the necessary FAR to adequately implement the West Quadrant Plan's vision. We strongly urge the commission to work with staff to increase the floor area ratio along the southern transit mall and along the Orange Line for the following reasons:

- The transit mall connects billions of dollars of transit investment and should be the location of Portland's densest development.
- There is a significant amount of developable land along the southern portion of the transit mall and an increase in FAR will help develop this land to its highest potential.
- The central city is the appropriate place for tall, well designed buildings.
- The currently proposed FAR of 6:1 along the southern transit mall between Mill and Lincoln does not match the rest of the transit mall's FAR which is between 9:1 and 15:1.
- The currently proposed FAR is not internally consistent with the code, which states in section 33.510.200 (A) that the largest floor area ratios should be located along the Transit Mall and high-capacity transit lines.
- The University Place Hotel property represents one of the last large, redevelopable parcels in downtown and increased FAR on this, and the surrounding parcels, will result in development that is more appropriate and in character with the existing development.
- PSU has entered into a development agreement with the PDC to develop the University Place Hotel site and two blocks along SW 4th Avenue within the next ten years, in a mixed use and dense manner that will help meet both PSU and City of Portland goals.

We recommend that the FAR along the southern transit mall between SW Mill and SW Lincoln and between Broadway and 4th Avenues be increased to 9:1 and that the parcels around the Orange line that are now

recommended for 4:1 be increased to 6:1 (*see attached appendix*). Providing this entitlement will provide opportunities for better urban form and take advantage of our excellent transit infrastructure.

Transportation System Plan

PSU is supportive of the majority of amendments in Section 2b of the plan, including the proposed performance targets for single-occupancy vehicle trips in the central city and the policies regarding walking, bicycling, transit, and transportation demand management. However, in order for PSU to achieve its potential for sustainable transportation and contribute effectively towards the 85% non-SOV target prescribed by the proposed draft, we strongly recommend the following changes:

- Regarding Map 5: Central City Bicycle Classifications
 - Re-establish SW 4th Avenue as a Major City Bikeway from SW Madison to NW Flanders. The provision of enhanced and protected bicycle facilities on SW 4th is critical to providing a northbound couplet to SW Broadway. SW 4th is also currently the second most highly used route by current bicycle commuters coming from PSU, despite its lack of any provisions for cycling today.
 - Classify SW Mill St between SW 4th and SW Park as a City Bikeway. This low-traffic street could provide a valuable connection eastbound to 4th Ave through the provision of a contraflow lane.
 - While PSU welcomes the addition of the Green Loop project to the SW Park Blocks, it should be noted that the vision for this project calls for a mixed-use, recreational environment that should not be conflated with the need for separated, bicycle commuter-specific facilities on SW Broadway and SW 4th.
- Regarding the Candidate Projects Map
 - The addition of pedestrian crossing improvements on SW Market at the South Park Blocks.

A few items from the Proposed Draft that PSU particularly supports are:

- The classification of SW Harrison, SW Jefferson, and SW Columbia as Major City Bikeways,
- The inclusion of signal improvements on SW Broadway in the candidate projects list, and
- The addition of pedestrian crossing improvements at SW 6th and SW Jackson, adjacent to the I-405 off ramp.

Your valuable time is appreciated, and please feel free to contact my office with any questions.

Sincerely,



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Appendix: PSU request for FAR increases along southern transit mall

