

SOUTH PARK BLOCKS

I **endorse the priority/goal of obtaining historic designation for the South Park Blocks**. There is some urgency, however, since the heights and uses being proposed along the blocks could incentivize the demolition of many of the historic churches, historic cultural facilities and early apartment buildings, all of which offer human scale, sunlight and historic character to the park blocks. I **recommend moving the time line for this from 6-20 years to 2-5, for that reason**. (See: Vol5 p147 UD23 Obtain historic designation for South Park Blocks.)

Zoning/use has been changed on the east side of the blocks from RX (mixed-use/residential) to CX (commercial). I **recommend against this change, instead recommend retention of the RX zone on both sides/frontages of the park blocks**. When looking at that eastern frontage blocks, there are historic churches and apartment buildings, both of which are more closely associated with residential areas. The exception is the Goodman owned parking lot, the Broadway frontage of which is currently being developed into a tall hotel, threatening to block sunlight.

The threat of loss of sunlight through loss of human scaled buildings and the addition of tall buildings is real. The Ladd Tower's shadows on the South Park Blocks at 11 AM in May 2016 is a good demonstration of what is lost with towers along the blocks.

Earlier height maximums on and along the South Park Blocks were thought to be 100'. There is some confusion about that, but I **strongly recommend maximum building heights for the blocks adjacent to the park be no more than 80'**. In the current proposal, they vary from 185' to 250' to 320' to 370'.

In the current proposal, shadow studies are required on the west side of the park blocks, but not the east side. I **recommend shadow studies be required on both sides of the park**. People use the park both in the morning and the evenings.

Based on the above analysis, the following **are recommended changes** in the draft plan.

Vol5 p147 UD23. Obtain historic designation for the South Park Blocks: **Change the timeline from 6-20 years to 2-5 years**.

Vol1 p70, Policy 5.DT-4b. South Park Blocks: **Add sunlight protection as a requirement. This requirement should also be reflected in the shadow study requirement map** (Vol2A1 p337 Map 510-4).

Vol1 Urban Design 5.3 p66. Dynamic Skyline: Change last sentence to read, "**Require** heights and building forms that preserve sunlight on public open spaces and parks."

Vol2p331, 337: Maps of Heights along South Park Blocks: **Lower to 80' maximum along the park blocks and remove the designation of "area eligible for height increase."**

Vol2 p467, 469. Zoning Maps: **Keep RX zoning along South Park Blocks as expressed on p467 map. Eliminate zone change on p469 map.**

I also **endorse the following** policy actions relating to the South Park Blocks:

Vol5 p111 UD81: Develop a set of special design guidelines and streetscape improvements for the Cultural District.

Vol5 p139, p153, p177 RC81: Develop a package of streetscape improvements for the cultural district to enhance the pedestrian experience between attractions including the OHS, the Art Museum and the Arlene Schnitzer Concert Hall.

David Newman

1221 SW 10th

Portland , OR 97205

Vol5 p145 EN 20: Develop a strategy for inventorying, removing and replacing trees in South Park Blocks to eliminate safety hazards while maintaining or enhancing canopy coverage and habitat.

7-26-16