

From: Colin Cortes [mailto:colin.m.cortes@gmail.com]
Sent: Sunday, August 07, 2016 5:07 PM
To: Planning and Sustainability Commission <psc@portlandoregon.gov>
Subject: CC2035 Plan Testimony

Dear Planning and Sustainability Commission:

These comments relate to the [June 2016 draft](#) of the proposed 2035 comprehensive or “comp” plan and are for your consideration for the upcoming August 9, 2016 public hearing.

Floor Area Ratios (FARs) & Maximum Heights

While skyscrapers are not necessary to provide housing density and employment intensity necessary to support frequent transit, and continuous areas of buildings of 4-6 stories are sufficient for this planning objective, nonetheless I acknowledge the potential legal difficulties of downzoning much downtown and with existing towers. I suggest overall not increasing base height limits and not extending areas of height increase eligibility.

That said, and specific to certain areas:

Downtown, East of the South Park Blocks

I support in the blocks bound by Broadway, Market, Park Avenue, and a little beyond Jefferson lowering the base height from 300 to 250 feet (ft). I object to the remainder of the 300 ft base height area to the east getting height increase eligibility.

Downtown, North of the West End

In the area generally bound by W. Burnside, 11th, Yamhill, and I-405, have the height eligibility not allow towers as high as the existing Indigo @ Twelve West tower at 12th and Washington. The tower is way too tall compared to its context, and all future buildings being at that height would be too much. No building should be higher than

Historic Districts

I support:

- the proposed reduced building heights both in historic districts and on sites adjacent to parks and other open spaces (referring to Maps 510-3 and 510-4); and
- allowing owners of historic resources to transfer FAR if they sign an agreement to seismically upgrade their buildings.

[Map 510-4 Maximum Heights Including Eligible Height Increases](#)

- I support adding map that shows the ultimate heights possible with bonuses and height transfers included. As for the heights themselves, and exempting built structures as high or higher:

- Even with a separate FAR control, I object to the unlimited height (UL) areas near the Pearl shown on proposed [Map 510-4](#). I suggest no more than 250 ft as the majority of neighboring area.
- I object to the north portion of the US Post Office site able to have up to 400 ft. The next nearest height area is 325 ft in an area that at least has the MAX lines along NW 5th and 6th Avenues. There's no policy basis for these. Lower both areas from the max possible heights of 400 and 325 respectively to no more than 250 as is most of the Brewery Blocks and the Pearl.
- In the 325 ft area south of W. Burnside and generally centered along I-405, lower to no more than 250 ft to be more consistent from the West End to the Brewery Blocks and the Pearl.
- Improve the height transition from Skidmore / Old Town to the south/southwest by fine-tuning 75/130/460 to 75/130/235 by creating a height band of no more than 235 ft that parallels the 130 ft height band for at least a half block.
- Excepting existing structures as high or high, shrink the 460 area in the north part of downtown to extend only three blocks east-west centered along the SW 5th and 6th Avenue transit mall and only up to three blocks north-south centered along the Morrison and Yamhill MAX red lines. The 460 area in the south part of downtown already has this three-block relationship to the MAX lines. For the remaining area, lower the height to no more than 325 ft.

Morrison Bridgehead

Regarding Map 510-3, Map 3 of 3, I object to the extent of designation of “area eligible for height increase” at the Morrison west bridgehead because it is against the purpose statement in [33.510.200A](#). of stepping down to the Willamette River. At the least split the difference on the site, with the blocks between SW Naito Parkway and 1st Avenue having no eligibility for height increase, while the blocks between SW 1st and 2nd may be eligible.

Old Town / Chinatown

In Old Town / Chinatown, I support the overall lower base height from 460 and 350 to 250 and lesser extent of height increase eligibility area.

Shadow Analysis

Regarding [510.210D.2.](#), the proposed revised "required shadow analysis" should include the winter solstice as well as the proposed spring equinox (April 21).

US Post Office Site

Regarding [Map 510-2](#) Max FARs, on Map 1 of 3, the labeled US Post Office site at NW Broadway and Hoyt has too high an FAR rise from 4:1 to of 7:1 because despite the

purpose statement in 33.510.200A., this FAR steps up from the Pearl and NW Portland instead of remaining steady or dropping down to meet the Slabtown neighborhood. At the very least, it should not be higher than 6:1, which is the same to the south and southeast and no more of a contrast with 4:1 to the north, northeast, and west than the adjacent 6:1 areas to the south.

West End

In the area of the West End bound by SW 10th Avenue, Market, I-405, and Salmon, and where the height limit is proposed to remain 250 ft, lower this limit to 200 ft on the blocks between the streetcar lines on SW 10th and SW 11th Avenues and between Jefferson and Market and the block bound by 10th, 11th, Salmon, and Main. For the remaining blocks to the west currently proposed at 250, lower to 150.

The existing Benson Tower at SW 11th and Clay is way too tall and out of context, and the effect of all 250-ft high blocks at full development would be far too much. Buildings as tall as the existing Eliot Tower at SW 10th and Jefferson are ok adjacent to transit (i.e. the streetcar) in the West End. Anywhere else in the West End proposed at 250 needs to be lower. I suggest a height roughly the same as the existing Museum Place at SW 11th and Jefferson. More height is not needed to provide housing density supporting even minimal transit, and buildings overall (even commercial or mixed use ones) provide no benefit to extreme height other than to the owners of land on which they would stand.

Lighting

I request that the proposed lighting standards for wildlife habitat in certain overlay zones in 33.510.253 of Volume 2A, Part 1 Central City Plan District be broadened. The zoning code currently doesn't regulate exterior lighting. I suggest basing a comp plan policy or zoning regulation on the models of the Dark-Sky Association at <<http://darksky.org/lighting/model-lighting-laws-policy/>>. A policy would state a lessening unnecessary and ill-directed lighting while, given it's the central city, make exemptions for public buildings and spaces and certain structures such as public art and theater marquees.

In short, require that altered or new private on-site exterior lighting fixtures be full cut-off to allow no or minimal light trespass into public spaces, including parks, plazas, biking and walking paths and trails, and streets. (In turn, have a requirement in the public works code or equivalent that public lighting fixtures allow no or minimal trespass beyond public property or right of way.)

Transportation

I support designating the Central City as a Multimodal Mixed-Use Area per state allowance and what that implies.

Downtown TR42

I support the policy to enhance W. Burnside to improve streetscape quality, multimodal access, and bicycle and pedestrian safety.

Jefferson Columbia Bikeway

Specifically, build only cycling improvements that also improve the streetscape for pedestrians. Building on Measure 20131 in the Transportation System Plan (TSP), a Jefferson Columbia Bikeway needs to be expanded to become safe and pleasant for pedestrians—with wider sidewalks and narrower traffic lanes on those streets. Wider sidewalks will also allow large canopy street trees, which are too few along much of these streets west of the South Park Blocks. Large canopy street trees will also make Columbia and Jefferson safer and more pleasant for cyclists too.

SmartPark

The February 2016 draft of the [Volume 1 Goals and Policies document](#) doesn't mention upon the City [SmartPark](#) public garage system.

I suggest pairing additional garage locations with reducing the overall private parking supply in the central city. A benefit is stronger public policy influence over the overall central city parking supply. Specifically, as further development occurs and off-street parking lessens, provide a few strategically located concentrations of public parking, ideally below buildings or public squares or behind buildings.

These locations could be towards the outer edges of the Central City Plan District and can serve to sooner intercept those motorists that do arrive in the central city, especially the west side and for long periods, to not cruise and get off-street sooner (and be closer to getting out of the district when they do leave) and to do so prior to coming upon transit lines.

General locations without SmartParks that seem ideal include any of:

- Northern Pearl District, e.g. as part of US Post Office redevelopment (i.e. “just get off the Broadway Bridge and park”);
- Lloyd District (“just park now and ride TriMet into downtown”);
- Southern Central Eastside Industrial District (“just park now and ride TriMet into downtown”);
- South downtown / Auditorium District; and (“just park now and don’t bother driving past Market Street”)

The City could assess a revised or new system development charge or a kind of fee-in-lieu costing developers a fraction of what it would cost to building what little off-street parking is required today. The overall parking required of a developer would be lessened in relation to

this fee. Funds pooled would be the capital and perhaps some operating costs for the additional garages.

Align the funding requests in the TSP to reflect the above transportation-related urban design priorities and begin to fund them.

Urban Design

Policy 2.GH-2 Goose Hollow Jefferson main street and West End UD 86.

I support developing and implementing a strategy to cap I-405 along both sides of Jefferson. I urge in addition to this, revising the policies to extend capping south to Columbia Street and to cap also at the MAX lines from the north side of Morrison to the south side of Yamhill (a block and two half-blocks).

West End UD 79

I support the policy to reduce the impacts to neighbors from I-405 noise and air pollution by installing green walls on new/redeveloped buildings and street trees wherever possible, but with a special focus along SW 12th and SW 13th Avenues instead of “where appropriate.”

West End UD 82

I support exploring opportunities for consolidating and/or redeveloping Burnside’s “jug handles” into public spaces. I urge attention foremost on the intersection of W. Burnside, SW Broadway, and SW Pine.

Align the funding requests in the TSP to reflect the above transportation priorities and begin to fund them.

Sincerely,

A handwritten signature in blue ink that reads "Colin Cortes". The signature is written in a cursive, flowing style.

Colin Cortes, AICP, CNU-A

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