



August 8, 2016

Planning and Sustainability Commission
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

Members of the Planning and Sustainability Commission:

ATTN: CC2035 Testimony

We appreciate the opportunity to comment on the CC2035 Proposed Draft of zoning regulations for the Central City Plan District. BPS undertook an extraordinarily difficult task of overhauling the Comprehensive Plan and Zoning Code, and has done an amazing job of preparing a reasoned CC2035 Proposed Draft for review. While there are many proposed amendments to the zoning code that we fully support, we think important issues remain that need further consideration. Attached to this cover letter we offer a series of detailed amendments to the CC2035 Proposed Draft. Specifically we propose amendments as follows:

- Exhibit 1: Amend 33.510.200.E Floor Area Ratios
- Exhibit 2: Amend Map 510-2 Proposed Maximum Floor Areas
- Exhibit 3: Amend 33.510.263.B.1 Parking and Loading Access
- Exhibit 4: Amend 33.510.205.D.3 Intra-Subdistrict FAR Transfer
- Exhibit 5: Amend 33.510.205.C.2 Affordable Housing Bonus FAR
- Exhibit 6: Amend 33.510.244 Low-Carbon Buildings
- Exhibit 7: Amend Map 510-2 Base Heights
- Exhibit 8: Amend 33.510.263.A Purpose of Parking and Loading on Access Regulations
- Exhibit 9: Amend 33.510.205.C.2 Affordable Housing Bonus and Affordable Housing Fund
- Exhibit 10: Amend 33.510.243.B.1 Ecoroof
- Exhibit 11: Amend Map 510-4 Bonus Height

We look forward to working with you on these matters.

Sincerely,

A handwritten signature in blue ink, appearing to read "Greg Goodman", is written over a horizontal line.

Greg Goodman, Co-President

A handwritten signature in blue ink, appearing to read "Matthew Goodman", is written over a horizontal line.

Matthew Goodman, Vice President

A handwritten signature in blue ink, appearing to read "Mark Goodman", is written over a horizontal line.

Mark Goodman, Co-President

A handwritten signature in blue ink, appearing to read "Chris Kopca", is written over a horizontal line.

Chris Kopca, Asset Manager



Attached: Exhibits 1-11

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Exhibit 1

Spur Central City Residential Development by Adding to 33.510.200.E an FAR Exemption for Residential Floor Area in Excess of the Initial 3:1 FAR Increase

A central goal of CC2035 is to spur residential development in the Central City. The proposed *CC2035 Goals and Policies*, which underlie the zoning code regulations, contain numerous policies and related actions to drive central city residential development. Policy 2.8 typifies this emphasis:

Create attractive, dense, high-quality affordable housing throughout the Central City that accommodates a broad range of needs, preferences, and financial capability in terms of different types, tenures, sizes, costs and locations. Support new housing opportunities for students, families and older adults.

Central City residential development is also at the core of other regional and city objectives related to active transportation, transit ridership, carbon reduction, and others. It is incumbent on the zoning code to provide policies to truly foster residential development. While residential development goals and objectives must sometimes be weighed against other goals and objectives, where residential development can be fostered without conflicting with other priorities -- it should be.

Consistent with the policy emphasis on affordable housing and historic preservation, the first 3:1 FAR increase for residential development must come from the three priority FAR methods. But after the first 3:1 FAR increase, floor area can be obtained through FAR transfers. Unless the developer has other properties to transfer FAR from, the developer must purchase this FAR from other property owners. While these FAR transfers may financially benefit those property owners, it serves no policy purpose. In fact, it runs contrary to CC2035 policies by adding cost to residential development -- thereby impeding residential development and/or making housing less affordable.

A better way to foster residential development is to allow residential floor area beyond the initial 3:1 FAR increase to be exempt from the FAR transfer requirement. This would allow residential development after the initial 3:1 FAR increase to be free of the added cost of purchasing FAR from other property owners.

The rationale for requiring FAR transfers appears to be a concern that the overall density of the Central City districts will grow too large. In previous years this was a problem because it could violate aspects of the state Transportation Planning Rule (TPR). However, the TPR is no longer an impediment to allowing overall higher densities in the Central City due to the Central City's recent designation as Multimodal Mixed-Use Area (MMA). As an MMA, automobile congestion standards no longer apply to Central City land use changes. Furthermore, the CC2035 Proposed Draft does not actually control building bulk through FAR -- it controls bulk by height limits since there is no limit on the amount of increased FAR that can be earned/transferred at a site.

Given the policy emphasis on Central City development and the weak policy justification for requiring increased FAR after the initial 3:1 increase to be purchased from other property owners via FAR transfers, we propose the following amendments in bold and underlined text to subsection 33.510.200.E of CC2035:

33.510.200 Floor Area Ratios

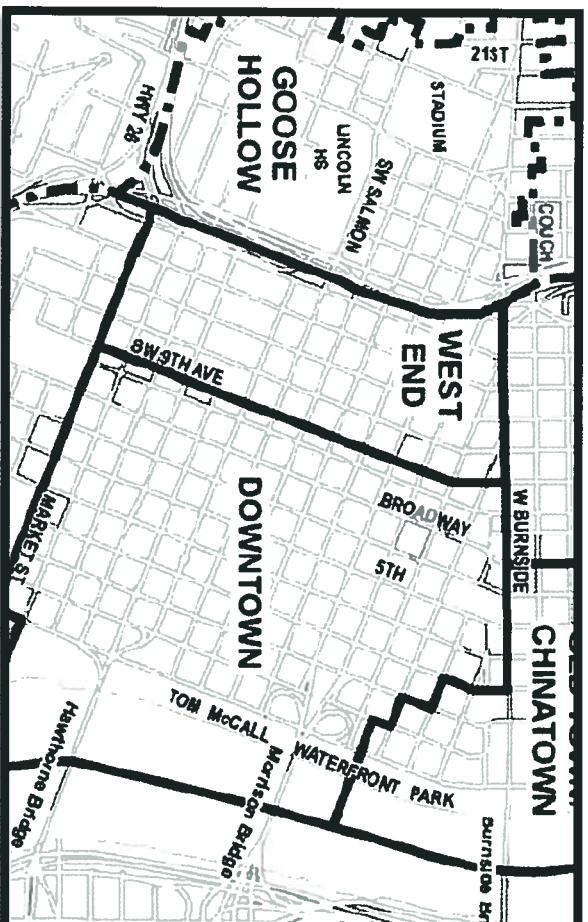
E. Exemptions. The following are exempt from the regulations in Subsections C...

3. In the CX, RX, and EX zones, floor area in excess of the base floor area plus the initial 3:1 increase in floor area at a site that is used for residential purposes does not count toward the maximum FAR for the site.

Exhibit 2

Amend Map 510-2 to provide a base FAR of 9:1 in the CX Zone in the West End Subdistrict

The West End Subdistrict is flanked by SW 9th and SW 14th between W. Burnside and Market Street.



Today the portion of the West End between SW 9th and SW 11th is zoned CX, while the area west of SW 11th is RX. However, when the City adopted the West End Plan in 2002, it created an overlay for the area north of SW Salmon and west of SW 11th that generally permitted mixed-use development similar to the CX zone. The CC2035 Proposed Draft reinforces the mixed-use vision of the West End by rezoning much of the area north of SW Salmon and west of SW 11th as CX.

Proposed Zoning of West End (Blue is RX and Pink is CX)

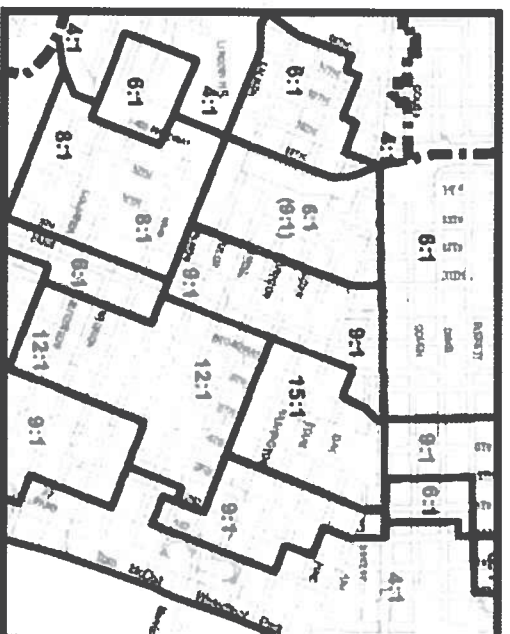


Consistent with the different zoning, the *Central City 2035 Goals and Policies (Proposed Draft)* for the West End are different for the northern portion of the West End and the southern portion. For example:

- Policy 1.WE-1 “North of Taylor: Encourage a broad mix of land uses in the West End, particularly north of SW Taylor Street, including office and retail opportunities in addition to residential.”
- Policy 2.WE-5 “South of Salmon Street, encourage residential development as the predominant use; to the north encourage it as a major component of new development. In particular, encourage multi-family housing supportive of families.”

With regard to the base FAR, the existing zoning code acknowledges the policy difference between the northern and southern portion of the West End. The figure below is from Map 510-2 in the existing code. As shown, the area north of Salmon has a base FAR of 8:1, while the mixed use area between SW Salmon/W. Burnside and SW 11th/SW 14th Avenues has 6:1 FAR if less than one-third of a development is residential and 9:1 if more than one-third of the development is residential. The 9:1 FAR expressly mirrored the 9:1 FAR in the CX portion of the West End west of SW 9th,

Map 510-2 in Currently Effective Zoning Code



However, in setting the base FAR for the entire West End west of SW 11th at 8:1 (Map 510-2 in CC2035 Proposed Draft), the CC2035 Proposed Draft did not take into account the policy difference between the northern and southern portions of the West End. Staff explains its reason for the proposed downsized base FAR north of Taylor on page 48 of the CC2035 Proposed Draft as follows “*Staff proposes instead to set the base entitlement to 8:1 [north of Taylor], similar to the surrounding areas to the south.*” Given the policy vision for the CX portion of the West End, it would be more appropriate to set the base FAR for the “surrounding” CX zone between SW 11th and SW 14th at 9:1, consistent with its existing FAR and the FAR for the portion of the West End CX zone between SW 9th and SW 11th.

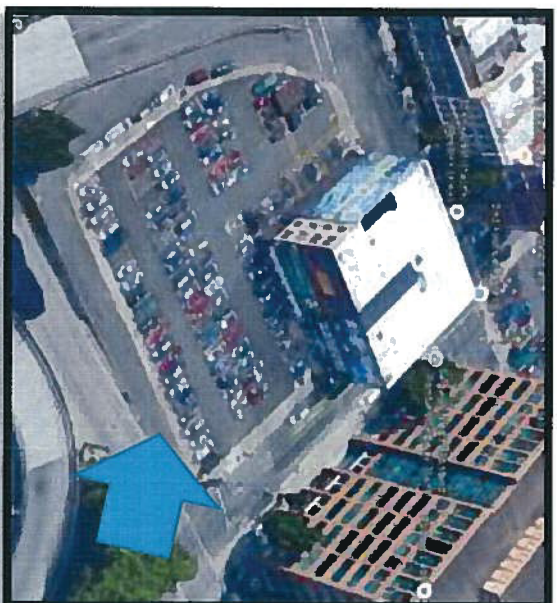
Accordingly, we recommend:

- Amending Map 510-2 to provide a base FAR in the CX zone of the West End west of SW 11th Avenue as 9:1.

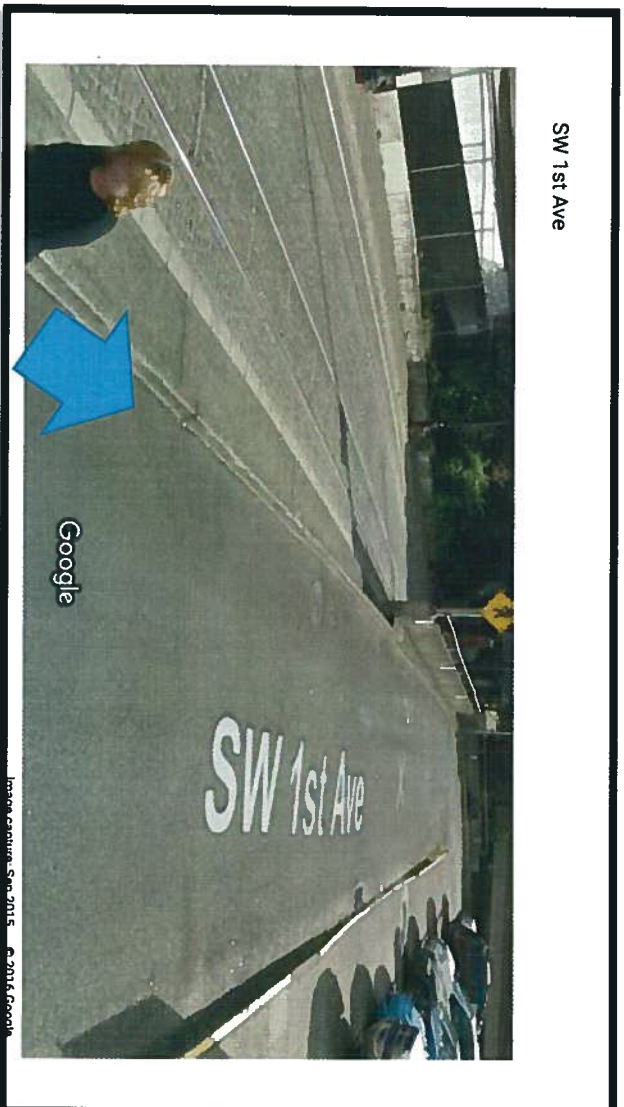
Exhibit 3

Amend 33.510.263.B.1 to not prohibit parking and loading access on SW 1st Avenue between SW Stark and Washington where a lane of SW 1st Avenue is physically separated from the LRT alignment

The Review Daft added PCC 33.510.263.B.1.f, which prohibits motor vehicle access to parking and loading along SW First Avenue between NW Davis Street and SW Morrison, the segment where light rail operates on SW First Avenue. However, a unique situation exists at SW 1st Avenue between SW Stark and SW Washington, which is not properly accounted for in the code language.



As shown below, the auto circulation lane on SW 1st Avenue at this location is physically segregated from the light rail alignment due to the grade change as the light rail alignment dips below the Morrison Bridge ramps adjacent to SW Washington.



Because it is physically separated, allowing parking and loading access on SW 1st Avenue between SW Stark and Washington would not impair light rail operations. Moreover, parking and loading access on SW 1st Avenue in this location may be preferable than using SW 2nd or SW Stark, which are Major City Bikeways. The physical alignment of SW Washington in this location may not be ideal for parking and loading access, and can only be accessed by SW 1st Avenue anyway. So overall, prohibiting parking and loading access on SW 1st Avenue between SW Stark and Washington does not facilitate light rail operations in any way, and may lead to using alternative access ways that are less desirable based on City objectives.

Thus, we recommend that PCC 33.510.263.B.1.f be amended as follows:

B. Parking and loading access standards.

1. *Motor vehicle access to or from any parking or loading area, or parking structure is prohibited on or along the following streets unless it is the site's only frontage, in which case it requires an adjustment*

*f. On 1st Ave between NW Davis Street and SW Morrison Street, **except between SW Stark and SW Washington.***

Exhibit 4

- Amend **33.510.205.D.3** to facilitate the acquisition of additional floor area in the West End Subdistrict after the initial 3:1 floor area increase

We are concerned that the proposed regulations will not provide a sufficient amount of reasonably priced FAR for West End Subdistrict development to accomplish the City's objectives for the subdistrict.

The Historic Resource transfer option (33.510.205.D.1) is the only Central City-wide floor area source. But given the seismic upgrade pre-requisite and the low FAR on many historic sites, we believe this is a very limited supply of floor area given the needs of the Central City. This means the primary way to acquire additional floor area above 3:1 in the West End Subdistrict will be the "transfer of floor area within a subdistrict (33.510.205.D.2)" option.

Unfortunately intra-subdistrict FAR transfers may not work as intended in the West End Subdistrict. The West End is the smallest, by area, of the core Central City subdistricts. Some West End FAR has already been transferred, making unavailable for future development. A large share of the subdistrict is currently used by surface parking lots or underdeveloped properties, further reducing the FAR available for intra-subdistrict transfers. Given the limited supply of transferrable FAR, the price for FAR could be unduly high. As a result, the City's vision for the subdistrict may not be achieved.

Accordingly, we suggest amending the proposed **33.510.205.D.3** as shown in bold underlined text below:

3. ***Transfer of floor area between subdistricts. Floor area, including bonus floor area and bonus floor area earned through a bonus that no longer exists in the zoning code, may be transferred between sites in the University District/South Downtown and the Downtown subdistricts and between the West End and the Downtown subdistricts. Floor area transfers are subject to the following restrictions...***

Exhibit 5

- **Amend 33.510.205.C.2 to leverage the benefit of the affordable housing bonus for developments that are fully or primarily affordable housing projects**

The ability of the affordable housing FAR bonus in the Review Draft to leverage affordable housing can be greatly enhanced by adding flexibility for projects that are fully or primarily affordable housing projects. We define here a project to be primarily an affordable housing project (“Affordable Housing Project”) if at least 50% of its entire floor area in the development is dedicated to 80% MFI affordable housing.

A primary goal of the bonus FAR regulations is to spur the development of housing affordable to those earning less than 80% MFI. The current proposal requires that 25% of the bonus FAR must be used for affordable housing; this is generally a small percentage of the total floor area in the development. For the most part it is impractical to do a residential development that has a small percentage of affordable housing due to the administrative requirements and costs associated with certifying it complies with code requirements. Thus the affordable housing FAR bonus will for the most part only be useful to developments that are Affordable Housing Projects; however in the Central City these projects will still generally require additional financial subsidies. Thus the affordable housing bonus FAR provision in the Review Draft helps an Affordable Housing Project in acquiring additional FAR for itself, if it is needed, but little else.

With some tweaking, the efficacy of the affordable housing bonus FAR provision can be greatly enhanced. Specifically, we suggest the affordable housing FAR bonus should allow more bonus FAR to be earned by an Affordable Housing Project and allow the affordable housing bonus FAR not used by the Affordable Housing Project to be transferred to any other developments in the Central City to meet in whole or part their initial 3:1 FAR increase.

We see this potentially helping in several ways:

- For a large Affordable Housing Project that needs more FAR than the base FAR plus the affordable housing bonus FAR in the Review Draft, the proposal below eliminates the need to purchase FAR and add cost (and the need for additional subsidy) for the Affordable Housing Project.
- For Affordable Housing Projects that do not need the full amount of affordable housing bonus FAR, the proposal below generates funding that can be used to develop the Affordable Housing Project and, thereby, reduce or eliminate the need for the limited amount of available public subsidy.
- For developers of multiple Central City properties, the proposal below allows for the consolidation of affordable housing floor area into one Affordable Housing Project, rather than having small amounts of affordable housing in several buildings, making the administration of the affordable housing requirement more practical, while still meeting requirements for the initial 3:1 FAR increase.

Accordingly, we recommend amending 33.510.205.C.2 as follows:

a. *Affordable housing bonus option. Proposals in the CX, EX, and RX zones that include affordable housing will receive bonus floor area. **Except for as provided in subparagraph (3) below**, up to 3 to 1 FAR can be earned if at least 25 percent of the increased floor area is dedicated to housing affordable to those earning no more than 80 percent of the area median family income. To qualify for this bonus option, the following requirements must be met:*

(1) *The applicant must provide a letter from the Portland Housing Bureau certifying that the development meets the standards of this Paragraph and any administrative requirements. The letter is required to be submitted before a building permit can be issued for the development, but is not required in order to apply for a land use review.*

(2) *The property owner must execute a covenant with the City that complies with the requirements of Section 33.700.060. The covenant must ensure that affordable dwelling units created using this bonus will remain affordable to households meeting the income restrictions and meet the administrative requirements of the Portland Housing Bureau or qualified administrator for 60 years.*

(3) *If a proposal is in the CX, EX, or RX zone and at least 50% of the floor area is dedicated to housing affordable to those earning no more than 80 percent of the area median family income, the affordable housing bonus shall be equal to 75% of the floor area dedicated to housing affordable to those earning no more than 80 percent of the area median family income. There is no maximum to the amount of bonus floor area that may be earned. To qualify for this bonus option, the requirements in subparagraph (2) and (3), above, must be met. Unused bonus floor area can be transferred to sites within the Central City and can be used by the receiving site to satisfy the requirements for any floor area increase including the first 2:1 floor area increase described in 33.510.205.B.1.a and the next 1:1 floor area increase described in 33.510.205.B.1.b.*

Exhibit 6

Amend 33.510.244 (Low-Carbon Buildings) to allow for low-carbon certification by LEED and equivalent standards

Several respected organizations are now operating that perform green/low-carbon building certifications that are equivalent to US Green Building Council's Leadership in Energy and Environmental Design (LEED) standards. It does not seem appropriate to have the zoning code require Central City developers to financially engage only one enterprise by name. The zoning code should allow for equivalent certifications. To the extent it is necessary, BPS can issue administrative rules describing what constitutes equivalency, or can enumerate specific equivalent certifications.

Thus, we recommend in bold and underlined text the following amendments to 33.510.244:

33.510.244 Low-Carbon Buildings

A. Purpose. *The low-carbon buildings standard ensures that new buildings and additions to existing buildings are designed and constructed to meet the US Green Building Council's Leadership in Energy and Environmental Design (LEED) standards at the gold level **or meet an equivalent standard by another certifying organization.** The benefits of meeting LEED **or equivalent standards include improving energy efficiency, preserving natural resources, and protecting the health of the occupants.***

B. Low-carbon building standard. *New buildings with a net building area of at least 50,000 square feet, and alterations to existing buildings that increase net building area by at least 50,000 square feet must provide a letter from the Bureau of Planning and Sustainability that verifies that the project has registered to earn LEED gold level certification **or an equivalent standard by another certifying organization and prepared a preliminary LEED or equivalent project checklist showing which LEED or equivalent credits will be pursued for the building.***

Exhibit 7

Amend Map 510-2 to provide a base FAR for site at 87 SW Stark commensurate with increase height limit

The half block site at 87 SW Stark is located just outside of the Skidmore/Old Town historic district. The CC2035 Proposed Draft provides a maximum height with bonus of 250 feet, but continues to propose a base FAR of 4:1, similar to sites that are in the historic district. Abutting properties outside of the historic district are proposed to have a 9:1 FAR.

We think that to be consistent with the updated height limit for the site, the site should have a 9:1 FAR. Accordingly we recommended the following amendment to the proposed code:

- Amend Map 510-2 to increase the proposed Maximum FAR for the site at 87 SW Stark from 4:1 to 9:1.

Exhibit 8

Amend 33.510.263.A to Clarify Purpose of Parking and Loading on Access Regulations

CC2035 Proposed Draft 33.510.263 determines which Central City streets are “prohibited” from having access to a building (parking or loading) and where such access is “not allowed.” CC2035 Proposed Draft 33.510.263.A states the purpose of these regulations:

a. Purpose. The purpose of restricting the location of parking access is to ensure safety and the efficient function of the transportation system, including the need for reasonable parking access. Parking access shall be designed so that motor vehicles can enter and exit the parking facility without being required to cross the tracks of a light rail or streetcar alignment, and to avoid any other significant adverse impact on transit operations. Parking access shall be designed to avoid adverse impacts on operation and safety of pedestrian, bicycle, or motor vehicle circulation, and shall not preclude the future construction of facilities such as protected bikeways. A driveway is not automatically considered such an impact. On blocks where transit stations are located, the pedestrian environment on both sides of the streets will be considered and protected.

Many Central City sites that have multiple street frontages where access is prohibited or not allowed, several sites have all frontages in one or more of these categories. Development on block faces where access is ‘not allowed’ need discretionary approval of the access location. Under 33.805.040.A, the standard for such approval includes whether the proposed access location meets the “purpose” of the regulation. The concern with the purpose language in 33.510.263.A focuses on the phrase “*and shall not preclude the future construction of facilities such as protected bikeways.*” This phrase becomes part of the standard for permitting access onto the street.

The proposed language provides no specific plan or definition of “facilities such as protected bikeways.” Does that mean unprotected bikeways are part of the standard or not? Future bus stops? Sidewalk expansion? Where will these facilities will be? What is their design? When will they be built? Since there are no specifications in the code, these judgments are left to the reviewer. And those judgments will change over time, as reviewers change. The developer will be stuck in the middle having to prove that whatever and wherever these facilities are, the proposed access is not precluding it. Will access be permitted on any of these street frontages, or will they fail the standard? By using such wide-open language, the purpose statement becomes unworkable. The purpose statement needs to be clearer about the need for reasonable parking access.

Thus, we recommend the following amendment to CC2035 Proposed Draft 33.510.263.A:

a. Purpose. The purpose of restricting the location of parking access is to ensure safety and the efficient function of the transportation system, including the need for reasonable parking access... No development shall be precluded from having reasonable parking access capable of handling its full entitlement of parking spaces under the zoning code without adding excessively to the cost of the development.

Exhibit 9

Amend 33.510.205.C.2 to provide a more complete description of the eligibility requirements for the affordable housing bonus and the calculation of the fee for the affordable housing fund bonus

Given the central importance placed on the affordable housing bonus and the affordable housing fund bonus in the proposed code, the proposed code must be clear about its requirements and not vulnerable to changing interpretations. Moreover, the zoning code must provide clear and objective standards that are only amendable in accordance with land use laws. The proposed code leaves essential policy choices to administrative rules; and by doing so do not provide clear and objective standards for either the affordable housing bonus of the affordable housing fund bonus.

To fix this, we believe 33.510.205.C.2.a should be amended to more completely describe:

- How affordability is measured under the code. While “80% MFI” is a key parameter in defining affordability, it is not sufficient. Code should describe how the 80% MFI tables are applied to rental and for-sale units (i.e.; when and how household size and apartment size are taken into consideration).
- The building area comprising affordable housing square footage. The proposed code requires at least 25% of increased floor area to be dedicated to affordable housing, but does not describe the area included in the 25% calculation (i.e.; does it include a proportionate amount of circulation/common area or just the internal dwelling unit space).

We also believe the CC2035 Proposed Draft 33.510.205.C.2.b should further describe how the affordable housing fund fee will be calculated. This can but does not necessarily require a precise formula, but could also include a description of the basic principles or factors. For example, the currently existing Affordable Housing Replacement Fund bonus option (33.510.210.C.15) has a stated cost per square foot that appears to escalate with inflation. Is that what is proposed here? If so, what is the initial fee? If not, how will the fee be calculated? Is it some calculated benefit to the developer of the FAR increase, an estimate of the subsidy requirement needed for building affordable units, or something else? What are the basic parameters in the calculation? 33.510.205.C.2.b should be amended to provide these details.

Exhibit 10

- **Amend 33.510.243.B.1 (Ecoroofs) to better accommodate roof-level active use decks**

To better allow for roof-deck active areas, BPS slightly reduced the required percentage of ecoroof coverage in the current draft code. However, the regulation is still based on assumptions of future roof design/layouts that may not apply in specific circumstances. Roof-top decks are a much desired amenity by potential tenants. Because the proposed code uses the term “must,” the ecoroof coverage requirements in the code are set in stone and cannot be adjusted. This presumes too much certainty about how roofs may be used or designed. The proposed code needs to provide more flexibility for the design and size of roof-top amenities.

Thus, we recommend that 33.510.243.B.1 be amended as follows:

- B. *Ecoroof standard. In the CX, EX, RX, and IGI zones, new buildings with a net building area of at least 20,000 square feet must, **unless otherwise approved through an adjustment**, have an ecoroof that meets the following standards:*
 1. *The ecoroof must cover at least 60 percent of the roof area. Roof area does not include areas covered by solar panels, skylights or mechanical equipment, or areas used for fire evacuation routes*

Exhibit 11

Maximum heights on several downtown sites were unduly lowered to allow views from Upper Hall Street (CC SW24); a viewpoint that is not used and cannot be safely used by pedestrians, bicyclists, or motorists

While the Upper Hall Street viewpoint is highly ranked for its scenic quality, it fails to meet other criteria to justify protecting it as a viewpoint. Interestingly when it was first identified as a viewpoint, the protected view as if Mt. Hood. However, as part of the proposed CC2035 Scenic Resource Plan, this view is proposed to be removed from the protected list due, in part, to its lack of use by the general public.

Rather than declassify the viewpoint entirely, the CC2035 proposes to protect a different view from this viewpoint. But the basic problems with is viewpoint remain the same, as the City's evaluation in the *Scenic Resource Plan* notes: "Viewpoint access is limited due to its remote location, lack of parking, bike lanes, or transit access, and incomplete sidewalk." (Volume 3A SCENIC RESOURCES PROTECTION PLAN Part 2: Scenic Resources Inventory; Proposed Draft; June 20, 2016)

As you can see below, the viewpoint sits at the end of a sidewalk that does not provide continuous pedestrian access that sits at the beginning of a hairpin curve. There is no viewpoint, as shown by the arrow it is simply the stub-end of an incomplete sidewalk where vegetation blocks views.



The hairpin turn is, for the most part, a blind turn for motorists. Extreme care is required in both directions to avoid cars coming from the other direction, as one makes the hairpin turn. Parking in this vicinity should be disallowed, for it makes the hairpin turn even more difficult and unsafe. The sidewalks on neither side of Upper Hall are used by pedestrians very often; and the continuous sidewalk on the west side of Upper Hall is the sidewalk does is used, to the limited extent either sidewalk is used.

As a result of its location, the City evaluation gave it gets a zero rating for developed as a viewpoint, access to viewpoint, and use as a viewpoint.

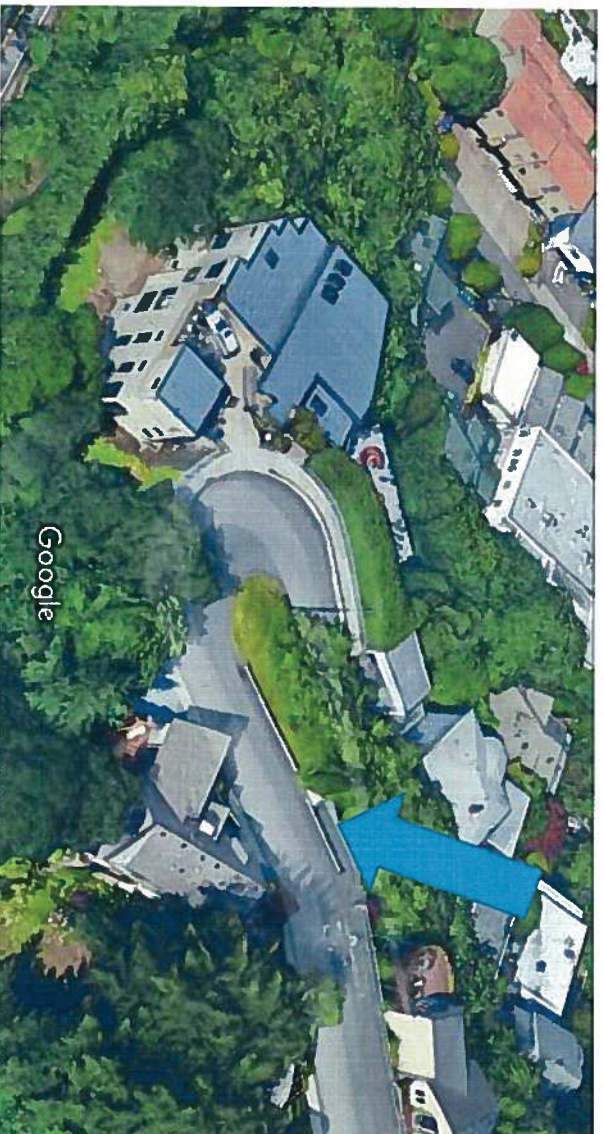
The two illustrations below further highlight how unsafe and unusable this viewpoint is.

This view of Upper Hall shows the view point from the bottom of the hairpin turn looking up. The viewpoints is where the arrow points behind the vegetation.



The aerial view below further shows the isolated nature of the site, and its inaccessibility for general public use.

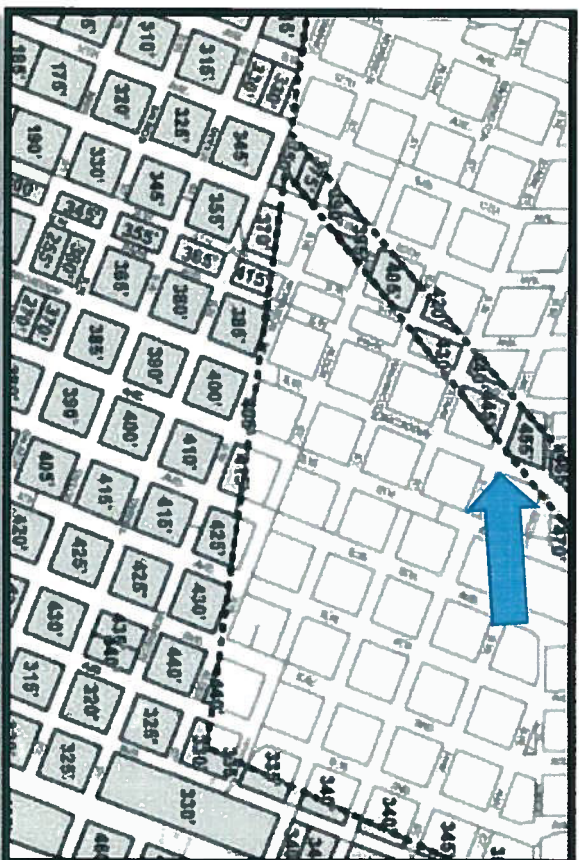
Google Maps SW Upper Hall St



The City's evaluation regarding the economics of protecting this viewpoint is also incorrect. The evaluation in the Scenic Resource Protection Plan concludes "*Due to the elevation of the viewpoint, there is minimal economic impact from protecting the views of Mt Adams and Mt St Helens.*" (Central City Scenic Resources Protection Plan: Proposed Draft, Summary, Results and Implementation; June 20,

2016, page 91). As shown in the “480 Maps” prepared by the City, protection of this viewpoint results in a swath of reduced development capacity through the West End and Downtown subdistricts.

Scenic Resources Protection Plan
Map 480-2 (Map 9 of 12)



As a result, of its lack of access, unsafe location, lack of use, and economic impacts, we suggest that the Upper Hall Street viewpoint no longer be a protected viewpoint and as a result that the Map 510-4 be amended to include Bonus Heights that do no reflect the viewpoint, as originally proposed in the Discussion Draft, and shown below.

Map 510-4 from CC2035 Discussion Draft

