



Northwest District Association

August 9, 2016 PSC hearing verbal testimony:

Commissioners;

I am Steve Pinger, I reside at 2669 NW Savier St. I am representing the Northwest District Association, and I was a member of the Stakeholder Advisory Committee for the West Quadrant Plan.

We have submitted written testimony on the Proposed Draft, which we ask you to consider. The comments and recommendations in our testimony are quite broad in their scope, as they reflect what we believe to be the fundamental questions that the CC2035 Plan process has raised that still may need to be answered more fully before the Commission might make any recommendation to the Council for adoption of the Plan.

I will only emphasize one aspect of our comments at this time, and that is concerning the proposal to provide allowable height bonuses as an inducement to create affordable housing in central Portland. The “affordability” issue in Portland is not limited to housing, but is at play in commercial and retail sectors as well. The issue is central to the livability of our city, as it is intertwined with questions of equity and inequality, and is, through the manner in which it is addressed in the current proposals in the draft plan, highly influential in the growth model that we are being asked to accept for the next generation.

To that end, we would ask BPS staff to identify clear evidence of the effectiveness of this proposal, and to identify current relevant precedents where this approach has been successful, all in order to facilitate the Commission in assessing the feasibility of, and risk associated with, this enormous shift in public policy.

Thank you.



Northwest District Association

August 9, 2016

Portland Planning and Sustainability Commission

1900 SW 4th Avenue
Portland, Oregon 97201

RE: CC2035 Plan Proposed Draft – comments and recommendations

Commissioners:

The Northwest District Association Planning Committee has reviewed the *CC2035 Plan Proposed Draft*, and offers the following comments and recommendations. These comments and recommendations are based on our earlier April 8, 2016 comments on the *CC2035 Discussion Draft*, and are intended to be taken with them as a whole.

As with our earlier testimony, these comments are not being made as Northwest District residents identifying simply policies of concern affecting our neighborhood, but rather as Portland citizens reviewing central city-wide issues and planning principles profoundly influencing the character of our city for the next generation.

The River, the Freeways and the Green Loop

Before taking on a new initiative, such as the “Green Loop”, follow through on the needed completion of Waterfront Park and on the repair to the city and river around the freeways.

- Mitigate the impact of the Eastbank Freeway on the river and the urban fabric of the city.
- Prioritize a demonstration project for capping portions the I-405 Freeway trench.
- Complete Waterfront Park.
- Allow smaller buildings to be developed directly adjacent to the river at the bridgeheads to activate Waterfront Park, rather than tall new buildings across Naito Parkway.

Urban Form

Complete the implementation of the urban form concept for the central city from *The Downtown Plan* before considering changes to it.

- Concentrate tall buildings along the north-south transit corridor, between Broadway and Fourth.
- Step building heights down to the river.
- Step building heights down to the western neighborhoods.
- Protect the Park Blocks corridor.

Building Heights and Density

Do not increase allowable building heights *unless necessary to achieve density goals*, and coupled with increases in FAR.

- Review *existing* allowable building heights for their appropriateness, and for potential conflicts with stated *CC2035 Concept Plan* equity and existing character goals.
- Provide evidence of the effectiveness of allowing “Height Bonuses” to create affordable housing, and identify precedents where this approach has been successful.
- Delete the “Shade Analysis Areas” entirely.

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- Reduce the overabundance of excess “headroom” in allowable building heights.

Conservation of Portland’s Existing Character

Conserve the real reason that people want to live and work in Portland: its comfortable scale, the character of its streets and neighborhoods, and its unpretentious buildings and way of life.

- Revise the portions of *The CC2035 Plan’s* proposed allowable building heights bonuses and other incentives where they threaten the City’s imagable and iconic buildings and places.
- Revise the portions of *The CC2035 Plan’s* proposed allowable building heights bonuses and other incentives where they induce an additional speculative layer to an already distorted market.
- Revise the portions of *The CC2035 Plan’s* proposed allowable building heights bonuses and other incentives where they are in contradiction to the adopted *CC2035 Concept Plan*, Urban Design Goals L and M.4
- Stop being concerned about Portland having an *exciting skyline*.

Ethics

Review input from the West Quadrant Plan process to *The CC2035 Plan* to assess the presence of actual and potential conflicts of interest on the SAC, *as well as unrepresentative bias*.

- Require disclosure of the financial interests from *all* SAC members, per the Auditor’s Report, *before* making any recommendation on the CC2035 to City Council.

Best Regards,
Northwest District Association Planning Committee

A handwritten signature in black ink, appearing to read "Steve Pinger", with a horizontal line extending to the right.

Steve Pinger
Member, for the Committee
Member, CC2035 West Quadrant Plan SAC



Northwest District Association

April 8, 2016

Bureau of Planning and Sustainability
1900 SW 4th Avenue
Portland, Oregon 97201

RE: CC2035 Plan Discussion Draft – draft comments

CC 2035 Plan staff:

The Northwest District Association Planning Committee has reviewed the *CC2035 Plan Discussion Draft*, and offers the following comments. These comments are intended to be quite broad in their outlook, as there are practical challenges for a lay organization to provide meaningful detailed comments on the proposed code language given the limited time frame provided for our review. The comments do, however, follow on concerns that the District raised during the West Quadrant Plan process, and that we plan to offer more specific assessments of during the Commission and Council hearings and amendment processes.

These comments are not being made as Northwest District residents identifying simply policies of concern affecting our neighborhood, but rather as Portland citizens reviewing central city-wide issues and planning principles profoundly influencing the character of our city for the next generation.

The River, the Freeways and the Green Loop

- The *Big Idea No. 2* to “Focus on the Willamette River” is destined to be not-so-big an idea if it doesn’t recognize the reality of the Eastbank Freeway dominating half of the river’s frontage, as well as reverberating across the river to exert a significant presence on the west bank and Waterfront Park. The Plan must begin to look at ways of mitigating this major rend in the urban fabric of the city. Here is where *The CC2035 Plan* needs to be truly aspirational, and to be as bold as *The Downtown Plan* once was, for the opportunity to do so will not come around again for several decades.
- The I-405 Freeway trench is a rend at least as disruptive in the city’s urban fabric as the Eastbank Freeway, but presents a more achievable potential solution. Several previous studies have identified the relative feasibility of capping portions of the freeway trench, but such an action does not appear to be prioritized in the Plan.
- The Waterfront Park has been in a placeholder use for 40 years. It was never intended to be an intermittently used “fairgrounds” space, and an overused walking, jogging and bicycling through-route next to the river. If we are to focus on the river, let’s be sure there’s something there to focus on. Rather than building tall buildings across Naito Parkway from the park as proposed, consider allowing smaller buildings to be developed directly adjacent to the river at the bridgeheads that could provide the missing private commercial frontages that are necessary to activate the park year-round, and to create more enclosed and defined park spaces than the current continuous broad swath of grass with no-man-lands in the areas under the bridges.
- Finish what we’ve started: follow through on the needed completion of Waterfront Park and the repair to the city and river around the freeways before taking on a new initiative, such as the “Green Loop”.

Urban Form

- *The Downtown Plan* provided a clear concept for the urban form of the central city: tall buildings concentrated along the north-south transit corridor, between Broadway and Fourth, with building heights stepping down toward the river and toward the western neighborhoods. Unfortunately, this fundamental concept was never fully translated into ordinance relative to building heights west of Broadway. It needs to be now. And moreover, even where ordinance did provide for buildings stepping down to the river, the current Plan proposes changes to allow much taller buildings along Naito Parkway, adjacent to Waterfront Park.
- Stepping building heights down to the river means stepping building heights down to the river. Allowing tall buildings at the bridgeheads is not the way to activate Waterfront Park, and is potentially legally challengeable by owners of, and tenants in, buildings who had assumed that their valuable views were protected.
- Stepping building heights down to the western neighborhoods means stepping building heights down to the western neighborhoods. The recently finished Park Avenue West tower, two blocks west of Broadway, is a well designed and constructed building, but is completely out of scale to the existing character of the built-on portion of the Park Blocks corridor, and overwhelms this imagable and soulful district of the downtown. This building, however, would have fit right in a couple of blocks to the east where *The Downtown Plan* indicated buildings of this height should be concentrated.
- Reduce the overabundance of excess “headroom” in allowable building heights that has resulted in an emerging pattern of scattered towers in a predominately low and mid-rise city, which is an outcome that is in conflict with the CPP’s own *Urban Design Assessment*.

Building Heights and Density

- The Plan proposes to increase allowable building heights in many areas of the central city, *but without any increase in densities*. This does not achieve any of Metro’s density goals, but rather simply provides an avenue to create more expensive, taller, real estate. This is in conflict with goals of *The CC2035 Concept Plan*.
- The West Quadrant Plan process assumed that the *existing* allowable building heights were to be the point of departure for considering mostly additional height allowances. While there were a few reductions in height in the process, the entire West Quadrant’s existing allowable building heights needed to be critically reviewed for their appropriateness, and for potential conflicts with stated *CC2035 Concept Plan* equity and existing character goals, which imply the need for the lowering of allowable heights in many areas of the central city.
- Using “Height Bonuses” to create affordable housing is a tail-chasing exercise at best, creating only ever more expensive real estate, in turn making everything nearby ever more unaffordable, especially with the bonus thresholds as low as currently proposed.
- Delete the “Shade Analysis Areas” entirely. The assumption that the shadows cast by tall buildings are their only effect on the areas adjacent to them is ludicrous. The primary effect of tall buildings on their surroundings is to significantly distort the urban ecosystems by inducing drastic shifts in land values, and to experientially overwhelm the scale and character of their adjacent street environments. Portland’s streets are its primary system of public space, and its most enviable public asset.

Conservation of Portland’s Existing Character

- *The CC2035 Plan’s* proposed allowable building heights and other incentives threaten, through excessive economic pressure for development, many of the imagable and iconic buildings and places that make Portland *Portland*, and are in contradiction to the adopted *CC2035 Concept Plan*, Urban Design Goals L and M.4
- At heart, *The CC2035 Plan* is about what kind of city we want Portland to become over the next generation. How we manage the height that buildings are allowed to be built to, and where they can be built, is a fundamental part of this question, and no other factor has the ability to influence the

livability of the central city to the extent that this does, *and Portland's livability is truly its greatest asset*. Everybody wants to come to work and live in Portland, and it's not because of Portland's *exciting skyline*, but because of its comfortable scale, the character of its streets and neighborhoods and its unpretentious buildings and way of life. These qualities are the soul of Portland that we need to be careful to conserve, and that the potential effects of the increases in building heights proposed in *The CC2035 Plan*, as currently written, put into jeopardy.

Ethics

- The BPS's response to the citizen's complaint, as upheld by the City Ombudsman, is completely inadequate. The comprehensive planning process during the West Quadrant Plan process has been tainted by the unrepresentative bias of the Stakeholder Advisory Committee, as it was constituted, relative to Statewide Planning Goal 1. Merely disclosing the financial interests that may have been served by input from SAC members does not remediate the problem, nor does it comport with local and state ethics rules. Any input from the tainted West Quadrant Plan process to *The CC2035 Plan* must be reviewed by an independent body to assess the presence of actual and potential conflicts of interest, as well as unrepresentative bias. Appropriate action must be taken to correct such conflicts and bias before *The CC2035 Plan* can be considered for adoption.

Best Regards,
Northwest District Association Planning Committee



Steve Pinger
member
CC2035 West Quadrant Plan SAC member