



City of Portland, Oregon
Bureau of Development Services
Land Use Services
FROM CONCEPT TO CONSTRUCTION

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STAFF REPORT AND RECOMMENDATION TO THE
LANDMARKS COMMISSION & DESIGN COMMISSION -
ONE PACIFIC SQUARE GROUND FLOOR & PLAZA ALTERATIONS

CASE FILE: LU 18-277253 HR
PC # 18-250178
REVIEW BY: Landmarks Commission

CASE FILE: LU 19-101014 DZ
PC # 18-250178
REVIEW BY: Design Commission

WHEN: March 14, 2019 @ 1:30 PM
WHERE: 1900 SW Fourth Ave., Room 2500B
Portland, OR 97201

For the Historic Resource Review it is important to submit all evidence to the Landmarks Commission. City Council will not accept additional evidence for LU 18-277253 HR if there is an appeal of this proposal.

Bureau of Development Services Staff: Megan Sita Walker 503-823-7294 /
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GENERAL INFORMATION

Applicant: Gauri Rajbaidya | Sera Architects
338 NW 5th Ave
Portland, OR 97209
(503) 445-7387

Owner: Chris Hartson | Specht Properties Inc
10260 SW Greenburg Rd., Suite 170
Portland, OR 97223

Party of Interest: Stephanie Amend | Sera Architects
338 NW 5th Ave
Portland, OR 97209

Site Address: **220 NW 2ND AVE**

Legal Description: BLOCK 14 LOT 1-8 EXC PT IN ST, COUCHS ADD
Tax Account No.: R180200680
State ID No.: 1N1E34CA 04500
Quarter Section: 3029 & 3030

- Neighborhood:** Old Town-China Town, contact Sarah Stevenson 503-226-4368 x2 or Zach Fruchtengarten 503-227-1515.
- Business District:** Downtown Retail Council, contact at lfrisch@portlandalliance.com & Old Town Community Association, contact at chair@oldtownchinatown.org.
- District Coalition:** Neighbors West/Northwest, contact Mark Sieber at 503-823-4212.
- Plan District:** Central City - Old Town/Chinatown
- Other Designations:** Southern half of the site is a noncontributing resource in the Skidmore/ Old Town Historic District
- Zoning:** CXd – the entire site is zoned Central Commercial with the Design Overlay; the southern half of the site is zoned Central Commercial with Historic Resource Protection and Design Overlays
- Case Type:** HR – Historic Resource Review (LU18-277253 HR); and
DZ – Design Review (19-101014 DZ)
- Procedure:** Type III with a public hearing before the Landmarks Commission for the southern half of the site, and a Type III with a public hearing before the Design Commission for the northern half of the site. The decision(s) of the Landmarks Commission and Design Commission can be appealed to City Council.

Proposal:

The proposal is for the renovation of the ground floor level of the existing One Pacific Square (OPS) building. The site straddles two districts, with the south half located in Skidmore/Old Town Historic District; and the north half in the Central City Plan District – Oldtown/ Chinatown Subdistrict. The project will be subject to two (2) Type III reviews: one to be reviewed by the Historic Landmarks Commission (HLC) for the proposed work on the south half of the site (LU 18-277253 HR); and one to be reviewed by the Design Commission (DZC) for the proposed work on the north half of the site (LU 19-101014 DZ).

The proposal includes alterations to the ground floor to include the replacement of existing tinted glazing with clear glazing, recladding existing brick cornices along NW 2nd and NW 1st (east and west facades) with composite metal panel to match the existing metal panel on the north and south facades, and the refinishing of all existing ground level brick surfaces (columns, stair entry, and wall area) with a plaster coat. The proposal also includes alterations to the plazas that surround the base of the building including removing the existing stair at the northwest corner, the addition of a new raised planters, seating, and upgrades to paving materials.

Historic Resource Review and Design Review are required because the proposal is for non- exempt exterior alterations within a historic district and within the design overlay.

Relevant Approval Criteria:

In order to be approved, this proposal must comply with the approval criteria of Title 33, Portland Zoning Code. The applicable approval criteria are:

North Half of Site (Design Review, LU 19-101014 DZ)

- *Central City Fundamental Design Guidelines*
- *River District Design Guidelines*
- Oregon Statewide Planning Goals

South Half of Site (Historic Resource Review, LU 18-277253 HR)

- *Skidmore/Old Town Design Guidelines*
- *Central City Fundamental Design Guidelines*
- Oregon Statewide Planning Goals

ANALYSIS

Site and Vicinity: Campbell Yost Grube Architects designed One Pacific Square (OPS); the City approved OPS in 1980-81; it was constructed in 1984. This 13-story modernist building occupies an entire city block (Block 14 of the Davis's Addition). The Portland City Council approved One Pacific Square as part of a 6.5 block master plan (CU 7-80), and was the first and only building constructed as part of the 1980 master plan. **The subject site was granted variances from City Council to increase the allowable FAR on the site from 4:1 to 6.12:1 and the allowable height from 75' (in the historic district) to 188' to allow for the building that we see today.**

Many existing design features were intended to achieve greater compatibility with the Historic District: the shorter and angled atrium near NW Davis Street; the red brick-clad terrace, spandrels and exposed columns; **the depth of the large covered 14' arcades and extensive ground floor level plaza spaces,** and the NW Everett Street garage access (moved from NW Davis) were incorporated into building design based on direction from the 1980-81 Portland Historic Landmarks Commission (PHLC) review process.

The full block, 38,000 SF, site straddles two districts, with the south half located in the Skidmore/Old Town Historic District, and the north half in the Central City Plan District – Old Town/ Chinatown Subdistrict. The site is located in the North of Burnside Pedestrian District and the Old Town/ Chinatown Bicycle District. The site is bound by NW Everett Street to the north, NW Davis Street to the south, NW 2nd Avenue to the west, and NW 1st Avenue to the east. The MAX Light Rail (LRT) runs along the entire eastern frontage of the site on NW 1st Avenue, which is a Regional Transitway – Major Transit Priority Street, Central City Transit/ Pedestrian Street. NW Everett Street provides access to the Steel Bridge and is classified as Major Transit Priority Street, a Community Main Street and Local service bikeway. NW 2nd Avenue and NW Davis Street are classified as City Walkways and local service street.

The OPS building is a noncontributing resource in the Skidmore/ Old Town Historic District. Primary tenants included Northwest Natural Gas Company who are and the Lan Su Chinese Gardens administrative offices. OPS features panoramic views of the West Hills, the Willamette River, Downtown Portland, the Lan Su Chinese Garden and Mount Hood.

The Lan Su Chinese Garden is an important public attraction and asset for the Chinatown area and considered the “jewel” of Old Town. The two contributing historic structures are the Merchant hotel at the SW corner (Italianate style/tall first floor/cast iron store front system) and the Lyndon Musolf Manor directly west of OPS. Although most of the recent adjacent buildings incorporate red brick; several (including the upper stories of the Merchant Hotel, the Lyndon Musolf Manor, and the walls of the Chinese Garden) use gray and off-white tones on stuccoed or exposed brick.

The Skidmore/ Old Town Historic District was listed in the National Register of Historic Places on December 6, 1975, and due to its significance, the district was later listed as a National Historic Landmark District on May 7, 1977. The district was listed for being nationally significant for both its historical association with the early development and economic growth of the city of Portland, which was the most important urban center of

the late 1800s, as well as for its exceptional architectural collection, including mid- to-late 19th Century cast iron commercial buildings.

Zoning: The Central Commercial (CX) zone is intended to provide for commercial development within Portland's most urban and intense areas. A broad range of uses is allowed to reflect Portland's role as a commercial, cultural and governmental center. Development is intended to be very intense with high building coverage, large buildings, and buildings placed close together. Development is intended to be pedestrian-oriented with a strong emphasis on a safe and attractive streetscape.

The Design "d" overlay promotes the conservation and enhancement of areas of the City with special historic, architectural or cultural value. New development and exterior modifications to existing development are subject to design review. This is achieved through the creation of design districts and applying the Design Overlay Zone as part of community planning projects, development of design guidelines for each district, and by requiring design review. In addition, design review ensures that certain types of infill development will be compatible with the neighborhood and enhance the area.

The Historic Resource Protection overlay is comprised of Historic and Conservation Districts, as well as Historic and Conservation Landmarks and protects certain historic resources in the region and preserves significant parts of the region's heritage. The regulations implement Portland's Comprehensive Plan policies that address historic preservation. These policies recognize the role historic resources have in promoting the education and enjoyment of those living in and visiting the region. The regulations foster pride among the region's citizens in their city and its heritage. Historic preservation beautifies the city, promotes the city's economic health, and helps to preserve and enhance the value of historic properties.

The Central City Plan District implements the Central City Plan and other plans applicable to the Central City area. These other plans include the Downtown Plan, the River District Plan, the University District Plan, and the Central City Transportation management Plan. The Central City plan district implements portions of these plans by adding code provisions which address special circumstances existing in the Central City area. The site is within the Downtown Sub district of this plan district.

Land Use History: City records indicate that prior land use reviews include:

- LU81-006197; LU80-100031; LU80-005822: approval of the Master Plan, and Phase I- One Pacific Square building.
- HLDZ 20-82 (LU82-005835): Approval of material design and color.
- LU83- 006452; LU90-005582; HL006-90: Approval of signage
- LU90-200450: Approval of Conditional Use Review
- LU05-176629: Approval of metal and wood trellis, glass windscreen and benches/planters.
- LU 16-114403 DZ & LU 16-141377 HR: Approval of ground floor expansion and plaza alterations.

Agency Review: A "Notice of proposal in Your Neighborhood" was mailed **February 22, 2019**. The following Bureaus have responded with no issue or concerns:

1. Bureau of Environmental Services (See Exhibit E-1)
2. Life safety Division of BDS (See Exhibit E-2)
3. Site Development Section of BDS (See Exhibit E-3)
4. Urban Forestry (See Exhibit E-4)
5. Fire Bureau (See Exhibit E-5)

Neighborhood Review: A Notice of Proposal in Your Neighborhood was mailed on **February 22, 2019**. One written response has been received from either the Neighborhood Association or notified property owners in response to the proposal.

1. Peter Englander and Will Naito, Co-chairs of the Old Town Community Association, Land Use Committee, February 7, 2019, wrote in support of the proposal. They stated that they are very excited to see an updated improvement plan for One Pacific Square. They note recommendations they had for the design team to include, “careful consideration of any removal of brick pavers, as it is a key element of the Skidmore district, and some concern of the use of white stucco – although it does honor the exterior of Lan Su, it has also invited graffiti tagging (as has been the experience at Lan Su)”. See Exhibit F-1 for additional information.

Summary of Applicant’s Statement: The following is taken directly from the applicant’s revised project narrative provided on January 3, 2019 (See pages 1 and 2 of Exhibit A-2).

The 220 NW or the Pacific One Tower building is a unique high-rise bookending the Skidmore Oldtown Historic District. Half of the building falls under the purview of the Skidmore Oldtown Historic District and the corresponding design guidelines and the other half is under the River District Guideline. While not under the Oldtown Chinatown Historic district, it is diagonally across from the Lan Su Chinese garden. One thing that is very important to note is the architecture of this building fits with neither of the historic district and is a very distinctly shaped building that requires careful study.

The Pacific One Tower building is a high rise with a faceted geometric tower that sits on a geometric base like a crystalline structure. The grey aluminum vertical mullions that frame the reflective curtain wall creates a strong unmistakable towering framework providing a last strong landmark before leaving the Oldtown or signifying one’s arrival to it.

This simple geometric strength of the architecture above is asymmetrically brought to ground to fit the needs of the modern commerce and active streetscape. The grounding of the building as it meets the public right of way needs to support the strong geometry and framework of the rest of the building. If the tower above is reflecting the historic and non-historic surrounding, the podium base of the building below needs to entice with full transparency to the activities that can happen at all the retail or business spaces.

However, the ground floor is currently missing many elements that would support the tower or activate the public life at the street level. For one, the private realm of the building has no clear delineation from the public right of way. The effect of this is that the whole base of the building has turned into a massive thoroughfare. To support retail and business there must be a way to hold the patrons. This is missing.

Another major issue is that, since the all the ground floor frontage appears to be a major thoroughfare, there is no clear pathway to the entry to the building. This is further compounded by the fact that all the glazing at the ground floor is heavily tinted and appears very unwelcoming. The activities inside the retail and offices would greatly benefit from more transparency to put eyes on street and invite patrons into the building.

The south frontage that should be more active due to the solar exposure is currently used only by people smoking and appears like the back of the house rather than a more pleasant and active retail or office space. The existing masonry benches are in poor condition, impede pedestrian movement, and are little used because they are not designed in any way to support the ground floor activation.

We are setting out to bring clarity, coherence, and commerce at the base of the tower. We are actively engaging the local community association into our design process and getting their strong buy-in on the proposal. The local community association is in strong agreement with the design proposal that these changes will bring much needed business in these two important districts, and their letters of recommendation will be submitted to the review staff. 220 NW is a pivotal point to bring business, community, and vitality to the ground level of this historic district.

Our main design objectives:

The objective of this design project is to bring more business tenants and customers to the ground floor of the building. The project aims to provide tenable spaces for businesses to flourish. To support this primary objective, we are activating the ground floor with changes that brings more transparency, useable outdoor space, and to clarify the private portions of the property that is ambiguously blended with the public right of way.

Our design approach:

- bring clarity to the building entry
- make handicap-accessible entry to the building equitably available at the main entrance and not tucked away or hidden
- make the ground floor glazing transparent to make the retail spaces more active
- create clarity between private realm and public right-of-way
- create variety of occupiable outdoor spaces to support office and retail spaces
- bring more planting at the ground level in the private realm
- wrap the brick gutter that are in a state of disrepair with metal panels consistent with the south and the north face of the building
- introduce lighter colored stucco to bring brightness under the existing deep overhangs
- provide spaces to curate the historic timeline of the two historic districts

ZONING CODE APPROVAL CRITERIA

[1] Chapter 33.825 Design Review

Section 33.825.010 Purpose of Design Review

Design review ensures that development conserves and enhances the recognized special design values of a site or area. Design review is used to ensure the conservation, enhancement, and continued vitality of the identified scenic, architectural, and cultural values of each design district or area. Design review ensures that certain types of infill development will be compatible with the neighborhood and enhance the area. Design review is also used in certain cases to review public and private projects to ensure that they are of a high design quality.

Section 33.825.055 Design Review Approval Criteria

A design review application will be approved if the review body finds the applicant to have shown that the proposal complies with the design guidelines for the area.

Findings: The site is designated with design overlay zoning (d). Therefore the proposal requires Design Review approval. Because the site is within the Central City Plan District- River Sub-district, the applicable approval criteria are

listed in Central City Fundamental Design Guidelines and River District Design Guidelines.

[2] Chapter 33.846, Historic Reviews

Section 33.846.010 Purpose of Historic Resource Review

Historic Resource Review ensures the conservation and enhancement of the special characteristics of historic resources.

Section 33.846.060 Historic Resource Review Approval Criteria

Requests for Historic Resource Review will be approved if the review body finds the applicant has shown that all of the approval criteria have been met.

Findings: The site is located within the Skidmore/Old Town Historic District. Therefore the proposal requires Historic Resource Review approval. The relevant approval criteria are the Central City Fundamental Design Guidelines and the Skidmore/Old Town Historic Design Guidelines.

Central City Fundamental Design Guidelines & Oregon Statewide Planning Goals (Approval criteria for both Design & Historic Resource Review)

These guidelines provide the constitutional framework for all design review areas in the Central City.

The Central City Fundamental Design Guidelines focus on four general categories. **(A) Portland Personality**, addresses design issues and elements that reinforce and enhance Portland's character. **(B) Pedestrian Emphasis**, addresses design issues and elements that contribute to a successful pedestrian environment. **(C) Project Design**, addresses specific building characteristics and their relationships to the public environment. **(D) Special Areas**, provides design guidelines for the four special areas of the Central City.

Central City Plan Design Goals

These sets of goals are those developed to guide development throughout the Central City. They apply within all of the Central City policy areas. The nine goals for design review within the Central City are as follows:

1. Encourage urban design excellence in the Central City;
2. Integrate urban design and preservation of our heritage into the development process;
3. Enhance the character of the Central City's districts;
4. Promote the development of diversity and areas of special character within the Central City;
5. Establish an urban design relationship between the Central City's districts and the Central City as a whole;
6. Provide for a pleasant, rich and diverse pedestrian experience for pedestrians;
7. Provide for the humanization of the Central City through promotion of the arts;
8. Assist in creating a 24-hour Central City which is safe, humane and prosperous;
9. Ensure that new development is at a human scale and that it relates to the scale and desired character of its setting and the Central City as a whole.

Staff has considered all guidelines and has addressed only those guidelines considered applicable to this project.

CONTEXT

A1. Integrate the River. Orient architectural and landscape elements including, but not limited to lobbies, entries, balconies, terraces, and outdoor areas to the Willamette River and Greenway. Develop access ways for pedestrians that provide connections to the Willamette River and Greenway.

A2. Emphasize Portland Themes. When provided, integrate Portland-related themes with the development's overall design concept.

A5. Enhance, Embellish, and Identify Areas. Enhance an area by reflecting the local character within the right-of-way. Embellish an area by integrating elements in new development that build on the area's character. Identify an area's special features or qualities by integrating them into new development.

A9. Strengthen Gateways. Develop and/or strengthen gateway locations.

C1. Enhance View Opportunities. Orient windows, entrances, balconies and other building elements to surrounding points of interest and activity. Size and place new buildings to protect existing views and view corridors. Develop building façades that create visual connections to adjacent public spaces.

C4. Complement the Context of Existing Buildings. Complement the context of existing buildings by using and adding to the local design vocabulary.

Findings for A1, A2, A5, A9, C1, and C4: In reviewing the proposed changes to the public realm on-site – the ground floor and plaza spaces of the building – staff referenced the original approvals for the Master Plan/ building massing, and the building design to provide context and inform the discussion of the changes currently proposed. The Master Plan associated with the subject site and the massing concept for “Phase I” (the subject development) were originally approved on appeal by City Council in 1980 (CU 7-80). As noted previously, City Council ultimately allowed variances to increase FAR from the allowed 4:1 to 6.12:1 and to increase the height of the building from the allowed 75’ (in the Historic District) to 188’. The premise offered by the applicant at that time to justify these increases in bulk and height in response to the public need criterion (which were ultimately supported) is that the proposal would offer the following:

- The revitalization of Old Town and the wider ranged development implications of the entire Pacific Square project for all of downtown;
- The economic benefit of the project; and
- The support the project will provide for mass transit.

While the Portland Historic Landmarks Commission (PHLC), Portland Design Committee, and City Council ultimately supported and approved the variances to increase height and bulk, it was understood that subsequent reviews would be needed to ensure that the building would be compatible with the district - with the Portland Design Committee noting the need for at-grade retail access along DW Davis and NW 2nd. Additionally, the PHLC added a condition of approval to their support of the variances that, “the project’s (Phase I and the Pacific Square Complex) tax increment monies be programmed for the public improvements within the Skidmore/ Old Town Historic District”. While the variances were supported, the comments and condition show intent for the building’s mass and bulk to be mitigated through design compatibility with and sensitivity to the Historic District, and benefit of the building going toward the pedestrian experience in the district.

In the proceeding reviews for the “finer aspects of the Design Review” (HLDZ 9-81 and HLDZ 20-82), for building materials, ground floor and plaza spaces, changes were made in response to PHLC comments to ensure that at-grade retail access was maximized, that the plaza spaces referenced the surrounding area and the Historic District, and that the plazas were designed to serve pedestrians, LTR

users, and building tenants.

Considering the history of the site and how it was originally designed to relate to its context, the proposal does not meet the above criteria in the following ways:

- The removal of fixed seating along NW Davis does not enhance the pedestrian experience along the site's primary connection to the Willamette River.
- While staff could support revisions to the surface treatments of the ground floor plaza spaces that surround the building, the current design does not retain reference to how the existing plazas were designed to relate to the Transit Mall and does not retain coherent references to the surface treatments in the Historic District or adjacent rights-of-way.
- Additionally, the proposed material palette for surface treatments and planters – concrete block pavers, loose rock ("cobbles"), and GFRC raised planters at the edges of the site – do not employ quality and durability that complement the local design vocabulary.
- The Brewster Hotel "High Water Line" stone marker currently located on the west edge of the site along NW 2nd is noted in the narrative to be retained. However, limited information has been provided and the drawings do not indicate where the marker is proposed to be relocated. Staff recommends that the marker be located in place clearly visible from the pedestrian realm.
- While not an official "Gateway", this block serves as the built edge to the Skidmore/Old Town Historic District and is highly visible as the first and last MAX stops heading into and out of downtown for two MAX lines. The proposed alterations to the existing plaza spaces do not serve to activate the transition areas that connect the building to on- and off-site pedestrian amenities which are key elements of the original design that were used to connect the building to the Historic District and LRT platform.
- The existing building includes upper story terraces with views to the Willamette River and staff supports installation of clear glazing which will greatly improve the ground floor experience and allow for views into and out of ground floor tenant space. However, the proposed raised planters at the corners of the ground level plaza spaces do not enhance opportunities for activity at existing corner entries and limited access from the building to the proposed NE terrace do not enhance view opportunities.

These criteria are therefore not met.

A3. Respect the Portland Block Structures. Maintain and extend the traditional 200-foot block pattern to preserve the Central City's ratio of open space to built space. Where superblocks exist, locate public and/or private rights-of-way in a manner that reflects the 200-foot block pattern, and include landscaping and seating to enhance the pedestrian environment.

Findings: The proposal continues to maintain the traditional 200-foot block structure.

This criterion is therefore met.

A6. Reuse/Rehabilitate/Restore Buildings. Where practical, reuse, rehabilitate, and restore buildings and/or building elements.

Findings: The intent of the proposal is to revitalize the ground floors spaces of

this building through installation of clear glazing at the ground floor, highlighting one main entry to the building (off of NW 2nd), define the property line and provide opportunities for tenant amenity in the ground floor plaza spaces.

Staff supports the current proposal to re-use and revitalize the existing building through alterations to the ground floor. However, the current proposal focuses on introducing new components in the form of barriers at the property line rather than supporting movement through and activation of existing plaza spaces. Staff finds that the way that these new components are applied does not respect the original intent of the on-site pedestrian realm which was a primary element of the original design. Specifically, the current proposal does not serve to connect the recessed storefront to the street, does not provide amenity to LTR users, and does not utilize surface treatments and materials to connect the building to the district.

This criterion is therefore not met.

PUBLIC REALM

A4. Use Unifying Elements. Integrate unifying elements and/or develop new features that help unify and connect individual buildings and different areas.

A8. Contribute to a Vibrant Streetscape. Integrate building setbacks with adjacent sidewalks to increase the space for potential public use. Develop visual and physical connections into buildings' active interior spaces from adjacent sidewalks. Use architectural elements such as atriums, grand entries and large ground-level windows to reveal important interior spaces and activities.

B3. Bridge Pedestrian Obstacles. Bridge across barriers and obstacles to pedestrian movement by connecting the pedestrian system with innovative, well-marked crossings and consistent sidewalk designs.

B4. Provide Stopping and Viewing Places. Provide safe, comfortable places where people can stop, view, socialize and rest. Ensure that these places do not conflict with other sidewalk uses.

B5. Make Plazas, Parks and Open Space Successful. Orient building elements such as main entries, lobbies, windows, and balconies to face public parks, plazas, and open spaces. Where provided, integrate water features and/or public art to enhance the public open space. Develop locally oriented pocket parks that incorporate amenities for nearby patrons.

C6. Develop Transitions between Buildings and Public Spaces. Develop transitions between private development and public open space. Use site design features such as movement zones, landscape elements, gathering places, and seating opportunities to develop transition areas where private development directly abuts a dedicated public open space.

C7. Design Corners that Build Active Intersections. Use design elements including, but not limited to, varying building heights, changes in façade plane, large windows, awnings, canopies, marquees, signs and pedestrian entrances to highlight building corners. Locate flexible sidewalk-level retail opportunities at building corners. Locate stairs, elevators, and other upper floor building access points toward the middle of the block.

C9. Develop Flexible Sidewalk-Level Spaces. Develop flexible spaces at the sidewalk-level of buildings to accommodate a variety of active uses.

Findings for A4, A8, B3, B4, B5, C6, C7, and C9: In the original reviews for the “finer aspects of the Design Review” (HLDZ 9-81 and HLDZ 20-82), for building materials, ground floor and plaza spaces, the following changes were made in response to PHLC comments:

- The entrance to below grade parking was relocated from NW Davis to NW Everett (out of the Historic District, allowing for at grade retail on Davis);

- The arcades along the entire building were extended with the arcade along NW Davis to a depth of 20' to provide additional shelter and waiting area for Light Rail (LRT) commuters;
- The retail spaces were lowered to grade level (where possible due to the relocation of the parking access ramp to the north);
- The walls, planters, and grilles were removed to provide a direct visual relationship (to) Old Town, the plaza and retail activity, as well as to reinforce pedestrian traffic

As noted in the applicant's revised statement, the primary goals of the proposal are to highlight one main entry to the building, define the property line, and provide plaza amenity for tenants of the building. Staff supports the replacement of existing tinted glazing with clear glazing and the goal of the proposal to increase the usability and activation of the ground floor. However, in considering the history of the design, recent case history for alterations to ground level plaza spaces adjacent to transit, and the chosen methods of the current proposal, staff finds that the current proposal does not meet the approval criteria in the following ways:

- The existing surface treatments for the ground floor plaza spaces include a grid of brick pavers and exposed aggregate concrete, noted in the original approval to reference to the Transit Mall. On- and off-site street furniture was also noted to have been designed to relate to Old Town area to provide a sense of continuity – unifying the area. The current proposal removes unifying elements in these ground floor plaza spaces. Additionally, while staff could support changes to plaza surface treatments, staff finds that the proposed replacement materials and how they are applied on the site (varying depth and length of concrete block pavers) do not adequately reference existing patterns in the Historic District or surrounding area.
- The proposal includes the introduction of barriers – raised planters and raised terraces – at the property line, concentrated at corners and adjacent to spill-out space. These elements do not contribute to a vibrant streetscape as they serve to limit, not increase, the space available for potential public use.
- The existing ground floor plaza spaces were intentionally designed as an extension of the adjacent public rights-of-way to serve LTR users and pedestrians in addition to serving building tenants as mitigation in exchange for significant added height and FAR. The removal of fixed seating along NW Davis facing into the Historic District and the pushing out of on-site pedestrian amenity on the east and west frontages to within 2' of the property line does not enhance opportunities to stop, view, socialize, and rest.
- Additionally, it is not clear how these proposed changes to ground floor plaza spaces are intended to activate and connect the site to adjacent public rights-of-way as information on the design intent of the individual plaza spaces and intended movement patterns on-site have not been provided.
- The installation of clear glazing will greatly improve the ground floor of the existing building – allowing views into and out of the building. However, staff suggests the applicant go further to ensure the activation of the proposed plaza spaces by increasing access points (such as providing additional access points from the building to the proposed NE terrace). Increasing access points from the building to the proposed plaza spaces and providing clear physical and visual connections from the right-of-way

- to the plaza spaces will serve to activate these spaces.
- The existing stairs at the NW corner of the site that are oriented towards the Chinese Gardens, provide access to an existing corner entry (to remain), and respond to the corner entries on adjacent buildings immediately to the north and west of the site. The removal of the corner stair specifically, and the removal of access in general, does not respond to the adjacent open space and does not serve to activate the intersection.
- The guidelines note that the flexibility of sidewalk level spaces is critical to these spaces maintaining utility over time. To ensure the flexibility of the NW corner of the site, staff could support the retention of the corner entry stair, a section of raised terrace pulled back from the property line which would allow for enough depth in seating and planting to soften the floorplate at this corner and increase the usability of this area for pedestrians and building tenants.

These criteria are therefore not met.

A7. Establish and Maintain a Sense of Urban Enclosure. Define public rights-of-way by creating and maintaining a sense of urban enclosure.

B1. Reinforce and Enhance the Pedestrian System. Maintain a convenient access route for pedestrian travel where a public right-of-way exists or has existed. Develop and define the different zones of a sidewalk: building frontage zone, street furniture zone, movement zone, and the curb. Develop pedestrian access routes to supplement the public right-of-way system through superblocks or other large blocks.

Findings for A7 and B1: The existing building is setback from the street on the south, east, and west frontages. The current proposal maintains this recessed storefront condition. While elements of the proposal define the property line and therefore the adjacent rights-of-way, these elements act as barriers concentrated at the corners of the site, and do not serve to encourage a sense of permeability to activate plaza spaces. Staff finds that guideline A7, as applied to on-site pedestrian amenities, intends to encourage development that supports and adds value to the off-site pedestrian realm (public rights-of-way). This added value to the public right-of-way can be accomplished with a building that is built out to the property line - framing and bringing activity to the street. Or, as in the current case, this could be accomplished with at-grade activated plaza spaces with human scale elements that are designed as amenities to both public and private realms.

The existing plaza spaces were designed as pedestrian amenities that act as extensions of the public right-of-way in exchanges for significant added height and FAR. Change in material is the primary method used to differentiate the on-site pedestrian amenity from the public right-of-way. Staff finds that the proposed alterations to the plazas do not yet that support the activation of these spaces, support movement through the site, or continue to provide amenities for pedestrians and LTR users, in addition to building tenants.

These criteria are therefore not met.

B2. Protect the Pedestrian. Protect the pedestrian environment from vehicular movement. Develop integrated identification, sign, and sidewalk-oriented night-lighting systems that offer safety, interest, and diversity to the pedestrian. Incorporate building equipment, mechanical exhaust routing systems, and/or service areas in a manner that does not detract from the pedestrian environment.

B6. Develop Weather Protection. Develop integrated weather protection systems at

the sidewalk-level of buildings to mitigate the effects of rain, wind, glare, shadow, reflection, and sunlight on the pedestrian environment.

B7. Integrate Barrier-Free Design. Integrate access systems for all people with the building's overall design concept.

C8. Differentiate the Sidewalk-Level of Buildings. Differentiate the sidewalk-level of the building from the middle and top by using elements including, but not limited to, different exterior materials, awnings, signs, and large windows.

C12. Integrate Exterior Lighting. Integrate exterior lighting and its staging or structural components with the building's overall design concept. Use exterior lighting to highlight the building's architecture, being sensitive to its impacts on the skyline at night.

Findings for B2, B6, B7, C8, and C12: The existing building has arcades that surround the base of the building with recessed storefront conditions on south, east, and west elevations. The above guidelines are met in the following ways:

- The proposal includes a series of ramps that serve to make the main entry of the building (on the west elevation) ADA accessible. The current entry on the east entrance to the lobby (facing the MAX platform) serves to provide ADA access to the lobby.
- The existing arcades, proposed to remain, provide ample pedestrian weather protection.
- The proposed clear glazing at the ground floor serves to differentiate the sidewalk level of the building.
- Pedestrian level lighting is proposed at all columns and recessed into the soffits of the existing arcades providing increase visibility.

These criteria are met.

C13. Integrate Signs. Integrate signs and their associated structural components with the building's overall design concept. Size, place, design, and light signs to not dominate the skyline. Signs should have only a minimal presence in the Portland skyline.

Findings: Information on any proposed signage has not been provided for staff to review. Staff notes that signage over 32 SF on the north half of the site, and signage of any size in the Historic District (south half of the site) is subject to Design and Historic Resource Review, respectively.

This criterion is not applicable.

QUALITY & PERMANENCE

C2. Promote Quality and Permanence in Development. Use design principles and building materials that promote quality and permanence.

C3. Respect Architectural Integrity. Respect the original character of an existing building when modifying its exterior. Develop vertical and horizontal additions that are compatible with the existing building, to enhance the overall proposal's architectural integrity.

C5. Design for Coherency. Integrate the different building and design elements including, but not limited to, construction materials, roofs, entrances, as well as window, door, sign, and lighting systems, to achieve a coherent composition.

Findings for C2, C3, and C5: The above guidelines are not met in the following ways:

- Staff supports the recladding of existing brick columns and walls with stucco at the ground floor as this the exposed concrete columns on the north elevation and the adjacent buildings including the upper stories of the Merchant Hotel, the Lyndon Musolf Manor, the recent infill development – Block 8L – located southeast of the site, and the walls of the Chinese Garden, that use gray and off-white tones on stuccoed or exposed brick.
- Staff also supports the re-cladding of the existing brick cornices/ gutters at the first and second floors on the east and west elevations with backed metal panel which is consistent with the existing metal panel at this level on the north and south elevations.
- Staff finds that the use of loose rock “cobbles” as a surface treatment at the NE corner of the site, is not common in the area, does not promote a sense of quality and permanence and could be a potential safety hazard to the max lines.
- Staff has concerns with the durability of the proposed GFRC raised planters at edges of the site as this is not material seen in high impact areas and does not relate to materials commonly seen in the surrounding area.
- Staff could support the application of different pavers and concrete surface treatments that serve to define the site and support the movement of pedestrians and transit users, in addition to building tenants. However, the application of these materials as currently proposed is not coherent and do not adequately reference the adjacent rights-of-way or district. Specifically, the application of concrete block pavers at the edges of the site with inconsistent depth and length seem arbitrary.
- The existing stair at the NW corner relates to the Chinese Garden, the existing corner entry to the building (to remain), and the corner entries of adjacent buildings. The removal of the corner stair and access to the building from the corner does not respect the integrity of the building or how it relates to the Chinese Garden or adjacent corner entries.
- The proposal to install raised planters and terraces – acting as barriers at the property line - does not respect the original design of the ground floor plaza spaces of the building. Specifically, the proposal does not respect the integrity of these spaces to serve as extensions of the public right-of-way; benefiting pedestrians and LTR users in addition to building tenants.

These criteria are therefore not met.

Oregon Statewide Planning Goals

Goal 1: Citizen Involvement

Goal 1 calls for “the opportunity for citizens to be involved in all phases of the planning process.” It requires each city and county to have a citizen involvement program containing six components specified in the goal. It also requires local governments to have a Committee for Citizen Involvement (CCI) to monitor and encourage public participation in planning.

Findings: The City of Portland maintains an extensive citizen involvement program which complies with all relevant aspects of Goal 1, including specific requirements in Zoning Code Chapter 33.730 for public notice of land use review applications that seek public comment on proposals. There are opportunities for the public to testify at a local hearing on land use proposals for Type III land use review applications, and for Type II and Type IIX land use decisions if appealed. For this application, a written notice seeking comments on the proposal was

mailed to property-owners and tenants within 100 feet of the site, and to recognized organizations in which the site is located. The public notice requirements for this application have been and will continue to be met, and nothing about this proposal affects the City's ongoing compliance with Goal 1. Therefore, the proposal is consistent with this goal.

Goal 2: Land Use Planning

Goal 2 outlines the basic procedures of Oregon's statewide planning program. It states that land use decisions are to be made in accordance with a comprehensive plan, and that suitable "implementation ordinances" to put the plan's policies into effect must be adopted. It requires that plans be based on "factual information"; that local plans and ordinances be coordinated with those of other jurisdictions and agencies; and that plans be reviewed periodically and amended as needed. Goal 2 also contains standards for taking exceptions to statewide goals. An exception may be taken when a statewide goal cannot or should not be applied to a particular area or situation.

Findings: Compliance with Goal 2 is achieved, in part, through the City's comprehensive planning process and land use regulations. For quasi-judicial proposals, Goal 2 requires that the decision be supported by an adequate factual base, which means it must be supported by substantial evidence in the record. *As discussed earlier in the findings that respond to the relevant approval criteria contained in the Portland Zoning Code, the proposal complies with the applicable regulations, as supported by substantial evidence in the record. As a result, the proposal meets Goal 2.*

Goal 3: Agricultural Lands

Goal 3 defines "agricultural lands," and requires counties to inventory such lands and to "preserve and maintain" them through farm zoning. Details on the uses allowed in farm zones are found in ORS Chapter 215 and in Oregon Administrative Rules, Chapter 660, Division 33.

Goal 4: Forest Lands

This goal defines forest lands and requires counties to inventory them and adopt policies and ordinances that will "conserve forest lands for forest uses."

Findings for Goals 3 and 4: In 1991, as part of Ordinance No. 164517, the City of Portland took an exception to the agriculture and forestry goals in the manner authorized by state law and Goal 2. Since this review does not change any of the facts or analyses upon which the exception was based, the exception is still valid and Goal 3 and Goal 4 do not apply.

Goal 5: Open Spaces, Scenic and Historic Areas and Natural Resources

Goal 5 relates to the protection of natural and cultural resources. It establishes a process for inventorying the quality, quantity, and location of 12 categories of natural resources. Additionally, Goal 5 encourages but does not require local governments to maintain inventories of historic resources, open spaces, and scenic views and sites.

Findings: The City complies with Goal 5 by identifying and protecting natural, scenic, and historic resources in the City's Zoning Map and Zoning Code. Natural and scenic resources are identified by the Environmental Protection ("p"), Environmental Conservation ("c"), and Scenic ("s") overlay zones on the Zoning Map. The Zoning Code imposes special restrictions on development activities within these overlay zones. Historic resources are identified on the Zoning Map either with landmark designations for individual sites or as Historic Districts or Conservation Districts. *This site is not within any environmental or scenic overlay zones and is not part of any designated historic resource. Therefore, Goal 5 is not*

applicable.

Goal 6: Air, Water and Land Resources Quality

Goal 6 requires local comprehensive plans and implementing measures to be consistent with state and federal regulations on matters such as groundwater pollution.

Findings: Compliance with Goal 6 is achieved through the implementation of development regulations such as the City's Stormwater Management Manual at the time of building permit review, and through the City's continued compliance with Oregon Department of Environmental Quality (DEQ) requirements for cities. The Bureau of Environmental Services reviewed the proposal for conformance with sanitary sewer and stormwater management requirements and expressed no objections to approval of the application, as mentioned earlier in this report. *Staff finds the proposal is consistent with Goal 6.*

Goal 7: Areas Subject to Natural Disasters and Hazards

Goal 7 requires that jurisdictions adopt development restrictions or safeguards to protect people and property from natural hazards. Under Goal 7, natural hazards include floods, landslides, earthquakes, tsunamis, coastal erosion, and wildfires. Goal 7 requires that local governments adopt inventories, policies, and implementing measures to reduce risks from natural hazards to people and property.

Findings: The City complies with Goal 7 by mapping natural hazard areas such as floodplains and potential landslide areas, which can be found in the City's MapWorks geographic information system. The City imposes additional requirements for development in those areas through a variety of regulations in the Zoning Code, such as through special plan districts or land division regulations. *The subject site is not within any mapped floodplain or landslide hazard area, so Goal 7 does not apply.*

Goal 8: Recreation Needs

Goal 8 calls for each community to evaluate its areas and facilities for recreation and develop plans to deal with the projected demand for them. It also sets forth detailed standards for expediting siting of destination resorts.

Findings: The City maintains compliance with Goal 8 through its comprehensive planning process, which includes long-range planning for parks and recreational facilities. Staff finds the current proposal will not affect existing or proposed parks or recreation facilities in any way that is not anticipated by the zoning for the site, or by the parks and recreation system development charges that are assessed at time of building permit. Furthermore, nothing about the proposal will undermine planning for future facilities. *Therefore, the proposal is consistent with Goal 8.*

Goal 9: Economy of the State

Goal 9 calls for diversification and improvement of the economy. Goal 9 requires communities to inventory commercial and industrial lands, project future needs for such lands, and plan and zone enough land to meet those needs.

Findings: Land needs for a variety of industrial and commercial uses are identified in the adopted and acknowledged Economic Opportunity Analysis (EOA) (Ordinance 187831). The EOA analyzed adequate growth capacity for a diverse range of employment uses by distinguishing several geographies and conducting a buildable land inventory and capacity analysis in each. In response to the EOA, the City adopted policies and regulations to ensure an adequate supply of sites of suitable size, type, location and service levels in compliance with Goal 9. The City

must consider the EOA and Buildable Lands Inventory when updating the City's Zoning Map and Zoning Code. *Because this proposal does not change the supply of industrial or commercial land in the City, the proposal is consistent with Goal 9.*

Goal 10: Housing

Goal 10 requires local governments to plan for and accommodate needed housing types. The Goal also requires cities to inventory its buildable residential lands, project future needs for such lands, and plan and zone enough buildable land to meet those needs. It also prohibits local plans from discriminating against needed housing types.

Findings: The City complies with Goal 10 through its adopted and acknowledged inventory of buildable residential land (Ordinance 187831), which demonstrates that the City has zoned and designated an adequate supply of housing. For needed housing, the Zoning Code includes clear and objective standards. *Since this proposal is not related to housing or to land zoned for residential use, Goal 10 is not applicable.*

Goal 11: Public Facilities and Services

Goal 11 calls for efficient planning of public services such as sewers, water, law enforcement, and fire protection. The goal's central concept is that public services should be planned in accordance with a community's needs and capacities rather than be forced to respond to development as it occurs.

Findings: The City of Portland maintains an adopted and acknowledged public facilities plan to comply with Goal 11. See Citywide Systems Plan adopted by Ordinance 187831. The public facilities plan is implemented by the City's public services bureaus, and these bureaus review development applications for adequacy of public services. Where existing public services are not adequate for a proposed development, the applicant is required to extend public services at their own expense in a way that conforms to the public facilities plan. *In this case, the City's public services bureaus found that existing public services are adequate to serve the proposal, as discussed earlier in this report.*

Goal 12: Transportation

Goal 12 seeks to provide and encourage "safe, convenient and economic transportation system." Among other things, Goal 12 requires that transportation plans consider all modes of transportation and be based on inventory of transportation needs.

Findings: The City of Portland maintains a Transportation System Plan (TSP) to comply with Goal 12, adopted by Ordinances 187832, 188177 and 188957. The City's TSP aims to "make it more convenient for people to walk, bicycle, use transit, use automobile travel more efficiently, and drive less to meet their daily needs." The extent to which a proposal affects the City's transportation system and the goals of the TSP is evaluated by the Portland Bureau of Transportation (PBOT). *The scope of this project does not warrant transportation review; therefore Goal 12 is not applicable.*

Goal 13: Energy

Goal 13 seeks to conserve energy and declares that "land and uses developed on the land shall be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles."

Findings: With respect to energy use from transportation, as identified above in response to Goal 12, the City maintains a TSP that aims to "make it more convenient for people to walk, bicycle, use transit, use automobile travel more

efficiently, and drive less to meet their daily needs.” This is intended to promote energy conservation related to transportation. Additionally, at the time of building permit review and inspection, the City will also implement energy efficiency requirements for the building itself, as required by the current building code. *For these reasons, staff finds the proposal is consistent with Goal 13.*

Goal 14: Urbanization

This goal requires cities to estimate future growth and needs for land and then plan and zone enough land to meet those needs. It calls for each city to establish an “urban growth boundary” (UGB) to “identify and separate urbanizable land from rural land.” It specifies seven factors that must be considered in drawing up a UGB. It also lists four criteria to be applied when undeveloped land within a UGB is to be converted to urban uses.

Findings: In the Portland region, most of the functions required by Goal 14 are administered by the Metro regional government rather than by individual cities. The desired development pattern for the region is articulated in Metro’s Regional 2040 Growth Concept, which emphasizes denser development in designated centers and corridors. The Regional 2040 Growth Concept is carried out by Metro’s Urban Growth Management Functional Plan, and the City of Portland is required to conform its zoning regulations to this functional plan. *This land use review proposal does not change the UGB surrounding the Portland region and does not affect the Portland Zoning Code’s compliance with Metro’s Urban Growth Management Functional Plan. Therefore, Goal 14 is not applicable.*

Goal 15: Willamette Greenway

Goal 15 sets forth procedures for administering the 300 miles of greenway that protects the Willamette River.

Findings: The City of Portland complies with Goal 15 by applying Greenway overlay zones which impose special requirements on development activities near the Willamette River. The subject site for this review is not within a Greenway overlay zone near the Willamette River, so Goal 15 does not apply.

Goal 16: Estuarine Resources

This goal requires local governments to classify Oregon’s 22 major estuaries in four categories: natural, conservation, shallow-draft development, and deep-draft development. It then describes types of land uses and activities that are permissible in those “management units.”

Goal 17: Coastal Shorelands

This goal defines a planning area bounded by the ocean beaches on the west and the coast highway (State Route 101) on the east. It specifies how certain types of land and resources there are to be managed: major marshes, for example, are to be protected. Sites best suited for unique coastal land uses (port facilities, for example) are reserved for “water-dependent” or “water-related” uses.

Goal 18: Beaches and Dunes

Goal 18 sets planning standards for development on various types of dunes. It prohibits residential development on beaches and active foredunes, but allows some other types of development if they meet key criteria. The goal also deals with dune grading, groundwater drawdown in dunal aquifers, and the breaching of foredunes.

Goal 19: Ocean Resources

Goal 19 aims “to conserve the long-term values, benefits, and natural resources of the nearshore ocean and the continental shelf.” It deals with matters such as dumping of dredge spoils and discharging of waste products into the open sea. Goal 19’s main requirements are for state agencies rather than cities and counties.

Findings: *Since Portland is not within Oregon's coastal zone, Goals 16-19 do not apply.*

<p style="text-align: center;">River District Design Goals (Approval criteria for Design Review Only)</p>

1. Extend the river into the community to develop a functional and symbolic relationship with the Willamette River.
2. Create a community of distinct neighborhoods that accommodates a significant part of the region's residential growth.
3. Enhance the District's character and livability by fostering attractive design and activities that give comfort, convenience, safety and pleasure to all its residents and visitors.
4. Strengthen connections within River District, and to adjacent areas.

Staff has considered all guidelines and has addressed only those guidelines considered applicable to this project.

A1-1. Link the River to the Community. Link the Willamette River to the community reinforcing the river's significance. This guideline may be accomplished by:

- 1) Organizing land areas and groupings of buildings to visually define the river's linkage to the community.
- 2) Focusing and articulating roadways and pedestrian ways to emphasize the river.
- 3) Developing projects that celebrate the river and contribute to creating centers of interest and activity that focuses on the Willamette.
- 4) Connecting the internal areas of the District to the Willamette Greenway Trail.

A3-1. Provide Convenient Pedestrian Linkages. Provide convenient linkages throughout the River District that facilitate movement for pedestrians to and from the river, and to and from adjacent neighborhoods. This guideline may be accomplished by:

- 1) Using visual and physical cues within the design of the building and building entries to express connections to the river and to adjacent neighborhoods.
- 2) Orienting integrated open spaces and trails that physically and visually link the river and/or surrounding neighborhoods.
- 3) Reusing or retaining cobblestone within the design of new development.
- 4) Encouraging flexibility and creativity along streets enhancing their historic or cultural role.
- 5) Creating visual and physical links across major corridors such as I-405, Burnside, and Front/Naito to strengthen connections to the river and other neighborhoods.

A5-1-3. Reinforce the Identity of Chinatown. This guideline may be accomplished by:

- 1) Emphasizing the Asian ambiance of Chinatown with visual and cultural design features that relate to, and are appropriate to, the District's ethnic history and character.
- 2) Using ornate signs that enhance the ethnic character of the District.

A5-4. Integrate Works of Art. Integrate works of art or other special design features that increase the public enjoyment of the District. This guideline may be accomplished by:

- 1) Integrating art into open spaces or along pathways.
- 2) Incorporating art within the structure of the building.
- 3) Using "found objects" that are remnants from the area's history.

A8-1. Design Fences, Walls and Gateways to be Seen Over. Design fences, walls and gateways located between a building and the sidewalk to be seen over to allow for social

interaction. This guideline may be accomplished by:

- 1) Elevating building entries higher than the public sidewalk or path.
- 2) Creating a low fence or wall to visually separate but not hide semi-private spaces.
- 3) Using a low or stepped-down planting area or terraces to separate private development from a public sidewalk.

B1-1. Provide Human Scale to Buildings along Walkways. Provide human scale and interest to buildings along sidewalks and walkways. This guideline may be accomplished by:

- 1) Providing street furniture outside of ground floor retail, such as tables and chairs, signage and lighting, as well as large windows and balconies to encourage social interaction.
- 2) Providing stoops, windows, and balconies within the ground floors of residential buildings.

C1-1. Increase River View Opportunities. Increase river view opportunities to emphasize the River District ambiance. This guideline may be accomplished by:

- 1) Designing and locating development projects to visually link their views to the river.
- 2) Providing public stopping and viewing places which take advantage of views of River District activities and features.
- 3) Designing and orienting open space and landscape areas to emphasize views of the river.

Findings for A1-1, A3-1, A5-1-3, A5-4, A8-1, B1-1, and C1-1: The above guidelines are not met in the following ways:

- The removal of fixed seating along NW Davis does not enhance the pedestrian experience along the site's primary connection to the Willamette River removing opportunities to stop, sit and rest on this frontage.
- The proposed alterations to the east plazas of the building do not serve to support the existing east lobby entry facing the MAX platform and the river – limiting the site's connection to the river.
- The proposed narrative notes the retention of art located near the west lobby entry. Staff supports the retention of existing art on site. The Brewster Hotel "High Water Line" stone marker currently located on the west edge of the site along NW 2nd is noted in the narrative to be retained. However, limited information has been provided and the drawings do not indicate where the marker is proposed to be relocated. Staff recommends that the marker be located in place clearly visible from the public pedestrian realm.
- The proposed site plan and narrative also note "Interpretive Historic Artwork/ Exhibit" along the wall of the proposed raised terrace at the NW corner of the site. Limited information has been provided for staff to review, but as "exterior alterations" they will be subject to review.
- The existing building includes upper story terraces with views to the Willamette River and staff supports installation of clear glazing which will greatly improve the ground floor experience and allow for views into and out of ground floor tenant space. However, the proposed raised planters at the corners of the ground level plaza spaces do not enhance opportunities for activity at existing corner entries and limited access from the building to the proposed NE terrace do not enhance view opportunities.
- The proposed removal of the existing corner stair at the NW corner to be replaced with raised planters and a raised terrace (approximately 4' tall to the large raised planters and the terrace level with the addition of 42" glass railings at the terrace). This condition creates a significant barrier at the property line.
- The background of guideline B1-1 states that buildings "have a

responsibility to contribute to pedestrian comfort and enjoyment”. Given the deeply recessed storefront on the building, and the original intent for them (mitigation for significant increases in height and FAR) the plaza spaces surrounding the building are tasked with bringing activity to the street edge. This should be in addition to provide transition areas connecting on-site pedestrian amenities to the building. The proposed revisions to the existing ground level plazas proposal do not support the connection of on- and off-site pedestrian amenities which contributes to the comfort and enjoyment of the pedestrian realm.

These criteria are therefore not met.

A9-1. Provide a Distinct Sense of Entry and Exit. When developing at gateway locations, provide a distinct sense of entry and exit that relates to the special qualities of an area. This guideline may be accomplished by:

- 1) Orienting building massing and form towards the intersection of a major district entrance.
- 2) Creating structures or art or using special historic structures to frame a key district or special area entry.

Findings: While not an official “Gateway”, this block serves as the built edge to the Skidmore/Old Town Historic District and is highly visible as the first and last MAX stops heading into and out of downtown for two MAX lines. The proposed alterations to the existing plaza spaces do not serve to activate the transition areas that connect the building to on- and off-site pedestrian amenities. These amenities were design to support how building related to the Historic District and LRT platform. As currently design the proposal does not provide a distinct sense of entry to the Historic District and does not support the highly visible east elevation of the site along the LRT platform.

This criterion is therefore not met.

B5-2. Strengthen the Significance of the Classical Chinese Garden.¹ This guideline may be accomplished by:

- 1) Orienting surrounding building entrances, lobbies, terraces, windows, and active use areas to the Classical Chinese Garden.
- 2) Using muted, light, or reflective building materials.
- 3) Orienting primary building masses away from the garden.
- 4) Reflecting an Asian-influenced level of articulation and architectural texture and detail in new development surrounding the Classical Chinese Garden.

Findings for B5-2: The northwest corner of the OPS site is within 200 feet of the Chinese Garden; the entire site is within 400 feet. The removal of the existing corner stair and access to the corner entry (to remain), and the installation of larger raised planters and a raised terrace cut off from the street at the NW corner of the site does not strengthen the significance of the Chinese Garden. This guideline could be met by increasing opportunities for activity at the corner with the retention of the corner stair that retains access to the existing angled entry and responds the Chinese Garden. Staff could also support a section of raised terrace that allows for adequate depth for layered seating and planting that could help soften this raised floor plate condition that abuts the Chinese Garden.

This criterion is therefore not met.

¹

Skidmore/Old Town Historic District Design Guidelines (For Historic Resource Review Only)

The Skidmore/Old Town Historic District is a unique asset to Portland and has been recognized nationally by its placement on the National Register of Historic Places. In addition, the Skidmore/Old Town Historic District has been identified as a National Landmark, of which there is only one other in Portland, Pioneer Courthouse. There are certain procedures and regulations the City has adopted for the protection and enhancement of the Skidmore/Old Town Historic District.

Staff has considered all guidelines and has addressed only those guidelines considered applicable to this project.

Skidmore/Old Town Historic District Design Guidelines

General Guidelines

A1.a. Reinforce the Predominant Scale and Massing of the Historic District.

A1.b. Reinforce Pedestrian Scale and Orientation in the District.

A1.c. Reestablish the Sense of the District in Waterfront Park and on Naito Parkway.

A2. Maintain and Strengthen the Street Wall in New Construction, Additions, and Improvements to Open Portions of Sites.

Findings for A1.a, A1.b, A1.c, and A2: The above guidelines are not met in the following ways:

- The current proposal does not serve the permeability and activation of on-site plaza spaces that define the edge condition of the site.
- Activated edges at the street contribute to the character of the district. Given that contributing resources are typically built to the lot line, this active edge is relatively flat. As such, tools to support visual and physical connections at these active edges consist of clear storefront glazing and more building entries. However, seeing as the subject building is pulled back from the street – the site’s active edges are much deeper and are intended to support physical and visual connections to the building itself in addition to supporting the movement within and programming of activated edges between the building and adjacent rights-of-way. As designed, the proposal does not reinforce the pedestrian scale and orientation in the district as the proposed alterations include barriers adjacent to the property line – concentrated at corners – that serve to sever rather than strengthen the street edge.

These criteria are therefore not met.

A4. Select Historically Compatible, High Quality Materials with Finishes and Colors that are Appropriate to the District.

Findings: The proposed GFRC raised planters located along the east and west frontages of the site and loose rock “cobbles” are not common in high impact areas, lack durability, and do not utilize high quality materials appropriate to the district. Additionally, the proposed concrete pavers lack detail and brick may be more appropriate to the district.

This criterion is therefore not met.

A5. Install Lighting that Strengthens the Historic Character and Vitality of the District.

Findings: The proposal includes an increase in pedestrian level lighting along the east, west, and south frontages of the site. Lighting is placed under the existing deep soffits and will increase visibility in these recessed areas that occur on three (3) frontages. The proposed lighting at columns highlights the rhythm of the structural bays. Highlighting the clear expression of this structural rhythm at the base of the building, in particular the consistent application along the southern edge that is located within the Historic District, with integrated lighting brings focus to these existing elements that relate to the rhythm of columns and piers seen on contributing resources in the District.

This criterion is met.

A6. Integrate Signage in a Manner that Contributes to the Character of the Building and the District.

Findings for A6: Information on any proposed signage has not been provided for staff to review. Staff notes that signage of any size in the Historic District is subject to Historic Resource Review.

This criterion is not applicable.

A8. Sensitive Integrate the Entries to Parking and Loading.

Findings: All parking and loading areas for the subject site are located off of NW Everett, the northern edge of the site, and are located outside of the Skidmore/ Old Town Historic District boundary that runs east-west through the center of the site.

This criterion is not applicable.

Guidelines for Alterations

B1. Respect the Building's Historic Period, Style, Materials, and Details in the Design of Alterations.

Findings: The southern half of the site is located in the Skidmore/ Old Town Historic District and the existing OPS building is a noncontributing resource in the Skidmore/ Old Town Historic District. As such, the proposal does not entail modification or removal of historic material and details. The existing brick clad columns, as well as the brick cornices on the east and west and all other brick surfaces located at the base of the building, are proposed to be re-clad with cement plaster, to match the exposed concrete columns on the north elevation. This stucco cladding relates to some of the adjacent buildings including the upper stories of the Merchant Hotel, the Lyndon Musolf Manor, the recent infill development – Block 8L – located southeast of the site, and the walls of the Chinese Garden, that use gray and off-white tones on stuccoed or exposed brick.

This criterion is therefore met.

B2. Preserve and Repair Historic Exterior Materials and Distinctive Details. Maintain the Vertical Lines of Columns and Piers, the Horizontal Definition of Spandrels and Cornices, and Other Primary Structural Elements.

Findings for B1, B2, and B3: The Brewster Hotel stone floor marker is noted in

the project narrative to be retained. However, limited information as to where the marker will be relocated on site has been provided for staff to review. The present stone marker, located at the street edge near the west entrance of the building, is from the former Brewster Hotel (constructed 1892), once located at the NE corner of NW 3rd and NW Flanders (a property then owned by the Portland Gas Co., which later become the Lan Su Chinese Garden). When the stone and brick building was demolished in the early 1980s, various artifacts were salvaged by the Gas Co. and reinstalled in the Skidmore/ Old Town Historic District. Included in the salvaged artifacts was the stone carving, originally located in the Brewster Hotel's First Floor stone work. The stone marker measures 2 ft. 9 1/4 in. wide x 14 3/4 in. high and may have been cut down to fit within the brick module of the existing wall. It states "High Water, June 7, 11 AM, 1894. Cut horizontally into the stone is the height of the flood waters of 1894, which is 3 ft. 9 3/4 in. above the existing sidewalk. This would translate roughly into 36.80 ft. (above mean sea level). As the floor level of the Conference level is 37.00 ft., it suggests that the marker will project slightly above the floor line of the building.

This criterion is therefore not met.

DEVELOPMENT STANDARDS

Unless specifically required in the approval criteria listed above, this proposal does not have to meet the development standards in order to be approved during this review process. The plans submitted for a building or zoning permit must demonstrate that all requirements of Title 11 can be met, and that all development standards of Title 33 can be met or have received an Adjustment or Modification via a land use review, prior to the approval of a building or zoning permit.

CONCLUSIONS

Aspects of the proposed design, such as replacement of existing tinted glazing with clear glazing at the ground floor, will better integrate the existing building with pedestrian realm and with storefronts in the historic district. However, the proposal as a whole does not adequately address the public pedestrian realm or activate the street edge, lessons connection to the historic district, and does not form a coherent expression. The purpose of the Historic Resource Review process is to ensure that additions, new construction, and exterior alterations to historic resources do not compromise design standards and their ability to convey historic significance. The purpose of Design Review is to promote the conservation, enhancement, and continued vitality of areas of the City with special scenic, architectural, or cultural value. Staff finds that this proposal does not meet the applicable Design and Historic Resource Review approval criteria and therefore does not yet warrant approval.

TENTATIVE STAFF RECOMMENDATION

(May be revised upon receipt of new information at any time to the Landmarks Commission decision)

Staff recommends denial of exterior alterations to the ground floor plazas of the One Pacific Square building at 220 NW 2nd in the Chinatown/ Old Town Subdistrict of the Central City Plan District and partially located in the Skidmore/ Old Town Historic District.

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Procedural Information. The application for the Historic Resource Review (LU 18-277253 HR) was submitted on December 12, 2018, and was determined to be complete on January 22, 2019.

The application for the Design Review (LU 19-101014 DZ) was submitted on January 3, 2019 and was determined to be complete on January 22, 2019.

Zoning Code Section 33.700.080 states that Land Use Review applications are reviewed under the regulations in effect at the time the application was submitted, provided that the application is complete at the time of submittal, or complete within 180 days. Therefore, the Historic Resource Review (LU 18-277253 HR) was reviewed against the Zoning Code in effect on December 12, 2018 and the Design Review (LU 19-101014 DZ) was reviewed against the Zoning Code in effect on January 3, 2019.

ORS 227.178 states the City must issue a final decision on Land Use Review applications within 120-days of the application being deemed complete. The 120-day review period may be waived or extended at the request of the applicant.

For the Historic Resource Review case (LU 18-277253 HR), the applicant did not waive or extend the 120-day review period. Unless waived or extended by the applicant, **the 120 days for the HR case will expire on: May 22, 2019.**

For the Design Review case (LU 19-101014 DZ), the applicant waived the 120-day review period, as stated with Exhibit (Exhibit A-12). Unless further extended by the applicant, **the 120 days for the DZ case will expire on: January 22, 2020.**

Some of the information contained in this report was provided by the applicant.

As required by Section 33.800.060 of the Portland Zoning Code, the burden of proof is on the applicant to show that the approval criteria are met. The Bureau of Development Services has independently reviewed the information submitted by the applicant and has included this information only where the Bureau of Development Services has determined the information satisfactorily demonstrates compliance with the applicable approval criteria. This report is the recommendation of the Bureau of Development Services with input from other City and public agencies.

This report is not a decision. The review body for Historic Resource Review proposal is the Landmarks Commission. The review body for Design Review proposal is the Design Commission. The Landmarks Commission and the Design Commission will make respective decisions for these cases. This report is a recommendation to the Landmarks Commission and Design Commission by the Bureau of Development Services. The review body may adopt, modify, or reject this recommendation. The Landmarks Commission and Design will make respective decisions about this proposal at the hearing or will grant a continuance. Your comments to the Landmarks Commission and/or Design Commission can be mailed, c/o the Landmarks Commission or c/o the Design Commission, 1900 SW Fourth Ave., Suite 5000, Portland, OR 97201 or faxed to 503-823-5630.

You will receive mailed notice of the decision if you write a letter received before the hearing or testify at the hearing, or if you are the property owner or applicant. You may review the files on these cases by appointment at our office at 1900 SW Fourth Ave., Suite 5000, Portland, OR 97201. Please call the file review line at 503-823-7617 to schedule an appointment.

Appeal of the decision(s). The respective decisions of the Landmarks Commission and Design Commission may be appealed to City Council, who will hold a public hearing. If

you or anyone else appeals the decision of the review body, for the Historic Resource Review case (LU 18-277253 HR), only evidence previously presented to the Landmarks Commission will be considered by the City Council.

Who can appeal: You may appeal the decision only if you write a letter which is received before the close of the record for the hearing, if you testify at the hearing, or if you are the property owner/applicant. **Appeals must be filed within 14 days of the decision. An appeal fee of \$5,000 will be charged (one-half of the application fee for this case).**

Additional information on how to file and the deadline for filing an appeal will be included with the decision. Assistance in filing the appeal and information on fee waivers are available from the Bureau of Development Services in the Development Services Center, 1900 SW Fourth Ave., First Floor. Neighborhood associations recognized by the Office of Neighborhood Involvement may qualify for a waiver of the appeal fee provided that the association has standing to appeal. The appeal must contain the signature of the Chair person or other person authorized by the association, confirming the vote to appeal was done in accordance with the organization's bylaws.

Neighborhood associations, who wish to qualify for a fee waiver, must complete the Type III Appeal Fee Waiver Request for Organizations Form and submit it prior to the appeal deadline. The Type III Appeal Fee Waiver Request for Organizations Form contains instructions on how to apply for a fee waiver, including the required vote to appeal.

The Bureau of Development Services is committed to providing equal access to information and hearings. Please notify us no less than five business days prior to the event if you need special accommodations. Call 503-823-7300 (TTY 503-823-6868).

Megan Sita Walker
March 4, 2019

EXHIBITS – NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement
 - 1. Original Narrative for HR, Rec'd December 12, 2018
 - 2. Original Narrative for DZ, Rec'd January 3, 2019
 - 3. Original Drawing Packet for HR, Rec'd December 12, 2018 – Not Approved/For Reference Only
 - 4. Original Drawing Packet for DZ, Rec'd January 3, 2019 – Not Approved/For Reference Only
 - 5. Applicant response to both DZ and HR Incomplete letter/ Staff Memo, Rec'd January 22, 2019
 - 6. Revised Narrative, Rec'd January 22, 2019
 - 7. Revised Drawing Packet for HR and DZ, Rec'd January 22, 2019 – Not Approved/For Reference Only
 - 8. Revised Sketches, Rec'd February 11, 2019 – Not Approved/For Reference Only
 - 9. Revised Sketches, Rec'd February 12, 2019 – Not Approved/For Reference Only
 - 10. Revised Sketches, Rec'd February 14, 2019 – Not Approved/For Reference Only
 - 11. Revised Drawing Packet for HR and DZ, Rec'd February 19, 2019 – Not Approved/For Reference Only
 - 12. 120-Day wavier
- B. Zoning Map
- C. Plan & Drawings:

1. Cover
 2. Existing Site Plan
 3. Proposed Site Plan
 4. Enlarged Plan – NW Corner ‘Option 1’ – proposed
 5. Enlarged Plan – NW Corner ‘Option 2’
 6. Enlarged Plan – NW Corner ‘Option 3’
 7. North Elevation
 8. East Elevation
 9. South Elevation
 10. West Elevation
 11. Building Sections
 12. Building Sections
 13. Enlarged Plan @ Property Line – North
 14. Enlarged Plan @ Property Line - East
 15. Enlarged Plan @ Property Line - South
 16. Enlarged Plan @ Property Line - West
 17. Metal Panel Detail
 18. Site Details
 19. Site Details
 20. Site Details
 21. Lighting Plan
 22. Lighting Cut Sheets
 23. Lighting Cut Sheets
 24. Lighting Cut Sheets
 25. Utility Plan
- D. Notification information:
1. Request for Response
 2. Posting Letter sent to applicant
 3. Notice to be posted
 4. Applicant’s statement certifying posting
 5. Mailed notice
 6. Mailing list
- E. Agency Responses:
1. Bureau of Environmental Services
 2. Life safety Division of BDS
 3. Site Development Section of BDS
 4. Urban Forestry
 5. Fire Bureau
- F. Correspondence:
1. Peter Englander and Will Naito, Co-chairs of the Old Town Community Association, Land Use Committee, February 7, 2019, wrote in support of the proposal.
- G. Other
1. Original LUR Application
 2. Incomplete Letters for HR and DZ from staff to applicant, sent January 2, 2019 and January 11, 2019 respectively
 3. Staff memo to Applicant regarding HR, sent January 11, 2019
 4. Email correspondence between staff and the applicant