February 4, 2020

Ms. Hillary Adam Bureau of Development Services Land Use Services City of Portland 1900 SW 4th Avenue Suite #5000 Portland, Oregon 97201

RE: USPS Master Plan/Broadway Corridor Project

Dear Ms. Adam,

Thank you for your time on the phone last week and for trying to answer some of our questions about the Post Office development. We'd like to share a few of our concerns about this project moving forward.

Let me say that we are not simply opposed to the new development. On the contrary, we see it as a positive evolution of the city of Portland. That said, as property owners in the Pearl District we are extremely disappointed to see the grossly disproportionate dimensions of the planned structures. I supposed the original sin is the zoning changes that allowed these extreme heights. There is simply no disguising that the effect will be a city within a city. These planned masses will dwarf the other structures in the Pearl. The Cosmopolitan notwithstanding, the enduring but now seriously flagging charm of our city, is how it balances growth with the extant architecture so that the history is allowed to shine though. That's not what we're seeing here.

To put it in simpler and starker terms, the endlessly beguiling view of Mt. Hood as enjoyed from our tenth floor condo will be blotted out. Like that. Additionally, the shadows cast by these behemoths is like something out of an Expressionist painting from the "doom is just around the corner" 1920's. You're not trying to tell us that, I hope. Isn't it obvious that the natural setting of the hills to the west and Mt. Hood and the Willamette to the east distinguish our city in a way that can't be approached by the most amazing buildings you might ever dream of? Interestingly, the plans address the issue of excessive shadows created by the structures but only insofar as they effect the central green areas of the project. This rankles more than you know.

I understand that Prosper Portland is conducting studies to manage the additional traffic but studies notwithstanding, this will represent an enormous influx of traffic into the Pearl District. Another of the once-redeeming aspects of our city, a lighter reliance upon automobile transportation, will fall precipitously to the wayside. At a minimum, automobiles should be restricted to entering parking from the east side of the property and every effort should be made to minimize the flow of cars into the Pearl District.

So, yes, redevelopment of the Post Office is potentially great. Extending the North Blocks into the development is a nice touch. But these excessive masses are ridiculous. We noticed in the plans that there is actually a minimum height of 100' owing to the idea that it isn't profitable to develop something smaller. Yikes! I'm sure there are algorithms of many sorts that "absolutely prove" in many ways that this must be a super massive development. But let's face it, when it's done, it's done. I don't know anyone, save the few who have profited from said overdevelopment, who have ever said "Gee, if they had only built bigger, higher, blocked more light, blocked more view, been more anonymous looking. If it all could only diminish me just a little more. Yes, that would have been better."

Let's just say, it would be great if the project could at least suggest that it remembers that "human-sized" was once a goal. Let's get serious about including greater separation between more varied sized buildings that give onto larger open spaces.

Thank you again, Ms. Adam, for your time and attention.

Sincerely,

Joe and Liz Lawlor

joelawlor@sbcglobal.net

cell 818-482-1768

February 5, 2020

937 NW Glisan Street Unit 1030 Portland OR 97209

Bureau of Development Services 1900 SW Fourth Avenue Suite 5000 Portland OR 97201

We believe that the plans, as presented in the January 21,2020, notice of public hearing do not comply with the Approval Criteria for Central City Master Plans 33.510.H.

Item 5 states in part: The Master Plan...ensures that development within the plan boundary will not excessively shade the adjacent park.

We contend that the 400' tail buildings shown on blocks 6, 9A, and 9C will cast shade on Jamison Square, which is located one block west, during spring, summer, and autumn months when the sun rises to the east and northeast of the project site. This will have a detrimental effect on the park. The wooden boardwalk which usually dries quickly in the morning, will remain wet and slippery longer, creating dangerous footing and likely deteriorate sooner. Vegetation will suffer. A park area that is beloved, because it is sunny, will become a dark canyon.

Item 8 states in part: The Transportation system is capable for supporting the proposed uses in addition to the existing in the plan area.

Currently both Lovejoy and Glisan Streets are maxed out in the morning and afternoon when people are moving in and out of the Pearl District. The additional residents and the employees of the proposed 400" tall buildings will increase the traffic on these connector streets to that level that the streets here do not support.

We urge you to consider the impacts the proposed project will have on this successful district.

Regards, Kent and Lillian Brown

CASE FILE: LU 19-246279 CCMP AD-USPS BRedway Corridor Master Plan PC#19-147103 Date: February 6, 2020

- From: 1001 NW Lovejoy Street, Unit 806 Portland, OR 97209
- To: Bureau of Development Services 1900 SW Fourth Avenue, Suite 5000 Portland, OR 97201
- Re: Case file : LU 19-246279 CCMP AD USPS Broadway Corridor Master Plan PC # 19-147103

I am writing on behalf of myself and the undersigned residents of the Metropolitan Condominiums, located at NW Tenth and Lovejoy, one block west of the proposed USPS development.

We believe that the plans (as presented in the January 21, 2020, notice of public hearing) do not comply with the Approval Criteria for Central City Master Plans stated in 33.510.255.H.

Item 5 states in part: The master plan ... ensures that development within the plan boundary will not excessively shade the adjacent park.

We contend that the 400' tall buildings shown on blocks 6, 9A, 9B and 9C will cast shade on Jamison Square, which is located one block to the west, during spring, summer, and autumn months when the sun rises to the east and northeast of the project site. This will have a detrimental effect on the park in that both vegetation and human users will be impacted by the lack of sun. Benches along the eastern border, which were designed so that one could sit and enjoy the morning sun, will be in shade until midday. The wooden boardwalk which usually dries quickly in the morning, will remain wet and slippery longer and likely deteriorate sooner. Vegetation designed for day long sun will suffer. A park area that is a beloved, because it is sunny, will become a dark canyon.

Item 8 states in part: The transportation system is capable of supporting the proposed uses in addition to the existing uses in the plan area.

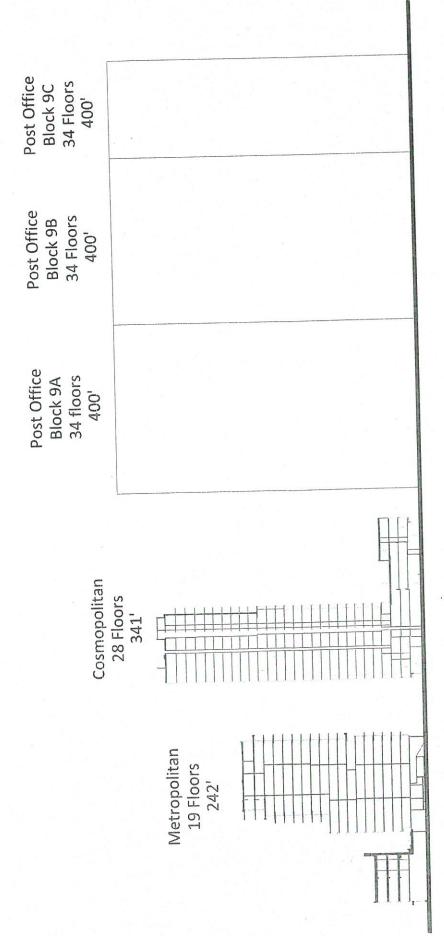
Currently both Lovejoy and Glisan Streets are maxed out in the morning and afternoon when people are moving in and out of the Pearl District. The additional residents and employees of the proposed 400' tall buildings will increase the density of traffic on these connector streets to a level that the streets here do not support.

We urge you to consider the negative impact that this proposed project will have on one of Portland's successful districts. The 400' tall buildings are too close to this residential area and more suitable to downtown.

Thank you for considering our concerns.

Sincerely, Linda Berry, AIA, LEED AP

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Height Comparison

Proposed Post Office Development on Lovejoy from Broadway to 9th Avenue Comments from Metropolitan Condominium Residents regarding Case file : LU 19-246279 CCMP AD – USPS Broadway Corridor Master Plan PC # 19-147103

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Comments from Metropolitan Condominium Residents regarding Case file : LU 19-246279 CCMP AD – USPS Broadway Corridor Master Plan PC # 19-147103

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February 13, 2020

To: Hilary Adam, BDS Sarah Harpole, Prosper Portland Chris Warner, Nick Falbo, Courtney Duke, PBOT Nolan Lienhart, ZGF Portland Design Commission

Re: LU 19-246279 CCMP AD

The Pearl District Neighborhood Association Planning and Transportation Committee recently reviewed the Master Plan submission materials for the upcoming Design Review of the USPS portion of the Broadway Corridor. We have followed the evolution of this master plan and offer the following targeted recommendations for the Design Commission to consider. Our two primary considerations for the master plan are that the development must be fully integrated into the existing urban fabric and the open space and the Green Loop must be successfully executed. However, we also request that the City and Prosper Portland implement parking strategies and Transportation Demand Management programs to achieve an access target of 85 percent non-single occupant vehicle commute mode share for the site as called for in the Broadway Corridor Framework Plan. The following is a series of recommendations provided by the Committee.

Green Loop (Hoyt to Kearney)

The Committee expressed support for the separated path along Park Avenue and the Green Loop incline, which allows the facility to rise up to the Broadway Bridge while remaining integrated within the open space. We preferred using the podium option between Buildings 7 and 8 for the Green Loop bridge over Johnson and Kearney streets. While we recognize some advantages of a free-standing bridge both for phasing concerns and pedestrian opportunities below, we feel that the Green Loop should be wider (utilizing the full 50' width shown) and be more integrated into surrounding buildings. Too many of Portland's important paths such as the Eastbank Esplanade and Waterfront Park are not adequate for current usage, let alone for the city's future population growth. We recommend a wider bridge across Johnson and Kearney as well to match.

Building 1A/1B Option

The Committee supports the option that provides the least amount of shade on the open space. We feel the open space must take priority as its success underpins the success of the entire development. Quality public space must be a priority given the density and intensity of use on the site. A successful space is required to catalyze the greatly underutilized asset that is the North Parks Blocks. The whole is greater than the sum of its parts.



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<u>Building 2</u>

The Committee believes the activation of the top of Building 2 is key to activating the Green Loop climb. We support a larger building footprint to allow a successful retail program, however, the larger footprint should not come at the expense of reducing the planned open space. The larger footprint should be contained under the grade rise for the incline.

Park Avenue Alley

The concept of an alleyway off a primary path is compelling and something that Portland, with its continuous and relentless grid, is lacking. The committee does have concerns about the chances of success. If Johnson Street becomes the retail and activity spine as envisioned, then it will certainly help bring people to the alley. However, the alley terminates at Kearney Street which is purposely lacking in activation and serves mainly to allow auto access to the northern parcels' parking garages. Moreover, Kearney is pedestrianized west of 9th Avenue and is therefore not a through street westerly into the Pearl. We certainly welcome new typologies and opportunities for discovery and surprise but are concerned that there appears to be an inward focus to the site as designed. We do not want to sacrifice the activation of 9th Avenue for an inward alley if choices must be made. It is critical that 9th Avenue be activated appropriately to stitch this site into the existing fabric of the Pearl. We cannot have a "wall" separating the site from the rest of the neighborhood.

Building 7

This site is the focal point of the open space and the progression of the North Park Blocks. The Committee strongly urges the inclusion of specific language to require this building to be a signature design with substantial carving of the mass. Given its prominence, Building 7 should be iconic in its design and sculpted to allow it to differentiate itself from its other tall large neighbors in the northern parcels, while also allowing for sufficient sunlight to reach the proposed plaza at Kearney and Station Way. In many respects, this building will likely become the defining symbol of the open space and the overall project.

Northern Parcels/Green Loop Plaza (Broadway/Lovejoy)

The northern parcels are designated to provide the highest intensity of use, mass and height. Given its proximity to the largely residential portion of the Pearl District, it is imperative that these towers be well designed for lightness and articulation. At 340 feet, the Cosmopolitan building is an example of how a well-designed tower can mitigate the effects of height on its surroundings. We strongly encourage the inclusion of language to require substantial sculpting and articulation of these sites. While the lower southern buildings will act as an urban edge to the open space, the north towers will rise above and must get lighter in mass to allow sunlight to penetrate the site. The Committee also showed interest in pulling the Building 9 podium back to allow more light and space for the Green Loop plaza at Broadway/Lovejoy.

Master Street Plan

The Committee supports the proposed curbless streetscape design concepts for Park Avenue and



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Johnson Street through the site, as they provide ample space for people walking and biking and will

Johnson Street through the site, as they provide ample space for people walking and biking and will create a unique sense of place in this transformative new development. There is also consensus on the Park Avenue multi-use path alignment for the Green Loop, which improves upon the NW Park/9th project (#16) in the adopted Central City in Motion plan and is better aligned with the goals and vision of the Green Loop to serve as a low-stress, family-friendly alternative to NW Broadway.

However, there is concern regarding the proposed two-way bicycle facility on Johnson Street and how bicycle users would transition from a separated two-way facility to a shared street environment west of 9th Avenue. Moreover, it is important that this site does not generate excess automobile traffic along the Johnson neighborhood greenway. The east end of this facility at Station Way also seems unresolved and lacks a purposeful connection to the rest of the bicycle network. In addition, the proposed on-street parking and loading plan does not seem to accommodate the planned CCIM bicycle facilities on Hoyt Street and 9th Avenue. These are all details that must be clarified and addressed by PBOT before the Committee can offer its support.

Traffic and Parking/TDM

We wish to reiterate the need for the Master Plan to adhere to the goal of 85 percent non-SOV commute mode split as documented in the 2015 Framework Plan and Central City 2035 Plan for the Pearl District. Committee members expressed significant concern about the impact of the development on the transportation system in the proposed area, especially along 9th Avenue and at the Broadway/Lovejoy intersection. These concerns have not been ameliorated since subsequently reviewing the USPS Master Plan Traffic Impact Statement, and it calls into question whether Prosper Portland is only going to encourage greater automobile traffic and congestion by planning for 2,800 off-street parking spaces at the USPS site, all of which would need to be constructed aboveground due to soil contamination. While it's important to acknowledge that these ratios are presented as worst-case scenarios in the TIS, there is seemingly no mechanism in place to prevent this unfortunate outcome.

Of particular note is the proposed parking ratio of **1.25 spaces per 1,000 SF** for the office and retail uses, which while technically allowed under the City's maximum parking requirements within the North Pearl subarea, does not accurately reflect the USPS site's central downtown location and the richness of multimodal options available. This amount of off-street parking is not only incompatible with the tenets of the Framework Plan, it will be extremely expensive to construct (potentially impacting the number or affordability of the proposed housing units and office space), and will also adversely impact the pedestrian realm due to the persistent presence of blank walls within the site. There should also be some flexibility to lower the average residential parking ratios given the site's advantageous location compared to the rest of the North Pearl (where the average ratio for apartments is observed at 0.6-0.7). A coordinated shared parking strategy for the residential and office (or other complementary uses) is the most cost-effective solution to accommodate the forecasted parking demand without overbuilding supply, and is encouraged under CC2035.



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In addition to issues with the proposed parking ratios, the Master Plan is lacking on critical details for managing the level of demand expected to be generated by the development. While the plan includes vague promises to implement "robust TDM," it will take a concerted effort on the part of the developer, Prosper Portland, and the City to reach the desired mode split for the USPS site (or for even a more attainable target of 60-75 percent). Some potential TDM strategies that have proven successful in other similarly sized developments include a combination of free or subsidized transit/Biketown passes for residents and employees, carpool and telecommute incentives, a cycle station facility as built in the Lloyd, and mandatory daily parking fees for commuters (rather than monthly). The PDNA needs to see a comprehensive TDM strategy on this scale to feel confident that the proposed development will not significantly worsen conditions for people who already walk, bike, take transit, and drive in this area.

Project Phasing

Finally, the Committee recognizes the USPS and larger Broadway Corridor redevelopment plans are a once in a generation opportunity to expand, enhance and connect the River District. We largely support the primary concepts of the Master Plan but have significant concerns that the phasing and implementation of the Plan will not result in success. Prosper Portland's past efforts at site development demonstrate mixed results at best.

Because the site has been carved into three master developer entities, we fear a less than cohesive result. It is critical the open space and central public infrastructure be constructed earlier in the project delivery timeline, not later. The piecemeal development of buildings without the unifying connection will likely result in a disjointed collection of generic buildings. Given budget restraints, it is apparent that a major and well-funded tenant must be recruited to occupy the northern parcels and fund much of the integrated public infrastructure. Despite the long-standing community need for more parks and open space on a per-capita basis, Portland Parks continues to direct investments away from Central City, demonstrating that private funding will be needed for much of the public amenities outlined in this plan.

Respectfully,

David Dysert & Reza Farhoodi Planning & Transportation Co-Chairs Pearl District Neighborhood Association