February 29,2020

To: City of Portland Design Commission

From: Mike Houck

Re: Comments on LU 20-102914, Alamo Manhattan Blocks

Chair Livingston and Commissioners,

I am submitting this testimony on behalf of the Urban Greenspaces Institute in response to the newest submission of the proposed Alamo Manhattan development on the Willamette Greenway. As with the previous submission which we provided testimony on we have serious concerns with the Greenway elements of the current proposal. We recommend denial of the application until our concerns are met as well as the multiple concerns outlined in the staff report from various city bureaus and BDS staff.

First and foremost we are disappointed that the applicant has turned down offers from Portland Parks and Recreation and Prosper Portland which have offered to provide applicant with additional funding to enhance the Greenway design. Our primary interest is that the applicant, at a minimum, create a Greenway design that is equal in quality and performance to that of the Greenway to the north at South Waterfront. In our opinion the applicant seeks to do the least acceptable in its Greenway design. This alone warrants denial of the application.

The Greenway element of the proposed development is equal in importance the proposed development, not an “extra frill”or “amenity.” The Willamette Greenway is an essential element of the city’s infrastructure and as such should be designed to the highest standard.

The following are our specific reasons for rejecting the application:

FAR Bonus: The applicant has requested an additional 125 feet in height for providing and additional 2,500 square feet of open space abutting the Greenway. We have reviewed the graphics in their application and conclude that the proposed additional open space is fragmented space that would not actually add to public space as it is spread out in small increments across the development. We urge denial of the FAR bonus based on increased open space.

Concreted Retaining Wall: Our understanding is the wall is a hazard and likely to fail within the next few years. We support one of two options to the applicant’s proposal. Either the applicant does whatever is necessary to make the retaining wall safe for public use or remove the wall entirely. We concur with PP&R’s recommendation that if upgrading is not feasible “a more significant vegetative barrier should be provided and the pedestrian walkway should curve away and not lead people towards the pier”, which would become an unsafe, attractive public nuisance.

Trees: We agree with Urban Forestry that more “large-form” trees are needed in Subarea 2. The proposed trees are not only too small in form to produce meaningful riparan habitat but they are the incorrect species. The focus should be on native vegetation such as the trees recommended by Urban Forestry: Quercus grryana, Alnus rubra, and Thuja plicata. We would also like to see significant planting of native Salix species which, as with South Waterfront, would result in a dense understory of vegetation in the riparian zone landward of Ordinary High Water. It is not only important to use native vegetation (trees and shurbs) but to use species appropriate to the Pacific Northwest and in the riparian zone of the Willamette River. An added concern is the density of plantings. The graphics depict very sparse planting of trees. We urge the Design Commission to require significantly increased density of trees, particularly tall trees with large canopies.

Green Roofs: While we understand that technically the applicant does not have to provide green roofs under the April 2017 code, the assertion that artificial turf, which applicant asserts will have the “appearance of grass from a distance”, provides stormwater management is absurd on its face. We urge the applicant to reconsider use of ecoroofs. There are many ways to produce ecoroofs that are not as costly as the applicant asserts. We will be providing some alternative ecoroof designs that we hope the applicant will consider, understanding there is no requirement for green roofs.

Transition from Private to Public Space: As noted on pages 10-11 of the staff report, C6, the applicant has not addressed the ongoing concern that the buildings come right up to the Greenway and there is insufficient separation between the Greenway and development. Again, the proposed FAR bonus should not be given for additional open space based on what has been presented. We would suggest that the applicant employ the same strategy that was successfully used at South Waterfront where installation of visually attractive, densely planted stormwater planters/swales between the Greenway and buildings created a well-defined transition between private spaces and the Greenway.

The staff report states “the Commission noted at the 12/12/19 hearing that more setback and erosion of the building needs to occur along the greenway and that the more active uses need to be oriented toward the greenway to acknowledge the public amenity.” We concur, although as we previously stated, we do not view the Greenway as an “amenity” but, rather, as a critical element of the city’s infrastructure that warrants far more commitment to quantity and quality than is the case with this application.

Goal 7, Energy: The staff report only discusses issues related to transportation. We question why energy useage of the buildings is not a factor to be considered with regard to meeting Goal 7. We point out that while ecoroofs are not required they are well known for their ability to reduce energy demands for cooling and heating buildings.

South Waterfront Greenway Review: While we appreciate the fact that the Design Commission referenced our earlier concerns and applicant did refer to its efforts to address our concerns, we continue to have numerous concerns outlined in our current feedback. For example, we concur with the following staff comment, “Landscaping calculations for Subarea 2 must be corrected: 20,452 sf feet of shrubs are required *at a minimum* (emphasis ours); and 5,113 sf of ground cover are required.”

We would add that the plant palette is overwhelmingly non-native species. We urge the Commission to require a preponderance of trees, shrubs and ground cover be native as well as typical of what one would find in the riparian and nearby upland along the Willamette River in the Portland region. We suggest use of the City of Portland’s plant list, <https://beta.portland.gov/bps/environ-planning/portland-plant-list>.

Plaza at Abernethy:

We concur with PP&R’s observation that this plaza is poorly situated as an outlook and that it be eliminated outright or, at a minimum, relocated as recommended.

Enhance the riverbanks: We strongly support the applicant’s plan to lay the bank back. However, we agree with staff that 5. Enhance the riverbank (page 32 of the staff report), that this has not been met. As noted earlier, one major source of concern is both the species and density of tree planting, neither of which meets this criterion, with the preponderance of low-form, non-native trees.

6. Design diverse plant communities: What exactly does the applicant mean by “The project will be ‘self-mitigating?’ As staff notes, the applicant has not proposed plantings at the correct density or diversity.

Better Enhancement: As we noted in our opening remarks, the applicant seems to be doing as little as possible to create an exceptional Greenway that “will better enhance the natural, scenic, historical, economic, and recreational qualities of the greenway.” We concur with staff findings that the applicant has not provided sufficient information or, in our opinion, proposed Greenway design, to determine whether this criterion has been met. We go farther in asserting that the criterion has not been met.

Pilings: We recommend that the Design Commission require removal of all the pilings.

Respectfully,



Mike Houck