Steve Pinger 2669 NW Savier St. Portland Oregon 97210

October 1, 2014

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

Re: West Quadrant Plan Proposed Draft, August 2014

Commissioners;

I have been a West Quadrant Plan SAC member for the last year and a half, and drafted the *Building Height Policy Minority Report* on behalf of the Northwest District Association.

I am forwarding the following general comments and recommendations in review of the *West Quadrant Plan Proposed Draft*, August 2014:

page	element	comment / recommendation
p. 28	Concept Maps, Building Heights	The significant distinction in the street level experience of buildings that surround an open space, or a street enclosure, is between buildings that are less than approximately 100' tall and those that are taller. The impact of the scale of buildings on adjacent public spaces, even if they step back, once they get to be above 175' does not change much between a 250' building, a 325' building or a 460' building.
p. 51	Central City-wide Policies and Actions: Urban Design	 Add the following Policies: District Character and Scale. Retain the personality and feel of the districts by preserving the modest original buildings that they are composed of, and conserving the scale of the multi-block street enclosures that give the districts their distinct character, personality and desirability. Coherent Urban Form. Concentrate tall buildings along the transit spines and at freeway viaducts and bridgeheads. Avoid creating a pattern of dispersed individual towers in areas of low neighboring buildings. Appropriate Allowable Building Heights. Establish building height allowances that are appropriate to realistic foreseeable market demands, underlying developable density and the scale of the existing neighboring context. Street Character. Reinforce the social role of our street environments, as they are the primary component of our system of public spaces.
p. 49	Central City-wide Policies and Actions: Health and Environment	Low Carbon Development: acknowledge that there are significantly higher levels of carbon emissions for constructing new buildings than for the retention and renovation of existing buildings.

p. 58	Downtown: Public Realm Concept Diagram	Recognize the Park Blocks Corridor between Broadway and 10 th Ave., from Lovejoy to Jackson, as a distinct sub-district of the West Quadrant, and not an area at the edges of the Downtown and West End districts.
p. 59	Downtown: Key Elements 1 and 2	Are these coordinated with the Waterfront Park Master Plan? Is this master plan relevant? The waterfront needs a stronger, clearer identity and broader use to sustain stronger connections from the Downtown.
p. 59	Downtown: Key Element 6	Consider creating development sites <i>on the waterfront</i> at the bridgeheads, and a series of waterfront parks between them as an alternative to the continuous, monolithic park we have had there for 40 years.
p. 67	Downtown: Urban Design Policy 4c	Provide real buildings and real uses at the waterfront, and not just "attractors, kiosks and displays".
p. 67	Downtown: Urban Design Policy 5	Recognize the Park Blocks Corridor between Broadway and 10 th Ave., from Lovejoy to Jackson, as a distinct sub-district of the West Quadrant.
p. 67	Downtown: Urban Design Policy 7	Recognize and conserve the distinct character and scale of SW Park and 9th Avenues.
p. 68	Downtown: Urban Design Policy 9	Consider allowing general commercial activities on the waterfront, and not limiting uses to "recreational and tourism activities".
p. 68	Downtown: Urban Design Policy 10	Protect and conserve the character and scale of the Park Blocks Corridor throughout the West Quadrant.
p. 68	Downtown: Urban Design Policy 12	Change to read: "stepping down in height to the Willamette River, and to the Park Blocks Corridor and western neighborhoods."
p. 75	West End: Key Element 2	Clarify this concept to align with the <i>CC2035 Concept Plan's</i> Goals L and M, and Policy 31
p. 75	West End: Key Element 3	Enough freeway cap exploring; implement a demonstration project. Do not limit the cap to open space. The <i>I-405 Strategy Team Report</i> assumed a cap suitable to support a 7 story building.
p. 79	West End: Urban Design Policy 1	Change to read: "West End by encouraging the preservation and rehabilitation Encourage infill development that respects the district's <i>distinct</i> urban character <i>and scale</i> ."
p. 80	West End: Urban Design Policy 3	Recognize and conserve the distinct character of SW Park and 9th Avenues.
p. 80	West End: Urban Design Policy 6	Provide example of "private plazas and pocket parks" that are successful. Enhance the public open space network by improvements to existing public open spaces and streets.
p. 85	Goose Hollow: Key Element 1	Are "new plazas and gathering spaces" plausible or desirable along W. Burnside, especially given the building heights that are proposed on the south side?

p. 85	Goose Hollow: Key Element 2	Is there an alternative concept if Lincoln HS is not completely redeveloped, but renovated and expanded? There are limitations on the application of TIF funding.
p. 85	Goose Hollow: Key Element 4	Enough freeway cap exploring; implement a demonstration project. Do not limit the cap to open space. The <i>I-405 Strategy Team Report</i> assumed a cap suitable to support a 7 story building.
p. 85	Goose Hollow: Key Element ?	Clarify the concept at the south end of the district, the substation, Hwy 26, etc.
p. 85	Goose Hollow: Regional Center Policy 2	Is expanding "the frequency and range of event types at Providence Park" feasible given the limitations of the agreement with the Timbers FC, and the field surface?
p. 97	Pearl District: Key Element 2	Parcels under the I-405 viaducts are not suitable for "open space, recreation, and other public uses". Encourage private commercial development as "fringe incubator" facilities.
p. 97	Pearl District: Key Element 3	Clarify the definition of "signature city attractions". Provide for the connection of the Park Blocks extension to the waterfront greenway below the Broadway Bridge.
p. 97	Pearl District: Key Element 4	Clarify the meaning of this concept element, and the need for "high density development along the riverfront". Is this consistent with the <i>Centennial Mills Framework Plan</i> ?
p. 103	Pearl District: Urban Design Policy 8	Clarify this policy to align with the <i>CC2035 Concept Plan's</i> Goals L and M, and Policy 31

Respectfully,

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Commissioners;

I have been a West Quadrant Plan SAC member for the last year and a half, and drafted the *Building Height Policy Minority Report* on behalf of the Northwest District Association.

I am forwarding the following comments in response to several statements that were made during the Planning and Sustainability Commission hearing on September 9th, 2014:

height allows more design flexibility, lighter, more slender, airier buildings.

- more height doesn't allow more design flexibility, *it allows more height*. If given the option, new projects will almost always build to the greater allowed height, and the design may *or may not* be better for it, but whatever it is, it will be taller.
- poorly designed and constructed buildings are possible at any height, as are well designed ones.

taller buildings require a more stringent construction type which assures a better quality building.

- construction types are not necessarily a direct indicator of the "quality" of a building. They are reliably, however, an indicator of the *cost* of a building: *high rise buildings cost more to build and to occupy intrinsically than low rise buildings.*
- poorly designed and constructed buildings are possible with any construction type, as are well designed ones.

we need more height or we'll be sprawling to Forest Grove; can't meet density goals without more height.

- The Central Portland Plan: Urban Design Assessment states "A recent study (Central Portland Development Capacity Study) affirms that Portland does not need height to compensate for any foreseeable shortage of development capacity. The basis for changes in existing height allocations are therefore most likely to be driven by desired views, solar and micro-climate concerns, desires for location specific visual emphasis. More general local and city identity as well as the broader desire for urban density and synergistic economic opportunity are also considerations."

Open Space Performance Standards protect the open spaces in the West Quadrant while allowing for more height than is otherwise allowed.

- the Open Space Performance Standards attempt to protect open space from the shadows that tall buildings cast, and allow buildings adjacent to the south and west of open spaces to be taller than the base height allowances, as long as their shadows aren't any greater at certain times of day on April 21st. Shadows are not the whole story, however, with respect to the impact of tall buildings on open space. The experiential sense that tall buildings tend to overwhelm adjacent open spaces and streets, and project a tacit feeling of ownership over these public spaces are far greater impacts than transient shadows on certain days of the year.
- the significant distinction in the street level experience of buildings that surround an open space, or a street enclosure, is between buildings that are less than approximately 100' tall and those that are

taller. The impact of the scale of buildings on adjacent public spaces, even if they step back, once they get to be above 175' does not change much between a 250' building, a 325' building or a 460' building.

even in Paris there are buildings that are 689' tall

the Tour Montparnasse was completed in 1973. It is 240' taller than the 2nd tallest building in Paris, and *it is not well-loved*. Of the 15 tallest buildings in Paris, one was built in 1979, the rest were built before 1974. The city has moved on from thinking that it needs tall buildings, if it really ever did. I suspect that most Parisians would prefer that the Tour Montparnasse had never been built.

Respectfully,

Steve Pinger CC2035 West Quadrant Plan SAC member

SSP/