



CONCORDIA  
UNIVERSITY

November 3, 2014

Portland Planning and Sustainability Commission  
c/o Bureau of Planning and Sustainability  
1900 SW 4<sup>th</sup> Avenue, Suite 7000  
Portland, Oregon 97201

Re: Portland Comprehensive Plan Update  
Proposed Campus Institution Plan Designation

Dear Commissioners:

On behalf of Concordia University, I would like to provide comments on the proposed changes to the Comprehensive Plan relating to institutions, and in particular the proposed amendments relating to Campus Institutions.

As you may be aware, a coalition of colleges within the City of Portland has been formed to specifically address the land use challenges we face on all of our campuses. The adoption of new zoning and specifically the new Campus Institution (CI) Plan Designation appears to be a solid step in supporting our colleges, yet ensuring that we continue good planning that addresses the concerns of our surrounding neighborhoods.

Concordia University has been under an Impact Mitigation Plan (IMP) since 1997. We are currently in the process of amending our IMP to accommodate the Faubion School project, and are also underway with early programming and master planning for an update to our IMP for the next 20 years which we anticipate will be submitted in spring/summer of 2015. This is well in advance of the State of Oregon's anticipated 2017 acknowledgement of the new Comprehensive Plan. Because of the land use history and campus development that has occurred and is envisioned for Concordia University, it would be a significant hardship to eliminate or change regulations relating to IMPs without ensuring that nuances associated with the existing IMP are properly reflected in future land use regulations.

Draft Concept Report #1 outlines two potential ways that individual campuses would be regulated at the expiration of their existing Conditional Use Master Plan (CUMP) or IMP. Option 1 allows the university to choose whether to renew the CUMP/IMP or to apply to rezone the site to a campus institution zone, whereas Option 2 would mandate that apply to rezone the campus. We believe the City should consider a third option in which the City simultaneously rezones existing institutional campuses when the new plan designation is applied, while giving each institution the option to renew the CUMP or IMP upon its expiration.

We look forward to working with City Staff and the College Coalition as these amendments to the Comprehensive Plan Update and the campus institution implementing zones move forward. While we endorse the concept of the Campus Institution plan designation, the final details of the implementing zones will determine the ultimate effect of the land use regulations on existing institutions. Pending further refinement of campus institution implementing zones, it is unclear at this time whether the proposed zones would support the university's continued growth as predictably as our current IMP.

Please do not hesitate to contact me if you have any questions and/or need additional information regarding our campus and our university's benefits to the community.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis Stoecklin". The signature is fluid and cursive, with a large initial "D" and "S".

Dennis Stoecklin, CPA  
Chief Financial Officer