



Northwest District Association

December 14, 2015

Dear Planning and Sustainability Commissioners:

Our recommendation: REMOVE THE LEGACY GOOD SAMARITAN FACILITY FROM THE CIZP

Thank you for the opportunity to respond to the *Campus Institutional Zoning Project Early Implementation of the 2035 Comprehensive Plan Proposed Draft – November 2015*. The Northwest District Association, through its executive planning committee, offers the following comments based on review of the multiple drafts, membership on the advisory committee, meetings with BPS staff, and multiple work sessions with Legacy Good Samaritan. We have worked to coordinate this initial response with Good Samaritan and to link it to the *Comprehensive Plan*, the *Employment Zoning Project*, the *Mixed Use Zoning Project*, and the *Transportation System Plan*. This reflects our commitment to working with the City and our business community on plans that affect the livability of Northwest Portland.

Our work on the CIZP has led us to conclude, at this stage in the planning process, that the best way to plan for service growth at Legacy Good Samaritan is to not include it in the CIZP. The CIZP, as currently drafted, does not reflect the unique nature of the Good Samaritan campus as it functions in the NW neighborhood. The CZIP does not work for Good Samaritan because it presumes that all institutions can be treated in the zoning code in a similar fashion. We don't find this to be the case with Good Samaritan.

Good Samaritan currently operates under a conditional use master plan within the regulatory guidelines of the City of Portland's *Northwest District Plan* and a good neighbor agreement with the NWDA. This regulatory construct works well for the neighborhood, the institution and the city and is based on decades of work between all stakeholders. It allows for considerable growth at Good Samaritan that helps the city meet its economic development goals, as outlined in the *Economic Opportunity Analysis*.

As drafted, the CIZP ignores the unique characteristics of Legacy Good Samaritan, its integration into the neighborhood, its unique grid development pattern that provides for multiple access and throughways, its building's sizes and locations that respond to the grid and the surrounding built environment and its allowable FAR which is greater than the CIZP permits. By not acknowledging these fundamental characteristics, and also discounting the need for specific transportation, access and parking allowances, the CIZP would not serve the NW community and Legacy Good Samaritan as they continue to grow and evolve together.

The NW District Planning Committee remains committed to further discussion with BPS staff, in cooperation with Legacy Good Samaritan, to find solutions that allow service and employment growth at Good Samaritan. As stated, we find that the CIZP continues to evolve away from a

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solution that embraces the distinctive features of Northwest and Good Samaritan. Our sense is that NW and Legacy Good Samaritan would be better served through amending the NW District Plan to create a sub-district for the Legacy Good Samaritan growth boundary area. The sub-district would incorporate elements of the existing Master Plan, the NW District Plan and the draft CIZP.

We look forward to continuing to work with Legacy Good Samaritan, BPS staff, the PSC and City Council on opportunities to address our concerns while meeting the policy goal for accommodating growth on major campus institutions.

Sincerely,



John Bradley

Chair NWDA Planning Committee