

TO: Commissioners of the Planning and Sustainability Commission,
FROM: Wendy Rahm, 1221 SW 10th Avenue, #1001, Portland, OR 97205
SUBJECT: CENTRAL CITY 20135 PLAN TESTIMONY for June 20, 2016 draft
DATE: August 2, 2016

As a follow-up to oral testimony on the West End at the Planning and Sustainability Commission hearing on July 26, 2016, I would like to provide a more detailed summary of points raised then by myself and others. In addition to endorsements for many policies in the draft, below are some remaining concerns and recommendations for the West End and the South Park Blocks. There are also additional points for which there was not time to include in oral testimony.

Thanks are due to BPS Staff for their hard work and for many improvements made to the West End portions of this draft. I would also like to thank the commissioners for their commitment and hard work. I would be happy to discuss any of your concerns should there be questions. Thank you for considering our recommendations as you move to a new draft.

1. WEST END: FAR/HEIGHTS/BONUS

ENDORSEMENT:

We endorse the inclusion of **historic preservation as a FAR bonus option.**

RECOMMENDATIONS:

Reduce the FAR to 7:1 and reduce the maximum building height to 100' throughout the West End. Reconsider the FAR/height boundary between the West End and Downtown: Park Avenue. With a base 7:1 FAR and a maximum building height of 100', **create a stepped-down transition area to the west** of Park Avenue or along both sides of 9th Avenue, reflecting existing form and massing. **Create an additional transition area east** of Park Avenue for one or two blocks with a base 9:1 FAR with a maximum building height of between 250' and 325'.

- A primary reason for lowering the West End FAR and heights is incorporated in **Policy 5.7 Neighborhood Transitions**. Retention of a **stepped-down dense but compact urban form throughout the West End's mixed-use (commercial/residential) district creates a distinct transition** between the lower zoned neighboring districts with FARs of 4:1 and 6:1 (the Pearl, Goose Hollow, and the University District) and the denser, taller, corporate downtown district with FARs of 12:1 and 15:1. Such a step-down transition would be gentler and protect distinctions between these neighborhoods. A FAR of 7:1 with a 100' maximum building height **would still meet density goals**, but encourage future West End development/rehabilitation/reuse to be in a **more compact form rather than a podium-tower form** of the corporate downtown. Keeping the neighborhoods distinct and preserving the authentic, unique feel of the West End would ensure its ongoing popularity with shoppers, diners and tourists alike. (Vol1 p66 Policy 5.7)
- Protecting the West End as a physically distinct transition area of dense, *compact, mixed-use* (commercial and residential) urban forms would preserve the vibrancy and variety of the human-scaled businesses/offices and apartment/condo buildings. Worth mentioning is that today many of the residential buildings provide **housing for low and middle income families**. The lower FAR and heights would encourage the continuing use/rehabilitation of these buildings as affordable residential units, thus support the **affordable housing policies of "housing diversity" and "no net loss."** (Vol1 p43 Policies 2.8 and 2.10b)
- Another reason to support this proposal is that it would go far **in protecting the unique and historic character of the West End**. The dense, compact urban form would **support two policies: "promote**

contextually-sensitive infill development on vacant and surface parking lots” and “protect the personality and character of the West End.” This area is rich with buildings telling the history of Portland from the 1880’s to the late 1930’s. Many architectural styles and noted architects are represented. This significance to Portland has been well documented in two Multiple Property Listings, in the 1984 Historic Resource Inventory, and with individual listings on the National Register. The inventory in Vol5 points out that 105 buildings predate 1930 and that 135 buildings are 1-6 stories. (Vol1 p69-70 Policy 5.19; Vol1 p71 Policy 5.WE-3; Vol5 p220-222 UD79)

- Lowering heights to no more than 100 feet would also support Urban Design Goal 5.C: “The Central City’s public realm is **characterized by human-scaled accessible streets, connections, parks, open space...**” (Vol 1 p64 Goal 5.C)
- Finally, reducing the maximum building heights in the West End to 100’ would also preserve **the historic view corridors** of our notable, dramatic volcanoes from Goose Hollow, including from Vista Bridge. The deterioration of these views is leading to our city’s loss of a sense of place. The views should include at least 1000 feet below the tree line. With a height limit of 100’, there would likely be no further deterioration of these view corridors by West End buildings. (Vol1 p.66 Policy 5.4)

2. WEST END: HISTORIC PRESERVATION

Preservation of the many historic resources in the West End is a priority. The map in Vol5 p222 and the tables on p221 confirm the historic significance of this area. So do the 1984 Historic Resources Inventory, 2 Multiple Property Listings, and the National Register. The West End is unlikely to ever become a historic district, which means other tools need to provide the ability to be proactive.

ENDORSEMENTS

We **endorse the many changes** incorporated in the new draft that encourage this goal. Among them are:

- A **new “Historic Preservation” section** in Central City Urban Design with policies to encourage reuse and incentives that will support the protection of historic and culturally sensitive resources (Vol1 p 69, policies 5.18, 5.19, 5.20);
- A policy to **protect existing buildings and historic resources in the West End** (Vol1 p71, policy 5.WE-3);
- Retention of a **bonus allowance** that recognizes **historic preservation** needs, including seismic upgrades (Vol2A1 p52,53,63,64,65), and revising regulations to allow **incremental seismic upgrades** (Vol5 p92 RC55).
- Advocacy for the **state historic rehabilitation tax credit** (Vol5 p99 UD2);
- Update of the **Historic Resources Inventory** for the Central City, prioritizing **West End and Goose Hollow** (Vol5 p99 UD4);
- Update/expansion of the 2 Downtown **Multiple Property Listings**, in which many **West End buildings** are already included but endorse the need to broaden the listing (Vol5 p111 UD78)
- Inclusion of the **mapping of West End historic resources and detailed information** about them in the West End subsection (Vol5 p220-222).

RECOMMENDATIONS

However, we **recommend the following additions:**

- Add a **new Policy to Vol1 p.35 1.WE-4**. Repeat (adapted) excerpt from Vol 1 p36 Policy 1.OT-4 as a policy under the West End sub section. Suggested language:
Encourage the reuse, rehabilitation and seismic upgrade of underutilized buildings and historic resources to increase and protect useable space to support economic activity in the district and to preserve and enhance the cultural and historical significance of the area.

- Add **new action items** on Vol5 p92 under both BDS and PBEM headings:
West End RC55 Consider creating/revising seismic regulations to allow for more incremental upgrades. Timeline: 2-5 years.

3. WEST END: CHANGE IN ZONE FROM RX TO CX.

ENDORSEMENT (but see below for document consistency changes needed)

- We **endorse the change of the RX/CX demarcation line in the West End from SW Salmon Street to SW Taylor Street**, as outlined in Vol 1 p35 1.WE.1. These affected blocks house several National Register buildings more in keeping with residential zoning (churches, cultural building and apartment buildings).
 - However, note that other **language and maps** in the draft need to reflect this change:
 - Vol1 p93 paragraph 1, line 1(change “*Salmon*” to “*Taylor*”);
 - maps in Vol 1 p11, p31, p91;
 - Vol 1 p93 WE “retail core” extension map into West End should stop at Taylor, not at Salmon as currently shown.
 - Vol1 p44 Policy 2.WE-5: **Refine** this policy to reflect *South of Taylor and west of 11th*, assuming agreement with the recommendation, below, against the northwest corner zoning change west of 11th from RX to CX.

RECOMMENDATION:

Preserve the RX zoning in the northwest corner of the West End. (Vol2A1 p473)

- We **do not endorse the change from RX to CX in the northwest corner of the West End** (north of SW Taylor and west of SW 11th Avenue).
 - The area holds **many historic resource buildings** (see map in Vol5 p222), many currently being used as **affordable housing**. The West End is one of the densest areas for affordable housing in the central city. RX validates ongoing residential uses of these historic resources and will likely help preserve them.
 - However, RX **does not preclude some flexibility**, i.e., allowing existing non-residential uses to continue and not forcing a change in use for a building under rehabilitation formerly used for non-residential purposes. Therefore, office buildings sprinkled throughout the area can be preserved as offices. In addition, ground floor retail is required for new development, preserving the mixed-use character of this area.
 - Retain CX zoning east of SW 11th Avenue, north of SW Taylor.
- An RX emphasis will help meet the **goal of 6800 households** by 2035 in the West End and reinforce the **affordable housing “no net loss” goal**. Retaining “**housing diversity**” and a strong residential element in this part of the district is key to keeping the West End, downtown and the cultural districts vibrant and active 24/7. (Vol1 p43 Policy 2.8 and 2.10b., Vol 1p44 Policy 2.WE-5 and Vol5 p3)

4. WEST END: PARK/NEW OPEN SPACE/COMMUNITY CENTER + PLANNING FOR CITY-OWNED BLOCK (Morrison/10th)

ENDORSEMENT

- We **endorse the policy for a “complete neighborhood”** that highlights needs for “**public schools, parks, open space and recreation opportunities, community centers, urban canopy**” in the West End as this district increases in density. (Vol1 p42 Policy 2.1, Vol1 p69 Policy 5.17, Vol1 p93 map)

- **Reconcile the West End policy for a potential/park/open space throughout the draft:**
Reconcile the supporting policies and maps (expressed in Vol 1 p42 Policy 2.1; p44 Policy 2.WE-1; Vol1 p93 map; and Vol5 p231 map) with several maps not reflecting this open space need: show a *potential* West End park/open space on maps in Vol 1 p11, p40-41, p64-5 and p78-79.
- Add the word “**community center**” (per Vol 1 p42 Policy 2.1) to **Vol1 p44 Policy 2.WE-1**. Appreciate and endorse the other items listed in this policy. Endorse also the inclusion of HN35 for a West End community center in Vol5 p177 though the timeline should be changed to **2-5 years** and it should be **linked to other bureaus**. (See recommendation, below.)
- We **endorse the goal of encouraging and protecting “housing diversity”** in the West End, including retention and growth of multi-family **housing supportive of families**. More families = population increase, which will require more open space be found in the West End. (Vol1 p44 Policy 2.WE-5)

RECOMMENDATIONS

- In addition to echoing the policy to identify a park in the West End throughout the draft (above), **add new language for a park/open space both in a new policy 5.WE-4 (Vol1 p71) and in Vol5’s implementation action list, possibly with linkage to RC80.**
 - Add a *parks/open space policy need* to Vol1 p71 as **new Policy 5.WE-4** to reaffirm Vol1 p69 Policy 5.17, which calls out “WE” needing a park/open space. The West End certainly qualifies for inclusion given the stated criteria: “especially in areas zoned for high density, mixed use development.”
 - **Add “Identifying a new park/open space site” in Vol 5 as an action for the West End for “Parks and Recreation” or it is unlikely to be done** (Vol5 p153). City data provides strong evidence to support this new action item in the **2-5 year timeline**: i.e., **there are no (0.00) open spaces currently in the West End** (Vol5 p59). Yet by 2035, the plan is to have 9,900 jobs and 6,800 households (significantly to include **families**) in the West End. The district will be densely populated, both day and evening. Therefore, a higher priority and urgency ought to be given to a park/open space for this district. A neighborhood park (as opposed to a city park) is needed. Consider its inclusion on the Bureau of Parks and Recreation 2-5 year action list.
 - As the city targets state: “By 2035 **people will spend 20% more time in the CC’s public spaces.**” More time + more people = need for more open space! South Park blocks and Director Square (not in the West End) are already often over-crowded and are city parks, not neighborhood parks. (Vol5 p87 TARGET)
- A **community center** and (nearby at least) elementary and middle **schools** are needed to help build community connections and to avoid creating a cold, impersonal, disconnected urban neighborhood. Trouble can often brew in just such neighborhoods. Policy 6.6 (Vol1 p81) directs: “...Encourage social health by **fostering community** in a hospitable public realm.” It is important to support the health and livability for all West End inhabitants by **fostering social connections** in this increasingly dense neighborhood. (Vol5 p177 HN35.)
- **Link the finding of an open/space/community center to the planning for the city-owned block** on SW Yamhill and 10th where Mother Goose and a parking facility are today (Vol5 RC80 p110, p118, p140, p160, p177). Recommend a **timeline of 2-5 years** for both. Although the open space need is expressed as an action for “private” investment (Vol5 p177), city ownership of an entire block in the West End creates an obvious opportunity for negotiations, possibly for funds or a swap for a

potential park/open space within central West End. Linkage to ongoing planning by BPS, PDC, PBOT, OMF (and PPR) would avoid missing out on unexplored opportunities for this block. Ongoing planning for seismic upgrades and rehabilitation may be able to fold in new ideas for this urgent need for open space.

- Recommend Action Items (Vol 5 p177) **HN33, HN35, and RC80 be linked in the 2-5 year period and BPS, PDC, PBOT, OMF, PPR** be added as planning bureaus. **Participants should also include residents from the West End.** Link playgrounds, open spaces, and a community center (per HN35: "a publicly accessible neighborhood facility that fosters community interaction and exchange for WE residents") to the SW Yamhill/10th garage block planning. This need is supported by the expected increase in both households and jobs.
- A future West End park relates to **future canopy needs**. The West End canopy **goal estimates are low**, perhaps because there is no identified open space where additional trees can be planted. Yet additional trees are needed in this dense, urban district to **mitigate heat island effect and air quality** and to **soften the urban landscape**. Because no other sites are identified for additional tree canopy, a new central open space in the West End needs to be found to improve the canopy goal estimates. (Vol5 p66-69)
- Possible **deletion**: Vol 1 P92, WE 2035 Vision statement: Describes the West End as having "**open space assets**". If this is a "vision", okay. But if a reflection of today, this should be deleted. Vol5 p59 data shows there **are 0.00 (zero!) existing parks/open spaces in the WE**. At a minimum, clarification is needed, perhaps with verb tense.

5. SOUTH PARK BLOCKS

ENDORSEMENTS

W also **endorse the following policy actions** relating to the South Park Blocks:

- Develop a set of special **design guidelines and streetscape improvements for the Cultural District**. (Vol5 p111 UD81)
- Develop a package of streetscape improvements for the cultural district to **enhance the pedestrian experience** between attractions including the OHS, the Art Museum and the Arlene Schnitzer Concert Hall. (Vol5 p139, p153, p177 RC81)
- Develop a **strategy for inventorying, removing and replacing trees in South Park Blocks** to eliminate safety hazards while maintaining or enhancing canopy coverage and habitat. (Vol5 p145 EN 20)

RECOMMENDATIONS:

- We **strongly endorse the priority/goal of obtaining historic designation for the South Park Blocks**. There is some urgency, however, since the heights and uses being proposed along the blocks could incentivize the demolition of historic churches, historic cultural facilities and early apartment buildings, all of which offer human scale, sunlight and historic character to the park blocks. Therefore, we **recommend moving the time line for this from 6-20 years to 2-5**. (See: Vol5 p147 UD23 Obtain historic designation for S. Park Blocks.)
- Zoning has been changed on the east side of the park from RX to CX. We **recommend against this change, instead recommend retaining the RX zone on all frontages of the South Park blocks**. When looking at the eastern frontage blocks, there are historic churches and apartment buildings, both of which are more closely associated with residential areas. The exception is the Goodman owned parking lot, the Broadway frontage of which is currently being developed into a tall hotel,

threatening to block sunlight. **Keep RX zoning along South Park Blocks as expressed on p467 map. Eliminate zone change on p469 map.** (Vol2 p467, 469. Zoning Maps)

- The **threat of loss of sunlight** because of a loss of human scaled buildings or the addition of tall buildings is real. The picture (below) of the Ladd Tower's **shadows on the South Park Blocks at 11 AM in May 2016** is a good demonstration of what is lost by allowing towers along the blocks. The picture was taken looking east towards Ladd Tower and the human-scale First Christian Church across the park blocks. In the left foreground is the Portland Art Museum roof and on the right is the historic St. James Lutheran Church.



- **Add sunlight protection for open spaces as a requirement. Change wording** for Policy on **Dynamic Skyline**: Change last sentence to read, **“Require** heights and building forms that preserve sunlight on public open spaces and parks.” (Vol1 p66 Urban Design 5.3)
- To avoid further degradation, add protection of sunlight as a requirement to policy language as a final line in the paragraph on the South Park Blocks: **“Require protection of sunlight on the South Park Blocks.”** (Vol1 p70, Policy 5.DT-4b.)
- Earlier height maximums on and along the park blocks were thought to be 100’ or less. There is some confusion about that, but we strongly **recommend maximum building heights for frontage blocks adjacent to the park be no more than 100’. Consider even 75’.** This height would support Goal 5.C that the “Central City’s public realm be characterized by human-scaled...parks, open spaces...” In the current proposal, allowances vary from 185’ to 250’ to 320’ to 370’. **Lower maximum building heights to 100’ or 75’ along both sides of the park blocks, require step backs at third story of buildings over 3 stories, and remove the designation of “area eligible for height increase.”** (Vol2 p331, p337: Maps of Heights along South Park Blocks; Vol1 p64 Goal 5.C)
- In the current proposal, shadow studies are required on the west side of the park blocks, but not the east side. We **recommend shadow studies be required on both sides of the park.** People

use the park both in the morning and the evenings. Reflect this **requirement in the shadow study map.** (Vol2A1 p337 Map 510-4)

6. HERITAGE TREES

We endorse the inclusion of language that encourages the **protection of our Landmark and Heritage trees.** We suggest a new **action item** in Vol 5 to **strengthen code language to include meaningful penalties in cases of accidental or unapproved removal of these Heritage trees.** Recognize that development and preservation guidelines for a more densely urban site need to be more precise and restrictive than in a less urban area. (Vol1 p82 Policy 6.9c; Vol5 p91 BDS; Vol5 p98 BPS; Vol5 p141 PPR)

7. WEST END: URBAN DESIGN GUIDELINES

We appreciate the language in the plan acknowledging that the West End does not have separate design guidelines and would recommend that the West End receive that kind of planning. **West End design guidelines** would ensure future planning could incorporate 2 other policies, 5.19 and 5.WE-3 respectively: “promote contextually-sensitive infill development on vacant and surface parking lots” and “protect the personality and character of the West End.” (Vol5 p209 UD1, last line on page; Vol1 p69-70 Policy 5.19; Vol1 p71 Policy 5.WE-3)

8. HISTORIC VIEW CORRIDORS

Historic view corridors from Goose Hollow are under threat by being blocked out by tall buildings. The existing historic view of Mt. Hood includes a large portion of the tree line, to include at least 1000 feet below the tree line; the plan’s proposed view (below) is grossly inadequate, **diminishing our sense of place** as a city. **Lowering the maximum building heights in the West End to 100’** would dramatically reduce the threat of loss of these views by West End buildings. (Vol1 p66 Policy 5.4)



Figure 16: View of Central City and Mt Hood from SW15 – Proposed Bonus Heights

9. URBAN DESIGN LANGUAGE SUGGESTION

In Goal 5B, recommend **substituting the word “dense” for “high-density”.** A few districts in the Central City have *high-density*, but most are better described as *dense*. I suggest it is unlikely that the entire Central City will eventually be entirely “high density.” (Vol1 p64 Goal 5B.)