



Overlook Neighborhood Association

2209 N Schofield St
Portland, OR 97217

July 16, 2008

Mayor Tom Potter and Portland City Council
City Hall
1220 SW 4th Avenue
Portland, OR 97201

Re: North Interstate Corridor Plan

The following comments were unanimously approved by the Overlook Neighborhood Association on July 15, 2008. They highlight some of the key issues and concerns shared by the neighborhood regarding the rezoning of the Interstate Corridor.

The proposed changes in the Interstate Corridor will bring significant changes to our neighborhood and have inspired intense interest and involvement over the past year and a half. While we appreciate the work the Planning Bureau has done in listening to our concerns and ideas and incorporating them into their proposal we do have some concerns, particularly with significant last-minute changes to maximum heights.

It is a great challenge to successfully incorporate higher-density, transit-supportive development into a neighborhood that, while currently a vibrant mix of uses, is primarily single-family residential. There is really no precedent in our city for this scale and type of development and, with increasing density throughout the city over the coming decades, this project has the potential to be a model for future planning. Because of that, we hope you will seriously consider our requests.

33.561.210 Maximum Building Height:

In the proposal presented to the public on April 10, 2008, the height limits for RH zones ranged from 65' to 85', with one pocket of 100'. At the time, the Overlook Neighborhood Association objected to those increases over the base zone limit of 65'. While zoning code now allows for 100' building heights in RH zones within 1,000' of a light rail station, it should be noted that this was not the case in 1993 when the Albina Community Plan, the basis for this proposal, was approved.

Neighbors were shocked when, after nearly a year and a half of community involvement with no mention of heights over 100', the Design Commission and Planning Commission proposed "height opportunity areas" with height limits of 125'. This is a significant change that, as a community, we have not had the opportunity to study or discuss. This level of building height in a neighborhood like ours has no precedent in Portland, and without examples to demonstrate the result, we worry that this is simply too high and

would be intimidating and out of scale in this mixed-use residential neighborhood. In the very near future, with the development of the Portland Plan, this concept of height opportunity areas will likely become much more developed and well thought out. We request that consideration of height opportunity areas along Interstate be postponed until that time.

If the current proposal does go through, the additional design review process in the height opportunity area will be critical. We are, however, concerned about the potential for variances being granted to the 4:1 FAR values. Developers interested in greater height will almost certainly ask for more permissive FARs, which would discount any potential benefits of the increased height limits. Additionally, as a lesson for future planning projects, we feel that input should be solicited from the Design Commission and Planning Commission before the period of public participation is over. Their expertise is crucial, but significant changes made after the conclusion of the public process makes citizens who participated in that process wonder “what was the point?”.

Proposed Amendments to the Community Design Guideline P1:

While Section G provides some guidance in addressing the integration of high-density development along the border of the neighborhood west of Interstate Ave., there is no guidance for the areas east of Interstate Ave., where the greatest discontinuity will occur and where the height opportunity areas lie. In both areas, strong design guidance and review will be crucial to reduce the risk of future conflicts while successfully achieving growth that is sensitive to neighbors and their concerns about privacy. In particular, guidance is needed for developers on the use of landscaping, window orientation, and balconies.

Planning for parks:

The Office of Transportation’s May 27 analysis estimates that the number of households in the corridor will double by 2030. This will place significant pressure on existing parks and green spaces, particularly in the northern end of the neighborhood where they are scarcer. We would like to see a commitment to improving and increasing these resources with remedies such as a recalculation of park allocation money, creation of pocket parks, and incentives for the creation of publicly-accessible open spaces. We strongly support the Bureau of Planning recommendation (supported by the Planning Commission) to continue discussions with Portland Public Schools, the PDC, and Portland Parks and Recreation to preserve some of the Kenton School property on the northwest corner of Interstate and Lombard as public open space.

Need for traffic and infrastructure studies:

In their determination that the proposed rezoning does not trigger further traffic analysis under the Transportation Planning Rule, the Office of Transportation compared the new zoning to the Albina Community Plan zoning, rather than current, actual usage. There is already congestion at peak hours, and their own projections indicate a growth of 2,500 additional daily trips during the afternoon peak, so we feel that skipping a traffic study would be a mistake. Rather than wait until it’s too late, we would like the Office of Transportation to expand their analysis. Of particular concern are key bottleneck intersections, drivers using adjacent residential streets to avoid congestion, emergency

services to areas with limited access points, and the continuing problem of truck traffic between Interstate 5 and the Albina Railyards. We are also concerned about similar stresses this density will place on water, sewer, power, and other infrastructure systems, and believe a little foresight will prevent a host of problems in the future.

33.561.230 Transition Between Zones:

Though we recognize the challenges associated with the transition from EX or RH to R2 or R2.5, we feel the proposed amendment for setbacks and stepdowns between EX or RH and R2 or R2.5 is not sufficient. This is particularly true in areas with 65' height limits (or 75' as currently proposed) abutting lower density residential zones.

32.34.030 "Neon Sign District":

Finally, we would also like to express our support for the proposed "Neon Sign District" as a means of supporting and preserving our neighborhood's unique history.

As a model for future development, this is an important project for the city as well as our neighborhood. Without proper consideration it also has the potential to negatively impact the neighborhood feel and uniqueness of the Interstate corridor. We appreciate your consideration and look forward to working with you to prevent future problems and to make this project be as successful as possible.

Thank you,

Eric Gale
Chair, Overlook Neighborhood Association