

2257 NW RALEIGH ST.
PORTLAND, OR 97210



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September 28, 2018

To: Jill DeCoursey, BDS and Portland Design Commission
Re: EA 18-210300 DA – 12th and Flanders Hotel/Residential

The developer and design team for this project came before our committee on August 7th for an initial introduction of the proposed program and massing. We appreciate their efforts to involve the committee so early in the process. Given this preliminary stage, it is too early to form conclusions but the committee wanted to provide the Design Commission with some initial thoughts and concerns on this proposal for the October 4th Design Advice Request.

This proposal presents challenges for the committee, as it is the first project we have seen under the new Central City 2035 code. The additional height and Floor Area Ratio transfer allowance have allowed a proposal with a new level of intensity of use for the Pearl, and in particular the South Pearl, which has a context of more traditional blocky warehouse massing. This proposal at the intersection of 12th Avenue and Flanders Street contrasts not only in its new taller height, but also in its point tower massing. Moreover, its program--that of part hotel, part residence solely served by valet--while not new in other cities, is a first for Portland and the Pearl.

How do we appropriately discuss context of a new building when, with a new code, it establishes a new context? Looking at the early development of the Pearl, buildings such as the Gregory did not have immediate buildings to support the height and mass but they used a vocabulary that was contextual, if too faux-historic for some. What might 12th & Flanders use to provide context? Some in the Pearl see a clear distinction between the original south Pearl and the blank slate North Pearl with unlimited height and glassy towers. Should the South Pearl have tall glassy and/or point towers too? These individuals do not believe so but prefer to uphold a distinct context between the two areas. Unfortunately, the code does not recognize this distinction despite its precedence. The blank slate that was present north of Lovejoy Street is by definition a different context. It should be noted this site is one block from the NW 13th Historic District.

The committee has long supported greater density which takes advantage of the location, live/work access and existing public transportation infrastructure. The Pearl is an ideal location to live and work car-free, especially at this particular site where numerous amenities and tens of thousands of jobs are located in reasonable walking distance. Moreover, parking garages are the most expensive part of new developments and we support increasing housing affordability and providing more options for renters that do not own vehicles (nearly half of all household renters in the River District do not have access to a vehicle, compared to 10 percent of household owners). In this sense, the proposal meets many of Portland's long term goals outlined in the CC2035 and the Transportation System Plan. In theory, we support the idea of the proposal but we are concerned the intensity of use at this location may present challenges. Below are a few:

1. The proposal will be setting a new precedent. Given this significance, the architecture must be exceptional. The small site will prove challenging to set back or carve out the massing to prevent a 23-story wall facing the street. How this building transitions from the tower down to the pedestrian realm is critical.

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2. Given the allowable height and FAR are being taken to the maximum, what is this building giving back? We would expect to see a significant amount of the FAR being transferred to this site to not simply be from Sector 1, but from within the Pearl itself. Ideally, the transfer would be from a building or buildings of character not currently protected, but which nonetheless contribute to historic context.
3. The intensity of use on such a small floor plate may also present challenges to access and circulation, as the site abuts the proposed Flanders Greenway. The loading and proposed valet drop off/pick up functions must be carefully considered as they relate to the greenway. This route will be a key connection for non-auto commuting from Northwest to the Eastside, finally bridging I-405 and Naito Parkway. Given this location, the proposal must provide ample bike storage facilities. Will there be enough room?

In sum, we are very supportive of adding car-free density to the Pearl, however, the initial proposal seen thus far presents challenges that will need to be addressed. We look forward to working with the development team to address these challenges.

We want to acknowledge the attendance and stated concerns of the neighbors who live near the site. Several adjacent residents have submitted written letters in opposition with concerns centering around the height of the proposal being out of context with the neighborhood, lack of off-street parking, loss of existing public parking, potential congestion impacts on 12th Avenue, and various traffic safety concerns. In addition, some want the existing tree to be preserved given its size, age and type. It is our understanding that these comments and letters will be addressed to the Design Commission as well.

Respectfully,

David Dysert
Planning & Transportation Co-Chair
Pearl District Neighborhood Association