



Sullivan's Gulch Neighborhood Association, c/o Holladay Park Plaza, 1300 NE 16th Ave., Portland, Oregon 97232
<http://www.sullivansgulch.org>

February 15, 2018

Staci Monroe, Land Use Services
Portland Bureau of Development Services
1900 SW Fourth Ave., Suite 4500
Portland, OR 97201

Subject: Sullivan's Gulch Neighborhood Association - Land Use and Transportation Committee (SGNA-LUTC), Response to Design Review Application - LU 16-291413 DZ

Dear Ms. Monroe:

The SGNA-LUTC offers the enclosed comments on the subject development review proposal. The neighborhood association previously commented on the development proposal in a letter to you dated December 13, 2017. Subsequent to that letter, members of the LUTC met with the development design team to discuss neighborhood concerns. We have not seen how the applicant intends to respond to those concerns so, in the interest of time, we provide these comments with the understanding that some or all may be addressed by the applicant in new materials being submitted to the Portland Design Review Commission (PDRC). In the event that is the case, we will submit a comment letter directly to the Commission in advance of the scheduled hearing on March 15, 2018.

For discussion purposes, we refer to buildings on the site as Building 1, the south building to be located where the cinema now stands, Building 2, the building immediately north of Multnomah Street across 15th from the Sears wing, and Building 3, the northern most building. A table listing the referenced design review criteria is included at the end of the letter. Our concerns and the approval criteria that they relate to are as follows.

1. **NE Clackamas Street Alignment** SGNA has selected NE Clackamas Street as our primary east/west pedestrian route. We are improving the pedestrian crossing at NE Clackamas Street and NE 21st Avenue with a grant from the City of Portland. We intend to enhance lighting for pedestrians along this route between NE 16th Avenue and NE 28th Avenue. We applaud the design's pedestrian orientation toward NE Clackamas Street, which is important because future Lloyd District residents and current residents of SGN will use this route to walk between the Lloyd District and commercial services east of

28th Avenue (e.g. Fred Meyer, New Seasons). *The alignment addresses Lloyd District Design Criteria B3, B4, B5, and C3-2.*

2. **Pedestrian Safety: NE 16th Street Ped.-Crossing** We applaud the pedestrian walkway through the new development but the design of the NE 16th Avenue crosswalk itself is awkward. It has offset crossing points that jog within the median in order to improve sight distances for approaching traffic. The offset crossing often strands pedestrians in the median. **We would like the City to reconsider this crossing alignment and/or install on-demand rapid flashing beacons here to improve pedestrian safety.** This is especially important given the increase in pedestrian use that is likely to occur at this location. The proposed diagonal walkway through the development creates an attractive and efficient walking route between SGN to the 11th Street Max Station and Lloyd Center destinations. *Consider Lloyd Center Design Criteria B1-2, B2, B3-1*
3. **Pedestrian Safety: Visibility to Lloyd Center** We are concerned that the view to the Lloyd Center is obstructed for anyone walking west along NE Clackamas Street with the aim to pass through the new development to the Lloyd Center and beyond. It may, for example, be possible to see the Convention Center spires from NE 16th. The public walkway between Buildings 2 and 3 'jogs' south then west as one passes through the development. It is not possible to see that one is not walking into a dead-end maze until one gets most of the way through the development. This perspective has the potential to create an uninviting atmosphere, especially given that the walkway is narrow relative to what it would be if this were a continuation of a public street.

It is unfortunate that utility lines under NE 16th Avenue prevent extending Building 3's northeast wing a bit farther north, which would make it easier to open the view through the pedestrian corridor. **A potential solution would be to alter the design for Building 3 so its south wing is incorporated into the design for Building 2.** This would eliminate the 'jog' in the walkway and allow a direct sightline to the new cinema space in the Sears building. We recognize this would increase the massing of Building 2 and may affect the functionality of Building 3. **Alternatively, and at a minimum, the design should include wayfinding signage, enhanced pedestrian-scale lighting (maybe with lighted pavers to guide pedestrians), and destination signage to encourage and reassure pass through pedestrian use.** *Consider Lloyd Center Design Criteria A5-8, B2, B7, C2,-1, and Central City Design Criteria C1, C5, and C6.*

4. **Public Space: Weather Protection in the Plaza Area** There is no weather protection shown for the seating in the 'plaza area' that frames the east entryway to the pedestrian corridor where the NE 16th Street pedestrian crosswalk lands. If this area is to function as a three-season public gathering space, protection from rain is needed. Maybe include a functional public art element here? *Consider Lloyd Center Design Criteria A5-3 and A5-4, A8, B5, and B6-1, and Central City Design Criteria C1.*
5. **Pedestrian Safety: Access at NE 15th Street** We are concerned about the pedestrian environment at the west end of the pedestrian pass-through corridor where it intersects with 15th Street, where a pedestrian confronts a wall of angle parking spaces. There is no

obvious way across the street at this point, which is about a block away from Multnomah Street and ½ block from a crosswalk to the north near the proposed parking garage entry. Walking north or south is out of direction if ones destination is the cinema or the Max Station. The most direct route to these destinations is to 'J' walk as a shortcut. Consider placing a crosswalk at this location. *Lloyd Center Design Criteria B3-1 and B7.*

6. **Landscape, Live/Work and Other Design Features** We like the stoop-entries to residences that line the south side of the pedestrian corridor. We like how landscaping is integrated in the edge design for the pedestrian pass through walkway. Is there an opportunity to use storm runoff/gray-water for irrigation of landscaped areas? We like the attempt to activate NE 16th Avenue using live/work apartments there. We like the intent to employ a 'Sullivan's Gulch' façade treatment on the east-facing buildings along NE 16th Avenue to soften this view from the neighborhood. These features address many Central City and Lloyd District guidelines.

Thank you for the opportunity to comment on this important development project. We look forward to working with staff, the Commission, and the development team to ensure that the project succeeds for tenants and neighbors alike.

Sincerely,



Daniel J Heffernan, Chair
Land Use and Transportation

David Brook, Chair
Sullivan's Gulch Neighborhood Association

Table 1 – Applicable Design Review Criteria

<i>Central City Design Criteria</i>		
C1 – Enhance View Opportunities	Size and place new buildings to protect existing views and view corridors; Develop building facades that create visual connections to adjacent public spaces.	3. Developing buildings to incorporate visual connections with adjacent public spaces. 4. Creating new small-scale views into building lobby spaces or entries.
C5 – Design for Coherency	Integrate the different building and design elements including, but not limited to, construction materials, roofs, entrances, as well as window, door, sign, and lighting systems, to achieve a coherent composition.	3. Developing an integrated strategy at the sidewalk-level of the project.
C6 - Develop Transitions Between Buildings and Public Spaces	Develop transitions between private development and public open space. Use site design features such as movement zones, landscape elements, gathering places, and seating opportunities to develop transition areas where private development directly abuts a dedicated public open space.	1. Using gathering areas and/or landscaping to define transition areas. 3. Developing open spaces that serve as transition spaces to the building. 7. Providing clear transitions from public to private spaces.
<i>Lloyd District Design Review Criteria</i>		
A5-3	Incorporate works of art	... art should be incorporated into the development of indoor and outdoor spaces
A5-4	Incorporate Water Features	Water features should be provided in outdoor public spaces where appropriate.

<i>Lloyd District Design Review Criteria</i>		
A5-8	Integrate the Lloyd Center Shopping Center into the Lloyd District	The Lloyd Center should continue to create well-defined pedestrian linkage to the surrounding area.
A9-1	Provide A Distinct Sends Of Entry and Exit	Design and develop gateways into and within the Lloyd District that are appropriate to the districts and subdistrict's emerging characteristics.
B1	Enhance the Pedestrian System	
B1-2	Incorporate Additional Lighting	Incorporate project lighting in a manner that reinforces the pedestrian environment and (that) promotes design continuity to an area...
B2	Protect the Pedestrian	
B3-1	Provide pedestrian crossings spaced at traditional one-block spacing	... pedestrian access across streets at the midpoint of subblocks...
B5	Make Plazas, Parks and Open Space Successful	
B6-1	Provide Pedestrian Rain Protection	Rain protection is required at the ground level of all new and rehabilitated commercial buildings located adjacent to primary pedestrian routes.
B7	Integrate Barrier Free Design	
C2-1	Maximize View Opportunities	Maximize view opportunities.
C3-2	Orient Design at the Lloyd District's Eastern Edge Toward the Neighborhoods	Design new projects along the easter edge of the district so that they relate to the neighborhood through building orientation, building design, and opportunities for pedestrian access.