



# Oregon

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## **NOTICE OF ADOPTED CHANGE TO A COMPREHENSIVE PLAN OR LAND USE REGULATION**

Date: July 20, 2015  
Jurisdiction: City of Portland  
Local file no.: Mult. Co Health Dept  
DLCD file no.: 001-15

The Department of Land Conservation and Development (DLCD) received the attached notice of adopted amendment to a comprehensive plan or land use regulation on 07/14/2015. A copy of the adopted amendment is available for review at the DLCD office in Salem and the local government office.

Notice of the proposed amendment was submitted to DLCD 36 days prior to the first evidentiary hearing.

### Appeal Procedures

Eligibility to appeal this amendment is governed by ORS 197.612, ORS 197.620, and ORS 197.830. Under ORS 197.830(9), a notice of intent to appeal a land use decision to LUBA must be filed no later than 21 days after the date the decision sought to be reviewed became final. If you have questions about the date the decision became final, please contact the jurisdiction that adopted the amendment.

A notice of intent to appeal must be served upon the local government and others who received written notice of the final decision from the local government. The notice of intent to appeal must be served and filed in the form and manner prescribed by LUBA, (OAR chapter 661, division 10).

If the amendment is not appealed, it will be deemed acknowledged as set forth in ORS 197.625(1)(a). Please call LUBA at 503-373-1265, if you have questions about appeal procedures.

### DLCD Contact

If you have questions about this notice, please contact DLCD's Plan Amendment Specialist at 503-934-0017 or [plan.amendments@state.or.us](mailto:plan.amendments@state.or.us)



# NOTICE OF ADOPTED CHANGE TO A COMPREHENSIVE PLAN OR LAND USE REGULATION

<b>FOR DLCD USE</b>	
File No.:	001-15 (23704)
	7/14/2015
	<del>7/13/2015</del>
Received: <del>7/13/2015</del>	

Local governments are required to send notice of an adopted change to a comprehensive plan or land use regulation **no more than 20 days after the adoption.** (See [OAR 660-018-0040](#)). The rules require that the notice include a completed copy of this form. **This notice form is not for submittal of a completed periodic review task or a plan amendment reviewed in the manner of periodic review.** Use [Form 4](#) for an adopted urban growth boundary including over 50 acres by a city with a population greater than 2,500 within the UGB or an urban growth boundary amendment over 100 acres adopted by a metropolitan service district. Use [Form 5](#) for an adopted urban reserve designation, or amendment to add over 50 acres, by a city with a population greater than 2,500 within the UGB. Use [Form 6](#) with submittal of an adopted periodic review task.

Jurisdiction: City of Portland

Local file no.: **Multnomah County Health Dept. Headquarters Project**

Date of adoption: 6/24/2015                      Date sent: 6/30/2015

Was Notice of a Proposed Change (Form 1) submitted to DLCD?

Yes: Date (use the date of last revision if a revised Form 1 was submitted): 3/23/2015

No

Is the adopted change different from what was described in the Notice of Proposed Change?    Yes    No

If yes, describe how the adoption differs from the proposal:

No changes to proposal.

Local contact (name and title): Nicholas Starin, Project Manager

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City: Portland

Zip: 97201-

**PLEASE COMPLETE ALL OF THE FOLLOWING SECTIONS THAT APPLY**

**For a change to comprehensive plan text:**

Identify the sections of the plan that were added or amended and which statewide planning goals those sections implement, if any:

**For a change to a comprehensive plan map:**

Identify the former and new map designations and the area affected:

- |                        |    |        |  |
|------------------------|----|--------|--|
| Change from<br>change. | to | acres. | A goal exception was required for this         |
| Change from<br>change. | to | acres. | A goal exception was required for this         |
| Change from<br>change. | to | acres. | A goal exception was required for this         |
| Change from            | to | acres. | A goal exception was required for this change. |

Location of affected property (T, R, Sec., TL and address):

The subject property is entirely within an urban growth boundary

The subject property is partially within an urban growth boundary

**If the comprehensive plan map change is a UGB amendment** including less than 50 acres and/or by a city with a population less than 2,500 in the urban area, indicate the number of acres of the former rural plan designation, by type, included in the boundary.

Exclusive Farm Use – Acres:	Non-resource – Acres:
Forest – Acres:	Marginal Lands – Acres:
Rural Residential – Acres:	Natural Resource/Coastal/Open Space – Acres:
Rural Commercial or Industrial – Acres:	Other: – Acres:

**If the comprehensive plan map change is an urban reserve** amendment including less than 50 acres, or establishment or amendment of an urban reserve by a city with a population less than 2,500 in the urban area, indicate the number of acres, by plan designation, included in the boundary.

Exclusive Farm Use – Acres:	Non-resource – Acres:
Forest – Acres:	Marginal Lands – Acres:
Rural Residential – Acres:	Natural Resource/Coastal/Open Space – Acres:
Rural Commercial or Industrial – Acres:	Other: – Acres:

**For a change to the text of an ordinance or code:**

Identify the sections of the ordinance or code that were added or amended by title and number:

33.510 Central City Plan District, Map 510-3, Maximum Heights

**For a change to a zoning map:**

Identify the former and new base zone designations and the area affected:

Change from	to	Acres:
Change from	to	Acres:
Change from	to	Acres:
Change from	to	Acres:

Identify additions to or removal from an overlay zone designation and the area affected:

Overlay zone designation:	Acres added:	Acres removed:
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Location of affected property (T, R, Sec., TL and address): 1N1E34BD, 80000, 2400, 2401, 2404, 2405

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List affected state or federal agencies, local governments and special districts: Multnomah County

Identify supplemental information that is included because it may be useful to inform DLCD or members of the public of the effect of the actual change that has been submitted with this Notice of Adopted Change, if any. If the submittal, including supplementary materials, exceeds 100 pages, include a summary of the amendment briefly describing its purpose and requirements.

In order to accommodate the anticipated need for 120,000 – 150,000 square feet of office space for the headquarters building, the maximum height limits on the block bounded by NW Broadway, NW 6th, NW Irving, and NW Hoyt are proposed to be increased from the current 75 foot limit to 150 feet.

Ordinance No. 187217

Amend the Central City Plan District to increase the height limit on Block U of Couch Addition and support construction of a headquarters building for the Multnomah County Health Department (Ordinance; amend Title 33)

The City of Portland Ordains:

**General Findings**

1. The Multnomah County Health Department (MCHD) promotes and protects the health of county residents by providing essential public health services, including environmental health services, public health investigation and reporting, and chronic and communicable disease prevention. The department also provides high-quality medical and dental care to vulnerable populations throughout its primary-care, school-based health, and specialty clinics throughout the county.
2. Multnomah County Health Department has outgrown the aging buildings where most of its administrative functions are now located. The need to replace existing unsafe, aged, inefficient and undersized facilities is urgent, and the demand for health services in Multnomah County is increasing.
3. Multnomah County has entered into a Disposition Agreement with the Portland Bureau of Housing to purchase a 17,500 square foot site on the eastern portion of Block U of Couch's Addition and intends to construct a new headquarters facility for the Multnomah County Health Department on this site.
4. The new Multnomah County Health Department headquarters building will allow the consolidation of the department's administrative functions from several different locations into a single, more efficient location.
5. In planning for the development of the new Health Department headquarters, Multnomah County engaged in an extensive public outreach process that included meetings with interested community groups including the Multnomah County Community Health Council, the Old Town/Chinatown Community Association and the River District Urban Renewal Advisory Committee. In addition, a Community Advisory Committee was formed to advise the County on the project and met on July 24, 2013, October 22, 2013, and March 31, 2014.
6. Multnomah County has identified a programmatic need for an estimated 120,000 to 150,000 square feet for its Health Department headquarters facility, greater than the current maximum development allowance of 105,000 square feet on the eastern portion of Block U. The existing maximum building height limit of 75 feet on Block U does not allow the full use of existing allowed FAR on the site (6:1 with up to 9:1 with use of bonuses or transfers).
7. In order to facilitate the development of the new Multnomah County Health Department headquarters, the Bureau of Planning and Sustainability initiated the Multnomah County Health Department Headquarters Project which proposed to amend Zoning Code Map 510-3 to: 1) increase the base maximum building height on Block U from 75 feet to 105 feet; and 2) make Block U eligible for up to 45 additional feet in height bonuses, for a total maximum of

150 feet, as described in the *Multnomah County Health Department Headquarters Project: Recommended Draft*, attached to this Ordinance as Exhibit A.

8. On March 23, 2015 notice of the proposed action was mailed to the Department of Land Conservation and Development in compliance with the post-acknowledgement review process required by OAR 660-018-0020 and ORS 197.610.
9. On March 26, 2015 notice of the Multnomah County Health Department Headquarters Project proposal and the April 28, 2015 Planning and Sustainability Commission hearing on the proposal was mailed to all neighborhood associations, neighborhood coalitions, and business associations in the city of Portland, as well as other interested persons and agencies, as required by ORS 227.186 and PCC 33.740. In addition, notice was mailed to all property owners affected by the proposal and all property owners within 400 feet of Block U of Couch's Addition.
10. On April 28, 2015 the Planning and Sustainability Commission held a hearing on the *Multnomah County Health Department Headquarters Project: Proposed Draft*. The Planning and Sustainability Commission voted unanimously to forward the draft to City Council for adoption.
11. On June 3, 2015 notice of the June 17, 2015 City Council hearing on the *Multnomah County Health Department Headquarters Project: Recommended Draft* was mailed to all who presented testimony orally or in writing to the Planning and Sustainability Commission and provided a name and address, those who asked for notice, and other interested parties.

#### **Findings on *Statewide Planning Goals***

12. State planning statutes require local jurisdictions to adopt and amend comprehensive plans and land use regulations in compliance with Oregon's *Statewide Planning Goals* against which its local land use decisions are measured and evaluated. Only the applicable Statewide Goals that apply to this request are addressed below.
13. **Goal 1, Citizen Involvement**, requires provision of opportunities for citizens to be involved in all phases of the planning process. The amendment supports this goal because opportunities for public involvement were provided as summarized below.
  - a) Staff from the Portland Bureau of Planning and Sustainability and Multnomah County met with the Old Town/Chinatown Community Association Land Use and Design Review Committee on March 17, 2015 to discuss the planned County Health Department headquarters and the proposed amendment to the maximum heights on Block U.
  - b) Staff from the Portland Bureau of Planning and Sustainability and Multnomah County met with the Pearl District Neighborhood Association Planning and Transportation Committee on March 17, 2015 to discuss the planned County Health Department headquarters and the proposed amendment to the maximum heights on Block U.

- c) The *Multnomah County Health Department Headquarters Project: Proposed Draft* was published on April 1, 2015 and made available to the public. The report was posted on the Bureau of Planning and Sustainability's web site and provided to all who requested a copy.
  - d) Staff from the Portland Bureau of Planning and Sustainability and Multnomah County attended the general meeting of the Old Town/Chinatown Community Association on April 1, 2015 and presented information on the planned County Health Department headquarters and the proposed amendment to the maximum heights on Block U.
  - e) Staff from the Portland Bureau of Planning and Sustainability and Multnomah County met with representatives of Home Forward on April 7, 2015 to discuss the planned County Health Department headquarters and the proposed amendment to the maximum heights on Block U.
  - f) Staff from the Portland Bureau of Planning and Sustainability and Multnomah County briefed the Portland Historic Landmarks Commission on the planned County Health Department headquarters and the proposed amendment to the maximum heights on Block U on April 13, 2015.
  - g) On April 28, 2015 the Planning and Sustainability Commission held a hearing and took public testimony on the *Multnomah County Health Department Headquarters Project: Proposed Draft*. On March 26, 2015 notice of the hearing on the proposal was mailed to all neighborhood associations, neighborhood coalitions, and business associations in the city of Portland, as well as other interested persons. In addition, notice was mailed to all property owners affected by the proposal and all property owners within 400 feet of Block U of Couch's Addition.
  - h) The *Multnomah County Health Department Headquarters Project: Recommended Draft* was published on June 3, 2015 and made available to the public. The report was posted on the Bureau of Planning and Sustainability's web site and provided to all who requested a copy.
  - i) City Council held a public hearing on the *Multnomah County Health Department Headquarters Project: Recommended Draft* and took public testimony on June 17, 2015. Notice of the hearing was mailed to all those who testified orally or in writing at the Planning and Sustainability Commission hearing, and to other persons who requested such notice, on May 29, 2015.
14. **Goal 2, Land Use Planning**, requires the development of a process and policy framework that provides the basis for all local land use decisions and assures that these decisions are based on an understanding of the facts relevant to the decision. The amendment supports this goal because it followed established city procedures for legislative actions, including Zoning Code Chapter 33.740, Legislative Procedure. The findings addressing Portland Comprehensive Plan Goal 1, Metropolitan Coordination, and its related policies and objectives also demonstrate compliance with this goal.

15. **Goals 3 and 4, Agricultural Lands and Forest Lands**, require the preservation and maintenance of the state's agricultural and forest lands, generally located outside of urban areas. The amendment supports these goals because the increase in the maximum allowable height on Block U increases development capacity in the Old Town/Chinatown District, where higher densities are encouraged to utilize land, infrastructure and transportation resources more efficiently. This in turn reduces the need to expand the Regional Urban Growth Boundary (UGB), therefore, preserving rural lands outside the UGB for agricultural and forest uses.
16. **Goal 5, Open Space, Scenic and Historic Areas, and Natural Resources**, requires the conservation of open space and the protection of natural, scenic and historic resources. The amendment supports this goal because no historic structures are located on Block U and, by increasing potential development capacity on the block, lessens development pressure on sites with historic resources. In addition, the ESEE Analysis completed for this project demonstrates that the additional development capacity created as a result of increasing the maximum allowable height on Block U will not adversely impact public views of the nearby Union Station Clock Tower, which is a designated scenic and historical resource. The preservation of the views of the Clock Tower is described in the Economic, Social, Environmental and Energy (ESEE) Analysis prepared as part of the planning process, attached as Appendix A of Exhibit A.
17. **Goal 6, Air, Water, and Land Resource Quality**, requires the maintenance and improvement of the quality of air, water and land resources. The amendment supports this goal because the increase in the maximum allowable height on Block U will allow the construction of a building of up to 150,000 gross square feet, allowing limited land resources to be used more efficiently in a transit-rich, mixed-use district of the Central City. This will increase the use of alternative transportation modes such as transit, biking, and walking, in turn improving air quality. In addition, the Multnomah County Health Department intends to construct a building that meets the LEED Gold certification, which will include several features to reduce, recycle and re-use water.
18. **Goal 9, Economic Development**, requires provision of adequate opportunities for a variety of economic activities vital to public health, welfare and prosperity. The amendment supports this goal because the increase in the maximum allowable height on Block U will increase the potential building capacity of the site, providing additional space for employment and economic activity in Portland's Central City, the economic center of the region. In addition, the amendment will facilitate consolidation of Multnomah County's Health Department administrative offices, bringing up to 350 well-paid employees into the Old Town/Chinatown District, in turn supporting the revitalization and economic health of this district and the Central City.
19. **Goal 11, Public Facilities and Services**, requires planning and development of a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for development. The amendment supports this goal because it will facilitate the development of a new Multnomah County Health Department facility. Public health services are an important element of public infrastructure serving the social, health and welfare needs of the County's 748,000 residents. Consolidating many of the functions of

the department into a single location in a transit-rich, mixed-use district will significantly increase efficient administration of the its programs.

20. **Goal 12, Transportation**, requires provision of a safe, convenient and economic transportation system. The amendment supports this goal because it increases development potential in an area with excellent street connectivity, transit, bicycling and walking facilities. There are several modes of transit service available to the site, including: the Green and Yellow Light Rail Transit (LRT) lines and bus service along the NW Transit Mall, with stops within one block of Block U; the #77 bus line on the NW Everett/NW Glisan street corridor within two blocks of Block U; and the Center Loop and North/South Streetcar lines, which operate on the NW 10<sup>th</sup>/11<sup>th</sup> Avenues Corridor, with stops within 4-5 blocks of Block U.

**The Oregon Transportation Planning Rule (TPR)**, which was adopted in 1991 and amended in 1996 and 2005 to implement State Goal 12, requires certain findings if a proposed Comprehensive Plan Map amendment, zone change, or regulation will significantly affect an existing or planned transportation facility. The amendment supports this rule because the increase in the maximum allowable height on Block U, which in turn will allow an increase in the development intensity from a maximum of 105,000 square feet, under the current height maximum, to a maximum of 150,000 square feet, will have no significant impact on transportation facilities. In addition, the amendment affects a site in the Central City, an area that has a managed transportation system and higher transit, bicycle and walking trips than elsewhere in the region as a result of excellent transit, bicycling and walking facilities. Maximum parking ratios for new development in the area encourage the use of alternative transportation modes. The findings for Portland Comprehensive Plan Goal 6, Transportation, and its relevant policies also demonstrate that the amendments are consistent with Goal 12 and the Transportation Planning Rule.

21. **Goal 13, Energy Conservation**, requires development of a land use pattern that maximizes the conservation of energy based on sound economic principles. The amendment supports this goal because it facilitates additional development in the Central City, an area that is well-served by existing urban infrastructure and transit and with significant concentrations of jobs, services, and housing. The proposed location of the Multnomah County Health Department headquarters on Block U would result in up to 350 administrative and health-care related jobs in the area, which are currently dispersed through the County. Co-locating these employees in single site will reduce the amount of driving between job sites, thus reducing energy use.
22. **Goal 14, Urbanization**, requires provision of an orderly and efficient transition of rural lands to urban use. The amendment supports this goal because the increased development potential on the site allows land already within the Regional UGB to be used more efficiently, which slows down the need to bring additional land into the UGB. The findings for Portland Comprehensive Plan Goal 2, Urban Development and Goal 3, Neighborhoods, and their relevant policies also demonstrate that the amendment supports this goal.

### **Findings on Metro's Urban Growth Management Functional Plan**



23. Metro's *Urban Growth Management Functional Plan (UGMFP)* has been developed by Metro, the Portland metropolitan regional government, to assist local jurisdictions to implement Statewide Planning Goals and the regional development vision. Only the applicable elements of UGMFP are addressed below.
24. **Title 1, Requirements for Housing and Employment Accommodation**, requires that each jurisdiction contribute its fair share to increasing the development capacity of land within the Regional UGB. This requirement is to be generally implemented through city-wide analysis based on calculated capacities from land use designations. The amendment is consistent with this title because it increases development capacity in Portland's Central City where several key infrastructure improvements, including Light Rail Transit (LRT) and Streetcar routes, have significantly increased transit capacity to support higher densities in a manner that minimizes new auto trips and parking demand. The amendment allows land already within the Regional UGB to be used more efficiently. The findings for Portland Comprehensive Plan Goal 2, Urban Development and Comprehensive Plan Goal 5 Economic Development also demonstrate that the amendment is consistent with this title.
25. **Title 6, Centers, Corridors, Station Communities and Main Streets**, calls for enhancements of these areas as principal centers of urban life via actions and investments by cities and counties, complemented by regional investments. The amendment supports this title because the increase in the maximum height on Block U permits increased development potential in the densely developed Central City, an area well supported by existing infrastructure, including regional transit. The amendment will facilitate the development of a new Multnomah County Health Department facility in a consolidated location and improve the local provision of public health services.

#### **Findings on Portland's *Comprehensive Plan***

26. The *City of Portland's Comprehensive Plan* is the policy document that establishes the basis for the city's land use planning that informs such implementing documents as the Zoning Code (Title 33). The following Comprehensive Plan goals, policies and objectives are relevant and applicable to the amendment.
27. **Goal 1, Metropolitan Coordination**, calls for the Comprehensive Plan to be coordinated with federal and state law and to support regional goals, objectives and plans. The amendment supports this goal because notification of the proposal was provided to the Oregon Department of Land Conservation and Development per ORS 197.610 and notice of the April 28, 2015 Planning and Sustainability Commission hearing on the *Multnomah County Health Department Headquarters Project: Proposed Draft* was sent to Metro, TriMet, and the Oregon Department of Transportation. In addition, the amendment does not change the Urban Growth Boundary, Urban Planning Area Boundary, or Urban Services Boundary or the policy or intent of existing regulations relating to metropolitan coordination and regional goals.
28. Policy 1.1, Urban Growth Boundary, requires support of the concept of a regional UGB for the Portland metropolitan area. The amendment, which increases the maximum allowable

height on Block U, supports this policy by increasing allowed development potential on site in a highly urbanized area that is supported by existing infrastructure, thus, reducing the need to expand the Regional UGB.

29. Policy 1.4, Intergovernmental Coordination, requires continuous participation in inter-governmental affairs with public agencies to coordinate metropolitan planning and project development and maximize the efficient use of public funds. The amendment supports this policy because the City and County have coordinated their efforts to undertake the amendment to facilitate the construction of Multnomah County Health Department headquarters. This will permit the County to improve the efficiency of government, by consolidating its Health Department's administrative headquarters in one place, and improve the local provision of public health services.
30. **Goal 2, Urban Development**, calls for maintaining Portland's role as the major regional employment and population center by expanding opportunities for housing and jobs, while retaining the character of established residential neighborhoods and business centers. The amendment supports this goal because the increase in the maximum height on Block U permits increased development potential in a densely developed area supported by existing infrastructure, including recent investments in LRT and streetcar service. Increasing density in the Central City lessens development pressure in established residential neighborhoods and business centers outside the Central City, helping to retain their character.
31. Policy 2.2, Urban Diversity, promotes a range of living environments and employment opportunities for Portland residents to attract and retain a stable and diversified population. The proposed legislative amendment supports this policy because the increased development capacity on Block U resulting from the increased maximum height will facilitate job creation in the Central City, a unique, mixed-use area at the center of the metropolitan region.
32. Policy 2.12, Transit Corridors, provides for a mixture of activities along Major Transit Routes, Major Transit Priority Streets, Transit Access Streets, and Main Streets to support the use of transit. The amendment supports this policy because it increases development potential on Block U which abuts the Transit Mall where the Yellow and Green LRT and bus lines are located. These lines are immediately accessible by the north- and south-bound transit stations at NW 6<sup>th</sup> Avenue/NW Hoyt Street and 5<sup>th</sup> Avenue/NW Glisan Street, respectively.
33. Policy 2.17, Transit Stations and Transit Centers, encourages transit-oriented development patterns at transit stations and at transit centers to provide for easy access to transit service with the design and mix of land uses surrounding transit stations and transit centers emphasizing a pedestrian- and bicycle-oriented environment and transit use. The amendment supports this policy because Block U is located in an area with excellent street connectivity, transit, bicycling and walking facilities, immediately adjacent to the Yellow/Green LRT line's Old Town/Chinatown transit stops at NW 6<sup>th</sup> Avenue/NW Hoyt

Street and 5<sup>th</sup> Avenue/NW Glisan Street, respectively. These transit investments support higher development capacity on the block.

34. Policy 2.18, Transit-Supportive Density, supports the establishment of minimum floor area ratios for non-residential development at light rail centers of 0.5:1. The amendment supports this policy because the increased maximum height will allow future development to utilize the existing 6:1 (9:1 with use of bonuses) FAR entitlement on block, in an area already rich in transit services.
35. Policy 2.19, Infill and Redevelopment, encourages infill and redevelopment as a way to implement the Livable City growth principles and accommodate expected increases in population and employment. In addition, it encourages infill and redevelopment in the Central City at transit stations, along Main Streets, and as neighborhood infill in existing residential, commercial and industrial areas. The amendment supports this policy because it increases development potential on an underutilized block that is within the already highly urbanized Central City that is well served by transit.
36. Policy 2.20, Utilization of Vacant Land, provides for full utilization of existing vacant land except in those areas designated as open space. The amendment supports this policy because the increased development potential will encourage development on the eastern half of Block U, which is vacant, promoting the efficient use of urban land.
37. Policy 2.25 Central City Plan, encourages continued investment within Portland's Central City while enhancing its attractiveness for work, recreation and living. Furthermore, through the implementation of the Central City Plan, the policy calls for the coordination of development and protection of Portland's citizens and enhancement of the Central City's special natural, cultural and aesthetic features. The amendment supports this policy because it increases the development capacity of Block U, supporting the Central City Plan's call for a dense mix of uses and enhanced public services, such as the County's public health services. The amendment creates no adverse impacts to views of the Union Station Clock Tower, a designated historic and scenic resource. The findings for the Central City Plan also demonstrate that the amendment supports this policy.
38. **Goal 3, Neighborhoods**, calls for the preservation and reinforcement of the stability and diversity of the city's neighborhoods while allowing for increased density. The amendment supports this goal because the increased density of development on Block U is in keeping with the mixed-use character and development densities in the Old Town/Chinatown neighborhood.
39. Policy 3.2, Social Conditions, calls for the provision and coordination of programs to promote neighborhood interest, concern and security and to minimize the social impact of land use decisions. The amendment supports this policy because it included opportunities for public involvement and because it will facilitate development of the consolidated administrative headquarters and some clinical services of the Multnomah County Health Department, which will provide jobs, bolster the district's mixed-use character, and provide direct public health care services to Portland residents.

40. Policy 3.4, Historic Preservation, calls for preserving and retaining historic structures throughout the city. The amendment supports this policy because no historic structures are located on Block U and, by increasing potential development capacity on the block, lessens development pressure on sites with historic resources. In addition, the amendment will not adversely impact views of the nearby Union Station Clock Tower, which is a designated scenic and historical resource, as documented in the ESEE analysis attached to Exhibit A.
41. **Goal 5, Economic Development**, calls for the promotion of a strong and diverse economy that provides a full range of employment and economic choices for individuals and families in all parts of the city. The amendment supports this goal because the increased development capacity on Block U resulting from the increased maximum height will facilitate job creation and economic activity in the Central City, the economic heart of the region. The amendment will facilitate the development of the new MCHD headquarters housing up to 350 well-paying jobs.
42. Policy 5.1, Urban Development and Revitalization, encourages investment in the development, redevelopment, rehabilitation and adaptive reuse of urban land and buildings for employment and housing opportunities. The amendment supports this policy because facilitates development on the vacant east half of Block U and promotes the efficient use of urban land that is well served by existing infrastructure.
43. Objective E calls for defining and developing Portland's cultural, historic, recreational, educational and environmental assets as marketing and image-building tools. The amendment is consistent with this objective because it preserves views of the Union Station Clock Tower, a historic and scenic resource, as described in the ESEE analysis, attached as Appendix A of Exhibit A.
44. Policy 5.4, Transportation System, promotes a multi-modal regional transportation system that stimulates and supports long-term economic development and business investment. The amendment supports this policy because it increases development potential on Block U, which is located in an area with excellent street connectivity, transit, bicycling and walking facilities. The findings for Statewide Planning Goal 12, Transportation and for Portland Comprehensive Plan Goal 6, Transportation and its relevant policies also demonstrate that the amendments support this policy.
45. Objective D supports transit-supportive development and redevelopment along designated transit streets and in the vicinity of transit stations. The amendment supports this objective because it increases development potential on Block U, which is adjacent to the NW Transit Mall which is served by the Green and Yellow Light Rail Transit (LRT) lines and buses. The #77 bus line on the NW Everett/NW Glisan street corridor is within two blocks of Block U and the Center Loop and North/South Streetcar lines on the NW 10<sup>th</sup>/11<sup>th</sup> Avenue Corridor, is within 4-5 blocks.
46. **Goal 6, Transportation**, calls for developing a balanced, equitable and efficient transportation system that provides a range of transportation choices; reinforces the

livability of neighborhoods; supports a strong and diverse economy; reduces air, noise and water pollution; and lessens reliance on the automobile while maintaining accessibility. The amendment supports this goal because it increases development potential on Block U which is located in an area with excellent street connectivity, transit, bicycling and walking facilities. The findings for Statewide Planning Goal 12, Transportation also demonstrate that the amendments support this goal and its related policies.

47. Policy 6.18, Adequacy of Transportation Facilities, ensures that amendments to the Comprehensive Plan, including goal exceptions and map amendments, zone changes, conditional uses, master plans, impact mitigation plans, and land use regulations that change allowed land uses are consistent with the identified function and capacity of, and adopted performance measures for, affected transportation facilities. The amendment is consistent with this policy because it increases development potential on Block U which is located in an area with excellent street connectivity, transit, bicycling and walking facilities. Block U is immediately adjacent to the NW Transit Mall, the capacity of which has been increased with the completion of the Green and Yellow LRT lines. In addition, Block U lies about 4-5 blocks east of the NW 10<sup>th</sup>/11<sup>th</sup> Avenue Corridor that supports two streetcar lines and the cross-town #77 bus line that runs on the NW Everett/Glisan Corridor. The findings for Statewide Planning Goal 12, Transportation and the Transportation Planning Rule also demonstrate that the amendment is consistent with this policy.
48. Policy 6.19, Transit-Oriented Development, reinforces the link between transit and land use by encouraging transit-oriented development and supporting increased residential and employment densities along transit streets, at existing and planned light rail transit stations, and at other major activity centers. The amendment supports this policy because the increase in maximum allowable height will allow an increase in development capacity, from 105,000 square feet to 150,000 square feet, in an area well-served by transit, including the Green and Yellow LRT and bus lines on the Transit Mall, streetcar service on the NW 10<sup>th</sup>/NW 11<sup>th</sup> Avenue Corridor and the #77 bus line on the NW Everett/Glisan Corridor.
49. Objective B calls for focusing medium-density and high-density development, including institutions, along transit lines. The amendment supports this objective because the increased development potential is located on a site adjacent to the NW Transit Mall and is within a block of both the north- and south-bound transit stations. In addition, this area in Old Town/Chinatown has a full complement of public sidewalks and bicycle lanes to provide the necessary pedestrian and bicycle access to transit.
50. **Goal 7, Energy**, calls for promotion of a sustainable energy future by increasing energy efficiency in all sectors of the city. The amendment supports this goal because it facilitates additional development in the Central City, an area that is well-served by existing urban infrastructure and transit and with significant concentrations of jobs, services, and housing. The proposed location of the Multnomah County Health Department headquarters on Block U would result in up to 350 administrative and health-care related jobs in the area, which are currently dispersed through the County. Co-locating these employees in single site will reduce the amount of driving between job sites, thus reducing energy use.

51. Policy 7.4, Energy Efficiency through Land Use Regulations, promotes residential, commercial, industrial and transportation energy efficiency and the use of renewable resources. The amendment supports this policy because 1) the increased development capacity encourages development of a single larger building that is inherently more energy efficient than creating two facilities with the same capacity; 2) the site is located immediate adjacent to high-capacity transit, including the Yellow and Green LRT lines and streetcar and bus service; and 3) the County is committed to building a facility that attains LEED Gold Certification.
52. Objective A promotes land use patterns that increase energy efficiency in buildings and transportation systems by making energy efficiency a critical element when developing new or modifying existing zoning regulations and adopting the comprehensive map. The amendment supports this objective because the increase in the maximum allowable height promotes more efficient land use patterns, increasing the development capacity on the eastern half of Block U, which is located immediately adjacent to the NW Transit Mall and transit stations for the Green and Yellow LRT lines.
53. **Goal 8, Environment**, calls for the maintenance and improvement of the quality of Portland's air, water and land resources. The amendment supports this goal because the increase in development capacity on Block U will allow limited land resources to be used more efficiently in a transit-rich, mixed-use district of the Central City that is well served by existing urban infrastructure. This will increase the use of alternative transportation modes such as transit, biking, and walking, in turn improving air quality.
54. Policy 8.2, Central City Transportation Management Plan, guides future city efforts in maintaining air quality standards in the CBD and allows for expanded employment and housing opportunities throughout the Central City. The amendment supports this policy because it increases the development capacity Block U, which immediately abuts the NW Transit Mall and transit stations for the Green and Yellow LRT lines. This supports reductions in single-occupant vehicle trips and the need for end-trip parking. The findings for the *Central City Transportation Management Plan* also demonstrate that the amendment supports this policy.
55. Policy 8.4 Ride Sharing, Bicycling, Walking, and Transit, promotes the use of alternative modes of transportation such as ridesharing, bicycling, walking and transit throughout the metropolitan area. The amendment supports this objective because it increases development potential in an area located immediately adjacent to the NW Transit Mall, within walking distance of streetcar and bus service, and that has a full complement of pedestrian and bicycle facilities.
56. **Goal 9, Citizen Involvement**, calls for improved methods and on-going opportunities for citizen involvement in the land use decision-making process, and the implementation, review and amendment of the Comprehensive Plan. The amendment supports this goal because the planning process followed requirements specified in Chapter 33.740, Legislative Procedure and included opportunities for citizen involvement. See the findings

for Statewide Planning Goal 1, Citizen Involvement for additional findings that demonstrate compliance with this goal.

57. Policy 9.4, Intergovernmental Cooperation, promotes citizen involvement in land use decisions initiated by other governmental agencies. The amendment supports this policy because the City and County have coordinated their efforts develop the proposed amendment in support of construction of a new Multnomah County Health Department headquarters.
58. **Goal 10, Plan Review and Administration**, calls for periodic review of the Comprehensive Plan, for implementation of the Plan, and addresses amendments to the Plan, to the Plan Map, and to the Zoning Code and Zoning Map. The amendment support this goal because it resulted from a review of the Zoning Code and is an amendment to Zoning Code Map 510-3.
59. Policy 10.6, Amendments to the Comprehensive Plan Goals, Policies, and Implementing Measures, requires that legislative amendments to the Comprehensive Plan and implementing ordinances must be reviewed by the Planning and Sustainability Commission that, in turn, makes recommendations to the City Council. The amendment supports this policy because the Planning and Sustainability Commission held a hearing on the amendment on April 28, 2015 and unanimously recommended its adoption by the City Council.
60. Policy 10.10, Amendments to the Zoning and Subdivision Regulations, requires amendments to the zoning and subdivision regulations to be clear, concise, and applicable to the broad range of development situations faced by a growing, urban city. The amendment supports this policy because it amends a Zoning Code development standard through a clear change to Map 510-3.
61. **Public Facilities General Goal 11-A** calls for provision of a timely, orderly and efficient arrangement of public facilities and services that support existing and planned land use patterns and densities. The amendment supports this goal because it facilitates the development of a new headquarters facility for the Multnomah County Health Department in a central, high-density location, close to other services and transportation networks.
62. Policy 11.1, Service Responsibility, encourages the planning efforts of those agencies providing services, including public health services. The amendment supports this policy because Multnomah County provides public health services to the residents of Portland as part of the two jurisdictions' sharing of service responsibilities. The increase of the maximum allowable height on Block U will allow the Multnomah County Health Department to build a headquarters building and consolidate most of its administrative functions, now scattered in several buildings, and provide some direct-service clinics.
63. **Goal 12, Urban Design**, supports the enhancement of Portland as a livable city, attractive in its setting and dynamic in its urban character by preserving its history and building a substantial legacy of quality private developments and public improvements for future

generations. The amendment supports this goal by increasing development potential on an underutilized site in the Central City, the highly urbanized, mixed use center of Portland and the region. In addition, Block U has a Design (“d”) overlay, which requires any building developed on the site to undergo Design Review to promote excellence in design.

64. Policy 12.3, Historic Preservation, supports the enhancement of the City’s identity through the protection of Portland’s significant historic resources and encourages development that sensitively incorporates preservation of historic structures and artifacts. The amendment supports this policy because no historic structures are located on Block U and, by increasing potential development capacity on the block, lessens development pressure on sites with historic resources. In addition, the ESEE Analysis completed for this project demonstrates that the additional development capacity created as a result of increasing the maximum allowable height on Block U will not adversely impact public views of the nearby Union Station Clock Tower, which is a designated scenic and historical resource.
65. Objective A calls for preserving and accentuating historic resources as part of an urban environment that is being re-shaped by new development projects. The amendment supports this objective because views of the Union Station Clock Tower, a designated scenic and historic resource, will not be affected adversely by the increased development capacity on Block U.

#### **Findings on the *Central City Plan***

66. The *Central City Plan* was adopted in 1988 as an area-specific update of the *Comprehensive Plan* for Portland's central city neighborhoods. The *Central City Plan* built upon the work of the *Downtown Plan*, extending its geographic area and expanding its range of policy concerns. The plan provides guidance for the growth and enhancement of Portland's Central City. In 1995, the plan was amended with the incorporation of the River District Plan policies. The following policies and further statements are relevant and applicable to the amendment.
67. **Policy 1, Economic Development**, calls for strengthening the Central City as the heart of the region and utilization of the Central City’s growth to foster the city’s prosperity and livability. The amendment supports this policy because it increases development capacity on Block U, facilitating job creation and economic activity in a district of the Central City that has a full complement of public infrastructure. In addition, the amendment will facilitate consolidation of Multnomah County’s Health Department administrative offices, bringing up to 350 well-paid employees into the Old Town/Chinatown District, in turn supporting the revitalization and economic health of this district and the Central City.
68. Statement I calls for fulfilling the vision of the *River District Plan* that envisions approximately 5,500 new housing units, 1.5 million square feet of additional office space, and 500,000 square feet of new retail facilities. The amendment supports this statement by increasing the potential for creating new office and retail space on a site within the River District. The findings for Central City Plan Policy 17, River District, and its relevant further statements also demonstrate that the amendment supports this statement.



69. **Policy 4, Transportation**, calls for actions that improve accessibility to the Central City from the rest of the region and to extend the Central City's ability to accommodate growth while enhancing livability. The amendment supports this policy because the increased development capacity on Block U supports nearby investments in high-capacity transit in the Central City, including the Green and Yellow LRT and bus lines on the Transit Mall and two Streetcar lines on the NW 10<sup>th</sup>/11<sup>th</sup> Avenue corridor.
70. **Policy 5, Human Services**, calls for providing social and health services for special needs populations and assisting dependent individuals to become more independent. The amendment supports this policy by facilitating the development of a new headquarters building for the Multnomah County Health Department that will consolidate many of its administrative functions and provide space for three health clinics. MCHD is the state's largest safety-net provider of high-quality medical and dental care to vulnerable populations.
71. **Policy 7, Natural Environment**, calls for improving the Central City's environment by reducing pollution, keeping the Central City clean and green, and providing opportunities to enjoy nature. The amendment supports this policy because the increase in development capacity on Block U will allow limited land resources to be used more efficiently in a transit-rich, mixed-use district of the Central City. This will increase the use of alternative transportation modes such as transit, biking, and walking, in turn reducing air pollution. In addition, the proposed location of the MCHD headquarters on Block U would result in up to 350 administrative and health-care related jobs in the area, which are currently dispersed through the County. Co-locating these employees in single site will reduce the amount of driving between job sites, thereby reducing pollution.
72. **Policy 11, Historic Preservation**, calls for the preservation and enhancement of the historically and architecturally important buildings. The amendment supports this policy because no historic structures are located on Block U and, by increasing potential development capacity on the block, lessens development pressure on sites with historic resources. In addition, the ESEE Analysis completed for this project demonstrates that the additional development capacity created as a result of increasing the maximum allowable height on Block U will not adversely impact public views of the Union Station Clock Tower, which is a designated scenic and historical resource.
73. **Policy 12, Urban Design**, calls for the enhancement of the Central City as a livable, walkable area that focuses on the Willamette River and captures the diversity and excitement of city living. The amendment supports this policy because it increases development potential in the dense, mixed-use Old Town/Chinatown neighborhood, an area with excellent street connectivity, transit, bicycling and walking facilities. The increase in height on Block U to a maximum of 150 feet steps down from the 350 foot limit immediately to the south, and transitions to 75 foot limit to the north, preserving a height step-down from the core and to the Willamette River. In addition, development resulting from the amendment will not adversely impact public views of the Union Station Clock Tower, which is a designated scenic and historical resource.

74. Statement B calls for excellence in the design of new buildings. The amendment is consistent with this statement because Block U has a Design (“d”) overlay, which requires any building developed on the site to undergo Design Review. The approval criteria for this review include the *Central City Fundamental Design Guidelines* and *River District Design Guidelines*.
75. Statement E calls for identifying and protecting significant public views. The amendment supports this statement because a new building constructed under the increased maximum allowable height on Block U will not adversely impact public views of the Union Station Clock Tower, which is a designated scenic and historical resource, as demonstrated in the ESEE Analysis attached as Appendix A to Exhibit A.
76. Statement F calls for locating the highest densities in Portland's Downtown and along transit corridors and to step density down towards the river and as distance from the core increases. The amendment supports this statement because the subject site, Block U, abuts NW 6<sup>th</sup> Avenue, on the Transit Mall in which significant investments have been made to construct the Green and Yellow LRT lines. This increased transit capacity, combined with nearby streetcar and bus service supports enhanced densities. In addition, the step-down in density towards the river and away from the core is preserved by the amendment, which increases allowed height on Block U to 150 feet, with allowed heights remaining at 350 feet to the south and 75 feet to the north.
77. **Policy 13, Plan Review**, calls for the periodic review of the progress of the *Central City Plan*. The amendment supports this policy because it is the result of a review of the existing maximum height limits specified in the Central City plan district, Zoning Code Chapter 33.510.
78. Statement B calls for refining and revising the *Central City Plan* implementing actions as circumstances change. The amendment supports this statement because it is a revision of a development standard contained in Zoning Code Chapter 33.510, Central City plan district, which is one of the primary implementation tools of the *Central City Plan*.
79. **Policy 17, River District**, calls for the extension of downtown development throughout the River District that is highly urban in character and the creation of a diverse community with neighborhoods housing a substantial resident population, providing jobs, services, and recreation, and that embrace of the Willamette River. The amendment supports this policy because the increase in maximum allowable height on Block U will facilitate higher development potential in an area that is highly urban in character and has the large transit capacity created by major investments in LRT and Streetcar. The increased density on the block will allow the Multnomah County Health Department to relocate and consolidate up to 350 employees in the River District and provide public health services to the district’s residents and employees.
80. Statement A calls for implementation of the River District development plan through public/private projects in the River District development plan's action areas. The

amendment supports this statement because it increases development potential on Block U, located within the Union Station/Old Town action area, immediately adjacent to the Transit Mall and within 4-5 blocks of the streetcar line.

81. Statement B calls for preserving and enhancing the district's history and architectural heritage. The amendment supports this statement because no historic structures are located on Block U and, by increasing potential development capacity on the block, lessens development pressure on sites with historic resources. In addition, the ESEE Analysis completed for this project demonstrates that the additional development capacity created as a result of increasing the maximum allowable height on Block U will not adversely impact public views of the Union Station Clock Tower, which is a designated scenic and historical resource.
82. Statement I calls for incorporating strategic public investments in infrastructure that will stimulate private investment. The amendment supports this statement by increasing development capacity on Block U, which abuts the Transit Mall within which significant public investment has been made in high-capacity LRT transit.
83. Statement K calls for contributing to the efficiency of urban living with development density, diversity of land use and quality of design that result in significant infrastructure cost savings. The amendment supports this statement by increasing development potential on Block U in an area well served by existing infrastructure and services. The amendment will facilitate the consolidation of the Multnomah County Health Department's administrative functions in a cost- and operationally-efficient way. In addition, the proposed facility, for which the County will strive to achieve LEED Gold Certification, will be subject to Design Review, to promote its quality of design.

#### **Findings on the *Central City Transportation Management Plan***

84. The Portland City Council adopted the *Central City Transportation Management Plan (CCTMP)* in September 1995 to promote economic vitality, livability and environmental quality in the Central City. The objectives of the *CCTMP* include concentrating new housing and jobs in the Central City, reducing automobile use by encouraging alternative modes, and improving air quality. The following *CCTMP* policies are relevant and applicable to the amendment.
85. **Policy 1: Growth with Livability**, calls for supporting the vitality of existing residences and businesses and the development of new housing in and attracting new jobs to the Central City. This policy also calls for improving the livability of the Central City by maintaining and improving the transportation systems for all modes. The amendment supports this policy by providing additional development capacity on Block U which will facilitate job creation and economic activity in a district of the Central City with excellent street connectivity, transit, bicycling and walking facilities.
86. **Policy 3: Mode Split**, calls for reducing the mode split of single-occupant vehicles by commuters to reduce vehicle miles traveled per capita and lessen congestion during the

peak hour. The amendment supports this policy by increasing development potential on Block U, located in an area with excellent street connectivity, transit, bicycling and walking facilities, including the Green and Yellow LRT lines and bus service on the Transit Mall, to which the site abuts, and two Portland Streetcar lines in the NW 10<sup>th</sup>/11<sup>th</sup> Avenue Corridor a few blocks to the west. The proposed location of the MCHD headquarters on Block U would result in up to 350 administrative and health-care related jobs in the area, which are currently dispersed through the County. Co-locating these employees in a single site will reduce the amount of driving between job sites.

87. **Policy 5: Transit**, calls for ensuring that the transit system will be a key component in stimulating economic development in the Central City, supporting the density and diversity of activities that lead to trips by alternative modes, minimizing congestion and improving air quality. The amendment supports this policy by increasing development potential and promoting transit-supportive development adjacent to the Transit Mall, which accommodates the Green and Yellow LRT and bus lines.

NOW, THEREFORE, the Council directs:

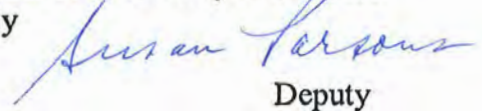
- a. Adopt Exhibit A, *Multnomah County Health Department Headquarters Project: Planning and Sustainability Commission Recommended Draft* and its appendix, dated June 3, 2015;
- b. Amend Title 33: Planning and Zoning, as shown in Exhibit A;
- c. Adopt the commentary and discussion in Exhibit A and its appendix as legislative intent and further findings.

Passed by the Council: JUN 24 2015

Mayor Charlie Hales  
Prepared by: Nicholas Starin  
Date Prepared: May 27, 2015

**Mary Hull Caballero**  
Auditor of the City of Portland

By



Deputy

Agenda No.  
**ORDINANCE NO. 187217**  
 Title

Amend the Central City Plan District (33-510) to increase the height limit on Block U of Couch's Addition and support construction of a headquarters building for the Multnomah County Health Department (Ordinance; Amend Title 33, ~~Planning and Zoning~~).

<p><b>INTRODUCED BY</b>                  Commissioner/Auditor:  <b>Charlie Hales</b></p>	<p>CLERK USE: DATE FILED <u>JUN 12 2015</u></p>
<p><b>COMMISSIONER APPROVAL</b></p> <p>Mayor—Finance and Administration - Hales <i>[Signature]</i></p> <p>Position 1/Utilities - Fritz</p> <p>Position 2/Works - Fish</p> <p>Position 3/Affairs - Saltzman</p> <p>Position 4/Safety - Novick</p>	<p>Mary Hull Caballero                  Auditor of the City of Portland</p> <p>By: <i>[Signature]</i>                  Deputy</p>
<p><b>BUREAU APPROVAL</b></p> <p>Bureau: BPS                  Bureau Head: Susan Anderson  <i>[Signature]</i></p> <p>Prepared by:                  Date Prepared: Nicholas Starin</p>	<p><b>ACTION TAKEN:</b></p> <p>JUN 17 2015 PASSED TO SECOND READING JUN 24 2015 9:30 A.M.</p>
<p>Impact Statement</p> <p>Completed <input checked="" type="checkbox"/> Amends Budget <input type="checkbox"/></p>	
<p>Portland Policy Document                  If "Yes" requires City Policy paragraph stated in document.                  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	
<p><b>City Auditor Office Approval:</b>                  required for Code Ordinances</p>	
<p><b>City Attorney Approval:</b>                  required for contract, code, easement, franchise, comp plan, charter <i>[Signature]</i></p>	
<p>Council Meeting Date <b>June 17, 2015</b></p>	

<b>AGENDA</b>
<p><b>TIME CERTAIN</b> <input checked="" type="checkbox"/>                  Start time: <u>2:30 pm</u></p> <p><b>Total amount of time needed:</b> _____                  (for presentation, testimony and discussion)</p>
<p><b>CONSENT</b> <input type="checkbox"/></p>
<p><b>REGULAR</b> <input type="checkbox"/></p> <p><b>Total amount of time needed:</b> _____                  (for presentation, testimony and discussion)</p>

FOUR-FIFTHS AGENDA	COMMISSIONERS VOTED AS FOLLOWS:		
		YEAS	NAYS
1. Fritz	1. Fritz	✓	
2. Fish	2. Fish	✓	
3. Saltzman	3. Saltzman	✓	
4. Novick	4. Novick	✓	
Hales	Hales	✓	

# Multnomah County Health Department Headquarters Project

## Amendment to Maximum Height Limit on Block “U”

**Proposed Draft**

DRAFT March 20, 2015



Bureau of Planning and Sustainability  
Innovation. Collaboration. Practical Solutions.

City of Portland, Oregon  
Charlie Hales, Mayor • Susan Anderson, Director



**The Portland Planning and Sustainability Commission will hold a public hearing  
on this proposal on:  
Tuesday, April 28th at 3:00 pm\*  
1900 SW 4th Avenue, Second Floor, Room 2500A**

\*please call (503) 823-7700 one week before the hearing for schedule time of this agenda item

The Bureau of Planning and Sustainability is committed to providing equal access to information and hearings. If you need special accommodation, please call 503-823-7700, the City's TTY at 503-823-6868, or the Oregon Relay Service at 1-800-735-2900.

For more information contact:  
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Portland Bureau of Planning and Sustainability  
1900 SW 4th Avenue, Suite 7100  
Portland, Oregon 97201  
**Phone:** (503) 823-5837  
**Email:** [nicholas.starin@portlandoregon.gov](mailto:nicholas.starin@portlandoregon.gov)

A digital copy of this report can be found at:  
<http://www.portlandoregon.gov/bps/mchdhq>

## **Acknowledgements**

### **Portland City Council**

Charlie Hales, *Mayor, Commissioner-in-Charge*

Nick Fish, *Commissioner*

Amanda Fritz, *Commissioner*

Steve Novick, *Commissioner*

Dan Saltzman, *Commissioner*

### **Portland Planning and Sustainability Commission**

André Baugh (Chair)

Katherine Schultz (Vice Chair)

Howard Shapiro (Vice Chair)

Karen Gray

Don Hanson

Mike Houck

Gary Oxman

Michelle Rudd

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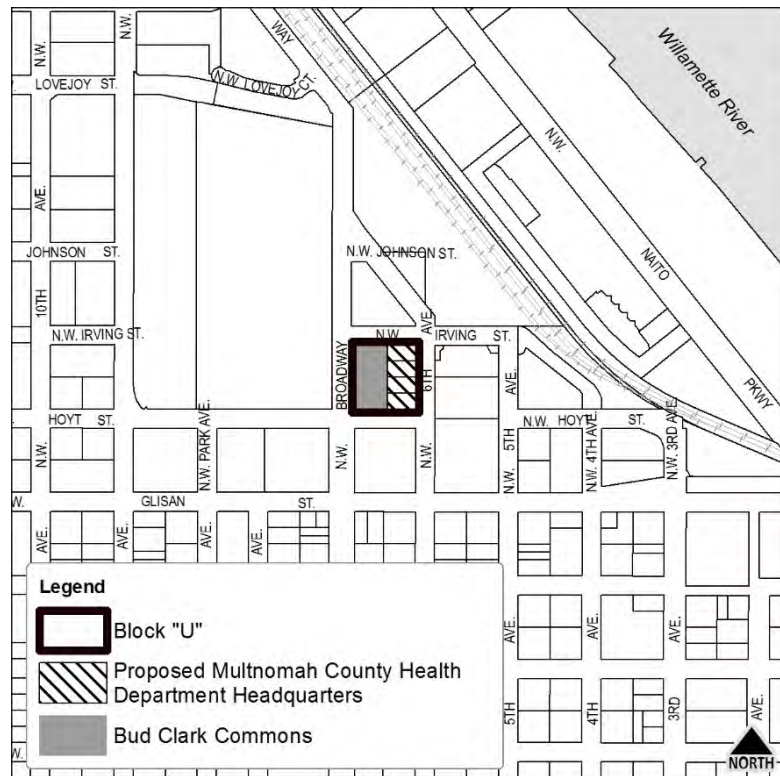
## I. Project Summary

Multnomah County is proposing to construct a new headquarters facility for its Health Department in Portland’s Old Town/Chinatown neighborhood. The site selected for the proposed facility is the eastern portion of Block U, located on NW 6th Ave, between NW Hoyt and NW Irving streets, within the River District of the Central City (see map below). Development of the Multnomah County Health Department (MCHD) Headquarters is a high priority project for the County. The need to replace existing unsafe, aged, inefficient and undersized facilities is urgent, and the demand for health services in Multnomah County is increasing.

The planned site for the MCHD Headquarters is subject to maximum height and floor area ratio (FAR) provisions contained in the Central City Plan District chapter of the Portland Zoning Code (33.510). The existing base maximum floor area ration (FAR) is 6:1, with the potential for 3:1 in additional FAR through the use of various bonus and/or transfer options. The existing maximum height on the site is 75 feet, and it is not eligible for the height bonuses.

In order to accommodate all the MCHD functions described in greater detail in Section II of this report, the building will require an estimated 120,000 to 150,000 square feet and be between 120 and 150 feet in height. To accommodate a structure of this size on a site that is less than a half block in size, the maximum height allowance would need to be increased from its current 75 foot limit.

Therefore, the Bureau of Planning and Sustainability (BPS) is proposing to raise the height allowance on Block U to a maximum of 150 feet. This would be achieved through a combination of a base height increase from 75 feet to 105 feet plus making the site eligible for up to 45 feet of bonus height, which the County could earn through the use of FAR bonuses and/or transfers for various public benefits.



The *Scenic Resources Protection Plan* (BPS, 1991) and the *Union Station Clock Tower-Related FAR and Height Limitation Study* (BPS, 2000) identify the Union Station Clock Tower as a scenic resource and there are some protected views of the Clock Tower. The *Draft Central City Scenic Resources Inventory* (to be released April 2015) continues to identify the Clock Tower and views of the Clock Tower as scenic resources. Because the subject site is located near the Clock Tower an updated Economic, Social, Environmental and Energy (ESEE) analysis was undertaken to evaluate the potential effect of the proposed increases in height on protected views of the Clock Tower. As described in greater detail in Section III of this report, the effect of a potential “conflicting use” between a building of up to 150 feet

on the undeveloped portion of Block U and preserving views of the Union Station Clock Tower is minor. Additional height will not block or partially block the view of the clock tower and adequate air space around the tower is preserved along the identified views.

## **II. Background**

### **1. Multnomah County Health Department Needs Assessment**

The Multnomah County Health Department (MCHD) works in partnership with its diverse communities to promote and protect the health of Multnomah County residents. It provides essential public health services, including communicable and chronic disease prevention, public health investigation and reporting, environmental health services, and health assessment and evaluation. The department also provides high-quality medical and dental care to vulnerable populations throughout its primary-care, school-based health, and specialty clinics in several locations throughout the county.

The health department has outgrown the aging buildings—the McCoy Building (426 SW Stark Street) and Lincoln Building (421 SW Oak Street)—where most of its administrative functions now are located. Multnomah County recently analyzed a broad range of relocation and reconfiguration options before determining that construction of a large new headquarters building concentrating most of its administrative departments and some direct-service functions would be the most functional and cost-effective option. Initially, the County considered dispersing some functions into various other facilities. However, as the estimates of construction costs have risen, in part due to the upswing in the economy, the rationale for a single facility to centralize its activities has become increasingly apparent. The growing cost of continued occupation of the McCoy Building especially has contributed to a sense of urgency to relocate MCHD into a more energy-efficient facility built to contemporary seismic and safety standards.

To this end, the County has entered into a Development Agreement with the Portland Bureau of Housing to purchase the eastern portion of Block U, adjacent to the Bud Clark Commons. Subsequently, the County has worked with ZGF Architects to develop a conceptual design for a new building of sufficient size to accommodate the identified 130,000 square feet of program space, significantly more than the site's current maximum base development allowance of 105,000 square feet.

Throughout its decision-making process, the County engaged the public, including outreach to community residents and business leaders, formation of a Community Advisory Committee (CAC) and creation of a project website. As the design evolves, public outreach will continue, with broader public input sought at an open house to be convened in the near future. In addition to providing excellent public health services and using public resources wisely, MCHD is also committed to meeting energy, climate and equity goals.

The Portland Development Commission has committed to a grant of approximately \$27 million in Tax Increment Financing (TIF). This will bring 350 of MCHD's administrative and healthcare staff into the Old Town/Chinatown neighborhood and support many of the City's policies to maximize mixed-use development in this portion of the Central City. The County is committed—through a combination of available County funding and other funding mechanisms—to cover the remainder of project costs. Because the new building is intended to be constructed to LEED Gold standard, the savings from calculated reductions in operational costs will help offset the initial investment in the new facility.

## 2. Summary of Previous Planning

Planning efforts over the last four decades have spurred the transition of much of the River District from traditional industrial activities and warehousing to vibrant mixed-use neighborhoods that respond to the area's history, culture and setting. The City uses building envelop limitations (e.g. maximum height and bulk (FAR) standards) to preserve public views, protect open spaces from shadows and safeguard the scale of historic districts. The design review process, which is mandatory throughout the Central City Plan District, provides an additional nuanced way to evaluate the compatibility of new development with existing nearby development, including sensitive historic buildings. Instead of focusing solely on the building's development envelope, design review is an integrated approach that provides iterative and collaborative design oversight.

Downtown Plan (1972). This major planning effort to envision a new future for Downtown Portland, this document identified the area between NW Glisan St and Union Station as an "opportunity site" for redevelopment as a mixed-use housing, office, retail and entertainment district anchored by a festival marketplace at the station. Maximum heights in the area were set at 410 feet.

Central City Plan (1988). Expanding the geographic extent of the Downtown Plan, the Central City Plan provides the policy framework for the establishment of the Central City Plan District and is the origin of the height, bulk (FAR), and bonus option regulations found in Chapter 33.510 of the Zoning Code described above. Building on the Downtown Plan, the CCP sought to "ensure that the Union Station Clock Tower remains the dominant visual landmark in the area" by limiting the building envelope along broad view corridors that lead to the station, such as NW 6<sup>th</sup> Ave.

River District Plan (1995). This document envisioned a "vital urban community of connected, diverse, and mixed use neighborhoods" for the River District which would capture much of Portland's expected population growth. The plan amended the CCP to create the River District Subdistrict. New policies for the district supported extending "downtown development throughout the River District that is highly urban in character" to accommodate a large residential population with supporting jobs, services and recreation.

The River District Design Guidelines (1996). This companion document to the River District Plan created subdistrict-wide design guidelines (to be applied with the *Central City Fundamental Design Guidelines*) to ensure development was particularly sensitive to the district's distinct history and character. Specifically, new development here is required to "reinforce the identity of the Union Station area" by "designing new development to focus on the station area as the area's centerpiece."

Old Town/Chinatown Vision and Development Plan (1997/1999). At a finer scale, this vision/development plan for Old Town/Chinatown incorporated the blocks leading up to Union Station. This encourages new office and retail uses with high quality design (especially for public-sponsored projects) that are compatible with historic resources such as Union Station. As one of the three "Trailways" blocks leading to Union Station, Block U was specifically called out as a focus of interest for this kind of development.

Scenic Resources Protection Plan (1991). The Scenic Resources Protection Plan identified a significant view of the Central City and the Union Station Clock Tower from the east bank of the Willamette River (the Eastbank Esplanade was not constructed at that time). The view is protected by a scenic resource (s)

overlay zone with a 25 foot height limit extending from the viewpoint to the eastern edge of the Willamette River.

Union Station Clock Tower-Related FAR and Height Limitations Study (2000). This study focused on the land surrounding the Union Station Clock Tower: I-405 to the Willamette River; NW Hoyt St. to NW Lovejoy St. An inventory of views of the Clock Tower was developed and an ESEE analysis was performed, considering potential change to FAR and height. Significant views of the Clock Tower were identified at the NW 6<sup>th</sup> Ave Transit Mall; NW Johnson St at approximately NW 12<sup>th</sup> Ave; the east bank of the Willamette River (same location identified in the Scenic Resources Protection Plan); the Steel Bridge; and the Broadway Bridge. An ESEE Analysis was performed to consider the impacts of height on the views and the historic resources. The study recommended a maximum height of 75 feet and FARs that varied throughout the area from 4:1 to 6:1; the 6:1 FAR was applied to the subject site.

Central City Concept Plan (2012, updated 2015). As the first step in a major update of the 1988 Central City Plan, this plan developed a broad policy framework and urban design directives to guide the development of additional policies and implementation tools for the Central City. It includes an emphasis upon economic, housing and social goals, Willamette River enhancement and urban design excellence. This proposal supports the following Central City Concept Plan goals and policies:

Goal A: Focus on the Central City as the center of activity for “both the city and the region for commerce, employment, arts, culture, entertainment, tourism, education, and government” with policies for supporting higher employment densities, maintaining adequate safety and security, and fostering a resilient Central City, able to mitigate and respond to natural hazards.

Goal F: “Support the ability to meet human and health service needs of at-risk populations concentrated within the Central City.”

Goal K: “Encourage the development of diverse, high-density districts that feature spaces and a character that facilitate social interaction and expand activities unique to the Central City” through the maintenance of significant public views, establishment of “transitions between the Central City’s denser, taller, and more commercial and industrial land uses and adjacent neighborhoods, while highlighting key gateway locations,” and promotion of infill development while “enhancing the identity of historically, culturally, and architecturally significant buildings and places.”

Goal M: A focus on human health in the urban center combines a desire for green buildings, energy efficiency, and access to active modes of transportation in proximity to services and employment.

West Quadrant Plan (2015). This recently adopted plan adds to the direction of the Central City Concept Plan by specifying a number of additional goals including: embracing development while preserving historic and cultural resources; incorporating design elements that make each area distinct; and addressing climate change by encouraging innovative buildings that can serve as a model of sustainable development. A discussion of building heights and public views in the plan contains a concept map showing building height inclusive of all bonuses up to 250 feet on blocks adjacent to Block U. Plans for Old Town/Chinatown seek to leverage the area’s culturally-varied history to encourage visitors, accommodate new institutions and mixed-use developments with a target of adding 3,000 new jobs, and provide more amenities and services for residents and workers.

### 3. Existing Conditions, Zoning and Height Limits

The site of the proposed new MCHD facility is located on Block U, bounded by NW Broadway and NW 6th Ave between NW Hoyt and NW Irving Streets, one block south of Union Station in the Old Town/Chinatown neighborhood of the Central City's River District. The west side of the block contains the Bud Clark Commons building, which includes 130 studio units for residents who have been experiencing homelessness, a transitional shelter and day center. Completed in 2011, this facility will likely not redevelop in the foreseeable future. The proposed site for the MCHD building lies on the easterly portion of the block, on vacant land currently owned by the Portland Housing Bureau.

#### **CX Base Zone**

Block U is zoned Central Commercial (CX) with the Design ("d") overlay. The CX base zone allows a broad range of retail, office, institutional and residential uses and...

*... is intended to provide for commercial development within Portland's most urban and intense areas. A broad range of uses is allowed to reflect Portland's role as a commercial, cultural and governmental center. Development is intended to be very intense with high building coverage, large buildings, and buildings placed close together. Development is intended to be pedestrian-oriented with a strong emphasis on a safe and attractive streetscape. (Section 33.130.030.H)*

#### **Design Overlay**

The Design ("d") overlay zone requires development projects to go through discretionary design review, administered by the Bureau of Development Services. The design review process reflects the special consideration paid to new development and redevelopment in the Central City and "promotes the conservation, enhancement, and continued vitality of areas of the City with special scenic, architectural, or cultural value."

The *Central City Fundamental Design Guidelines* and the *River District Design Guidelines* are the design review approval criteria for the site and provide a nuanced tool for shaping building design. A proposed building must respond to specific direction within the guidelines to enhance the area's identity, strengthen gateways, complement existing buildings, provide view areas, and reinforce the identity of the Union Station area.

#### **Central City Plan District: Maximum FAR and Height**

The site is also within the Central City Plan District, which applies a number of additional zoning regulations specific to the Central City and its subdistricts, including development standards that govern the height, massing and scale of new development. These regulations are contained in Zoning Code Chapter 33.510.

Maximum FAR. The overall bulk of buildings in the Central City are limited through maximum floor area ratios (FAR), the amount of development allowed on a site expressed as a ratio of a building's total floor area to the size of the site. These FAR limits are shown on Map 510-2. Currently, the site has a maximum base FAR allowance of 6:1. An additional 3:1 of FAR could potentially be earned through the use of bonuses and/or transfers (described below) for a total of 9:1.



Maximum Heights. Maximum heights for development in the Central City are set for the purposes of:

*... protecting views, creating a step down of building heights to the Willamette River, limiting shadows on public open spaces, ensuring building height compatibility and step downs to historical districts, and limiting shadows from new development on residential neighborhoods in and at the edges of the Central City. (Section 33.510.205.A)*

The maximum building height on Block U is currently 75 feet, with no option to earn additional height through bonuses or transfers, as shown on the existing Map 510-3 (1 of 3) reproduced on the following page (arrow points to Block U).

Thus, the 17,500 square foot site would accommodate up to 105,000 gross square feet of developable area under the base 6:1 FAR allowance. A building of this size would be inadequate for locating MCHD's activities as described above into a single location. In addition, the maximum height of 75 feet would make it difficult to achieve the allowed FAR on the site. It should be noted that heights step-down precipitously in this area, with a 350 foot height allowance immediately to the south of Block U.

Height and FAR bonuses and transfers. Section 33.510.210 of the Zoning Code identifies FAR and height bonuses available in the Central City Plan District for social and environmental amenities such as housing, funds for affordable housing, daycare, roof-top gardens/eco-roofs, public art, and bicycle parking and locker rooms. As part of the ongoing CC2035 Plan project, an update of the 1988 Central City Plan (discussed in the next section), the bonus system is under review and will be re-tooled to better fit the City's current policy objectives. While the new bonus system is still under development, City Council has directed the Bureau of Planning and Sustainability to focus its work on prioritizing affordable housing development, historic preservation, seismic upgrades and publicly-accessible open space.

In designated areas illustrated on Map 510-3, bonus height is linked to the earned FAR bonus (Section 33.510.210.D). For example, providing amenities that equate to a bonus FAR of at least 2:1, but less than 3:1, earns a height bonus of 30 feet in addition to the base height, because additional height is the only way to accommodate increased FAR. The maximum bonus height that may be earned is 45 feet.

In addition to the various FAR bonuses, additional FAR above the base allowance may be used on a site through FAR transfers described in Zoning Code section 33.510.200 and in applicable base zone sections of the code. These include transfers from sites with designated historic landmarks and single room occupancy hotels. These transfers also earn bonus height under section 33.510.210.D, with a limit of 45 additional feet earned through any combination of FAR bonuses and transfers.

Currently, Block U is not included in the area eligible for increased height identified on Map 510-3. Therefore it would be difficult to achieve greater development capacity through the bonus mechanism. Designated areas eligible for height bonuses are:

*... located such that increased height will not violate established view corridors, the preservation of the character of historical districts, the protection of public open spaces from shadow, and the preservation of the City's visual focus on important buildings (such as the Union Station Clock Tower). (Section 33.510.210.D)*

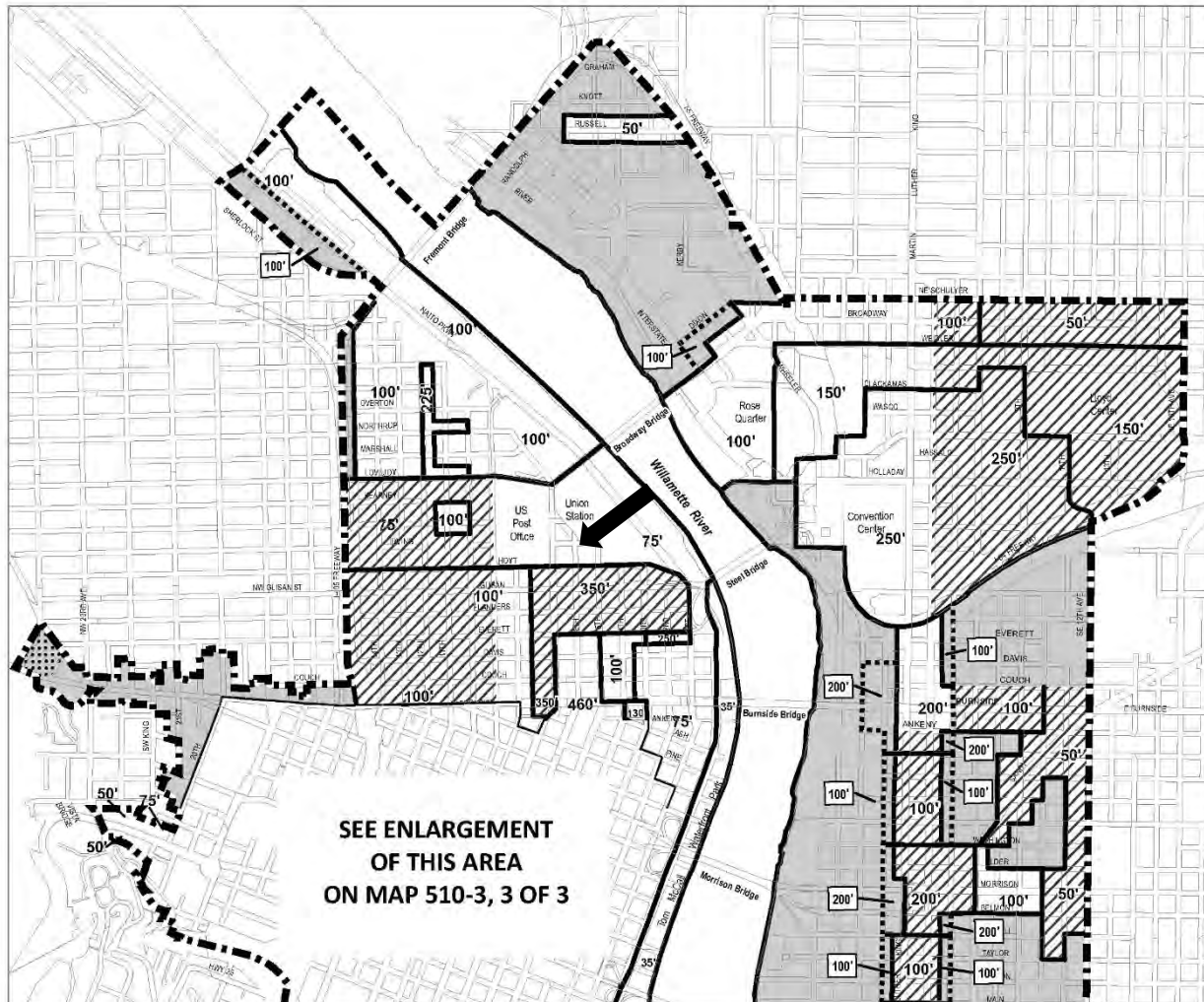
The existing restriction of 75 feet limits development on Block U quite dramatically relative to adjacent blocks. As illustrated in Map 510-3, the blocks immediately to the south of Block U have height limits that could result in buildings up to 350 feet.

# Existing Maximum Heights

# Map 510-3

Map 1 of 3

Map Revised March 1, 2015

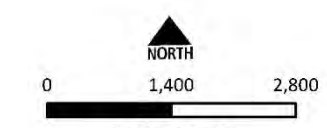


SEE ENLARGEMENT  
OF THIS AREA  
ON MAP 510-3, 3 OF 3

**Legend**

<b>X'</b>	Maximum building height		Areas where maximum height is determined by base zone		Area eligible for general and housing height bonus
<b>X'</b>	Allowable building height when rezoned to EX or CX				Area eligible for housing height bonus only

- Central City Plan District boundary
- Maximum heights area boundary
- Boundary of area when building heights are tied to rezoning to EX or CX



Scale in Feet  
Bureau of Planning and Sustainability  
Portland, Oregon

### III. Summary of ESEE Analysis: Views of the Union Station Clock Tower

The Draft Central City Scenic Resources Inventory to be released by the Bureau of Planning and Sustainability in April 2015 identified the Union Station Clock Tower as a scenic resource. Because Block U is located near the Clock Tower, an Economic, Social, Environmental and Energy (ESEE) analysis was undertaken to evaluate the potential effect of the proposed MCHD structure on identified views of the Clock Tower. The complete ESEE Analysis is contained in Appendix A.

#### 1. Identified Views

The following views of the historic Union Station Clock Tower were identified as significant relevant to the location of potential development on Block U<sup>1</sup>:

- NW 6<sup>th</sup> Ave: A right-of-way policy adopted in 1982 identified the tower as a “visual focal point” from the “primary view corridor” along NW 6<sup>th</sup> Ave looking north.
- East Bank of the Willamette – *The Scenic Views, Sites and Drives Inventory* identified a viewpoint from the east bank of the Willamette River on N. Thunderbird Way.
- Views from the Broadway and Steel Bridges were identified in the *Central City Plan* urban design map.

For ESEE analysis, images were generated to illustrate potential building envelopes on the eastern half of Block U at 75, 120 and 150 feet from each of the identified viewpoints. These have been used to determine “conflicting uses” and the degree and nature of their potential adverse impacts on the preservation of scenic views of the Clock Tower.

As shown in the table below, the ESEE analysis determined that the use of the site consistent with the base zone and Central City Plan District regulations with maximum building heights of up to 150 feet creates minor conflicting uses when measured against protecting views of the identified scenic resource.

#### Conflicting Uses Associated with Various Maximum Building Heights on Block U

Key Views	MAXIMUM HEIGHT		
	75 ft.	105 ft.	150 ft.
NW 6th and Glisan	None	None	None
Steel Bridge	None	Minor	Minor
Broadway Bridge	None	Minor	Minor
N Thunderbird Way	None	None	None

In the ESEE analysis, potential environmental, socio-economic and energy benefits are identified that would result from use of the site with greater building capacity, particularly if used for office or institutional use. The environmental analysis found minor impacts on the identified scenic resource, as

<sup>1</sup> Additional views of the Union Station Clock Tower were initially screened for potential impact from development on the subject site. It was determined that the subject site is located far enough away from the Clock Tower to have no impact on those views.

well as opportunities to mitigate for these impacts through the mandatory Design Review process and the provision of public amenities through bonuses and/or transfers.

## **2. Summary of ESEE Recommendations**

The conflicting uses between a building of up to 150 feet in height on the undeveloped portion of Block U and preservation of scenic views of the Union Station Clock Tower are minor. Increasing the maximum building height to 105 feet has little effect on the prominence of the Clock Tower from identified viewpoints. Additional height up to a total of 150 feet accrued through bonuses increases the conflicts slightly, but is mitigated by the provision of socio-economic-, environmental- and energy-related benefits that fall within the scope of this analysis. The ESEE analysis recommended that the conflicting uses be limited by providing a maximum base height on the site of 120 feet and access to bonuses with a potential maximum of 150 feet of height. Since the completion of the ESEE analysis, staff has revised the recommendation to reduce the increase of the base allowed height from 120 feet to 105 feet. Building heights above 150 feet should be prohibited. This trade-off will retain the prominence of the significant scenic resource via a step-down in building heights, while allowing the benefits of greater development at this critical site in the downtown landscape.

## **3. ESEE Implementation Tools**

The ESEE recommendation can be implemented through amendments to existing height regulations and the application of land use review procedures. The amendment of Map 510-3 of the Zoning Code will limit the base height on Block U to 105 feet. Forty-five feet of additional height may be earned through bonuses and/or transfers for a total maximum of 150 feet, with mitigation coming from provision of public benefits such as daycare, roof-top garden/eco-roof, public art, bicycle parking and locker room facilities, payments into an affordable housing fund, and/or FAR transfers from a historic landmark. As part of the recent West Quadrant Plan adoption process, City Council has directed the Bureau of Planning and Sustainability to focus its work in developing a new bonus system on prioritizing affordable housing development, historic preservation, seismic upgrades and publicly-accessible open space. The integration of any new building within established view corridors will be a component of the required Design Review.

Image from ESEE analysis showing MCHDHQ facility at 150 ft. in relation to future development potential in the area and Union Station Clock Tower.

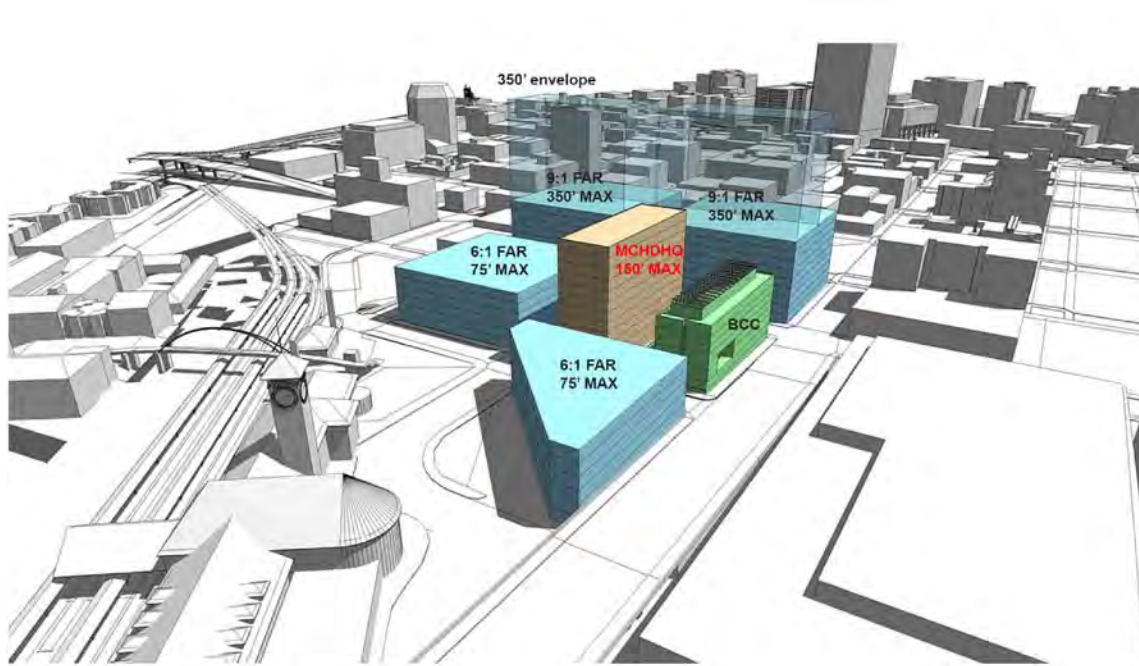


Image from ESEE analysis showing MCHDHQ facility at 150 ft. with view of Union Station along NW 6<sup>th</sup>



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## **IV. Proposed Amendment to Zoning Code Map 510-3**

### **Commentary**

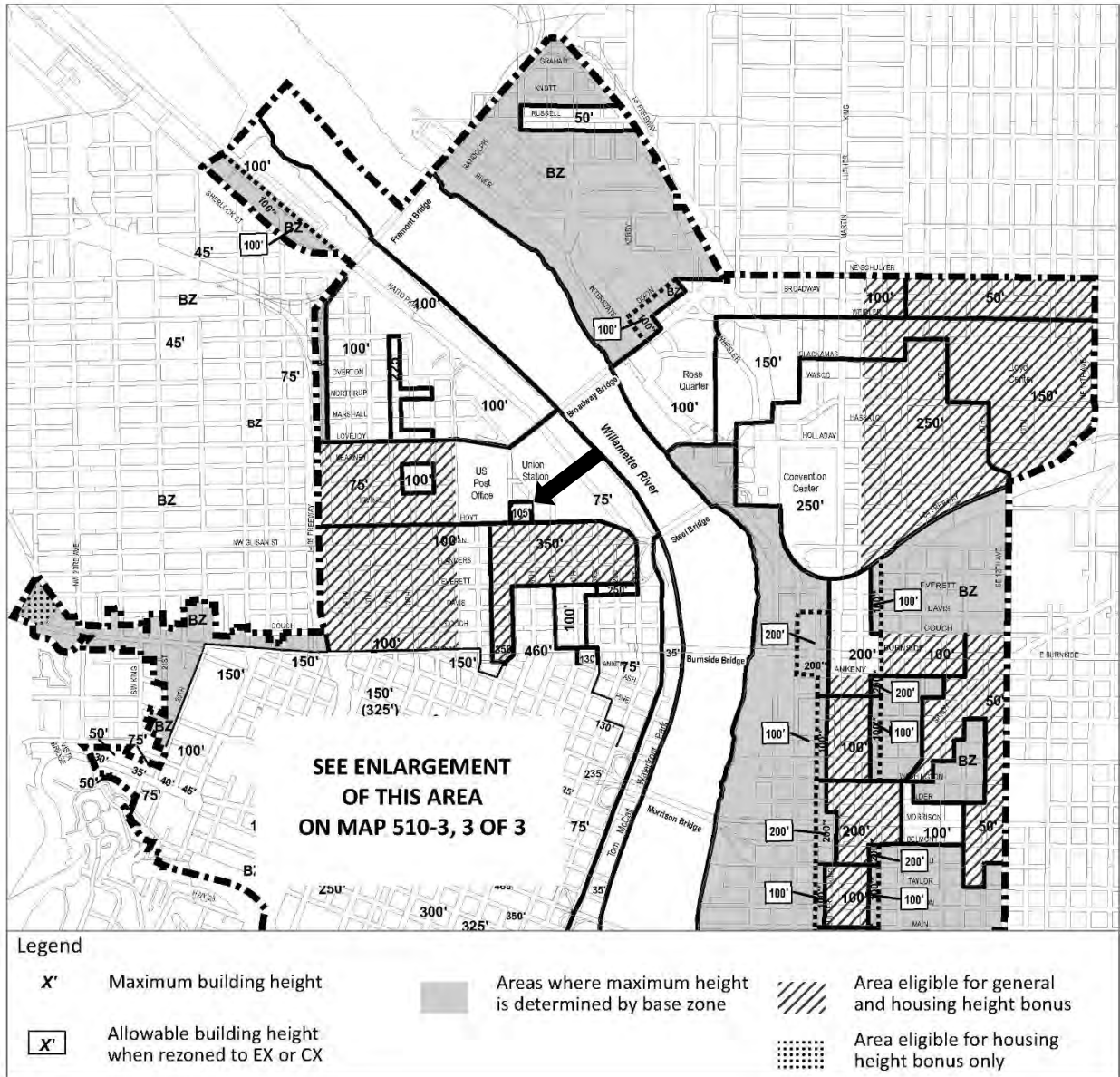
Two changes to Map 510-3, Maximum Heights of Zoning Code Chapter 33.510 are proposed. The amended map changes the maximum base building height on Block U, bounded by NW Broadway and NW 6th Avenues between NW Hoyt and NW Irving Streets, from 75' to 105'. It also adds Block U to the "Area eligible for general and housing height bonuses." This change will allow new development on the block to be built to a base height of 105' with the option of earning height bonuses of up to an additional 45'. Block U is indicated with an arrow, for identification purposes only.

# Proposed Maximum Heights

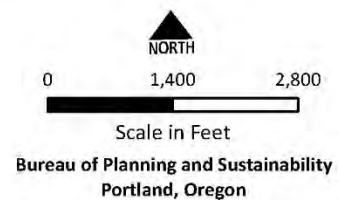
# Map 510-3

Map 1 of 3

Map Revised Xxxx X, 2015



- Central City Plan District boundary
- Maximum heights area
- Boundary of area when building heights are tied to rezoning to EX or CX





**APPENDIX A: ESEE ANALYSIS FOR THE  
PROPOSED MAP AMENDMENTS IMPACTING BLOCK U COUCH'S ADDITION  
TO THE CITY OF PORTLAND  
DRAFT March 20, 2015**

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**1. INTRODUCTION**

The purpose of this Economic, Social, Environmental and Energy (ESEE) Analysis is to evaluate the trade-offs associated with different building envelope entitlements for Block U of the Couch's Addition in Old Town/Chinatown and their effect upon significant scenic resources. The ESEE Analysis informs the Portland City Council's decision regarding the proposed amendment of Map 510-3 of the Zoning Code.

This ESEE includes detailed descriptions of the issues that should be considered for each of the four topics: economic, social, environmental, and energy. The analysis explores the consequences of various building development standards that could have an adverse impact upon significant scenic resources identified in the City of Portland's Scenic Resources Inventory, printed separately and available online at <http://www.portlandoregon.gov/bps/article/89965>.

The ESEE is a qualitative decision-making tool that relies on existing information. Information is presented in narrative descriptions illustrated by massing and viewpoint studies. For primary views, each of the six sections below describes the consequences of allowing, limiting or prohibiting conflicting uses and development allowances.

The final section includes a recommended decision that describes to what extent the different building envelope entitlements should be limited to protect significant scenic resources and provides programmatic tools that should be used to implement the decision.

**1.a. Scope of This ESEE Analysis**

This analysis looks at potential conflicts between allowing increased building envelope entitlements and protecting the scenic resource on the basis of economic, social, environmental, and energy consequences as required by the State of Oregon Administrative Rule for Statewide Planning Goal 5 (Natural Resources, Scenic and Historic Areas, and Open Spaces). This is accomplished by examining the uses and the proposed building development standards in the underlying zoning district to determine if they create a conflicting use, as defined by the administrative rule, which could adversely affect the identified scenic resource.

According to Goal 5, conflicting uses can be allowed despite the possible adverse impacts upon the scenic resource if the ESEE analyses "demonstrate that the conflicting use is of sufficient importance relative to the resource site, and must indicate why measures to protect the resource to some extent should not be provided" [660-023-0040 (5)(c)]. If the conflicting use and the resource are determined to be of comparable importance, then the conflicting use "should be allowed in a limited way that protects the resource site to a desired extent" [660-023-0045(5)(b)]. The ESEE Analysis may also determine that "the conflicting uses are so detrimental to the resource, that the conflicting uses should be prohibited" [660-023-0045(5)(a)].

### **1.b. Geographic Scope of the ESEE Analysis**

The ESEE Analysis is being performed for Block U in the Old Town/Chinatown Neighborhood. Bounded by NW Broadway and NW 6th Avenues between NW Hoyt and NW Irving Streets, the west side of the block has recently been developed for the Bud Clark Commons, which for purposes of this ESEE analysis it is assumed will not redevelop in the foreseeable future. Block U lies within the Central City Plan District and is zoned Central Commercial (CX) with the Design (“d”) overlay.

### **1.c. Building Development Standards under Analysis**

The proposal under consideration is to amend Map 510-3 of the Central City Plan (Chapter 33.510) of the Portland Zoning Code to alter the development standards of Block U. Two categories of building development standard specified in Map 510-3 are proposed to be amended as follows:

- Increase the maximum height allowance from 75’ to 105’.
- Include in the area eligible for general and housing height bonuses that would allow up to an additional 45’ of height, for a maximum of 150’.

As illustrated on Map 510-3, maximum height within the Central City is determined according to 33.510.205 for the purpose of:

...protecting views, creating a step down of building heights to the Willamette River, limiting shadows on public open spaces, ensuring building height compatibility and step downs to historical districts, and limiting shadows from new development on residential neighborhoods in and at the edges of the Central City. (33.510.205.A)

Also as illustrated on Map 510-3, height bonuses within the Central City are available in qualifying areas

...located such that increased height will not violate established view corridors, the preservation of the character of historical districts, the protection of public open spaces from shadow, and the preservation of the City's visual focus on important buildings (such as the Union Station Clock Tower). (33.510.210.D)

As illustrated in Figure 1, there is a great disparity in potential building height in the vicinity of Block U. The blocks immediately to the south have a height limit with bonuses available that could result in buildings up to 350', considerably taller than the current maximum for Block U or that proposed by the map amendment.

### **1.d. Scenic Resources Related to Site Affected by Map Amendment**

The development site, the eastern portion of Block U located at NW 6th Avenue and NW Hoyt Street in the Old Town/Chinatown Neighborhood, is ~400’ southwest of historic Union Station and is within the impact area for this designated scenic resource. Completed in 1896, the station has been a prominent landmark in downtown Portland for over a century. Due to the orientation of the station at an angle to the street grid, the station ‘faces’ downtown and its 150’ Clock Tower is aligned with NW 6<sup>th</sup> Avenue. In its 1989 Scenic Resources Inventory (SRI), the City recognized the tower as viewed from NW 6<sup>th</sup> Avenue as a “significant scenic resource”, identifying it as a primary feature of the Central City. Other views of the tower from specific vantage points have been protected since the 1990 adoption of the Scenic

Resources Protection Plan. These views were re-evaluated in 2000, resulting in updated regulations based on the *Union Station Clock Tower-related FAR and Height Limitations Study*. This analysis is the basis of the maximum heights and availability of FAR bonuses on Map 510-3. Currently the Bureau of Planning and Sustainability (BPS) is updating the SRI that forms the basis of current protections. This refinement of the Scenic Resources Inventory is in draft form, but provides an opportunity to re-evaluate the development restrictions in the immediate area.

### 1.e. Key Views Relative to Block U

The *Union Station Clock Tower-Related FAR and Height Limitations Study* (2000) provides an overview of policy and inventory documents that locate key views of the historic Union Station Clock Tower. Of these, the following are relevant to the location of Block U in the potential view-shed.

- NW 6<sup>th</sup> Avenue -- a right-of-way policy adopted in 1982 identified the tower as a “visual focal point” from the “primary view corridor” along NW 6<sup>th</sup> Avenue.
- East Bank of the Willamette -- *The Scenic Views, Sites and Drives Inventory* identified a viewpoint from the east bank of the Willamette River on N. Thunderbird Way.
- Views from the Broadway and Steel Bridges were identified in the *Central City Plan* urban design map.

For this ESEE analysis, images have been created to illustrate the potential building envelopes at 75', 105' and 150', allowed by increasing maximum height with and without height bonuses, from each of the identified viewpoints. These have been used to determine “conflicting uses”, the degree and nature of adverse impacts of this expanded development capacity of the site on the preservation of the scenic views of the Clock Tower.

### 1.f. Brief Description of Multnomah County Health Department Headquarters

Although this ESEE does not consider a particular proposed use, the possible location of a new headquarters and clinic facility for the Multnomah County Health Department (MCHD) on the eastern portion of Block U immediately adjacent to the recently completed Bud Clark Commons building is used as an example of potential use of the site. Subject to design review approval, the new MCHD Headquarters would consist of approximately 120,000-150,000 gross square feet of building at 120'-150' in height. MCHD serves the 748,000 county residents and is the largest safety-net health care provider in Oregon with 33 primary care, school-based, dental and specialty clinics. This project will benefit the public by creating an efficient, centralized administration that includes the Department's leadership and additional services such as emergency preparedness and response for public health emergencies, the communicable disease program, specialty clinics, pharmacy and electronic medical records. The relocation will house up to 350 of the department's employees.

## 2. Conflicting Use Analysis

This ESEE Analysis considers conflicts between the range of uses available within the base zone with a generalized development built to the proposed amended development standards and the identified key views of the scenic resource.

## 2.a. Allowed Uses

As the site is zoned Central Commercial (CX), a wide range of uses is allowed by right within the Central City Plan District, which is intended to provide for intense commercial development with large buildings envelopes and extensive building coverage. Development on the site could include any combination of housing, retail, institutional, or office uses.

## 2.b. Conflicting Use Impacts

The allowed uses on Block U do not have a direct impact on the scenic resource, but the building resulting from the proposed development standards must be analyzed to determine the potential adverse impact upon identified key views of the Union Station Clock Tower. In turn, the determination of “conflicting uses” for the purposes of the ESEE analysis then include potential uses in the additional FAR made available by the proposed expansion of the building envelope. These scenarios can be separated into, 1) a height allowance of 105’, and 2) access to an additional 45’ of height bonuses.

Potential conflicting uses are:

- Reduction in the visibility of the clock tower from an identified view corridor.
- Building height and mass next to or behind the clock tower that could make the tower less prominent.

The following Key Views are illustrated in the following figures and a matrix provided that classifies whether the resulting building envelope constitutes a conflicting use.

NW 6th and Glisan. Because the Clock Tower is centered in the right-of-way, the view corridor as seen looking north up NW 6<sup>th</sup> Avenue is not altered by variations in the height of development allowed on the eastern half of Block U. As illustrated in Figure 1, the existing buildings in the foreground contribute to the view down NW 6<sup>th</sup> Avenue with mature street trees framing the Clock Tower in the distance. There is not a conflict in the proposed use at either 105' or 150' and in maintaining the primary view corridor.

Center of Steel Bridge looking Northwest. Any development on Block U will be prominent from this viewpoint, and increasingly so as the building height increases, but will not block the view of the Clock Tower. In the panorama shown in View 2, the additional height proposed for the site provides for a building that balances the tall towers either recently completed or under construction in the River District north of Union Station. The location of Block U in the foreground of the view provides adequate air space in and around the Clock Tower to preserve its prominence as viewed from this location. Any conflict between the use and the scenic resource is negligible at 105' and minor at 150'.

Center of Broadway Bridge looking Southwest. As shown in View 3, the additional height proposed, in proximity to the Clock Tower might make the tower less prominent, but would not exceed it in height at either 105' or 150'. Appropriate design of the facades could result in the building blending in with other downtown buildings in the background behind the tower; this could be assured through the required Design Review. There is minor conflict in the proposed use at both 105' and 150' in terms of the “scenic panorama”.

View from Old Thunderbird Site. In View 4, development on Block U appears directly behind the Clock Tower, but with sufficient distance to mitigate the effect on air space around the tower that could potentially make it appear less prominent. Since clusters of development and the West Hills already

constitute the background, the view of the Clock Tower from this vantage point will not be in conflict with maintaining the scenic resource at either 105' or 150'.

**Conflicting Uses**

Key Views	MAXIMUM HEIGHT		
	75'	105'	150'
NW 6th and Glisan	None	None	None
Steel Bridge	None	Minor	Minor
Broadway Bridge	None	Minor	Minor
Old Thunderbird site	None	None	None

As shown in the figures and summarized in the table above, additional height, either 105' or 150', will not reduce the visibility of the Clock Tower from the key viewpoints. Therefore, for the purposes of this ESEE, the use of the site consistent with the base zone and Central City Plan District with allowable building heights up to 105' and 150' are minor conflicting uses when measured against maintaining the identified scenic resource.

**3. Economic Analysis**

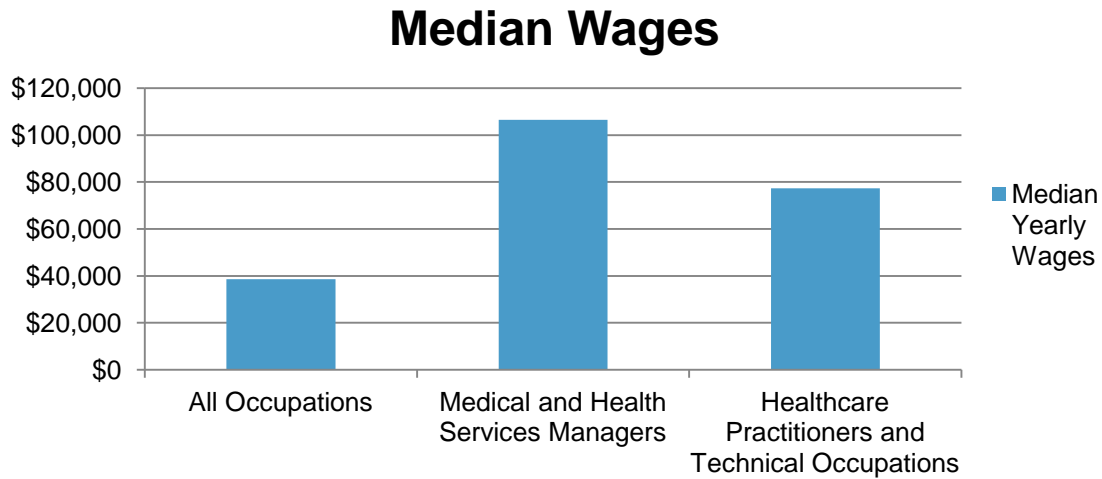
This section examines the economic consequences of allowing, limiting or prohibiting the previously - identified conflicting uses for Block U relative to protecting the Union Station Clock Tower, an identified scenic resource.

**3.a. Development/Uses**

- i. Employment and Economic Services.** As the underlying zoning allows a wide variety of uses, the potential conflicting uses presented by increased development capacity has a variety of employment outcomes. If developed with housing, there is little effect on employment by limiting or prohibiting the conflicting use. However, if developed with retail, commercial, office or institutional uses, the reduced building capacity that results from limiting or prohibiting the uses will have a significant impact upon employment in the Central City. As a neighborhood adjacent to the Central Business District, Old Town/Chinatown has long suffered from fewer jobs than expected given its proximity to business activity, entertainment and transportation networks.

By way of example, the potential location of the Multnomah County Health Department Headquarters at this site would result in up to 350 administrative and health-care related jobs in the area. These are significantly better paying jobs than the regional average as shown in Table 1 below. Limiting or prohibiting the conflicting use would at a minimum reduce the number of jobs at the site, but also might result in the inability of a user to utilize the site because it lacks capacity to consolidate administrative and service-providing functions into a singular location.

**Table 1: Median yearly wages by occupation class in the Portland-Vancouver-Hillsboro Area<sup>1</sup>**



**ii. Economic efficiencies due to location.** Designated for intense development, this site is located within a critical distance of the CBD-focused government, business and institutional centers of activity that make additional building capacity for non-residential uses extremely beneficial. There are numerous economic benefits generated by the close proximity of commercial activities, institutions and industries. For client-focused industries such as medical clinics or retail uses, Block U is close to a variety of transit options – bus, streetcar and LRT -- and high-density housing would provide a significant locational advantage. On the other hand, limiting or prohibiting increased conflicting uses on Block U would reduce the potential economic benefits from these economic efficiencies and collaborative opportunities.

**iii. Property values and rents.** The conflicting uses accommodate additional building capacity that would increase property values and provide additional housing, retail, office or institutional space that would be rent- and property tax-generating. An increase in neighboring values and rents also could be anticipated. Limiting or prohibiting the conflicting uses would likely reduce this anticipated increase.

**iv. Multiplier effect of development within district.** If developed with housing, the increased proposed capacity would result in more residents in the Old Town/Chinatown District, in turn generating greater demand for nearby retail, social and entertainment services. For office and institutional uses, there is often a corresponding multiplier effect on job creation associated with economic stimulus and collaborative opportunities. For example, if the potential MCHD Headquarters was to be developed on the site, up to 350 employees would be relocated to the site that potentially would result in another 350 jobs created nearby. Given the downtown location and pedestrian-/transit-oriented nature of the built environment in Old Town/Chinatown, the concentration of jobs as a result of the multiplier effect similarly would be located in the Central City. Limiting or prohibiting the conflicting uses would then necessarily reduce both the jobs directly created on the subject site as well as jobs in the area resulting from the multiplier effect.

<sup>1</sup> Source: Bureau of Labor and Statistics. May 2013. *Metropolitan and Nonmetropolitan Area Occupational Employment and Wage Estimates*.

### 3.b. Views and Tourism

In Portland, a significant amount of economic activity in the downtown neighborhoods is generated by tourism, and thus the protection of historic scenic resources is a critical component in maintaining a desirable and attractive Central City. As identified above, the primary view from NW 6<sup>th</sup> Avenue would not be affected by allowing additional building capacity on Block U. Other vantage points may be affected by the additional height allowances. However, these views are panoramic views of large portions of the Downtown and River Districts, with the West Hills as a backdrop. Regardless of the use of the building and its height at this location, proposed development will be subject to mandatory Design Review, which by its nature is concerned with aesthetics and scenic resources. Making the site eligible for height bonuses that accrue in exchange for the provision of such benefits as public art and water features would help to mitigate for conflicts that result from increased height.

## 4. Social

This section examines the social consequences of allowing, limiting or prohibiting conflicting uses for Block U.

### 4.a. Development/Uses

- i. **Employment.** The social benefits that accrue from an increased concentration of jobs within the Central City in proximity to transportation networks consist of reduced commute times, more opportunities for living close to work, more time for family and friends, and increased access to other entertainment and recreational opportunities in downtown Portland. As the building envelope expands, the potential for additional jobs on the site increases these social benefits. Limiting or prohibiting the expansion of the building envelope will, in turn, limit the accrual of these social benefits.
- ii. **Services provided and relationship to location.** Maximizing the intensity of development in locations well-served by Central City transit has been a cornerstone of multiple planning efforts including the current update of the Comprehensive Plan. Providing workforce and affordable housing options adjacent to and within the Central City and/or creating new employment concentrations of office and institutional activities facilitate fuller use of transportation infrastructure in addition to increased opportunities to walk and bike. Additional activation of nearby retail, entertainment and related services would likely result from concentrations of workers at the site. Limiting the development capacity of these uses reduces the social benefits ascribed to increased density in the Central City, potentially increasing home-to-work commutes, and reducing recreation and family time.
- iii. **Security and safety.** Bringing 350 workers to this location would increase street level pedestrian activity and the “eyes on the street” that contributes to overall public safety by providing natural surveillance of the surrounding spaces. Additionally, many uses seek to control access to their buildings including housing, institutions or commercial users. Concentrating a variety of functions in a single building provides the opportunity for greater security in controlling access. For example, with enough building capacity, a large facility for MCHD can concentrate functions such as administrative offices, clinics and pharmacy on a single site, combining security and access measures. Limiting the conflicting uses would reduce the building capacity and require institutions

to disperse their functions across multiple structures potentially reducing security and safety for their employees and clients.

#### 4.b. Views

- i. **Portland's imageability.** As a component of the broader panorama of Portland's skyline, allowing the conflicting uses above 150' could detract from the projected image of the building tower clusters that define the CBD from the River District and, in turn, from the South Waterfront District. Limiting the conflicting uses in buildings under 150' would allow such development to become an integral part of the cluster of buildings behind the Clock Tower that step up to greater heights as one moves southward. Limiting the uses to buildings below 120' would not result in a more defined image of the CBD, and could even create a more jarring transition from the lower building profile clustered around Union Station to the much taller buildings downtown.
- ii. **Historic and/or cultural importance.** Since its construction at the end of the 19<sup>th</sup> Century, Union Station has served as the north gateway to Portland's Central City. Situated astride the north end of NW 6<sup>th</sup> Avenue, the station served to connect train passengers to the local transportation network that brought visitors directly into Downtown. Thus, the Clock Tower defined the return route. As demonstrated above, limiting the conflicting uses to those that extend to only 150' will not block the view of the tower from NW 6<sup>th</sup> Avenue, so will not detract significantly from the cultural and historic importance placed on Central Station.
- iii. **Neighborhood Identity.** Although rail is no longer the predominant travel mode to Portland, it retains its historic and cultural importance, and, in so doing, defines the broader neighborhood as the scene of arrival. Even as many functions in the neighborhood have changed—for example, industrial and warehousing activities are no longer the leading activities—other historic activities remain. The neighborhood is still one of arrival, or stopovers, where services for those with few other options can be found. Its role as a node in various transportation networks is reinforced by the presence of the Bus Station and several LRT and streetcar routes that connect the Central City to outlying areas. Limiting the conflicting uses to buildings of 150' or less will not detract from the historic neighborhood identity as a transportation hub, and many uses that locate within the expanded building envelope would reinforce it. For example, creation of the MCHD Headquarters on Block U would continue the neighborhood's historic role of providing social- and health-related services to a broad component of Portland residents.
- iv. **Sense of place.** Union Station, with its distinctive Clock Tower, is historically designated, situated as it is at a critical juncture of the underlying street grid, giving it a distinct presence in the urban landscape. This sense of place is reinforced by the broad deference paid to the station by surrounding properties, which do not exceed the 150' Clock Tower, its highest element, in height and which are placed at some distance from its grounds. Limiting the conflicting uses on Block U would not detract significantly from the sense of place associated with Union Station.
- v. **Way-finding.** As a prominent view from many of the bridges over the Willamette River, the Clock Tower serves as a beacon in determining one's relative location within the west side of the Central City. Limiting the conflicting uses in buildings of up to 150' would contribute to this orientation role. The station's historic structure will continue to feature prominently in views as one approaches or moves through downtown even as nearby properties develop/redevelop.



- vi. **Air space.** As a prominent focal point from viewpoints in and around Downtown for more than a century, the Clock Tower is an important historical reminder of Union Station’s historic role and continuing presence in the urban landscape. Building height limitations in its immediate vicinity maintain sufficient views of the station from key corridors to retain its prominence as a scenic resource.

## 5. Environmental

This section examines the environmental consequences related to allowing, limiting or prohibiting conflicting uses for Block U.

### 5.a. Development/Uses

- i. **Efficiencies due to location.** Concentrating development activity in a location in the Downtown provides a number of environmental benefits related to creating efficiencies in transportation, building infrastructure, and heating and cooling. In contrast limiting or prohibiting the conflicting uses either limits the desirability of the site for redevelopment altogether or results in a limited amount of development that does not have the same level of efficiency. Additionally, it has often been suggested that the trade-off for protecting environmental resources within the Regional Urban Growth Boundary (UGB) is increased intensity of development in the Central City and other urban centers. Any reduction in the development capacity of Block U must necessarily increase development pressures in locations less ideally situated in the urban landscape.
- ii. **Heat Island.** The hard-scape of buildings in a predominately paved urban environment in combination with combustion engines and building heating and cooling systems create a net increase in ambient temperatures referred to as ‘heat island’. Potentially, a larger building with a larger, if more efficient, heating and cooling system will result in a larger contribution to overall heat island in the Central City. However, allowing the conflicting uses that result from access to building height bonuses would be more likely to result in buildings with green roofs that help to mitigate the heat island effect by limiting the reflectivity of roof-top surface materials. The required plantings actively cool the immediate environment through evapotranspiration.
- iii. **Stormwater.** Stormwater management is required of all new developments, but allowing the conflicting uses that result from access to building height bonuses would encourage the use of a rooftop garden that would also serve as a stormwater facility, slowing down and reducing the flow of rooftop-collected stormwater into the City’s stormwater system. Limiting or prohibiting the conflicting uses would reduce the incentives for providing rooftop stormwater management via an eco-roof.

### 5.b. Views

The following section discusses environmental components of the aesthetic experience of views.

- i. **Shadow.** The most significant environmental consequence of allowing a larger building envelope would be potential effects of shadow on neighboring properties, particularly public parks or viewpoints. As shown in Figure X, on April 21<sup>st</sup>, the shadow from a 150’ building built on the developable portion of Block U would not diminish the experience of any public open space or viewpoints in the area. The long access of the building is oriented north-south and the southern

façade will be only 87.5', therefore the long shadows created closer to the Winter Solstice will be very thin, falling largely on the parking lot adjacent to Union Station.

- ii. **Glare.** The proposed map amendment would increase the area of exterior building wall, that if clad in materials with high reflectivity could result in an increase in glare. These effects could be reduced by limiting or prohibiting the conflicting uses, but could be equally mitigated through the Design Review process that will mandate careful consideration of exterior materials in accordance with preserving scenic resources in the impact area.
- iii. **Wind tunnel.** Tall buildings in downtown locations often direct and funnel air currents creating a wind tunnel effect. In this location at the edge of the area of the central city where greater building heights are allowed, there would be little additional development of tall buildings that would reinforce the direction of air currents and affecting pedestrians in the area. This impact can also be addressed during the mandatory design review process.

## 6. Energy

This section examines the energy-related consequences from allowing, limiting or prohibiting conflicting uses for Block U.

### 6.a. Development/Uses

- i. **Efficiencies due to location.** Greater building capacity at a site such as Block U that is well-served by transit and near significant concentrations of jobs, services, and housing would increase energy efficiency. By way of example, the potential location of the MCHD Headquarters in this location would result in up to 350 administrative and health-care related jobs in the area, which are currently dispersed through the County. Co-locating these employees in single site provide a reduction in the amount of driving between job sites. Presumably, a similar efficiency would be created for clients who need to seek services and visit administrative offices in a single trip. Limiting or prohibiting the conflicting use would at a minimum reduce the efficiencies of concentrating a number of services at the site, but might result in the inability of a user to utilize the site because of the lack of opportunity to locate a number of a functions into a singular location.
- ii. **Construction and building materials.** Increasing building height and, therefore, building area on a site such as Block U increases the amount of building materials required but also maximizes the efficient use of structural elements and building services. Limiting or prohibiting uses in conflict with scenic views would reduce this efficiency.
- iii. **Heating and cooling.** Similarly, the economies of scale of heating and cooling a larger building result in greater energy efficiency. Limiting or prohibiting uses in conflict with scenic views would reduce this efficiency.

## 7. Recommendations

### 7.a. Recommended ESEE Decision

As demonstrated above, the conflicting uses between a building of up to 150' on the undeveloped portion of Block U and preservation of scenic views of the Union Station Clock Tower are minor.

Additional height, either 105' or 150' will not block or partially block the view of the Union Station Clock Tower. Increasing the building height to 105' has little effect on the prominence of the tower from identified viewpoints. The ability to accrue additional height through bonuses increases the conflicts slightly, but is mitigated by the provision of social, economic, environmental, and energy-related benefits that fall within the scope of this analysis. It is recommended that the conflicting uses be limited by providing a maximum base height on the site of 105' and access to bonuses with a potential maximum of 150' of height. Building heights above 150' should be prohibited to maintain the step down from larger buildings south of the site. This trade-off will retain the prominence of the significant scenic resource while allowing the benefits of greater development at this critical site in the downtown landscape.

**7.b. Implementation Tools**

The ESEE recommendation can be implemented using existing regulations and land use review procedures. The amendment of Map 510-3 of the Zoning Code will limit the base height of development on Block U to 105', with additional height bonuses creating the potential for greater height limited to 150' with mitigation coming from provision of a daycare center, rooftop garden and eco-roof, public art, funds for affordable housing, transfers from historic landmarks and/or locker room and bicycle parking facilities. The integration of any new building within the views from critical vistas throughout the downtown area will be a component of the required Design Review.

**Referenced Documents**

- Central City Plan (1988)*
- Scenic Resources Protection Plan (Adopted 1990)*
- Scenic Resources Inventory: Central City (DRAFT – to be released April 2015)*
- Union Station Clock Tower-Related FAR and Height Limitations Study (2000)*
- Scenic Views, Sites, and Drives Inventory (1989)*
- Scenic Views, Sites, and Corridors (1991)*
- Encroachments in the Public Right-of-Way City-Wide Policy (1982)*

**Maps**

- Map of Site Location
- Map of Scenic Resource and View Corridors

**Tables**

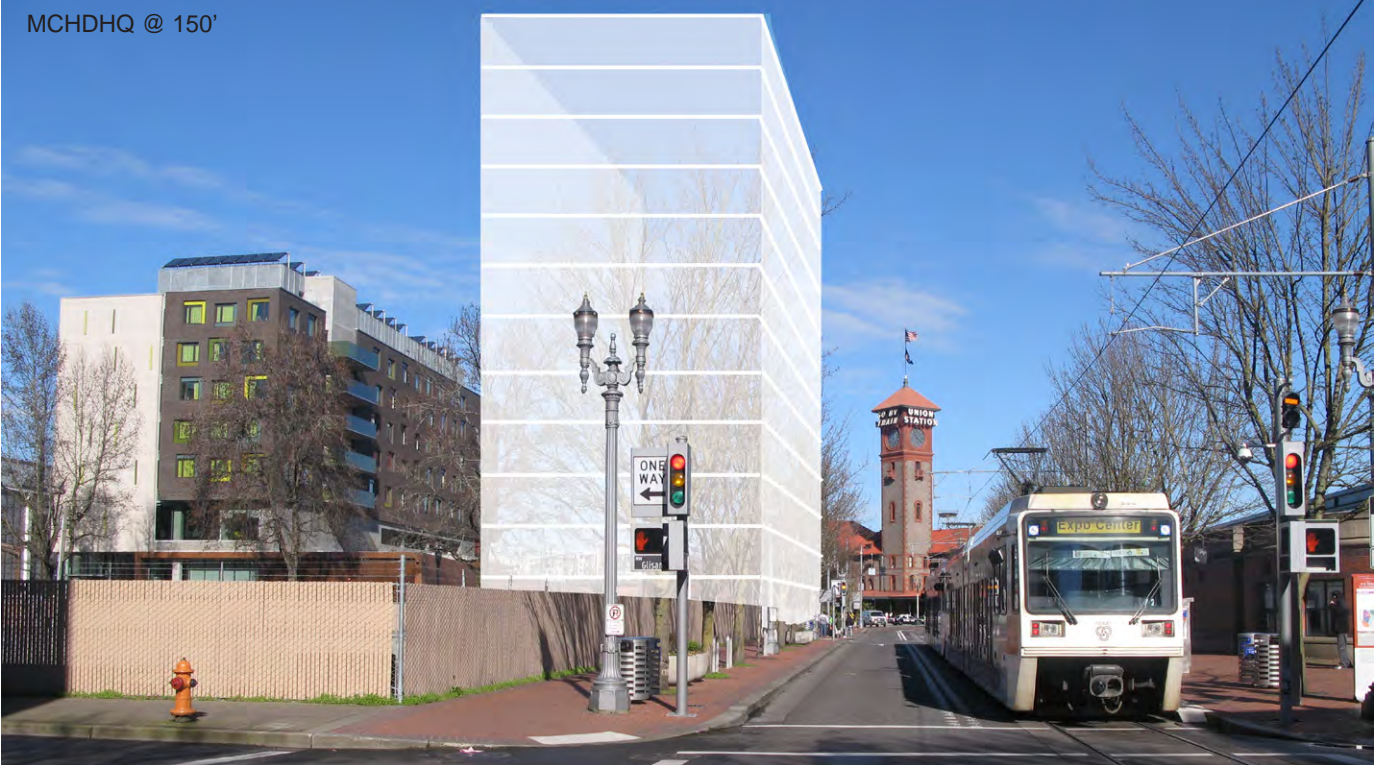
- Table 1: Median yearly wages by occupation class in the Portland-Vancouver-Hillsboro Area

**Figures and Views (attached)**

- Figure 1: A-C – 75', 120', and 150' Maximum Height in relation to adjacent development potential
- View 1: NW 6th and Glisan
- View 2: Center of Steel Bridge looking NW
- View 3: Center of Broadway Bridge looking SW
- View 4: View from Old Thunderbird site

**VIEW CORRIDOR ANALYSIS**

View 1: NW 6th and Glisan



## VIEW CORRIDOR ANALYSIS

View 1: NW 6th and Glisan



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**VIEW CORRIDOR ANALYSIS**

View 2: Center of Steel Bridge looking NW

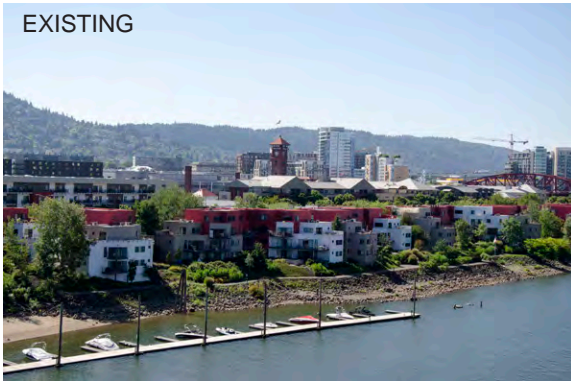
MCHDHQ @ 75'



MCHDHQ @ 150'



EXISTING

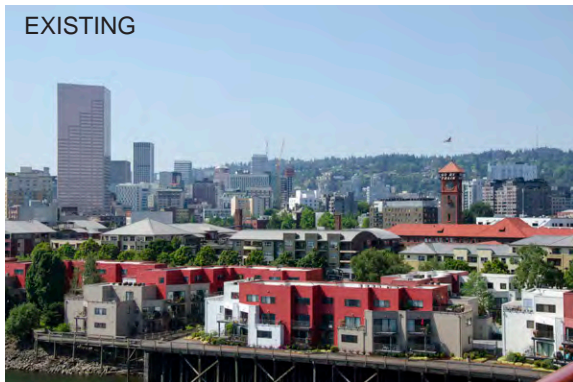


**VIEW CORRIDOR ANALYSIS**

View 2: Center of Steel Bridge looking NW



**VIEW CORRIDOR ANALYSIS**  
View 3: Center of Broadway Bridge

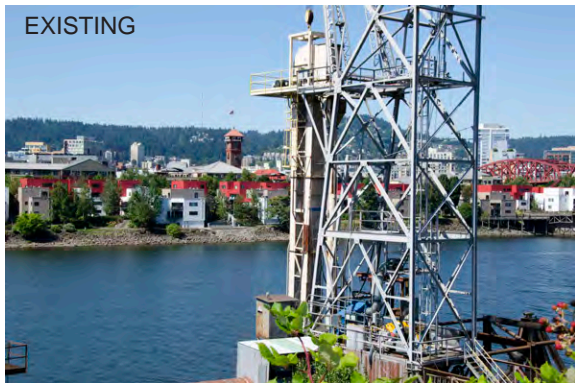




**VIEW CORRIDOR ANALYSIS**  
View 3: Center of Broadway Bridge



**VIEW CORRIDOR ANALYSIS**  
View 4: Old Thunderbird Motel Site

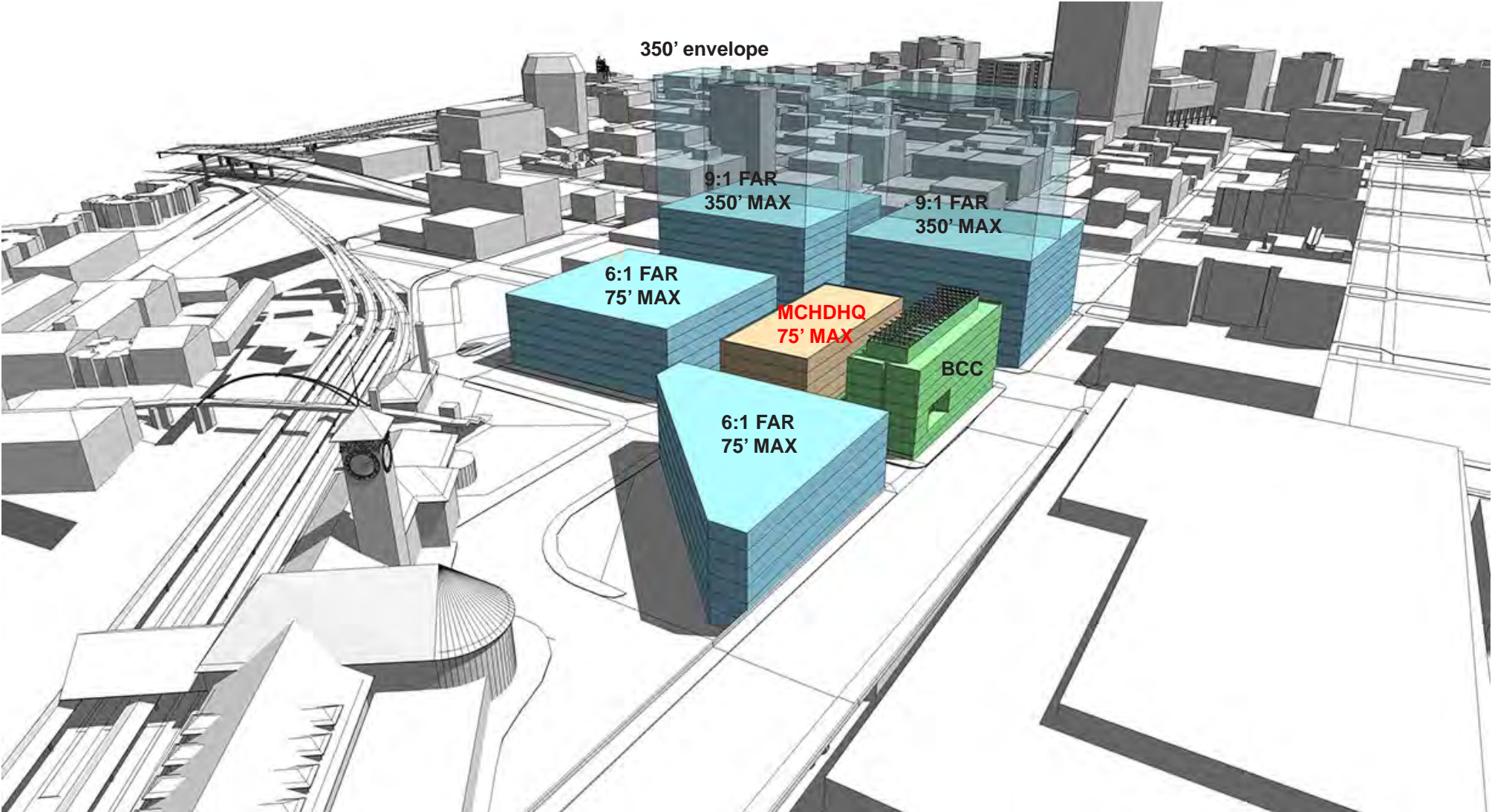


**VIEW CORRIDOR ANALYSIS**  
View 4: Old Thunderbird Motel Site



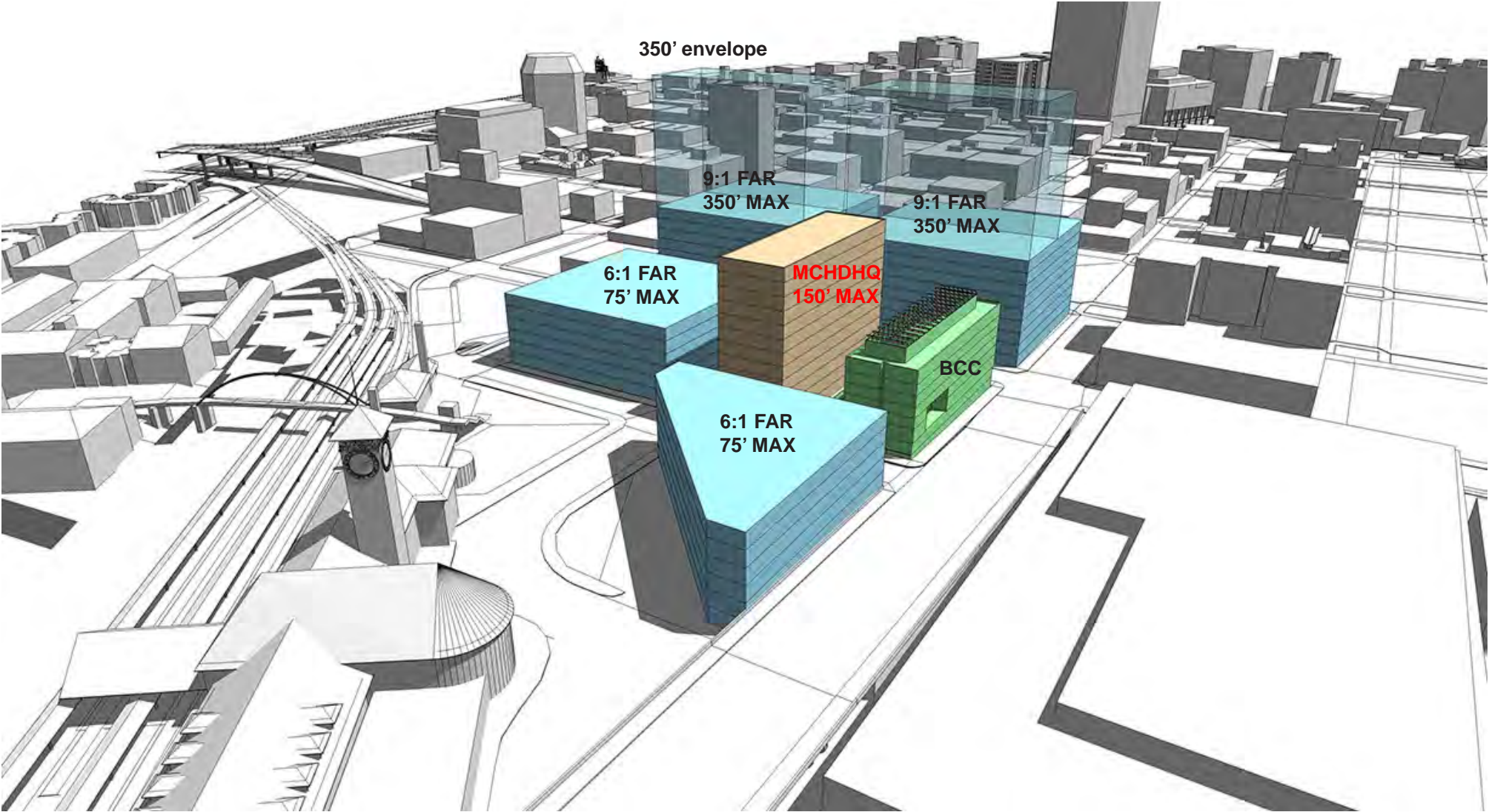
**VIEW CORRIDOR ANALYSIS**

MCHDHQ with 75' max height in relation to future development potential



**VIEW CORRIDOR ANALYSIS**

MCHDHQ with 150' max height in relation to future development potential



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**VIEW CORRIDOR ANALYSIS**

MCHDHQ with 120' max height in relation to future development potential

