



# Rose City Park Neighborhood Association

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April 10, 2008

City of Portland  
Bureau of Development Services  
Attn: Kristen Minor, Land Use Services  
1900 SW Fourth Ave., Suite 5000  
Portland, OR 97201

Subject: Providence Office Park, Case #: LU 08-113391 DZM  
Neighborhood Concerns & Proposed Conditions of Approval

Dear Ms. Minor:

The Rose City Park Neighborhood is pleased that Providence Health and Services are continuing to make investments in our area. The proposed use of the site for additional offices and a parking structure will help our community by building space for local job expansion and medical related support services for our area. Our concerns on this application are several-fold:

- 1) **Continued incremental development of an institutional campus.** The proposal should have been considered as a part of a super-block master plan for this campus area and include relational issues to the Providence South Campus, across the I-84 and linked by NE 47<sup>th</sup>, and as a linkage to the Hollywood Transit Center & commercial district.
- 2) **Limited opportunity to build long-term relationship with neighborhoods.** Were pleased with the opportunities provided by the Providence development team for presenting the proposal at our Neighborhood meeting and attending a joint neighborhood land use meeting to discuss this proposal. Nonetheless, a "Good Neighbor Agreement" between Providence and the Rose City & Hollywood Neighborhoods would help us all to become better at understanding our differing goals and accommodate the community's needs as we grow.
- 3) **The development of this site should not preclude the inclusion of this site in future Master Planning.** This site should be included in future master planning of the Providence North Campus where possible site amendments that may impact and require future improvements to this area; and
- 4) **Construction of the approved site plan should not preclude future development options that may be needed in the future master plan for this campus area,** including (See Exhibit D):
  - a. **Access to a bike/pedestrian corridor that could use the railroad and ODOT right of ways, including the area sheltered under the 43<sup>rd</sup> St. Off-Ramp.** This access would allow travelers from Halsey St. west of the 43<sup>rd</sup> St ramp's intersection to connect to the future Sullivan's Gulch Trail that is to run along an

easement on the south side of this site, thereby alleviating possible traffic conflicts at this and the 44<sup>th</sup> St. intersections.

- b. **Additional entrance and exit to this site from 47<sup>th</sup> Ave.** This includes the consideration of an exit drive located to the south of the 47<sup>th</sup> St Office Building that would include a wide pedestrian/bicycle sidewalk. This access then could be used to connect users of the Providence South Campus with their north campus, the Hollywood Transit Station, and Hollywood as a regional center. The additional entrance location should be considered on the Providence owned property just north of the current parking structure.

**Finding of Fact:**

**Finding 1:** This current proposal expands the Providence North Campus medical office supply & support facilities by approximately 5.02 –acres. It adds the Davis Business Center properties (tax lots 3000,3200, 3300, & 3500) and the land from the NE 44<sup>th</sup> Ave. ROW<sup>1</sup>. With the vacation of the 44<sup>th</sup> Ave. ROW these properties are being consolidated with their other commercially developed properties abutting this site that use this ROW access, including:

- 1. Medical Office Building      Tax Lot 2800    1235 NE 47<sup>th</sup> Ave      3.63 Acres
- 2. Parking Garage              Tax Lot 2900    1235 NE 47<sup>th</sup> Ave      0.86 Acres

Together, the Providence North Campus site will contain approximately 9.51 acres of contiguous developed property. Since all these properties are in the process of being consolidated to keep them from becoming landlocked, see Applicant’s Submittal Other Associated Actions, this action needs to happen first. In addition, since these consolidated properties are all to be under the Providence ownership then this application should include this entire site for purposes of this review.

**Recommendation:** First, this 9.51 acre site needs to be consolidated to remedy landlocked parcels with the vacation of the NE 44<sup>th</sup> Ave, under CHAPTER 33.675 LOT CONSOLIDATION. As one parcel, then, this 9.51 acre site needs to be reviewed as a Super-block, Chapter 33.293, and site area for this design review application.

**Finding 2:** The Providence North Campus development also includes a surface parking area located at 4835 NE Pacific that is used by Providence employees and is accessed from NE Multnomah St., east of NE 47<sup>th</sup>. Employees often use the cross walk located at the intersection of NE Multnomah and 47<sup>th</sup>, located at the north end of the I-84 Bridge Overpass. We have concerns of inadequate lighting at the crosswalk, creating a safety hazard, and the rutted asphalt on NE Multnomah St. due to the high traffic access to this parking facility.

**Recommendation:** That the Providence surface parking area located at 4835 NE Pacific and containing 1.85 acres is linked by usage to the 9.51 acre site and is to be included in the

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<sup>1</sup> This is gross square footage of the site prior to dedications. The applicant identifies the site as containing 203,497 sq. ft.(page 90 of submittal) that equates to 4.67 acres.

Providence North Campus consideration and Super-Block review. The Providence North Campus Site Accommodations, Exhibit D, should also be considered in this review.

**Finding 3:** Providence has purchased numerous properties on the north side of I-84 over the past 10 years, as shown in Exhibit A. The developments that have occurred incrementally over time include: 1) 47<sup>th</sup> Street Office Building renovation & expansion; 2) The Pacific St. Employee parking area, accessed from Multnomah St; and 3) 44<sup>th</sup> Street Parking Garage (circa 2000). In addition to the properties being added through the redevelopment of the Davis Business Center site, Providence has obtained 16-properties contiguous to this site. It is reasonable to assume that additional properties contiguous to these sites could be purchased by Providence in the future and should be included in the master plan.

**Recommendation:** All the Providence-owned properties located north of I-84 that are contiguous or linked through usage should be included in a master plan study for future development of this institutional campus area.

**Finding 4:** **Providence provision of shuttle service for employees & clients to minimize congestion.** A shuttle service currently is provided for users and employees of the Providence South Campus, including servicing the Providence Hospital. This same service should be considered for this North Campus area. This service could provide regular trips between its facilities and to and from the Hollywood Transit Center and city recognized regional center. This type of transit service would assist minimizing single occupancy vehicle congestion, promoting shared trips for your employees and clients, and better connect the Providence uses to those in the Hollywood area.

**Recommendation:** Expand Providence shuttle service to include employees and clients in the North Campus site, including the Providence Office Park.

**Finding 5:** **A step-back design or arcade on Halsey St. building frontage needed for pedestrian scale & to baffle wind tunnel effect in the area.** Halsey Street is recognized as a Transit Street. The application has not addressed the need for a pedestrian scale façade, environment, and pedestrian amenities that are required to be considered along this corridor. The following Portland Code Sections apply: Table 130-3 Commercial Standards; 33.130 240 – Pedestrian Standards; 33.130.215C2e Pedestrian District; and Chapter 33.218 Community Design Standards. For this frontage we recommend either building step-back façade, 2 stories for the first 20 feet of depth then it can step up in height, or an arcade with pedestrian amenities. Such, roof awnings and other architectural features should be added to match the historic design of the homes in the area and aide the baffling needed to reduce the wind tunnel effect.

*Please note: This structure is to face an 8-story structure on the north side of Halsey and this area is impacted by high winds throughout the year. Wind baffling in the site design and architecture is needed to be added that reduce the funnel effect that will be created with the current design.*

**Recommendation:** Increase pedestrian scale amenities & wind-baffling designs along the Halsey St. frontage, including, but not limited to, arcade awnings, planters, pedestrian amenities, and large scale street trees, in compliance with the code.

**Finding 6: Mitigate possible glare & heat island from proposed structures along I-84's 43<sup>rd</sup> St Off-Ramp with design and planting revisions.** The 65' high parking garage and Office Structure submittal did not include elevation drawings nor perspective images viewing from the south that included the I-84 Off-Ramp users at 43<sup>rd</sup> St. The reflection from these both the structures will likely to create a blinding alley for drivers unless design and window treatment designs mitigate this issue. In addition, their reflective properties may create an increased heat island on the I-84 off-ramp affecting stacking cars & drivers waiting for the light.

**Recommendation:** Implement design criteria to minimize potential reflective glare impact on the users of the ODOT I-84 43<sup>rd</sup> St Off-Ramp. Require a Heat & Glare Study to be conducted as to the effect and mitigation options available to the remedy the overheating of this off-ramp area and require the installation of tall stature trees to be planted along the western and southern perimeter of this site, along the ODOT ROW.

**Finding 6: A North Campus Master Plan for the Providence properties is needed to deal with the increased aggregate affect of this use in our community.** We recommend that Providence be required to develop a master plan for their North Campus area to help address the increased impacts of there agglomerated facilities at this Halsey St. campus. Exhibit E identifies Master Plan Considerations that should be integrated into this future master plan. The Providence development team even shared the results of their Traffic Impact Study that was completed prior to the submittal of this proposal. It too identified current issues with traffic light timing along Halsey St. and problems at major intersections such as Halsey and NE 47<sup>th</sup>. The increase and character of the traffic flow that impacts two related campuses make this site unique from a typical office building proposal and office campus site.

**Recommendation:** A North Campus Master Plan needs to be developed for the Providence owned properties located north of I-84 prior to further development of these properties. Such a plan should include the consideration of items identified in Exhibit E and the development of a Good Neighbor Agreement with the Hollywood and Rose City Park Neighborhoods. It should include a Traffic Impact Study that includes both the North and South Providence Campus sites.

Thank you for the opportunity to comment on this application. Please contact me directly if you have any questions or I can be of further assistance.

Respectfully,

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Tamara DeRidder, AICP, Land Use Co-Chair  
& for Ed Gorman, Land Use Co-Chair  
Rose City Park Neighborhood Association

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File: LU 08-113391 DZM;  
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Date

CC: Dana White, Providence Redevelopment Coordinator  
Marty Stevens, STIVEN Planning and Development Services, LLC  
Dan Seeman, Kittelson and Associates  
Michael Robinson, Perkins Coie, LLP  
Andrew Davis, Davis Park Business Center  
Trudi Rahija, Hollywood Neighborhood Land Use Committee Chair  
Sean Besso, Center Neighborhood Land Use Chair  
MJ Coe, Laurelhurst Neighborhood Association & Sullivan's Gulch Trail  
Gary Naylor, Laurelhurst Neighborhood Association Land Use Chair  
Bill Barber, CNN Neighborhood Planner  
Debbie Bischoff, City of Portland Senior Planner, NE District

**Attachments:**

Exhibit A: Property Ownership and Access  
Exhibit B: Site photos;  
Exhibit C: Site Plan revisions proposed;  
Exhibit D: Providence North Campus Site Accommodations  
Exhibit E: Providence North Campus Site Considerations