

October 1, 2019

Sierra Peterson, Associate Planner
 City of Beaverton
 Community Development Department
 Planning Division
 12725 SW Millikan Way
 P.O. Box 4755
 Beaverton, OR 97076
 VIA EMAIL

Received
 Planning Division
 10/01/19

Re: Cedar Hills Shopping Center at Park Way D2019-0110/LD2019-0026/PD209-0002

Dear Ms. Peterson:

I am a neighbor of the Cedar Hills Shopping Center and it recently came to my attention this project (via a post on NextDoor) was coming to the City of Beaverton's Planning Commission. I had anticipated, based on the Public hearing notice that indicated a staff report would be available online seven days in advance. I assumed that meant seven days in advance of the Facilities Review Committee Meeting scheduled for 10/2, but it isn't available when I checked on September 30. I also only had the time to review the preliminary plan set. Therefore, these comments are based on the plan set and include suggestions for what information should be addressed in the staff report.

1. **Public engagement by nearby residents of unincorporated Washington County has been inadequate. and the need to delay Planning Commission decision until unincorporated County residents have a chance to provide input into the project. Please describe what efforts were made to engage residents of urban unincorporated county in your staff report, and if no efforts were made, how this will be rectified before the project comes before the Planning Commission**
 - a. A neighbor mentioned that perhaps they had seen a sign noticing the public about the project at the corner of SW Wilshire and the unnamed 217 Access Road, which is essentially the back side of the shopping center. That corner is also very inaccessible to the public - it is a busy intersection with no place to park to get out to view signs. I've seen City of Beaverton notice signs for other projects and they are impossible to read from your car.
 - b. Where else was a sign posted? I have no memory of seeing anything posted in the shopping center itself, a place I visited once or twice a week. If no other sign was posted, why not?
 - c. Given that this property is immediately adjacent to another jurisdiction – urban unincorporated Washington County - what was done to reach out to Washington County neighbors? Since I'm not a Beaverton resident, I would not have received any notification via the Central Beaverton NAC. I have no memory of seeing anything come through via CPO #1, from whom I do receive their emails and notices. Please detail what was done to engage nearby residents outside of the city limits.
 - d. Given that the developer is requesting an amendment that would give it higher height and density based on being 1,320 feet (approximately ¼ of a mile) from a Light Rail Station, the same distance should be considered in which neighbors should be contacted of the proposed project courtesy should be provided to neighbors within 1,320 feet of this proposed project. I believe my home would be within this radius and I didn't get notified.
2. **Cedar Hills Shopping Center historically and currently provides a sense of entry to the neighborhood as well as neighborhood services. Please indicate how these two values will be continued with this project. Specifically indicate what has been done to retain the historic Cedar Hills sign and how commercial services would provide for neighborhood services. provided a sense of placemaking within an otherwise non-descript neighborhood – this design does not reflect that historic and current role. The historic sign should be retained and your staff report should describe how the property will serve the needs of the neighborhood.**
 - a. Please describe what has been done in regards to the Cedar Hills sign. Has it been reviewed for its historic status? Has consultation been done with the County or State Historic Preservation Officer? My

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understanding is that the sign has been present on site since the 1950s/1960s, which would make it a candidate for historic status. Please indicate in your staff report what measures, if any, have been done to retain the sign on site or relocate it (at the developer's expense) to another site.

- b. Please describe how the use of the commercial spaces would be conditioned in the approval to ensure they provide neighborhood services. Currently we have a coffee shop, several restaurants, a popular bar, a small market, and a child care center. It also provides space for music lessons, dance classes and other more community minded businesses. How will these types of businesses be retained? Is there any analysis of how many parking spaces are needed to support neighborhood businesses? Parking at the current center tends to be almost full most weekdays with people coming in and out of the center, how will the proposed shared use parking meet the needs of the community?
- c. The site currently provides much needed child care and as well as before/after school care (with bus drop off from the nearby elementary school). Child care centers need specialized space, both indoor and outdoor. Have you analyzed what impact removing the child care from the existing space has on the total available child care spaces in the nearby community or required that some of the commercial space be explicitly designed for child care use? Will the new design facilitate the pick up and drop off for before and after school care by a school bus, as the center currently accommodates? Please describe what efforts have been done to ensure that child care needs of the community are being met by this new proposal.
- d. What efforts, if any, are being made to help existing businesses relocate to another location and/or to allow them to come back to the new space after construction – and what provisions, if any, would be made to keep rents affordable to the types of neighborhood businesses that are currently located in the Center?

3. The project needs special amendments to the Beaverton Development Code in order to both double the floor area ratio and nearly double the height limits. The staff report should detail why these amendments are warranted as well as what alternatives were considered and why this one seems to be the preferred option.

- a. There are no other 6 story tall buildings in the vicinity of this project, all other buildings in the area are 2 stories or less, so this project would visually stand out from all other uses in the area.
- b. Aside from the underdeveloped property located across SW Parkway (with the strip club which many of us badly want to see re-developed), there is little other opportunity to increase height in this area, so that these buildings would likely remain the only 6-story buildings into the foreseeable future.
- c. What analysis was done in regards to allowing just 60-foot tall buildings per the existing zoning, rather than the developer's proposed 100-foot tall buildings? I would like to see an alternative presented that keeps the redevelopment existing FAR and building height limits to better understand why the increase is warranted. Was such an alternative ever presented by the developer and why was it not put forward by the City as the preferred alternative?

4. The project also needs special determination as to the parking proposed to be provided. What analysis has been done to indicate that this special determination is warranted? The staff report should describe the assumptions used to determine the amount of parking that would be needed, what analysis was done on impact on existing conditions, and include data about similar projects and whether similar assumptions were accurate.

- a. Currently, street parking is already at a premium in this neighborhood. The nearby 1-2 story apartment buildings located on SW Eastridge, SW Marlowe, SW Roxbury, and SW Butner do not provide enough parking for all their tenants so that in the evening there is little available street parking, and often spills into nearby neighborhood streets. During the day, when many tenants leave in their cars for work, these same streets then fill up with commuters parking in this neighborhood to access the MAX.
- b. The notice says the proposal is for 509 residential units and 56,000 s.f. of commercial space, with 566 on-site parking spaces and no changes to the surface streets around the project to add any more street parking. It appears that the developer assumes that there would be sharing of spaces between tenants and users of commercial businesses.
- c. There is no explanation of how the developer or the city thinks that small amount of parking spaces would be workable, without further impacting existing street parking. If all units had one car, then nearly 90% of the parking would be taken up by residential uses. If you guess that perhaps up to one-quarter of the

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residents would have more than one car, then the project would be putting an additional 125 cars onto the already crowded streets. If half of the residents have more than one car, then you're putting 250 cars onto surface streets.

- d. You may be assuming that residents of this property would be more reliant on public transportation, given the proximity to the MAX line. If so, those tenants would likely then leave their car at their residence to commute to work via Max, which reduces the amount of available spaces for shared use during the day.
- e. Given the dearth of other neighborhood services and lack of walkability in Washington County, I don't think it would be fair to assume that tenants would not have a car available to them (though nice try with the Uber/Lyft loading area note in the plan set). Parking requirements need to be significantly re-thought.
- f. Furthermore, I would think there is enough experience at other transit-oriented developments elsewhere in Beaverton and in the City of Portland to give a better sense of how many residents of such properties own cars, don't own cars, commute patterns, etc. Please include data from other similar properties that back up the developer's analysis that this is sufficient parking.
- g. Please also describe what the experience has been enforcing parking provisions after the property has been built (and possibly transferred to another entity to lease and manage the rentals). For example, I assume this provision would have to be enforced via a lease with a tenant that they could have only one car, or no car, how will that be monitored and enforced either by the leasing company and/or by the city – especially if the spill over of tenants' cars would come into unincorporated Washington County, and not remain within City of Beaverton limits?

5. **"Future Plaza" site contained within plan set but set to the future is confusing. Its status should be confirmed in the staff report and addressed.**

- a. The portion of the property indicated as the "future plaza," I believe this is the site of a former gas station of auto repair shop, which leads me to suspect that it could contain environmental hazards or leaking underground storage. Has environmental conditions been assessed and if needed, what is the remediation plan for the site and when would remediation occur?
- b. There's a rumor going around that the developer does not have property control over this portion of the site (that the current owner doesn't want to sell). It would be a travesty if a project of this size goes in and this one corner is not included and left in its existing conditions. What has the City done to work with the current owner and/or enforce any clean up regulations if indeed this site has environmental hazards? Does the City have any capacity to assist the property owner to remediate the sight to facilitate its inclusion in the project?
- c. Is the future plaza use being used in any way to support the higher FAR / building heights? If it isn't going to be developed at this time, it shouldn't be included in those calculations.
- d. There is no information as to when this future plaza would be developed, this should be explained in the staff report.

6. **Other project considerations.**

- a. I do like that the developer has included grassy open spaces that seem to invite common use, however, the proposed location of the plaza included in the plan set opens to face the unnamed 217 access road (and Highway 217), which is the noisiest part of the entire site. It is also the least connected portion of the property to the rest of the neighborhood. To truly provide common use as well as neighborhood use of this open space, it should be relocated to SW Marlowe which has more pedestrian use than does the unnamed access road.
- b. The other designed plazas mid-block on SW Parkway and SW Wilshire seem to more designed as landscaped entrances to an underground parking area and should not be counted as "open space" if used to support building heights/FAR.
- c. The plan set indicates adding two crosswalks at the intersection of the unnamed access road and SW Wilshire, when all four should be added. The crosswalk on the south side of SW Wilshire should be given special design attention as it is used by neighborhood children walking to school and the crossing is currently unsafe (as this is an onramp to Highway 217).

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- d. It is already difficult to make a turn from the unnamed access road onto SW Parkway given the existing level of traffic, especially making a right turn given the speed of traffic as it becomes the freeway on ramp to Highway 26. Please convert this to a four-way stop intersection instead.
- e. The plan set indicates a THPRD 14' wide trail – is the developer paying for this, or expecting THPRD to do so? If THPRD doesn't have the funds to pay for the trail, how will it be built and/or will the plan be changed as a result?
- f. The plan set indicates the 14' wide trail would continue east on SW Wilshire onto the overcrossing of Highway 217. Does that mean the street itself would be modified to add more protected walking path on the overcrossing bridge? If so, this would be something the neighborhood could get behind. If not, don't show it.
- g. Re the bicycle paths, please note in the staff report that there is significant bicycle commuting coming on SW Wilshire heading west. I believe these bicyclists might prefer to turn right onto SW Marlowe and then onto SW Parkway, but the intersection is difficult to navigate for cyclists. You might consider some other roadway designs to facilitate bicycling commuting. What efforts were made to reach out to the commuting cyclist community to better understand their needs? I suspect many of these cyclists are headed towards Nike, and I see them drop onto SW Eastridge/SW Roxbury to avoid the SW Parkway/SW Marlowe intersection. This is an opportunity to perhaps address a kink in the bicycle commute to facilitate more overall bicycle use.
- h. Please also note that the intersection at SW Marlowe, SW Eastridge and SW Roxbury also needs crosswalks and should be converted to an all way stop. There are currently no crosswalks at this location, despite it being the location of several school bus stops. Also, traffic coming uphill on Roxbury tends to travel faster as it has the right of way, as does traffic on SW Marlowe turning right onto SW Roxbury. It is an odd intersection and there are many near misses as a result of it not being an all-way stop.

Finally, the bench detail shown on page L2.4 is incredibly insulting. In this day and age, and in a city that prides itself on being welcoming and multi-cultural, why on earth would the plan set include a picture of a bored/angry white man "manspreading" over an entire bench with feminine packages at his feet? You can and should do better. To me, this picture is indicative of how little this developer has actually taken into account the needs of the community and how little the city has actually done to reflect the issues and concerns of its community – as well as the neighboring residents of Washington County.

I look forward to seeing your staff report address these issues.

Sincerely,

Holly Van Houten
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