



City of Portland, Oregon
Bureau of Development Services
Land Use Services
FROM CONCEPT TO CONSTRUCTION

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MEMORANDUM

Date: December 7, 2017
To: PAUL JEFFREYS, ANKROM MOISAN ARCHITECTS INC
From: Hillary Adam, Land Use Services
Hillary.adam@portlandoregon.gov / 503-823-3581
Re: 17-163803 DA – New Omni Tower
Design Advice Request Summary Memo December 4, 2017

Thank you for taking advantage of the opportunity to hold a Design Advice Request regarding your project. I hope you find it informative and valuable as you continue with your project development. Attached is a summary of the comments provided by the Historic Landmarks Commission at the December 4, 2017 Design Advice Request. This summary was generated from notes taken at the public meeting and a subsequent review of the public meeting recordings. To review those recordings, please visit:

http://efiles.portlandoregon.gov/webdrawer/search/rec?sm_class=uri_7547&count&rows=50

These Historic Landmarks Commission comments are intended to guide you in further design exploration of your project. These comments may also inform City staff when giving guidance over the course of future related land use reviews. It should be understood that these comments address the project as presented on December 4, 2017. As the project design evolves, the comments, too, may evolve or may no longer be pertinent.

Design Advice Requests are not intended to substitute for other Code-required land use or legislative procedures. Please keep in mind that the formal Type III land use review process [which includes a pre-application, a land use review application, public notification, a Staff Report and a public hearing] must be followed once the Design Advice Request meetings are complete, if formal approval for specific elements of your project is desired.

Please continue to coordinate with me as you prepare your formal land use application, or if you desire another Design Advice Request meeting with the Commission.

Encl:
Summary Memo

Cc: Historic Landmarks Commission
Respondents

This memo summarizes **Historic Landmarks Commission** design direction provided on December 4, 2017.

Commissioners in attendance on December 4, 2017: Kirk Ranzetta, Kristen Minor, Matthew Roman, Annie Mahoney, Wendy Chung, and Maya Foty

Impacts to the Existing Contributing Resource.

- One Commissioner asked if it was the applicant's intent that the building maintain its contributing status and noted that the guidelines require that vertical additions to contributing buildings must be designed to limit visual impact. He appreciated that the vertical addition was set back but wondered if it was enough or if the proposal was going too far toward potentially affecting the contributing status of the building. He noted that his primary concern is that the proposal not impact the status of the existing building.
- One Commissioner noted that guidelines C1 and C3 requires that additions are compatible with the form and massing of the existing building and noted that it is unclear how the vertical addition is compatible with the massing of the existing building when the addition is twelve stories larger than the one-story contributing resource. She noted that this site is surrounded by contributing resources.
- One Commissioner noted that the Commission has previously asked the SHPO to weigh in on proposals in this district to indicate whether they believed a proposal would ensure a building's contributing status would be retained after a proposal. He noted that the Commission needs to see that this building maintains its contributing status. He noted that he understands the relative impact of the addition and how the setback minimizes its presence on the street but stated that he was worried about setting precedent even though it is a creative solution that has been used in other jurisdictions, though SHPO's input would be valuable. He noted that if we knew for certain that the alternative façade was the true original façade, bringing that back could be viewed as mitigation for the rest of the proposal, but we don't know that that ever existed.
- One Commissioner noted that all of the Commission is concerned about this district because it is so tenuous in terms of the number of contributing structures, so there needs to be a way to address guideline A1 and add more of the character that is desired within this district as a nod to the Chinese/Japanese history. The addition of balconies, for instance, could address multiple guidelines.
- One Commissioner noted that this resource is one of the few one-story buildings in the district and is by far the smallest. It's a mid-block building and has street presence only at its frontage. She noted that it is very important that the applicant retain the front of the building but wasn't sure that retaining the building's status is more important than simply retaining the façade. She believed that what is important is retaining that façade and keeping it as part of the street frontage and having an adequate setback (which may need to be more than what is proposed). She stated that she hoped that this building would retain its contributing status but is sympathetic to retaining the important pieces of it, which is the front façade and having enough of a setback so that it still reads as an original one-story volume. Another Commissioner agreed and noted that it would be helpful to hear from SHPO whether or not the building above, setback as far as it is, would overshadow the existing.
- One Commissioner noted that it's such a small building and the fact that we have it is great and there are other examples where façades are kept and the building is gutted.
- One Commissioner noted that she agreed with everything that was said and stated her support for the proposed setback.
- One Commissioner asked the Commission: In thinking of this building on its own, are we going to allow 9-12 story additions to all contributing buildings in the district? If we are then height won't be a concern because they'll all be 13 stories tall. If this was just a single-story building and someone was proposing a 12-story addition to it, I'm not sure that we would be thrilled by that. He also noted that he was uncomfortable weighing one building's merit against another's just because it's modest and maybe not perfect. He noted that that bit of a streetscape is fairly intact and he worries about a Disneyland effect where all that is kept is a façade.
- One Commissioner stated that she did not believe that the Commission should do anything to cause, or potentially cause, the de-listing of a building, adding that it would be nice to have some guidance from SHPO. She noted that just because something is

contributing to a district, rather than individually listed, it does not, therefore, deserve less consideration. She stated that that is a mistaken idea, particularly in this district where the resources are so few in number and every one of them matters. She stated that she would hate to set a precedent and send the message that the Commission doesn't care because it's *only* a contributing resource and not a landmark.

- One Commissioner noted that, for her, it's the scale of the building; because it's so small and because we need development in the district, this may, on balance, be okay. Another commissioner agreed.

Impacts to the Historic District.

- The Commission noted that the New Chinatown/Japantown Historic District is on the cusp of not having enough contributing building, therefore, there is case to be made that every single building is as sacred as our most important buildings. It was strongly suggested that the applicant reach out to the State Historic Preservation Office to get feedback on the proposed building's impact to both the existing contributing resource and the historic district as a whole. The Commission noted that a SHPO opinion is not necessarily indicative of how the commission will vote on a proposal.
- One Commissioner stated that she is more concerned about whether or not the rest of the development would impact the district as a whole, even if it retains its contributing status. She noted that this is the edge of the district and wondered if the proposed new building would weaken the district because the edge of the district would be defined by a large modern building. She noted that she wants development in this district but it seems like an either/or proposition – either we approve things that are potentially incompatible with their massing or size or we continue to be blighted with parking lots and homelessness. She stated that she was concerned about how something this big and massive would impact the integrity of the district; this is too big.
- One Commissioner noted that there have been instances where SHPO has written warning letters about potential adverse effects. She noted that it's not just the fact that the number of contributing resources is around 50% but also the fact that there are tall incompatible buildings that impact the feel of the district. So here, we are very excited to see development that has specific benefits, but the district it is proposed in is at risk. What we need to recognize is that losing a district would impact every other property owner in the district with regard to their access to funding opportunities and tax breaks. She noted that there are a number of owners in the district that have already used benefits that come with being a contributing resource and if this district is delisted, there are going to be some liability issues. We need to find a balance; we want to see development but we need to be sure that this is not going to be the straw that breaks the camel's back and potentially cause the district to be de-listed.
- The Commission noted that with regard to Goal 5, there is an obligation on the part of municipalities to preserve the resources that they are entrusted with once something is listed in the National Register. In this case, it's raising the question of whether or not this building would remain contributing and, on balance, whether or not the economic development potential for redeveloping an underutilized parking lot justifies the potential harm to the integrity of the resource with a development at this scale.

Building Articulation.

- One Commissioner noted that the proposed building needs to be more referential to its context and relate more to nearby contributing buildings regarding style and articulation. In terms of reflecting a style of the district, if you want to do something more modern, it should look to Streamline Moderne.
- One Commissioner stated that the tower is nice, but it doesn't specifically declare that it belongs in this district rather than anywhere else in the city, yet the guidelines encourage that. She noted that she understood the desire to not do a faux historic building.
- One Commissioner noted that, when the guidelines were written, it was not expected that balconies would have to be proposed on every building. One Commissioner stated that Julietts do not even begin to approach the character or style of the district, where balconies are deep and occupiable.
- One Commissioner noted that the new addition above the Omni should be all dark so that it can recede more and be more differentiated from the tower. The panel at the spandrel should be brick or dark precast rather than something like metal.

- One Commissioner stated she liked the simplicity of the tower but the double-height bays don't help the height issue; more horizontal heavy elements and more punched openings would help mitigate the height. She noted that punched openings would be more appropriate and double height bays do not help it feel like a fabric building in the district. Other Commissioners agreed. One Commissioner stated that the double-height window modules create a more monumental, and less human, scale; it feels a little fascist.
- One Commissioner noted that the connection piece is the opportunity to blend the historic buildings with the new building. She noted that the tower is quite nice but wondered if there is a way for the connection piece to be used to blend historic and new, versus having the same vocabulary as the rest of the tower.
- The Commission noted that the ground level needs more work; it needs to be differentiated and engaging. The base needs to be more prominent and needs to have more articulation. Nice operable storefronts with a coffee shop on the corner would activate the ground floor.
- One Commissioner stated that there needs to be more richness and detail. She liked the idea of bringing the lintel piece from the Chinese Benevolent Building but did not see it in the proposed design; it is more like banding and it's very uniform – roughly every two stories. She noted that what is missing is the notched expression of that lintel, and suggested taking another look at that if you want that lintel expression.
- A couple Commissioners suggested that the applicant look at this building in terms of hierarchy studies. One Commissioner noted that the design was a really uniform frame within a frame. She suggested that the verticals could be expressed more strongly; it looks like part of the frame is lost as you come down to the lower stories of the building with the piers getting smaller at the bottom which is a little odd for a building to express a wider pier above than below. She also noted that, if you were more judicious with the horizontals and they felt more like a belt course with some projection, you could use fewer of them and get more out of it. She noted that the building lacks a top which is a glaring mismatch with the district; something needs to terminate the top of the building.
- One Commissioner noted that bulkheads can be used to designate a primary entrance from a secondary bay. It's also more practical from a durability standpoint and would lend itself more to the character of the district. She noted that she liked the location of the canopies as they aligned with the Omni. Another Commissioner noted that the canopies look a little applied and not very contextual.
- The Commission noted that a green wall is not indigenous to the district and that this would be a better location for a mural, or mosaic, or something with historic context that is a nod to the district. Another Commissioner noted concern for the success of the plantings.
- One Commissioner noted that the garage door should not be solid; something attractive, perhaps translucent glazing would be acceptable.
- One Commissioner expressed his concerns with the design: The double-height windows reinforce the idea that this is a monumental tower building and not a human-scaled building. The detailing is very harsh and reminiscent of fascist architecture. This building could be anywhere. I want to see a building that looks like it belongs in Chinatown. The base is very monotonous; it's a series of harsh column-to-column glazing. There does not appear to be a hierarchy to the entrance. There needs to be something that gives the sense that we are in New Chinatown/Japantown.
- The Commission suggested that the ground floor corner space should be retail to continue the activation of the streetscape. All agreed that this corner needs to be retail and a very active corner.
- One Commissioner stated that the ground level could be more interesting; it feels very monotonous and austere. It's a very regular bay system but there is nothing to indicate where the important openings are. He noted that when he thinks of Chinatowns in the country there's a lot of energy and this feels out of that context. Another Commissioner noted that this will never feel like Chinatown because there is not a concentration of Chinese people or Chinese businesses. She noted that the building needs to be more interesting at the ground floor, both programmatically or architecturally.
- One Commissioner stated that the street experience is the most important thing to her; this is the edge of the district. Guideline A1 needs to be taken to heart and some signifying factor that it is in the New Chinatown/Japantown Historic District needs to be included. Other Commissioners agreed.

Massing Compatibility.

- One Commissioner noted that at the previous DAR, the Commission had indicated that 7-10 stories would be more appropriate. She stated that she was unsure that she could support a building that is more than that. She noted that the tallest contributing building in the district is 7 stories; on this block is an 8-story building so 7-10 would feel more appropriate. The building has come a long way, but it's not enough.
- When asked if Commissioners could support a building at the proposed height if all other details were compatible, three Commissioners responded that they could not, two Commissioners responded that they were comfortable with the height. One Commissioner said that in order to accept this height, the ground floor has to be very well articulated and the reason he could get to yes is because there is some existing height in the district immediately near this location.
- One Commissioner noted that there is quite a bit at stake. The Commission is charged with preserving historic resources and that includes ensuring that development is compatible. We already know that this district is compromised to some degree. We want you to develop here, but we need to protect historic resources. City Council may consider the approval criteria through a different lens.
- One Commissioner noted that with regard to the pro forma, what is comes down to is how much is paid for the land and what building type was chosen. He noted that the Commission has experienced one architect appearing before them and saying the only way this will work is if they build a big tower, and then that architect gets fired and another architect somehow finds a way to make it work with something more reasonable for the district.
- One Commissioner stated that she is really concerned about surface parking lots and glad to hear the applicant is willing to expand retail, but she did not believe her opinion will change about 13 stories being incompatible.
- One Commissioner stated that this building does not have enough of the DNA of the district to warrant approval of a building this tall. He noted that the taller buildings in the district are precedents for what should not be repeated. There are specific approval criteria about relating the massing of the building to the massing of the contributing buildings in the district. He noted that he appreciated that the applicant looked at the context of the district but noted that that context has to be taken and applied to the new building and let the district have the bigger ego.
- One Commissioner stated that the approval criteria require her to apply the test of compatibility and this building is just not there. She noted that this building would be great across the street.
- One Commissioner noted that this is a district that needs development and she worries that we may be too conservative and scare developers away which could give the impression that we don't want the district to improve, which is why she is supportive of the height, even if she doesn't like it.
- One Commissioner stated that they have a duty to protect the district, not just in the SHPO sense, but also protect it from blight. She hates that the Commission is saying no, but feels like they are given a false choice between buildings that are too tall and parking lots with needles in them. Another Commissioner noted that money is going into the district and it's going to continue to be invested in; he isn't swayed that it's either going to blighted or a tall building.
- One Commissioner noted that height is not a criterion but massing is and she is not sure there is a way to make the proposed massing more compatible with detailing.

Public Testimony.

- Wayne Trantow, owner of loft in Old Town Lofts, noting concerns about loss of light to neighboring buildings and concerned about the impact to the character of the district. Considers the area above the Omni a light and view corridor and wonders how the building can respect the existing neighboring conditions. He noted that this particular block is a good emblem of the district with the Shipworks building and those at the SW corner.

Exhibit List

- A. Applicant's Submittals
 - 1. Original drawing set
- B. Zoning Map
- C. Drawings
 - 1. Drawing set for June 26, 2017 DAR
 - 2. Drawing set for December 4, 2017 DAR
 - 3. Additional drawings submitted at December 4, 2017 DAR
- D. Notification
 - 1. Posting instructions sent to applicant
 - 2. Posting notice as sent to applicant
 - 2. General information on DAR process included with e-mailed posting/notice
 - 3. Posting instructions for 2nd DAR
 - 4. Posting Notice for 2nd DAR
 - 5. Certification form for 2nd DAR
- E. Service Bureau Comments
 - 1. PBOT response
- F. Public Testimony
 - 1. June 26, 2017 Testifier Sign-In sheet
 - 2. Wayne Trantow
 - 3. Earl and Sheila Reeves
 - 4. Sarah Stevenson, Co-Chair Land Use and Design Review Committee Old Town/Chinatown Community Association wrote on December 1, 2017 in support
 - 5. December 4, 2017 Testifier Sign-In sheet
- G. Other
 - 1. Application form
 - 2. Memo to Commission, dated June 16, 2017
 - 3. Staff Presentation, dated June 26, 2017
 - 4. Applicant Presentation, dated June 26, 2017
 - 5. Summary of June 26, 2017 DAR
 - 6. Memo to Commission, dated November 27, 2017
 - 7. Staff Presentation, dated December 4, 2017
 - 8. Applicant Presentation, date December 4, 2017
 - 9. Summary of December 4, 2017 DAR